

July 28, 2011

Louis A. Florence, Jr.
President, TransAlta Centralia Generation LLC / DR
913 Big Hanaford Road
Centralia, Washington 98531

Re: Petition for an Exemption from Continuous Opacity Monitoring Requirements for Units BW21 and BW22 at the Centralia Generation Facility (Facility ID (ORISPL) 3845)

Dear Mr. Florence:

The United States Environmental Protection Agency (EPA) has reviewed the November 10, 2010 petition under §75.66, in which TransAlta Centralia Generation LLC (TransAlta) requested an exemption from the requirement to install continuous opacity monitoring systems (COMS) on Units BW21 and BW22 at the Centralia Generation Facility. EPA approves the petition, for the reasons discussed below.

Background

TransAlta owns and operates two coal-fired boilers, Units BW21 and BW22, at its Centralia, Washington facility (Centralia). According to TransAlta, these units are subject to the Acid Rain Program. Therefore, TransAlta is required to continuously monitor and report sulfur dioxide (SO₂), nitrogen oxides (NO_x), and carbon dioxide (CO₂) emissions, and heat input for these units, in accordance with 40 CFR Part 75. Part 75 also requires the owner or operator of a coal-fired unit to install and certify a continuous opacity monitoring system (COMS), unless the effluent gas stream is saturated and the owner or operator can demonstrate that the presence of condensed water impedes the accuracy of the opacity measurements (See §§75.14 (a) and (b)).

The exhaust configuration of each Centralia unit consists of two separate stacks, only one of which is in use at any time. During normal operation, the flue gas from each unit is routed through a pair of electrostatic precipitators (ESPs) to a flue gas desulfurization (FGD) system, and then to the main stack. However, when the FGD system malfunctions or when maintenance on the system is required, the flue gas is redirected to an uncontrolled bypass stack.

Because Units BW21 and BW22 have wet FGD systems, TransAlta believes that the main stacks qualify for an exemption from opacity monitoring under §75.14(b). Therefore, TransAlta submitted a petition to EPA on November 10, 2010, requesting this exemption. The petition included a copy of test reports from 2010 to demonstrate that the Unit BW21 and BW22 gas streams are saturated.

Question 5.6 in the “Part 75 Emissions Monitoring Policy Manual” provides guidance on how to qualify for the opacity monitoring exemption under §75.14(b). Question 5.6 explains that the data used to demonstrate that an effluent gas stream is saturated should be collected under conditions representative of normal unit operation (i.e., normal load, normal fuel, common weather conditions, and normal emission control equipment operation).

EPA’s Determination

In the November 10, 2010 petition, TransAlta provided a total of ten runs of stack gas moisture data for Centralia Units BW21 and BW22. EPA Reference Method 4 was used for the tests, which were performed on September 30, 2010 (for Unit BW21) and October 4, 2010 (for Unit BW22). Data from all ten runs indicate that the stack gas moisture content was above the saturation level. In a January 3, 2011 e-mail to EPA, TransAlta confirmed that the moisture data were collected under typical weather conditions, with the units and FGD systems operating normally. The tests were done at the normal operating load, while burning the normal fuel (coal).

In view of these considerations, EPA finds that TransAlta has satisfactorily demonstrated that the effluent gas streams from Units BW21 and BW22 at the Centralia facility are saturated when the FGD systems are in normal operation and the flue gases are routed through the scrubbers to the main stacks. This will impede the accuracy of opacity measurements made with COMS. Therefore, in accordance with §75.14(b), the Agency approves TransAlta’s petition to exempt Centralia Unit BW21 and BW22’s main (scrubber) stacks from the opacity monitoring requirements of §75.14(a).

Note, however, that this approval only exempts Units BW21 and BW22 from the COMS requirements of the Acid Rain Program. If another State or Federal regulatory program should require that a COMS be installed on either of these units (or both), TransAlta must either comply with that requirement or submit a separate petition to the agency administering the program, requesting a separate exemption.

EPA’s determination relies on the accuracy and completeness of the information provided by TransAlta in the November 10, 2010 petition and the January 3, 2011 e-mail, and is appealable under Part 78. If you have any questions or concerns about this determination, please contact Travis Johnson of my staff at (202) 343-9018 or at Johnson.Travis@epa.gov. Thank you for your continued cooperation.

Sincerely,

/s/

Sam Napolitano, Director
Clean Air Markets Division

cc: Travis Johnson, CAMD
Dan Meyer, EPA Region X
Clint Lamoreaux, Southwest Clean Air Agency
Tim Weber, TransAlta Centralia Generation LLC