



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JAN 24 2005

OFFICE OF  
AIR AND RADIATION

Mr. Paul L. Zweacker  
Director of Environmental Services  
TXU Energy  
1601 Bryan Street  
Dallas, TX 75201-3411

Re: Petition for Extension of Opacity Monitor Certification Deadline for Unit EMSES2 at the Eagle Mountain Steam Electric Station (Facility ID (ORISPL) 3489).

Dear Mr. Zweacker:

The United States Environmental Protection Agency (EPA) has reviewed TXU Energy's (TXU's) August 26, 2004 petition under §75.66, in which TXU requested an extension of the deadline to complete installation, certification, and operation of a continuous opacity monitoring system (COMS) on Unit EMSES2 at the Eagle Mountain Steam Electric Station in Fort Worth, Texas. EPA denies the petition, for the reasons given below.

Background

TXU owns and operates Unit EMSES2 at the Eagle Mountain Steam Electric Station facility in Fort Worth, Texas. Unit EMSES2 is an affected unit under the Acid Rain Program. Therefore, TXU is required to continuously monitor and report sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), and carbon dioxide (CO<sub>2</sub>) emissions and heat input for Unit EMSES2, in accordance with 40 CFR Part 75.

Unit EMSES2 is capable of combusting either natural gas or residual oil. Prior to 2003, the unit had met the definition of "gas-fired" in 40 CFR Part 72 and was exempt from continuous opacity monitoring under §75.14(c). However, in 2003, fuel oil combustion in Unit EMSES2 increased, and the unit lost its gas-fired status. Section 75.14(c) states that whenever a gas-fired unit loses its gas-fired status, a continuous opacity monitoring system (COMS) must be installed and certified by December 31 of the following year, unless the unit can be reclassified as "diesel-fired" under §72.2, in which case it would continue to be exempted from opacity monitoring. However, since Unit EMSES2 burns residual oil, it could not be reclassified as diesel-fired when its gas-fired status was lost. Therefore, installation and certification of a COMS on Unit EMSES2 is required by December 31, 2004.

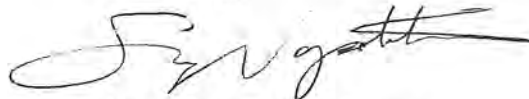
To certify a COMS, §75.20 (c)(8)(i) specifies that the requirements of Performance Specification 1(PS-1) in Appendix B of 40 CFR Part 60 must be met. Upon installation of a COMS, PS-1 requires a series of field audit tests to be performed, followed by a 168-hour "operational test period", during which a 7-day calibration drift test must be done. The unit must be in operation for at least 50% of the hours in the operational test period. TXU stated that Unit EMSES2 has not operated since July 29, 2004, is presently shut down with zero emissions, and is scheduled to be placed in long-term cold storage under the company's current management plan. Therefore, TXU requested an extension of the COMS installation and certification deadline until after recommencement of operation of the unit.

#### EPA's Determination

EPA denies TXU's August 26, 2004 request for an extension of the COMS installation and certification deadline until after recommencement of operation of Unit EMSES2. The petition is deemed unnecessary because §75.4(d) outlines the requirements for installation and certification of a COMS when a unit has been placed in long-term cold storage after having previously reported emissions data under Part 75. In accordance with §75.4(d), TXU must install and certify a COMS at Unit EMSES2 no later than 90 unit operating days or 180 calendar days (whichever occurs first) after the date that the unit recommences commercial operation. TXU must also submit a certification test notice at least 21 days prior to the first day of testing of the COMS, in accordance with §75.61(a)(1)(i).

EPA's determination in this letter relies on the accuracy and completeness of the information provided by TXU in the August 26, 2004 petition and is appealable under Part 78. If you have any questions regarding this determination, please contact Travis Johnson at (202) 343-9018.

Sincerely,



Sam Napolitano, Director  
Clean Air Markets Division

cc: Joyce Johnson, EPA Region 6  
Sandy Simko, TECQ  
Travis Johnson, CAMD