

December 18, 2001

Mr. John Shue,
Plant Manager
Ennis-Tractebel Power Company, LP
P.O. Box 718
Ennis, Texas 75120

Re: Petition for extension for CEMS certification for Ennis-Tractebel Electric
Generation Plant, ORIS Code 55223

Dear Mr. Shue:

The United States Environmental Protection Agency (EPA) has received your December 5, 2001 petition, under §75.66(a) of the Acid Rain regulations, for the Ennis-Tractebel Electric Generation Plant, ORIS Code 55223. The petition requests an extension of 60 days beyond the existing deadline to complete certification of the continuous emissions monitoring system (CEMS) for a new unit. For the reasons discussed below, EPA approves the petition, with certain conditions.

Background

The Ennis-Tractebel Power Company, LP (Ennis-Tractebel) operates a combined cycle unit at the Ennis-Tractebel Electric Generation Plant, which unit includes a GE G-frame combustion turbine (GT-1). The unit commenced commercial operation on September 2, 2001, when the combustion turbine was first synchronized to the grid. Under §75.4(b), the CEMS at the unit had to be certified within 90 days of the commencement of commercial operation.

According to Ennis-Tractebel, the project has had a number of delays due to various technical problems with the combustion turbine and the heat recovery unit. For example, there were problems concerning operation of the auto recirculation valve on the discharge of the boiler feed pump. Without this valve in operation, the feed water system, and consequently the unit, could not operate. The valve failed on two occasions, causing a unit shut-down for about 12 days.

Further, problems with the new technology of the G-frame combustion turbine engine and its steam transition cooling required modifications and changes to the unit. Because the new technology also required more frequent inspection of the combusters, unit operation

was interrupted for about 10 days. In addition, other problems (such as with the steam-cooling drain lines, static frequency converter system, speed probes, and DCS system) interrupted unit operation for about 25 days.

These technical problems prevented the unit from operating in the normal range, which was necessary for certification testing. Ennis-Tractebel expects to complete the testing in mid-January, 2002. For these reasons, Ennis-Tractebel requests a 60-day extension of the certification deadline.

EPA's Determination

As discussed above, Ennis-Tractebel experienced a number of unavoidable, technical problems during the start-up of the new unit. These difficulties appear to have significantly interfered with the operation of the combustion turbine and the company's ability to comply with the certification requirements. Further, the company appears to have made reasonable efforts to resolve the problems. For these reasons, EPA approves the petition for an extension of the certification period for 60 days from the current deadline under §75.4(b).

However, EPA maintain that Ennis-Tractebel extension should be conditioned on the reporting of emissions for the entire period for which reporting is required under part 75, i.e., starting from the original certification deadline under §75.4(b). Consequently, Ennis-Tractebel shall report substitute data for each operating hour from the first hour after 90 days from the unit's commencement of commercial operation until the hour for which the unit's CEMS are provisionally certified under §75.20(a)(3). In order to ensure that NOx emissions are not under-reported, Ennis-Tractebel shall use as substitute data, the maximum potential emission rate for NOx in accordance with part 75, appendix A, section 2.1.2.1(a) (option 2), (b), and (c).

EPA's determination relies on the accuracy and completeness of the information submitted on December 5 and 6, 2001 and is appealable under part 78 of the Acid Rain regulations. If you have any further questions about this matter, please contact Ruben Deza at (202) 564-3956.

Sincerely,

{s}

Brian J. McLean, Director
Clean Air Markets Division

cc. Joseph Winkler, Region VI