



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

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APR 27 2001

Michael J. Miller  
Designated Representative  
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OFFICE OF  
AIR AND RADIATION

Subject: Petition for an Extension of CEMS Certification Deadline for  
Wheatland Power Plant, Units 1, 2, 3, and 4

Dear Mr. Miller:

EPA has reviewed Enron North America Corporation's (Enron) petition under Section 75.66(a), dated August 25, 2000 and amended August 30 and September 25, 2000, requesting extension of the continuous emission monitoring system (CEMS) certification deadline for the Wheatland Power Plant. As discussed below, EPA approves an extension with certain conditions.

Background

The Wheatland Power Plant is a 500 MW power plant consisting of four simple-cycle, combustion turbines that commenced commercial operation on June 1, 2000. The combustion turbines (Units 1 through 4) are authorized to operate mostly during the summer as peaking units.

During the relative accuracy test audit (RATA) for nitrogen oxides (NO<sub>x</sub>) conducted on August 8, 2000, Enron found that the emissions in the stack for Unit 1 were stratified with regard to NO<sub>x</sub>, carbon monoxide, and oxygen. Subsequent testing and analysis confirmed the stratification at Unit 1 and also showed stratification in the stack for Unit 2. Because of the degree of stratification, Enron requested the manufacturer of the units to investigate why emissions in the stacks were stratified and to suggest remedies, including possible modifications of the stacks. The units have not operated since August 2000.

In the petition to EPA, Enron requested an extension of the deadline for certifying the NO<sub>x</sub>-diluent CEMS at each unit. Under Section 75.4(b), each unit's NO<sub>x</sub> CEMS must be certified within 90 days after commencement of commercial operation of the unit. Enron requested a new certification deadline of the later of January 31, 2001 or 720 operating hours from the commencement of commercial operation. According to Enron, an extension is necessary because of the limited operating hours of the units. In 2000, each of the units operated less than 70 hours because relatively low summer temperatures in the Midwest resulted in

reduced electricity demand. Enron stated that the units would not likely operate in 2001 until July.

EPA's Determination

In light of the unexpected stratification problems at the units and the units' limited operations in 2000, EPA agrees that the NO<sub>x</sub> CEMS certification deadline for the units should be extended. EPA is extending the deadline for each unit to the lesser of 720 operating hours or 30 calendar days from the date on which the unit first operates in 2001. EPA maintains that the 30-day limit on the extension is necessary in order to ensure that certification is completed in 2001. Further, EPA maintains that the extension should be conditioned on Enron reporting NO<sub>x</sub> emissions for the entire period for which reporting is required under part 75, i.e., starting from the original certification deadline under Section 75.4(b). Consequently, Enron shall report, for each unit, 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 NO<sub>x</sub> CEMS is provisionally certified under Section 75.20(a)(3). In order to ensure that NO<sub>x</sub> emissions are not under-reported, Enron shall use, as substitute data, the maximum potential emission rate for NO<sub>x</sub> in accordance with part 75, Appendix A, Section 2.1.2.1.

EPA notes that, in installing and certifying each unit's NO<sub>x</sub>-diluent CEMS, Enron must select a measurement point for the NO<sub>x</sub> pollutant concentration monitor and diluent gas monitor in accordance with part 75, Appendix A, section 1.1, such that when the RATA is conducted, the NO<sub>x</sub> CEMS collects a representative sample and also meets the standards for relative accuracy (RA) in Appendix A, Section 3.3.2. To pass that RATA, the NO<sub>x</sub> CEMS must reflect the average NO<sub>x</sub> emission rate determined by reference method traverse. The reference method traverse points are determined in accordance to Appendix A, Section 6.5.6. In accordance with Appendix A, Enron must select traverse points that assure acquisition of representative samples of pollutant and diluent concentrations, moisture content, temperature, and flue gas flow over the flue section.

EPA's determination in this letter relies on the accuracy and completeness of Enron's submissions on August 25 and 30 and September 25, 2000 and are appealable under part 78. If you have any questions regarding this correspondence, please contact Louis Nichols at (202) 564-0161.

Sincerely,



Brian J. McLean, Director  
Acid Rain Division

cc: Cecelia Mijares, Region 5  
Dave Cline, IDEM