



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

AUG 22 2002

OFFICE OF  
AIR AND RADIATION

Mr. Rodney J. Seagle  
Designated Representative  
Agua Fria Generating Station  
P.O. Box 52025  
Phoenix, AZ 85072-2025

Re: Petition to use uncertified fuel flow meters for apportioning heat input at Agua Fria Generating Station

Dear Mr. Seagle:

The United States Environmental Protection Agency (EPA) has reviewed the July 15, 2002 petition of the Salt River Project Agricultural Improvement and Power District (SRP) under §75.66(a) for the three units at the Agua Fria Generating Station (Agua Fria), ORIS Code #000141. The petition requested that EPA allow Agua Fria to use the existing uncertified gas fuel flow meters to apportion heat input from a commercial billing meter to each unit. As discussed below, EPA approves the petition with certain conditions.

Background

Agua Fria is converting from the use of a continuous emissions monitoring system (CEMS) to the Appendix D excepted methodology for its monitoring of sulfur dioxide (SO<sub>2</sub>) emissions starting with the third quarter of 2002. The facility primarily combusts pipeline natural gas.

According to SRP, its existing gas fuel flow meters cannot meet certification requirements under Part 75 for such meters. SRP therefore will replace the existing fuel flow meters with meters that are certified to meet these requirements. However, this replacement requires a complete unit outage for Agua Fria. SRP requests that EPA allow it to use the existing uncertified fuel flow meters in conjunction with the commercial billing meter to apportion the heat input to each unit until the end of the peak demand-operating season. SRP will then install certified fuel flow meters on each unit for future reporting under the Appendix D excepted methodology.

The commercial billing meter will only provide fuel flow values once a month and for the entire facility. SRP requests to apportion the monthly heat input obtained from the commercial billing meter data to each unit on an hourly basis. The apportionment will be based upon the data from each unit's uncertified gas fuel flow meter.

EPA's Determination

EPA grants SRP's request to use, on a temporary basis, monthly gas fuel flow data from the commercial billing meter and apportion that fuel flow to each unit based upon data from the uncertified fuel flow meters. The total fuel flow reported for the facility must equal the total adjusted fuel flow used for billing. SRP may not make any further adjustments to the commercial billing meter data. Also, the commercial billing meter must be identified in the monitoring plans for the units.

EPA believes that, since a qualified commercial billing meter will account for all fuel combusted at the facility, all SO<sub>2</sub> emissions from the facility will likely be accounted for using SRP's methodology. Any inaccuracy in the uncertified fuel flow meters will only affect the apportioning of the facility's total SO<sub>2</sub> emissions among the units at the facility and not the amount of the facility's total SO<sub>2</sub> emissions. Moreover, since these units burn mainly pipeline natural gas, the amount of SO<sub>2</sub> emissions will likely be very low.

The following equation must be used to convert the monthly commercial billing meter data to hourly values for each unit:

$$FF_{ij} = BMFF * \left( \frac{ff_{ij}}{\sum_j \sum_i ff_{ij}} \right)$$

Where:

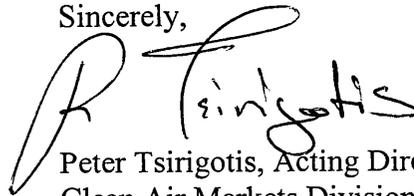
- $FF_{ij}$  = Unit hourly fuel flow used to determine heat input for unit i in hour j
- $BMFF$  = Total monthly fuel flow from the commercial billing meter
- $ff_{ij}$  = Hourly fuel flow from the existing fuel flow meter to unit i for hour j
- $\sum_j \sum_i ff_{ij}$  = Sum of uncertified fuel flows for each unit i for every hour j in the month

EPA approves SRP's use of this temporary methodology until the earlier of May 3, 2003 or the date on which SRP completes installation and certification of new gas fuel flow meters at

the three units.

EPA's determination in this letter relies on the accuracy and completeness of Agua Fria's July 15, 2002 submission and is appealable under Part 78. If you have any questions regarding this correspondence, please contact Matthew Boze at (202) 564-1975.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Tsirigotis". The signature is fluid and cursive, with a large initial "P" and "T".

Peter Tsirigotis, Acting Director  
Clean Air Markets Division

cc: Steve Frey, USEPA Region 9  
Wayne Hunt, AZ DEQ