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

MAR 11 2003

OFFICE OF  
AIR AND RADIATION

Mr. Jason M. Goodwin, P.E.  
Manager, Environmental - Air Quality Group  
Calpine Central, L.P.  
700 Milam, Suite 800  
Houston, Texas 77002

Re: Petition for extension for CEMS certification at Carville Energy Center (Facility ID (ORISPL 55404))

Dear Mr. Goodwin:

The United States Environmental Protection Agency (EPA) has reviewed Calpine Central, L.P.'s (Calpine) January 17, 2003 petition under §75.66(a) of the Acid Rain regulations. The petition requests extension of the deadline to complete certification of continuous emission monitoring system (CEMS) for nitrogen oxide (NO<sub>x</sub>) under Part 75. For the reasons discussed below, EPA approves the petition with conditions.

Background

Calpine is nearing the completion of construction and unit testing of the Carville Energy Center, L.P. (Carville), which is a two-unit combined cycle cogeneration facility located at Iberville Parish, Louisiana. The facility consists of: two General Electric 7FA combustion turbines (168 MW each); two Alstom heat recovery steam generators (one per turbine) with supplemental duct firing; and one Alstom steam turbine (181 MW). Under §75.4(b)(2), certification of the CEMS for Carville Units 1 and 2 must be completed within 90 operating days or 180 calendar days after commencement of commercial operation. According to Calpine, Units 1 and 2 commenced commercial operation on September 1 and 22, 2002, respectively.

The units were subsequently shutdown due to problems with the Alstom heat recovery steam generator at one of the units. The Alstom generator experienced a phase to ground fault on December 31, 2002 during the capacity testing. A phase connection lug from the connection to the stator winding failed. In addition, the generator also experienced arcing at its terminal connections, and a series loop failed. Believing that the generator problems resulted from the stator failure and

can be corrected by replacing the stator and cleaning and repairing the rotor, Calpine requested Alstom to manufacture a new stator and recondition the rotor. The new stator will be built in Germany, shipped, and then installed in the existing generator. The generator's rotor will be shipped to Richmond, Virginia for cleaning, balancing, and additional repairs. Based on the extent of the damage and the measures needed to reconstruct the generator, Calpine anticipates that the units will not start up until April or May, 2003. Calpine therefore requests extension of the CEMS certification deadline for the units until June 1, 2003.

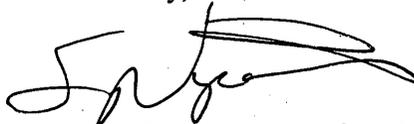
EPA's Determination

Calpine apparently experienced unavoidable, technical problems during the commissioning of the new units at Carville. These problems prevented Calpine from meeting the CEMS certification deadlines for Carville Units 1 and 2. Calpine appears to have taken reasonable measures to resolve these problems. Under these circumstances, EPA approves the requested extensions of the certification deadlines for the units until June 1, 2003.

However, EPA maintains that the extensions should be conditioned on Calpine reporting emissions for the entire period for which reporting is required under Part 75, i.e., starting from the original CEMS certification deadline for each unit. Consequently, Calpine shall report substitute data for Units 1 and 2 for each operating hour, from the first hour after 90 operating days from the respective unit's commencement of commercial operation until the hour for which that unit's NO<sub>x</sub> CEMS is certified under §75.20(a). In order to ensure that emissions are not under-reported, Calpine 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's determination relies on the accuracy and completeness of the information in the January 17, 2003 petition 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,



Sam Napolitano, Acting Director  
Clean Air Markets Division

cc. Joseph Winkler, Region VI