



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

JUN 29 2004

OFFICE OF
AIR AND RADIATION

David A. Heacock
Designated Representative
Dominion Generation
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060

Re: Petition to Extend Certification Deadline for the Oil Flowmeters at the
Gordonsville Power Station (Facility ID (ORISPL) 54844)

Dear Mr. Heacock:

This is in response to your May 20, 2004 letter in which Dominion Generation (Dominion) requested an extension of the certification deadline for the oil flowmeters installed on Units 1 and 2 at the Gordonsville Power Station (Gordonsville). EPA approves the petition, with conditions, as discussed below.

Background

Dominion owns and operates two combustion turbines (Units 1 and 2) at its Gordonsville, Virginia facility. Units 1 and 2 combust natural gas and distillate oil. The units are subject to the NO_x Budget Trading Program, under Virginia Department of Environmental Quality regulation 9 VAC 5, Chapter 140, which requires Dominion to continuously monitor and report nitrogen oxides (NO_x) emissions and unit heat input in accordance with 40 CFR Part 75, during each ozone season (i.e., from May 1 through September 30), beginning with the 2003 ozone season. This regulation further requires Dominion to hold NO_x allowances equal to the ozone season NO_x mass emissions from Units 1 and 2, as of May 31, 2004.

Prior to November, 2003, Units 1 and 2 were not owned by Dominion. Rather, Gordonsville was an independent power producer and, as such, was exempted from the Acid Rain Program under §72.6(b)(6). However, on November 21, 2003, Dominion completed the purchase of Gordonsville, which resulted in the facility losing its Acid Rain-exempt status, in accordance with §72.6(a)(3)(vi). Hence, Units 1 and 2 became subject to the Acid Rain Program on November 21, 2003.

Sections 75.4(c) and (c)(2) state that when a unit previously exempted from the Acid Rain Program loses its exempt status under §72.6(a)(3)(ii) through (vii), the owner or operator must

install and certify all required continuous monitoring systems by the earlier of: (a) 90 unit operating days; or (b) 180 calendar days from the date on which the unit first operates after becoming Acid Rain-affected.

After becoming subject to the Acid Rain Program, Units 1 and 2 first operated on November 25, 2003. According to Dominion, subsequent to that date, 180 calendar days elapsed before either of the units had accumulated 90 additional operating days. Therefore, the applicable monitor certification deadline for Units 1 and 2 is May 24, 2004, i.e., 180 days after November 25, 2003.

By virtue of its participation in the NO_x Budget Trading Program, Gordonsville had already installed and certified many of the continuous monitoring systems required by the Acid Rain Program (i.e., NO_x-diluent systems and gas flowmeters) prior to becoming Acid Rain-affected. Only the oil flowmeter systems remained uncertified.

Dominion attempted to certify the oil flowmeters prior to the May 24, 2004 deadline. The meters were sent to a laboratory to be calibrated, and then were returned to Gordonsville. However, when Dominion reviewed the results of the laboratory tests, it was discovered that the flowmeters did not meet the 2.0% accuracy specification in Appendix D of Part 75. According to Dominion, the flowmeters are in need of additional maintenance and will have to be sent back to the laboratory for re-calibration. In view of this, Dominion requested a 60-day extension of the certification test deadline in the May 20, 2004 petition.

EPA's Determination

EPA approves Dominion's request for a 60-day extension of the certification deadline for the oil flowmeters installed on Gordonsville Units 1 and 2. The approved extended deadline is July 23, 2004. However, note that although EPA is extending the monitor certification deadline, the Agency is not extending the deadline for reporting Acid Rain Program data. Therefore, in accordance with §75.64(a), Dominion shall report all SO₂, NO_x, and CO₂ emission data, heat input data, and other information required by the Acid Rain Program beginning at the original certification deadline of May 24, 2004. Notwithstanding this requirement, Dominion may begin reporting the Acid Rain data earlier than May 24, 2004 (e.g., at the beginning of the 2nd quarter of 2004), if this facilitates the report generation process.

EPA's approval is based on the fact that Dominion made a reasonable effort to meet the original certification deadline for the oil flowmeters. In the May 20, 2004 petition, Dominion stated that there are no immediate plans to burn oil in Units 1 and 2. Nevertheless, as a condition of this approval, Dominion shall report the maximum potential fuel flow rate (as defined in section 2.4.2.1 of Part 75, Appendix D) for each hour when oil is combusted in Gordonsville Units 1 and 2, in the time interval extending from May 24, 2004 (or from the date on which Acid Rain reporting is commenced, if such reporting commences prior to May 24, 2004) until the certification of the oil flowmeters has been successfully completed.

EPA's approval relies on the completeness and accuracy of the information provided by Dominion in the May 20, 2004 petition and is appealable under Part 78. If you have any questions about this determination, please contact Robert Vollaro, at (202) 343-9116. Thank you for your continued cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Sam Napolitano", with a long horizontal flourish extending to the right.

Sam Napolitano, Director
Clean Air Markets Division

cc: Jerry Curtin, EPA Region III
Frank Adams, Virginia DEQ
Robert Vollaro, CAMD