



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

APR 30 2002

OFFICE OF
AIR AND RADIATION

Mr. Mark Driscoll
Designated Representative
El Paso Corporation
1095 Cranbury - South River Road
Suite 10
Jamesburg, NJ 05531

Re: Petition for extension of CEMS certification deadline at Linden Cogen Unit
004001

Dear Mr. Driscoll,

The United States Environmental Protection Agency (EPA) has reviewed the February 1, 2002 petition submitted by El Paso Corporation (El Paso) under 40 CFR 75.66(a) for Unit 004001 at the Linden Cogen facility (ORIS Code # 50006). The petition requests a 60-day extension of the 90-day deadline under §75.4(b) for certification of continuous emissions monitoring systems (CEMS) for the unit. As discussed below, EPA approves an extension with certain conditions.

Background

Unit 004001 at the Linden Cogen facility is a 181 MW combined cycle combustion turbine. According to El Paso, the unit commenced commercial operation on November 13, 2001. Under § 75.4(b), the CEMS must be certified within 90 days after commencement of commercial operation of the unit. Therefore, the regulatory deadline for the unit is February 13, 2002.

According to El Paso, the CEMS certification testing for the unit was delayed because the unit experienced the following problems since commencing commercial operation and fired fuel only on an intermittent basis during November 13, 2001-February 8, 2002:

- On November 14, 2001, the boiler feed pumps had vibration problems requiring disassembly and repair. The pumps were returned to service on November 21, 2001.
- On November 27, 2001, several components of the downstream piping system failed,

leading to the melting of control wiring and control components of the turbine. Repairs to these components caused the unit to remain down until December 2, 2001.

- On December 7, 2001, a fuel leak in the fuel oil supply line lead to a fire causing damage that shut the unit down until December 30, 2001.
- Due to major failure of the atomizing air compressor on the liquid fuel supply system, tuning of the selective catalytic reduction (SCR) ammonia injection system was not completed until January 21, 2002.
- Subsequently, the unit was shut down to repair a tube leak in the Heat Recovery Steam Generator (HRSG). The repairs were completed on January 24, 2002.
- There was a tube leak in the HRSG, requiring postponement of the CEMS testing scheduled to begin January 22, 2002. According to El Paso, the CEMS certification contractor was not available again until February 25, 2002.

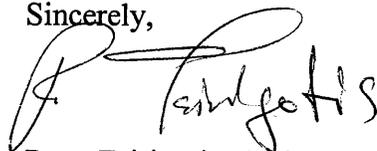
EPA's Determination

As discussed above, Linden Cogen Unit 004001 experienced several technical problems related to the commencement of operation. El Paso appears to have made reasonable efforts to address the problems and conduct CEMS certification testing. Therefore, EPA approves, with conditions, El Paso's request for a 60-day extension of the original certification deadline.

EPA maintains that the extension should be conditioned on El Paso reporting emissions for Unit 004001 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, El Paso 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 first hour for which the unit's CEMS are provisionally certified under § 75.20(a)(3). In order to ensure that nitrogen oxide (NO_x) emissions are not under-reported, Linden Cogen shall use, as substitute data, the maximum potential emission rate for NO_x in accordance with Part 75, appendix A, section 2.1.2.1 (a) (option 2), (b), and (c).

EPA's determination in this letter relies on the accuracy and completeness of El Paso's February 1 and February 12, 2002 submissions and is appealable under part 78. If you have any questions regarding this correspondence, please contact Matthew Boze at (202) 564-1975.

Sincerely,



Peter Tsirigotis, Acting Director
Clean Air Markets Division

cc: Ann Zownir, Region 2
John Preczewski, NJDEP