



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

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OFFICE OF
AIR AND RADIATION

Mr. Peter Steinbrenner
Alternate Designated Representative
PacifiCorp
Naughton Power Station
P.O. Box 191
Kemmerer, WY 83101

Re: Request for Approval of a Renewal Petition for Exemption from Continuous Opacity Monitoring Requirements for Naughton Power Station, Unit 3 (Facility ID (ORISPL) 4162)

Dear Mr. Steinbrenner:

This is in response to your July 3, 2003 petition and your September 4, 2003, January 8, 2004, and January 22, 2004 petition supplements in which PacifiCorp requested renewal of its exemption from the requirement to install a continuous opacity monitoring system on Unit 3 at the Naughton Power Station. EPA approves the petition, for the reasons discussed below.

Background

PacifiCorp owns and operates the Naughton Power Station in Kemmerer, Wyoming. Unit 3 at the Naughton facility is a coal-fired boiler which is subject to the Acid Rain Program. PacifiCorp is therefore required to monitor and report sulfur dioxide (SO₂), nitrogen oxides, and carbon dioxide emissions from Unit 3 in accordance with 40 CFR Part 75. Part 75 also requires the owner or operator of a coal-fired unit to install and certify a continuous opacity monitoring system (COMS), unless the effluent gas stream is saturated and the owner or operator can demonstrate that the presence of condensed water would impede the accuracy of the opacity measurements (see §§75.14 (a) and (b)).

Since Naughton Unit 3 has a wet flue gas desulfurization (FGD) system to control SO₂ emissions, PacifiCorp believes that the unit qualifies for an exemption from the opacity monitoring requirement under §75.14 (b). Therefore, PacifiCorp submitted a petition to EPA on January 22, 2001, requesting this exemption. The petition included demonstration data to show that the gas stream is saturated. EPA approved the petition on April 1, 2002. According to the terms of the petition approval, if EPA were to issue any new guidance on the implementation of §75.14(b), PacifiCorp would have 9 months from the date of issuance of the guidance to petition the Agency for a renewal of the opacity exemption for Unit 3.

On March 31, 2003, EPA issued a letter to PacifiCorp conveying new policy guidance on

how to qualify for the opacity monitoring exemption under §75.14(b). The new guidance states that the data used to demonstrate that the effluent gas stream is saturated should be collected under conditions representative of normal operations (i.e., normal load, normal fuel, common weather conditions, and normal emission control equipment operation). In response to this new guidance, PacifiCorp submitted a petition for renewal of Naughton Unit 3's opacity exemption on July 3, 2003. At EPA's request, supplementary information was provided on September 4, 2003, January 8, 2004, and January 22, 2004. The renewal petition and the supplementary information purport to establish that the demonstration data upon which EPA's approval of the opacity monitoring exemption was based were collected under normal operating conditions.

EPA's Determination

In its July 3 and September 4, 2003 submittals, PacifiCorp provided both long-term average operating data for Naughton Unit 3 and operating data at the time of the demonstration testing. The load data indicate that Unit 3 was operating at its normal (high) load level during each of the six test periods. PacifiCorp indicated that emission control equipment data were not collected during the test periods. However, SO₂ emission rates indicate that the wet FGD system was operating normally during the test periods.

In its January 8, 2004 and January 22, 2004 submittals, PacifiCorp provided hourly meteorological, e.g., temperature and relative humidity, and daily fuel characteristics, i.e., tons burned, % moisture, % ash, % sulfur, and Btu/#, data and summary statistics for 1999, 2000 and 2001. Because of the way data gaps and instrument error were originally handled, EPA recalculated the daily (for the six test dates) and annual mean and standard deviations of hourly temperature and relative humidity. PacifiCorp provided annual mean and standard deviations of daily fuel characteristics at EPA's request. Generally, a "normal" set of conditions reflects some variation in those conditions. Commonly, it is expected that when samples are taken of occurrences within that "normal" set, approximately 68 percent of sample values are within plus or minus one standard deviation of the sample mean. Using the annual mean \pm 1 standard deviation as the determinant of "normal" or common conditions, and applying this metric to the mean daily fuel characteristics, ambient temperatures and relative humidities on the six test dates, one test date, March 11, 2000, meets the new guidance.

Based on the above analysis, EPA has determined that the March 11, 2000 moisture content data upon which the original opacity exemption for Unit 3, in part, is based were collected at conditions of normal operating load, with the normal fuel being combusted, with the emission controls operating properly, and at typical ambient temperatures and relative humidities, and demonstrates the presence of condensed water in the stack. The new guidance for COMS exemption does not specify the amount of data required for a COMS exemption determination to be made. Because at least one set of test data, March 11, 2000, meets the new guidance, EPA approves the petition for renewal of the opacity monitoring exemption under §75.14 (b) for Naughton, Unit 3.

EPA's determination relies on the accuracy and completeness of the information in the July 3, 2003 petition, and the supplementary information provided on September 4, 2003,

January 8, 2004, and January 22, 2004 and is appealable under Part 78 of the Acid Rain regulations. If there are any further questions or concerns about this matter, please contact John Schakenbach of my staff at 202-343-9158 or at (schakenbach.john@epa.gov).

Sincerely,



Sam Napolitano, Acting Director
Clean Air Markets Division

cc: Albion Carlson, Region 8
Ron Rutherford, Region 8
Bob Gill, Wyoming DEQ
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