



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

APR 29 2002

OFFICE OF  
AIR AND RADIATION

B. H. Ransdell  
Director, Plant Manager  
Tractebel Power, Inc.  
Red Hills Power Plant  
P. O. Box 358  
Ackerman, MS 39735

Re: Petition for extension of CEMS certification deadline for Red Hills

Dear Mr. Ransdell:

EPA has reviewed your March 22, 2002 petition under §75.66(a) in which Tractebel Power, Inc. ("Tractebel") requested an extension of the deadline for installing and certifying continuous emission monitoring systems (CEMS) at two coal-fired units at the Red Hills facility ("Red Hills"). Specifically, Tractebel requested an extension of the deadline to June 1, 2002.

Background

Under § 75.4 (b) of the Acid Rain regulations, a new unit must install and certify continuous emission monitoring systems (CEMS) within 90 days of the date on which the unit commences commercial operation. Under § 72.2, "commence commercial operation" means to "have begun to generate electricity for sale, including the sale of test generation."<sup>1</sup> 40 CFR 72.2. According to Tractebel, Red Hills was synchronized to the grid on February 14, 2001. Tractebel thereby seems to indicate that the units began generating electricity for sale on that date, which would then be the date of commencement of commercial operation.

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<sup>1</sup> Tractebel has indicated that, based on a definition of "commercial operation" used by the U.S. Department of Energy, the company thought that the commencement of commercial operation was the date on which the owner takes control of a unit from the construction contractor. However, the definition of "commence commercial operation" in the Acid Rain Program regulations obviously governs this case, not a definition established by another agency for another program or for other purposes. EPA also notes that its definition is set forth in Section 402(22) of the Clean Air Act (as revised by the Clean Air Act Amendments of 1990), as well as in the original Acid Rain regulations issued in January 1993.

With an apparent date of commencement of commercial operation of February 14, 2001, the units' deadline for certifying the CEMS was 90 days after that date, or May 15, 2001. Tractebel requests an extension of the deadline for about 12 months to June 1, 2002.

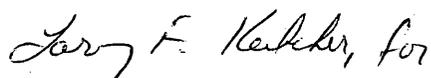
EPA's Determination

While EPA has not yet made a final determination in this matter, the Agency notes that Tractebel seeks an unusually long extension and has provided insufficient information thus far to support any extension. In its petition, Tractebel simply states that the required CEMS testing could not have been conducted at the Red Hills units because of "the significant number of outages the facility has experienced since February 14, 2001." Tractebel provides no technical or other specific information showing why CEMS certification testing could not have been performed during the almost 14- month period since the units apparently commenced commercial operation.

In order for EPA to complete its evaluation of Tractebel's petition, Tractebel should provide detailed responses to the questions in the attachment to this letter. Data may, of course, be provided electronically. In addition, Tractebel should provide any other information that the company believes may assist EPA in evaluating the basis for the requested extension.

EPA's response in this letter relies on the accuracy and completeness of the information provided in the March 22, 2002 petition. Please contact Mr. Ben Smith of my staff at (202) 564-9781 if you have any questions. Thank you for your cooperation.

Sincerely,

  
Panagiotis E. Tsirigotis, Acting Director  
Clean Air Markets Division

Attachment

cc: Lynn Haynes, EPA Region 4  
Chad LaFontaine, Mississippi Department of Environmental Quality  
Kim Nguyen, EPA Clean Air Markets Division

**INFORMATION IN SUPPORT OF EVALUATION OF TRACTEBEL'S PETITION  
UNDER 40 CFR §75.66(a)**

**1. Electricity Generation**

State on what date each unit began generating electricity for sale, including test generation, and provide documentation supporting that date. In its petition, Tractebel seems to indicate that the units began generating electricity for sale on February 14, 2001.

In addition, provide data for each unit and for every hour, from startup to the present on the amount of electricity generated.

**2. Fuels**

Provide data for each unit and for every hour, from startup to the present, on the amounts (quantity by weight and mmBtu) and types of materials fired. For each material fired, provide all available information with respect to percent sulfur and heating value.

**3. Emissions Data**

Provide copies of all emission monitoring data, emission test data, and calculation of emissions for the units from startup to the present. Also, provide all information required as part of a monitoring plan under §§ 75.53 and 75.62 .

**4. Emission Controls**

For each unit, provide information on: the rated removal efficiency of the scrubbers and any other emission controls at each unit; and the design parameters (e.g., design limestone feed rates and design liquid-to-gas ratios) related to such removal efficiency.

Further, for each unit, identify all hours from startup to the present, when the unit operated while the scrubbers and any other emission controls were operating at rated removal efficiency. Also, identify all hours from startup to the present, when the units operated while the controls were operating in a degraded (i.e., less than rated removal efficiency) mode or when they were not operating at all. For all of the above-identified hours, provide information on the actual values of the design parameters (e.g., limestone feed rates and liquid-to-gas ratios) and identify the effect on emissions of sulfur dioxide.

For each unit, describe recommended emission control maintenance schedules and provide dates and times when such maintenance was performed.

**5. Maximum Potential Concentration and Maximum Expected Concentration**

Provide a calculation of each unit's Maximum Potential Concentration and Maximum Expected Concentration of sulfur dioxide, in accordance with §2.1.1.1 and §2.1.1.2 of Appendix

A to Part 75, and Maximum Expected Concentration of nitrogen oxide, in accordance with §2.1.2.2 of Appendix A to Part 75. In addition, provide information supporting the boiler operating and emission control practices on which the calculations are based (e.g., scrubber pressure drops and bed temperatures). Where appropriate, you may reference specific responses to items 1-4 above.