

March 5, 2020

Mr. Jeff Leaf  
Primary Designated Representative  
AES Warrior Run, L.P.  
11600 Mexico Farms Rd. SE  
Cumberland, MD 21502

Re: Petition to Accept the Results of March 2019 Relative Accuracy Test Audits at AES Warrior Run Cogeneration Station (Facility ID (ORISPL) 10678)

Dear Mr. Leaf:

The United States Environmental Protection Agency (EPA) has reviewed the January 10, 2020 petition submitted by AES Warrior Run, L.P. (AES) under 40 CFR 75.66 requesting acceptance of the results of the March 7, 2019 relative accuracy test audits (RATAs) of certain continuous emission monitoring systems (CEMS) at the Warrior Run Cogeneration Station. EPA approves the petition, as discussed below.

## **Background**

AES owns and operates Warrior Run Cogeneration Station (Warrior Run) in Cumberland, Maryland. Warrior Run unit 001 is a coal-fired circulating fluidized bed boiler serving an electricity generator rated at 229 megawatts (MW). According to AES, unit 001 is subject to several Cross-State Air Pollution Rule (CSAPR) trading programs and the Regional Greenhouse Gas Initiative (RGGI) program. Therefore, AES is required to continuously monitor and report sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), and carbon dioxide (CO<sub>2</sub>) mass emissions and heat input for Warrior Run unit 001 in accordance with 40 CFR part 75. To meet these requirements, AES operates and maintains CEMS to continuously monitor SO<sub>2</sub>, NO<sub>x</sub>, and CO<sub>2</sub> concentrations and stack gas flow rate in the unit 001 stack.

Part 75 requires periodic (semiannual or annual) RATAs of the gas concentration and flow rate monitoring systems for quality assurance purposes. The part 75 regulations include procedures for determining the number of traverse points at which reference method sampling must be performed for a RATA of a gas concentration CEMS. Under section 6.5.6(b)(4) of appendix A to part 75, in order to qualify to use single-point reference method sampling, a 12-point stratification test must be performed and passed prior to each RATA to demonstrate that stratification is absent.

On September 10, 2019, EPA conducted, and Maryland Department of the Environment (MDE) observed, a part 75 CEMS audit at Warrior Run. During the review of the hardcopy gas RATA test report for the most recent previous RATAs conducted on March 7, 2019, EPA and MDE learned that those RATAs had been conducted at a single point but that prior to the RATAs, AES's test contractor had performed 3-point long-line stratification traverses instead of the 12-point stratification traverses required to qualify to use single-point gas RATA testing under part 75.<sup>1</sup>

On October 2, 2019, AES successfully completed gas RATAs in accordance with part 75 including a 12-point stratification test that met the part 75 criteria to qualify to use single-point reference method testing for all three gas concentrations (CO<sub>2</sub>, SO<sub>2</sub> and NO<sub>x</sub>).

In the January 10, 2020 petition, AES requests that EPA consider the March 2019 RATA tests as valid for quality assurance purposes because the results of the October RATAs and 12-point stratification tests and the similarity of the operating conditions under which the March and October tests were performed provide sufficient evidence that stratification was absent at the time of the March 2019 tests. To support its request, AES provides data in the petition concerning the operating conditions for unit 001 on the two test dates.

### **EPA's Determination**

EPA has reviewed the March 7, 2019 and October 2, 2019 RATA test reports and the operating data contained in the January 10, 2020 petition. EPA agrees that the data provided by AES indicate that the operating conditions during the two test periods were similar in ways that would be relevant to potential stratification. For example, at the times of both tests unit 001 was operating at nearly identical levels of load and heat input, the same fans were operating or not operating, and the unit's baghouse was in operation. Further, the results of the 12-point stratification test performed in October pass the acceptance criteria by almost the largest margins possible. Finally, the unit does not have a configuration or CEMS location that creates an unusual risk of stratification. For these reasons, the Agency finds that the follow-up testing conducted on Warrior Run unit 001 on October 2, 2019 provides sufficient evidence of an absence of stratification at the time of the March 2019 RATAs.

In view of these considerations, EPA approves AES's January 10, 2020 petition to accept as valid

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<sup>1</sup> The results of the three-point stratification test met the acceptance criteria to qualify to use single-point reference method testing found in section 8.1.2 of reference method 7E. However, the stratification test procedures and acceptance criteria to qualify for single-point reference method testing under part 75 differ from the procedures and acceptance criteria in section 8.1.2 of reference method 7E.

the results of the March 2019 RATAs of the SO<sub>2</sub>, NO<sub>x</sub>, and CO<sub>2</sub> gas concentration CEMS on unit 001 at Warrior Run. Therefore, the data recorded by these CEMS for the time period between the March and October 2019 RATAs may be reported as quality-assured, except for out-of-control periods, as provided in § 75.24.

EPA's determination relies on the accuracy and completeness of the information provided by AES in the January 10, 2020 petition and is appealable under 40 CFR part 78. If you have any questions regarding this determination, please contact Charles Frushour at (202) 343-9847. Thank you for your continued cooperation.

Sincerely,

/s/

Reid P. Harvey, Director  
Clean Air Markets Division

cc: Paul Arnold, EPA Region 3  
Mitchell Greger, Maryland Department of the Environment  
Charles Frushour, CAMD