



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

OFFICE OF AIR AND RADIATION

**October 16<sup>th</sup>, 2024**

Ms. Karalee Snyder  
Alternate Designated Representative  
Xcel Energy  
790 South Buchanan Street,  
Floor 5  
Amarillo, TX 79101

Re: Petition for waiver of the requirement to provide operating data to qualify as “gas-fired” for units 061B, 062B, and 063B at the Harrington Station (Facility ID (ORISPL) 6193)

Dear Ms. Snyder:

The United States Environmental Protection Agency (EPA) has reviewed the August 1, 2024, petition and subsequent emails dated August 8, 9, 13, 15, and 23 submitted by Southwestern Public Service Company (SPS) under 40 CFR 75.66. The petition requests a waiver for units 061B, 062B2, and 063B at the Harrington Station regarding the requirement to submit operating data to qualify as a “gas-fired” unit under 40 CFR 72.2. (The petition refers to units 061B, 062B, and 063B as units 1, 2, and 3, respectively.) EPA approves the petition in part, with conditions, as discussed below.

### **Background**

SPS owns and operates the Harrington Station (Harrington) in Amarillo, Texas. Harrington units 061B, 062B, and 063B have historically operated as coal-fired boilers, and each unit serves an electricity generator with a nameplate capacity rating of 360 megawatts. According to SPS, units 061B, 062B, and 063B are subject to the Acid Rain Program and a Cross-State Air Pollution Rule (CSAPR) trading program for ozone season emissions of nitrogen oxides (NO<sub>x</sub>). SPS is therefore required to continuously monitor and report sulfur dioxide (SO<sub>2</sub>), NO<sub>x</sub>, and carbon dioxide (CO<sub>2</sub>) mass emissions; NO<sub>x</sub> emission rate; and heat input for the units in accordance with 40 CFR part 75. To meet these monitoring requirements, SPS has installed and certified SO<sub>2</sub> continuous emission monitoring systems (CEMS), NO<sub>x</sub>-diluent CEMS, CO<sub>2</sub> CEMS, and stack gas flow rate monitors to measure emissions from units 061B, 062B, and 063B.

According to SPS, Harrington units 061B, 062B, and 063B will be converted to combust exclusively natural gas by January 1, 2025. SPS is undertaking the conversions pursuant to an agreement with the

Texas Commission on Environmental Quality (TCEQ) (Agreed Order, Docket No. 2020-0982-MIS, October 27, 2020). Under the agreement, SPS committed to cease coal combustion at the units by January 1, 2025, and also to apply for revisions to the units' federally enforceable New Source Review (NSR) permits reflecting the conversions. Federally enforceable revisions to the NSR permits prohibiting coal combustion by the units after December 31, 2024 were approved by TCEQ on June 6, 2024, for unit 061B (NSR permit no. 1388) and on April 28, 2022, for units 062B and 063B (NSR permit no. 5129).

Under part 75, units that meet the definition of "gas-fired" units in § 72.2 have monitoring options that are not available to coal-fired units, including the option to quantify a unit's SO<sub>2</sub> mass emissions and heat input rate using the methodology in appendix D to part 75 that relies on measurements of the quantity and quality of fuel combusted as an alternative to using SO<sub>2</sub> and stack gas flow rate CEMS. Gas-fired units also have options for quantifying CO<sub>2</sub> mass emissions under appendix G to part 75 that are not available to coal-fired units.

In the August 1, 2024, petition, SPS requests a waiver of an otherwise applicable condition for Harrington units 061B, 062B, and 063B to be considered gas-fired units for the purposes of part 75. The definition of "gas-fired" in § 72.2 includes provisions under which a unit that previously did not qualify as gas-fired can qualify as gas-fired based upon the submission of operating data for three calendar years or 720 operating hours, whichever is less, demonstrating that the unit has combusted natural gas for specified minimum percentages of its overall fuel usage and only fuel oil for its remaining fuel usage. SPS requests that units 061B, 062B, and 063B be considered gas-fired units for purposes of part 75 without the submission of such operating data, and requests that each unit's change from coal-fired to gas-fired status take effect on the date immediately after the date when SPS expects that unit to combust coal for the last time.

### **EPA's Determination**

Absent the waiver requested in SPS's petition, SPS would be required to submit three calendar years or 720 operating hours of operating data for each of the Harrington units following the units' conversions to gas-fired operation to demonstrate that the units qualify as gas-fired under § 72.2. The purpose of this data submission requirement is to provide assurance that the conversions are permanent. As described above, SPS has provided information intended to demonstrate the permanence of the conversions. Specifically, the units are now subject to not only an agreed order with state regulators but also federally enforceable permit conditions that prohibit the units from combusting fuels other than natural gas after December 31, 2024. EPA views these factors as providing sufficient assurance that the units' conversions from coal to natural gas combustion will be permanent, fulfilling the purpose of the operating data submission requirement and making that requirement unnecessary in this instance.

In view of these considerations, EPA approves SPS's petition for a waiver of the requirement to submit three calendar years or 720 hours of unit operating data to demonstrate that Harrington units 061B, 062B, and 063B will meet the definition of "gas-fired" under § 72.2 after December 31, 2024. However, EPA denies the petition in part, specifically with respect to the request for the units to be considered

gas-fired during the period after each unit last combusts coal and prior to January 1, 2025. Because EPA's approval is premised on the legal prohibition of coal combustion that will take effect as of January 1, 2025, EPA's approval cannot be relied on to treat the units as gas-fired before January 1, 2025. Units 061B, 062B, and 063B will be considered gas-fired for purposes of 40 CFR part 75 with respect to operation occurring on and after January 1, 2025.

EPA notes that this approval by itself does not alter any requirement to continue to use a CEMS that may arise under legal authority other than 40 CFR part 75, such as the facility's Title V operating permit, a state regulation, or a consent decree.

### **Conditions of Approval**

As conditions of this approval for Harrington units 061B, 062B, and 063B to be considered gas-fired units for purposes of 40 CFR part 75 for operation occurring on and after January 1, 2025, without the submission of operating data that would otherwise be required, SPS shall:

1. Make all necessary revisions to the electronic monitoring plans for Harrington units 061B, 062B, and 063B to represent the change from coal-fired to natural gas-fired. The monitoring plan revisions may include, but are not limited to, assigning appropriate closeout dates, activation dates, and codes for monitoring systems, monitoring methodologies, emissions and heat input rate formulas, and monitoring system span and range values;
2. If SPS elects to use the monitoring methodology under appendix D to part 75, ensure that the natural gas fuel flowmeters are certified according to section 2.1.5 of appendix D to part 75; and
3. If SPS elects to use the monitoring methodology under appendix D to part 75, ensure that the data acquisition and handling systems are properly programmed to use the appendix D methodology for quantifying SO<sub>2</sub> mass emissions and heat input rate and Equation G-4 for quantifying CO<sub>2</sub> mass emissions.

EPA's determination relies on the accuracy and completeness of SPS's August 1, 2024, petition and subsequent emails dated August 8, 9, 13, 15, and 23 and is appealable under 40 CFR part 78. If you have any questions regarding this determination, please contact Charles Frushour at (202) 343-9847 or by e-mail at [frushour.charles@epa.gov](mailto:frushour.charles@epa.gov).

Sincerely,

Rona Birnbaum, Director  
Clean Air and Power Division

cc: Emad Shahin, EPA Region 6  
Carolyn Maus, Texas Commission on Environmental Quality