

1	IN THE MATTER OF COMPLIANCE WITH RCW	)	
2	70.94 AND THE GENERAL REGULATIONS FOR	)	SWAPCA 97-2057R1
3	AIR POLLUTION SOURCES OF THE SOUTHWEST	)	REGULATORY ORDER TO
4	AIR POLLUTION CONTROL AUTHORITY	)	ESTABLISH RACT
5	Centralia Plant	RESPONDENT	) EMISSION LIMITS AND
6	PacifiCorp, et. al.	)	ORDER OF APPROVAL
7	Centralia, Washington	)	

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**INTRODUCTION**

1. Under RCW 70.94.154 of the Washington Clean Air Act, "reasonably available control technology" or "RACT" is required for all existing sources in Washington. All sources are required to achieve the lowest emission limit that the source or source category is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility. See RCW 70.94.154(1). In setting RACT, SWAPCA is required to consider the following factors: (1) the impact of the source upon air quality, (2) the availability of additional controls, (3) the emission reduction to be achieved by additional controls, (4) the impact of additional controls on air quality, and (5) the capital and operating costs of the additional controls. See RCW 70.94.030(19).
2. An important consideration in SWAPCA's determination of source-specific RACT for the Centralia Plant's sulfur dioxide (SO<sub>2</sub>) emissions is Centralia Plant's agreement to achieve certain significant reductions in emissions of sulfur dioxide, which are discussed below in Item 7. Because the Centralia Plant has already agreed as part of the CDM process to accept these emission reductions once required in a Regulatory Order, it is not



1 necessary for SWAPCA to assess whether a less stringent SO<sub>2</sub> emission limit will meet  
2 the requirements for RACT. Instead, in the RACT determination for SO<sub>2</sub> as provided in  
3 the Technical Support Document, SWAPCA has considered whether RACT requires a  
4 more stringent emission limit than the CDM target solution.

5 3. The Washington State legislature's decision to grant certain tax relief to the Centralia  
6 Plant has changed the economic feasibility determination analysis under RACT that would  
7 otherwise apply to this or similar sources. Thus, RACT for the Centralia Plant's SO<sub>2</sub>  
8 emission limit may not be easily transferred to other sources or source categories.

9 4. In addition to determining RACT for sulfur dioxide emissions, SWAPCA has also  
10 determined RACT emission limits for nitrogen oxides, particulate matter, and carbon  
11 monoxide.

12 5. SWAPCA has considered visibility impairment in Mount Rainier National Park and other  
13 Class I areas. While no formal BART determination has been made, SWAPCA has  
14 considered the federal "best available retrofit technology" (BART) guidelines for large  
15 coal-fired power plants, and specifically how the RACT emission limits compare with the  
16 new source performance standards (NSPS) (40 CFR 60.40a, Subpart Da).

## 17 REGULATORY BACKGROUND

### 18 **RACT Order SWAPCA 95-1787**

19 6. SWAPCA issued RACT Order SWAPCA 95-1787 in August 1995 establishing plant-wide  
20 SO<sub>2</sub> emission limits of 1.1 pounds per million Btu (lb/MBtu), annual average and 55,000  
21 tons/yr. Comments from the National Park Service and USDA Forest Service concerning  
22 BART prompted on-going discussions about additional SO<sub>2</sub> reductions. The 1995 RACT  
3 Order was withdrawn in September 1996 to facilitate another review of RACT and to



determine whether the collaborative decision making (CDM) target solution exceeds emission limits consistent with RACT.

### **CDM Target Solution**

7. A collaborative decision making (CDM) process during 1996 led to agreement among the Centralia Plant owners, federal land managers, and regulatory agencies to seek further emission reductions. The outcome of this process was a proposal to limit SO<sub>2</sub> emissions to no more than 10,000 tons/yr after December 31, 2002 and install NO<sub>x</sub> controls. In addition, proposed criteria were developed for: (a) Current Standards - Hourly Concentrations; (b) Operating Conditions with Controls - Good Operating Practices, Scrubber Outages, Unit Startup/Shutdown, Emissions Accounting, and Modifications; (c) Emission Limits - Control System Deadline, Hourly Concentrations in 2002, Hourly Concentration 2003 Onward, Annual Limit, and Bypass Stacks; (d) Monitoring and Reporting - CEMs, Compliance Data, Interim Compliance, Compliance Evaluation, Data Availability, and Reporting Frequency; and (e) Exceedances and Penalties - Hourly Exceedance, Annual Exceedance, Excess Emission, Definition of Violation, and General Enforcement and Allowance Forfeiture. Documentation from the CDM group collaborative process is provided in Appendix B of the Technical Support Document.

### **LEGAL AUTHORITY**

8. RCW 70.94.154 specifies that all sources in Washington State are required to meet emission limitations consistent with RACT. SWAPCA may issue a Regulatory Order to define emission limitations that constitute RACT and require compliance with such emission limitations. RACT means the lowest emission limit that a particular source or source category is capable of meeting by the application of control technology that is



1 reasonably available considering technological feasibility and economic feasibility  
2 (SWAPCA 400-030(68)).

- 3 9. Regulations have been established for the control of air pollutants emitted to the ambient  
4 air. Regulations applicable to the Centralia Plant which have been considered in  
5 establishing RACT emission limits and control requirements include, but are not limited  
6 to, the following regulations, codes or requirements. These items establish minimally  
7 acceptable emission limits that could be allowed for existing facilities. More stringent  
8 limits may be established in this Order consistent with implementation of RACT:

- 9 a. Title 40 Code of Federal Regulations (CFR) Part 60.40 et seq. (Subpart D)  
10 "Standards of Performance for Fossil-Fuel-Fired Steam Generators" applies to each  
11 steam generating unit of more than 250 million Btu per hour heat input for which  
12 construction commenced after August 17, 1971. This regulation does not apply  
13 to the Centralia Plant because construction of the Centralia Plant commenced in  
14 1968. SWAPCA approved construction of the Centralia Plant in a letter dated  
15 November 7, 1969.
- 16 b. Title 40 Code of Federal Regulations (CFR) Part 60.40a et seq. (Subpart Da)  
17 "Standards of Performance for Electric Utility Steam Generating Units for Which  
18 Construction Is Commenced After September 18, 1978" applies to each steam  
19 generating unit of more than 250 million Btu per hour heat input for which  
20 construction commenced after September 18, 1978. This regulation does not  
21 apply to the Centralia Plant because construction of the Centralia Plant  
22 commenced in 1968 and has not since been modified. SWAPCA approved  
3 construction of the Centralia Plant in a letter dated November 7, 1969.



- 1 c. WAC 173-400-151 "Retrofit Requirements for Visibility Protection" requires the  
2 owner or operator of any source to which significant visibility impairment of a  
3 mandatory Class I area is reasonably attributable, to apply BART for each  
4 contaminant contributing to visibility impairment that is emitted at more than 250  
5 tons per year.
- 6 d. WAC 173-470 "Ambient Air Quality Standards for Particulate Matter" establishes  
7 ambient air quality standards for total suspended particulate matter and for  
8 particulate matter smaller than 10 microns ( $PM_{10}$ ), which may not be exceeded  
9 more than one day per year.
- 10 e. WAC 173-474 "Ambient Air Quality Standards for Sulfur Oxides" established  
11 ambient air quality standards for sulfur oxides, measured as sulfur dioxide ( $SO_2$ ),  
12 of 0.4 parts per million (1-hour average) and 0.1 parts per million (24-hour  
13 average) which may not be exceeded more than once in a one-year period, and  
14 0.25 parts per million (1-hour average) which may not be exceeded more than  
15 twice in a consecutive seven-day period.
- 16 f. WAC 173-475 "Ambient Air Quality Standards for Carbon Monoxide, Ozone, and  
17 Nitrogen Dioxide" establishes an ambient air quality standard of 0.05 part per  
18 million (ppm), annual arithmetic mean for nitrogen dioxide; an ambient air quality  
19 standard of 0.12 ppm, one hour average, for ozone; and ambient air quality  
20 standards of 9.0 ppm, eight hour average, and 35.0 ppm, one hour average, for  
21 carbon monoxide.
- 22 g. SWAPCA 400-040 "General Standards for Maximum Emissions" Section 6  
3 requires that no person shall cause or permit the emission of a gas containing



1 sulfur dioxide from any emission unit in excess of 1000 ppm dry<sub>v/v</sub> corrected to  
2 7% O<sub>2</sub> or 12% CO<sub>2</sub> average for any consecutive 60 minutes.

- 3 h. SWAPCA 400-091 "Voluntary Limits on Emissions" requires that SWAPCA  
4 establish enforceable limits on emissions or limitations on potential to emit upon  
5 request by a source to an amount agreed to by the owner or operator and  
6 SWAPCA. SWAPCA shall issue a Regulatory Order to reduce that source's  
7 potential to emit whereby the terms and conditions of such Order shall be  
8 federally enforceable. Such Order shall be subject to public notice and comment.
- 9 i. SWAPCA 400-114 "Requirements for Replacement or Substantial Alteration of  
10 Emission Control Technology at an Existing Stationary Source" requires that the  
11 owner/operator of a source submit a Notice of Construction application to  
2 SWAPCA and that an Order of Approval/Regulatory Order be issued prior to  
13 making the replacement or alteration. For projects not otherwise reviewable under  
14 SWAPCA 400-110, SWAPCA may require the owner or operator to employ  
15 RACT. SWAPCA 400-114 applies to fuel modifications strictly for control of  
16 emissions, as well as to the installation of pollution control equipment.

## 17 REGULATORY FINDINGS

### 18 **Emission Units**

- 19 10. SWAPCA evaluated all emission units at the Centralia Plant to determine those units that  
20 should be considered for inclusion in a RACT evaluation. There were eight emission  
21 units identified as major plant components. In addition, the Title V application further  
22 identified four additional emission units. These four additional emission units were  
3 identified to be insignificant emission units in accordance with Title V requirements.
- 24 Based on the RACT criteria of RCW 70.94.154 and RCW 70.94.030, only the main



1       boilers (Boilers #1 and #2) were determined to be of significant nature such that a RACT  
2       evaluation and establishment of RACT emission limits would be practicable at this time.  
3       The full evaluation of the emission units are documented in the Technical Support  
4       Document in Section 2.2.

#### 5       **Pollutants Deemed to be of Concern**

- 6       11.   SWAPCA evaluated certain pollutants to determine whether they are "of concern" and  
7       whether it would be practicable to set RACT emission limits for them at this time.  
8       SWAPCA evaluated each of the criteria pollutants (sulfur dioxide, particulate matter,  
9       oxides of nitrogen, and carbon monoxide) to determine if they qualified as contaminants  
10      of concern for the Centralia Plant. Ozone was not directly evaluated because it is not a  
11      pollutant directly emitted by the Centralia Plant, however, ozone was evaluated as a  
12      byproduct of oxides of nitrogen and volatile organic compounds. In addition volatile  
13      organic compounds, hazardous air pollutants (HAPs) and toxic air pollutants (TAPs), and  
14      carbon dioxide were evaluated. Lead was not evaluated separately as a criteria pollutant  
15      but was considered under the category of hazardous air pollutant. SWAPCA applied  
16      criteria contained in RCW 70.94.154 and RCW 70.94.030 to each pollutant to arrive at  
17      a conclusion of which pollutants should be evaluated for RACT. Only those pollutants  
18      emitted from the emission units of concern that were identified above were evaluated.  
19      The pollutants of concern for which a RACT determination was deemed to be practicable  
20      are: sulfur dioxide, oxides of nitrogen, particulate matter and carbon monoxide. The full  
21      evaluation of the pollutants of concern are documented in the Technical Support  
22      Document in Section 2.3.



**SWAPCA's Discretion to Not Determine RACT Where Not Practicable**

12. Volatile organic compounds, hazardous air pollutants and toxic air pollutants, and carbon dioxide were determined to not be subject to RACT for the Centralia Plant based on individual factors explained in the Technical Support Document. The hazardous air pollutants were found to be insignificant (not of concern) or determined to not be practicable to have a RACT emission limit established at this time. One hazardous air pollutant, mercury (Hg), was determined to be potentially of concern and was evaluated in more detail than the other hazardous air pollutants. The U.S. EPA is currently evaluating mercury emissions from all power plants to establish the need for maximum achievable control technology (MACT) controls. Because the concentration of mercury emissions from the Centralia Plant are significantly below the Washington State established acceptable source impact level (ASIL) of WAC 173-460 and the fact that mercury is being considered for a federal MACT standard, mercury is not yet a pollutant of concern. Therefore, establishment of a RACT emission limit for mercury was not considered to be practicable at this time.

**Basis for Order**

13. This Order, in part, is issued in accordance with SWAPCA 400-091, upon request by the Respondent, to limit the potential to emit from the auxiliary boiler. The emission limitation is based on establishing an annual total fuel consumption limit for the auxiliary boiler of 600,000 gallons per year and AP-42 emission factors.
14. This Order, in part, is issued in accordance with SWAPCA 400-114(2)(a) requiring installation of RACT and is deemed to meet the requirements of SWAPCA 400-114(3) for Notice of Construction submittal and approval of replacement or substantial alteration of emission control technology at an existing stationary source. Respondent shall notify



1 SWAPCA of the selected control technology upon its final selection. Any additional  
2 monitoring and operating requirements necessary to ensure continuous compliance with  
3 applicable requirements shall be incorporated into the Title V permit at the time of its  
4 issuance or renewal, as appropriate.

5 **RACT and BART Findings**

6 15. SWAPCA finds that the 10,000 tons per year emission limit for SO<sub>2</sub> required in this  
7 Order meets or exceeds the requirement for an SO<sub>2</sub> RACT emission limit for the Centralia  
8 Plant.

9 16. SWAPCA finds that a 0.30 lb/MBtu, annual average, both units combined, emission limit  
10 for oxides of nitrogen, a 0.010 gr/dscf and 20% opacity emission limits for particulate  
11 matter, and 200 ppm, annual average, both units combined, emission limit for carbon  
12 monoxide, are levels of emissions that can be achieved by the Centralia Plant by  
13 application of RACT control technology, thereby establishing RACT emission limits as  
14 provided under RCW 70.94.154.

15 17. SWAPCA finds that, while no formal BART determination has been made, based on the  
16 requirements in this Order and documentation in the Technical Support Document, the  
17 emission limits in this RACT Order represent BART under 40 CFR 51 Subpart P, WAC  
18 173-400-151 and SWAPCA 400-151 for emissions of sulfur dioxide, particulate matter  
19 and nitrogen oxides by meeting the BART requirements for those pollutants.



1 NOW HAVING CONSIDERED THIS MATTER AND BEING DULY ADVISED, IT IS  
2 HEREBY ORDERED:

3 SULFUR DIOXIDE

4 18. THAT, unless otherwise provided below, no later than January 1, 2003 total SO<sub>2</sub>  
5 emissions from units #1 and #2, the auxiliary boiler (as described in Item 45), and other  
6 emission points throughout the facility, combined, shall not exceed 10,000 tons/yr in any  
7 rolling 12-month period. The determination of annual emissions shall be based on a  
8 rolling monthly calculation from the recorded hourly SO<sub>2</sub> emissions used for Acid Rain  
9 Program compliance evaluation. An annual average shall be computed for the preceding  
10 12-month period which ends with each month of the quarter, to be reported quarterly by  
11 the end of the month following the end of the calendar quarter.

2 19. THAT, the selected SO<sub>2</sub> emission control technology shall be operational no later than  
13 December 31, 2001 for one of the Plant units, and shall be operational no later than  
14 December 31, 2002 for the other Plant unit. However, if the selected SO<sub>2</sub> emission  
15 control method is fuel supply modification or a post-combustion control system applied  
16 to only one of the two units, neither of the units, or no controls, the emission limit for  
17 the entire Plant shall be effective after December 31, 2001.

18 20. THAT, the annual SO<sub>2</sub> exhaust gas emissions, during and after installation of control  
19 technology according to the schedule in Item 19 above, shall not exceed the following:

20 a. 7,500 tons per year, annual average, for the controlled unit including any bypass,  
21 and no annual limit for the uncontrolled unit, if discharged through separate stacks  
22 (flues), effective only in calendar year 2002;

3 b. 10,000 tons per year, annual average, for all exhaust gases discharged through a  
24 new flue (and bypass for the controlled unit) if this flue is to be common for both



units once control technology is applied to both units. The exhaust stream to which this limit applies consists of emissions from the first controlled unit for the entire year of 2002 and emissions from the second controlled unit for only that portion of the year 2002 that the second unit is in startup testing and discharges its exhaust through the new common flue. Compliance evaluation periods that span startup of the second unit shall use the monthly emissions calculated by the appropriate accounting method for each month;

c. 10,000 tons per year, annual average, both units combined, if both units have control technology installed (operational) by December 31, 2001, effective in calendar year 2002 and beyond;

d. 10,000 tons per year, annual average, both units combined, both units controlled, one or two stacks, effective in calendar year 2003 and beyond;

e. The Centralia Plant shall, within its operation and maintenance constraints, use all best efforts to preferentially load the unit first equipped with SO<sub>2</sub> emission control technology when the Plant is operating at less than maximum capacity from December 31, 2001 through December 30, 2002. Daily generation records for both units will be made available during calendar year 2002 to assess the relative loading of the scrubbed and unscrubbed units.

21. THAT, from January 1, 2002 onward, the SO<sub>2</sub> exhaust gas concentration from units to which emission reduction technology has been applied, according to the schedule in Item 19 above, shall not exceed the following short-term levels:

a. 250 ppm, 1-hour average measured on a dry basis corrected to 7% O<sub>2</sub> for the controlled unit(s); 1000 ppm, 1-hour average measured on a dry basis corrected to 7% O<sub>2</sub> for the uncontrolled unit for only 2002;



b. During planned or forced outages of the SO<sub>2</sub> emission control technology and during startups and/or shutdowns of a unit as defined in Section 25 below, if the selected SO<sub>2</sub> emission control technology cannot operate, the following alternative emission levels measured on a dry basis corrected to 7% O<sub>2</sub> shall apply:

(i) 1000 ppm, 1-hour average, if the exhaust gas from each unit is discharged through separate flues which are independently monitored;

(ii) If the exhaust gases from both units are discharged through a new common flue in which only a combined exhaust mixture may be monitored, then the following outage and startup/shutdown levels shall apply:

(a) In 2002, 1000 ppm, 1-hour average; and

(b) In 2003 and onward, 750 ppm, 1-hour average if the outage or startup/shutdown condition exists for only one unit, and 1000 ppm, 1-hour average if the condition exists for both units concurrently;

c. If the exhaust gases from both units are discharged through a new common flue, during startup testing of the second unit's SO<sub>2</sub> emission control technology, SO<sub>2</sub> concentrations shall not exceed 750 ppm, 1-hour average, only in 2002.

22. THAT, prior to compliance with the SO<sub>2</sub> emission limit in Item 18 above, neither Unit #1 nor Unit #2 shall exceed for any fixed hour at any time while fuel is being supplied to the unit, an SO<sub>2</sub> stack concentration of 1000 ppm, 1-hour average, dry basis corrected to 7% O<sub>2</sub> as provided in SWAPCA 400-040(6).

23. THAT, the duration of a forced outage of the SO<sub>2</sub> emission control technology shall be minimized by returning the emission control system to operation as soon as practicable.

A planned outage is defined as one that is scheduled in advance regardless of the length of the planning horizon. All other unanticipated system outages are defined to be forced.



1 The Centralia Plant is responsible for demonstrating that a forced outage which occurs  
2 while the plant continues to operate is unavoidable and is being managed to minimize  
3 emissions as provided in SWAPCA 400-107. Emission control system outages shall be  
4 reported to SWAPCA by telephone during the current business day or no later than the  
5 next business morning; a message may be left on an automatic answering machine outside  
6 normal business hours. A written report may be requested by SWAPCA, and shall be  
7 required for any forced outage longer than 72 hours. For outages exceeding 72 hours, the  
8 plant shall consider available means to reduce emissions of SO<sub>2</sub>, including, but not limited  
9 to, a reduction in electrical output, use of reduced sulfur content coal, or taking one or  
10 both units off line. Planned emission control system outages shall be conducted to the  
11 maximum extent possible during daily or weekly plant load reduction periods. No  
12 planned emission control system outages shall occur during the period of June 15 through  
13 September 15 except when the plant is completely off line and no fuel is burned.

14 24. THAT, all SO<sub>2</sub> emissions during startup, shutdown, equipment out of service, and upset  
15 conditions shall be included in the summation of emissions to determine compliance with  
16 the annual (12 month) emissions limit of 10,000 tpy.

17 25. THAT, during startup and shutdown of the Centralia Plant units (for normal operations  
18 or planned outages), emissions control equipment shall be operated to minimize overall  
19 emissions, except to the extent equipment operation will cause degradation of its long-  
20 term performance. Exceedances of the normal operation hourly SO<sub>2</sub> (250 ppm) and  
21 opacity limitations (20%) are excused under SWAPCA 400-107 during startup and  
22 shutdown when the electrostatic precipitators (ESPs) and SO<sub>2</sub> emission control system(s)  
23 are out of service. The shutdown period begins when the ESP temperature drops to  
24 220°F, the critical ESP de-energize temperature. When the critical temperature is



1 attained, first the SO<sub>2</sub> control system, and then the ESPs are taken out of service. For  
2 periods when all fuel is out of the boiler, SO<sub>2</sub> emissions shall be assumed to be zero. The  
3 startup period begins when fuel is introduced into a boiler with the intent of raising its  
4 temperature to operating conditions. The ESPs are energized when they reach operational  
5 temperature, or 220°F. The SO<sub>2</sub> control system(s) is(are) placed in service following ESP  
6 stabilization. The startup period ends when the earlier of the two operating events below  
7 occurs:

- 8 a. Opacity in the gas path downstream of the ESPs has stabilized below 10% for 30  
9 minutes (five consecutive 6-minute periods); or
- 10 b. 8 hours have elapsed after the startup unit is synchronized to be electrically on-  
11 line.

12 26. THAT, during equipment out of service and upsets (including forced outages), emissions  
13 in excess of the 250 ppm hourly SO<sub>2</sub> limitation are excused from the hourly limit  
14 provided they meet the burden of proof regarding unavoidable conditions that lead to  
15 excess emissions in accordance with SWAPCA 400-107. Centralia Plant shall record  
16 equipment out of service and upset conditions in the operation log for periodic inspection  
17 by SWAPCA. For periods when all fuel is out of the boiler, SO<sub>2</sub> emissions shall be  
18 assumed to be zero.

19 27. THAT, the compliance determination methodology for SO<sub>2</sub> emissions shall be as follows:

- 20 a. SO<sub>2</sub> emissions from each unit, if emitted through separate flues, shall be measured  
21 by an SO<sub>2</sub> monitor and the diluent (O<sub>2</sub> or CO<sub>2</sub>) monitor, which are continuous  
22 emission monitors (CEM) installed and operated to meet the requirements of 40  
23 CFR Part 75. Hourly (over a fixed clock hour, e.g., 1:00 p.m. to 1:59 p.m.) SO<sub>2</sub>  
24 averages shall be calculated by the CEM. Compliance with the hourly SO<sub>2</sub>



1 limitations shall be determined from the CEM data, collected in compliance with  
2 40 CFR Part 75 separately for Centralia Plant Units #1 and #2 from separate flues,  
3 or a combined flue, if applicable.

4 b. Compliance with the annual emission limit in tons per year shall be determined  
5 at the end of each calendar quarter from tons of SO<sub>2</sub> emitted during the three 12-  
6 month periods ending in that quarter. Emissions shall be calculated using the  
7 methodology in 40 CFR 75 for the Acid Rain Program. If prior to June 2000, the  
8 U.S. Environmental Protection Agency has not resolved the discrepancy that exists  
9 in calculating tons of SO<sub>2</sub> between the current 40 CFR Part 75 and coal burned  
10 methodologies, the Centralia Plant may propose to SWAPCA, for review and  
11 modification of this provision, alternative monitoring and compliance evaluation  
12 methods that more accurately represent true emissions.

13 c. The minimum data availability requirements of 40 CFR 75.20 to 75.34 shall be  
14 met. Periods of CEM malfunctions shall be subject to SWAPCA 400-105(5)(h)  
15 which exempts the Centralia Plant from monitoring and reporting requirements if  
16 SWAPCA determines that the CEM malfunction was unavoidable. When  
17 determining compliance with the SO<sub>2</sub> limitations for monitor out-of-service periods  
18 of four hours or less in duration, the average of the hour before and the hour  
19 following a monitor out-of-service period, in accordance with 40 CFR  
20 75.33(b)(1)(i) shall be used. Because the missing data substitution procedures for  
21 40 CFR 75.30 to 75.34 may require the use of emission values that do not  
22 represent actual emissions, alternative data may be used for missing data periods.  
23 When determining compliance with SO<sub>2</sub> limitations for monitor out-of-service  
24 periods greater than four hours, data from the on-line coal analyzer operated by



1 the Centralia Mining Company, the as-burned coal analyses conducted by  
2 Centralia Plant, and emission control system operating data shall be evaluated.  
3 The data or combination of data, that best represents actual emissions shall be  
4 used to determine compliance with the SO<sub>2</sub> limitations. Stack test data may be  
5 used, if available and approved by SWAPCA.

6 d. Quarterly reports for Centralia Plant Units #1 and #2 shall be submitted to  
7 SWAPCA by the end of the month following the end of each calendar quarter.  
8 Each report shall include, but not be limited to, the following:

- 9 (1) Hourly concentrations of SO<sub>2</sub> in ppm, dry basis corrected to 7% O<sub>2</sub>;
- 10 (2) Tons of SO<sub>2</sub> emitted from all relevant stacks (plus any extreme emergency  
11 bypasses through the old stacks) for each 12-month period, ending with the  
12 last day of each month in the quarter;
- 13 (3) Complete 40 CFR Part 75 quarterly report on disk may be submitted under  
14 separate cover;
- 15 (4) During 2002, daily megawatt generation from each boiler to allow  
16 confirmation of loading priority of the boilers.

17 28. THAT, exceedances and violations of short-term and annual emissions limitations shall  
18 be defined as described below:

- 19 a. An exceedance of the hourly limitation (250 ppm and 1000 ppm) is defined as any  
20 fixed hour (e.g., 1:00 p.m. to 1:59 p.m.) with SO<sub>2</sub> concentration over the  
21 limitations as defined and determined under Items 21 and 22 above;
- 22 b. Exceedance of the hourly SO<sub>2</sub> limitations in Items 21 and 22 above shall be  
23 subject to SWAPCA 400-107. The Centralia Plant shall have the burden of proof  
24 demonstrating unavoidable conditions that lead to excess emission in accordance



1 with SWAPCA 400-107. Excess emissions shall be reported to SWAPCA by  
2 telephone during the current business day or next business morning; a message  
3 may be left on an automatic answering machine outside normal business hours.  
4 A written report may be required by SWAPCA if determined necessary.  
5 Violations and penalties for exceedances of the hourly limits shall be determined  
6 in accordance with SWAPCA 400-230 and RCW 70.94;

7 c. An exceedance of the annual limitation is one 12-month period exceeding the  
8 tons/year SO<sub>2</sub> limitations as defined and determined under Items 18, 19, and 20  
9 above. All hourly SO<sub>2</sub> emission data for startup, shutdown, upset and forced or  
10 planned emission control system outage periods shall be included in the  
11 calculations of the annual tons of SO<sub>2</sub> emitted;

12 d. Except as provided herein, each exceedance of the annual (rolling 12-month)  
13 emission limitation shall constitute a continuing violation for the days in the last  
14 month of the 12-month (annual) period. Each day of violation shall be treated  
15 equally and be subject to penalty as allowed by law at the time of the non-  
16 compliance. The Centralia Plant may calculate 365-day emission summations  
17 ending on each day in the last month of the 12-month period to reduce the number  
18 of violation days subject to penalty. If adequately demonstrated, the number of  
19 violation days shall not include the number of 365-day periods ending within the  
20 last month of the exceedance period for which the emissions summation did not  
21 exceed the annual limit;

22 e. SWAPCA retains the authority to take enforcement action in response to  
23 deficiencies in plant operation and maintenance, equipment performance, or any



1 other matter not explicitly identified in Items 25 and 26, consistent with SWAPCA  
2 400 General Regulations for Air Pollution Sources;

3 f. In addition to penalties that may be assessed under statutory and regulatory  
4 authorities, beginning in calendar year 2002, the Centralia Plant shall forfeit  
5 ownership of SO<sub>2</sub> allowances to SWAPCA equal to 1.5 times the quantity of  
6 emissions in excess of the 10,000 ton annual limit calculated on a calendar year  
7 basis.

8 29. THAT, if the selected emission control technology includes construction of a new stack(s)  
9 with one or two flues, the existing stack for each unit may remain for bypass situations  
10 provided that certified CEMs are maintained in the existing stacks. If there are no  
11 certified functioning CEMs in the existing stacks, these stacks shall only be used during  
12 extreme emergency conditions, provided that a separate bypass duct around the SO<sub>2</sub>  
13 emission control technology is not constructed into the new stack. Examples of  
14 emergency conditions are interruption of the exhaust gas flow path through that unit's  
15 scrubber vessel, or other situations with the potential to result in personal injury or severe  
16 damage to the boiler, emission control systems, or new stack. Any bypass that is not  
17 monitored by a certified functional CEM is considered an upset condition and shall be  
18 reported to SWAPCA during the current business day or by the next business morning  
19 and shall be documented to SWAPCA within 5 days of the occurrence. All SO<sub>2</sub>  
20 emissions discharged from a bypass stack shall be included in the calculation of emissions  
21 for determining compliance with the annual limit.



1           **OXIDES OF NITROGEN**

2       30.     THAT, the annual average (calendar year) emission rate for NO<sub>x</sub> shall not exceed  
3           0.30 lb/MBtu, both units averaged together, for those hours when a unit's generating load  
4           is 360 MW gross or greater. (This annual average emission rate is calculated as the  
5           combined arithmetic sum of hourly emission rates for each unit when each unit's  
6           generating load is 360 MW gross, or greater, divided by the combined sum of the number  
7           of hours that each unit operated at 360 MW, or greater, during the calendar year.) For  
8           all operating hours, emissions of NO<sub>x</sub> shall not exceed 0.35 lb NO<sub>x</sub>/MBtu annual average  
9           (calendar year), both units averaged together. These emission limits shall be subject to  
10          the schedule in Items 31 and 32. All other provisions including compliance  
11          demonstration shall be consistent with the Acid Rain Program provisions.

2       31.     THAT, the selected NO<sub>x</sub> emission control technology shall be operational no later than  
13          December 31, 2001 for the first unit and December 31, 2002 for the second unit.

14      32.     THAT, the NO<sub>x</sub> exhaust gas emission rate during installation of control technology  
15          according to the schedule in Item 31 above, shall not exceed the following:

16          a.     0.31 lb/MBtu annual average for the controlled unit for all hours when the unit  
17                  generating load is 360 MW gross or above, 0.36 lb/MBtu annual average for all  
18                  operating hours for the controlled unit, 0.45 lb/MBtu annual average for the  
19                  uncontrolled unit, if discharged through separate stacks, effective only in calendar  
20                  year 2002;

21          b.     0.40 lb/MBtu, annual average, both units combined, if the exhaust gases from both  
22                  units (one unit controlled, one unit not controlled) are discharged through a new  
3                  common flue, effective only in calendar year 2002;



1 c. If both units have SO<sub>2</sub> control technology installed by December 31, 2001, the  
2 emission limits in Item 30 shall be effective in calendar year 2002 and beyond;

3 d. The emission limits in Item 30 shall be effective in calendar year 2003 and  
4 beyond.

5 33. THAT, for good cause, SWAPCA may, at its discretion and after meeting any public  
6 involvement requirements under SWAPCA 400-171 and any other applicable law or  
7 regulation, modify the NO<sub>x</sub> emissions limitations of this Order. Good cause may include,  
8 for example, higher NO<sub>x</sub> emissions than predicted by the manufacturer in the RACT  
9 submittal when operated in accordance with good industry practices or excessive boiler  
10 waterwall tube corrosion resulting from the installation and operation of the low NO<sub>x</sub>  
11 modifications. All causes resulting from installation of Level III low NO<sub>x</sub> technology  
2 shall be documented to SWAPCA no later than December 31, 2006, except excessive  
13 boiler waterwall tube corrosion which shall be documented to SWAPCA no later than  
14 December 31, 2008. A request to modify the NO<sub>x</sub> conditions of this Order shall include  
15 an explanation of the reasons why the RACT NO<sub>x</sub> emissions limits established in this  
16 Order cannot be met, why the reasons for such modification were beyond the control of  
17 the Centralia Plant, identification of any special operating conditions that may be the sole  
18 or principle reason for a modification, and what efforts were taken within the timelines  
19 specified above to avoid and/or mitigate the need for a modification. Nothing in this  
20 section shall be construed to limit SWAPCA's authority to revise this Order pursuant to  
21 Item 59 of this Order.



1           **PARTICULATE MATTER**

2       34.     THAT, emissions of front half particulate matter shall not exceed 0.010 gr/dscf (Method  
3           5, or equivalent, front half only), as corrected to 7% O<sub>2</sub>, evaluated once per year for each  
4           stack (flue) by source testing effective after December 31, 2001.

5       35.     THAT, compliance with the grain loading limit shall be based on an annual stack test  
6           using EPA Method 5, or equivalent. The test method selected shall be consistent with  
7           the SO<sub>2</sub> control technology selected and shall be appropriate for the stack conditions  
8           existing for the selected SO<sub>2</sub> control technology (i.e., wet or dry stack and maximum  
9           temperature). Only the front half catch shall be used for compliance demonstration with  
10          this limit, however, the backhalf catch should continue to be performed to provide an  
11          indication of total (condensible and non-condensable) particulate matter emitted from the  
12          plant.

13      36.     THAT, the opacity of emissions shall be based on the continuous opacity monitoring  
14           system (COMS) if stack conditions allow accurate particulate matter readings without  
15           being adversely affected by moisture. Opacity shall not exceed 20% based on a 6-minute  
16           average, except for one 6-minute period per hour of not more than 27% opacity. See 40  
17           CFR 60.42a(b). In addition, visible emissions as determined by a Certified Observer shall  
18           not exceed 20% opacity for more than 3 minutes in any one hour period as provided in  
19           SWAPCA 400-040(1). Both standards for opacity determination apply. If moisture is  
20           present in the gas stream to the extent that it interferes with the COMS providing accurate  
21           opacity data, then visual observations using EPA Method 9 shall be performed a  
22           minimum of once per quarter to demonstrate compliance.

23      37.     THAT, the particulate matter and opacity emission limits shall apply at all times but are  
24           excused for startup and shutdown, and may be excused for periods of malfunction or



upset consistent with SWAPCA 400-107. In addition, opacity exceedances shall be allowed during periods of manual precipitator rapping and are excused under SWAPCA 400-107(5). Such opacity exceedances shall be reported to SWAPCA no later than the next business day and shall be noted in the quarterly report.

38. THAT, during startup and shutdown of the Centralia Plant boilers for planned or forced unit outages, emissions control equipment shall be operated to minimize overall emissions, except to the extent equipment operation will cause degradation of its long-term performance. Exceedances of the normal operation particulate matter and opacity limitations are excused under WAC 173-400-107(4) and SWAPCA 400-107(4) during startup and shutdown when the electrostatic precipitators (ESPs) and SO<sub>2</sub> emission control system(s) are out of service. The shutdown period begins when the ESP temperature drops to the critical ESP de-energize temperature, 220°F. When the critical temperature is attained, first the SO<sub>2</sub> control system, and then the ESPs are taken out of service. The startup period begins when fuel is introduced into a boiler with the intent of raising its temperature to operating conditions. The ESPs are energized when they reach operational temperature. The SO<sub>2</sub> control system(s) is(are) placed in service following ESP stabilization. The startup period ends when the earlier of the two operating events below occurs:

- a. Opacity in the gas path downstream of both ESPs has stabilized below 10% for 30 minutes (five consecutive 6-minute periods); or
- b. 8 hours have elapsed after the startup unit is synchronized to be electrically on-line.



1           **CARBON MONOXIDE**

2       39.     THAT, emissions of carbon monoxide shall not exceed 200 ppm on an annual average  
3             (calendar year), combined. This emission limit is effective after December 31, 2001.

4       40.     THAT, compliance with the carbon monoxide emission concentration limit shall be  
5             determined annually using existing plant operating data to identify average CO  
6             concentrations. For information purposes, year-to-date average carbon monoxide  
7             concentrations shall be calculated and reported quarterly. Plant operating data collected  
8             by the CO monitors shall be validated once per year, for each stack (flue), by source  
9             testing, using EPA Method 10, to confirm the representativeness of the CO monitor data.

10           **PROJECT MILESTONES**

11       41.     THAT, to the extent applicable to the control technology selected, the following project  
12             milestones shall be met through reporting of progress to SWAPCA:

- 13           a.     Demonstration of initial progress to install SO<sub>2</sub> air pollution control facilities shall  
14                 be submitted by November 1, 1998. Initial progress may include, but is not  
15                 limited to: engineering work, agreements to proceed with construction, contracts  
16                 to purchase or contracts for construction of air pollution control facilities.
- 17           b.     A procurement contract for the first unit SO<sub>2</sub> emission control system(s) shall be  
18                 awarded no later than March 31, 1999.
- 19           c.     Commencement of physical onsite construction activity for the first unit SO<sub>2</sub>  
20                 emission control system(s) shall commence no later than August 31, 1999.
- 21           d.     A procurement contract for the second unit SO<sub>2</sub> emission control system(s) shall  
22                 be awarded no later than March 31, 2000.
- 23           e.     Commencement of physical onsite construction activity for the second unit SO<sub>2</sub>  
24                 emission control system(s) shall commence no later than August 31, 2000.



- 1 f. Commencement of startup testing of SO<sub>2</sub> control equipment for the first unit shall  
2 occur no later than October 31, 2001 and the second unit by no later than October  
3 31, 2002. Startup testing is considered to be the initiation of flue gas through the  
4 SO<sub>2</sub> control system.
- 5 g. The SO<sub>2</sub> control system shall be installed and fully operational for the first unit  
6 no later than December 31, 2001 and for the second unit no later than December  
7 31, 2002.
- 8 h. A procurement contract for the first unit NO<sub>x</sub> emission control system(s) shall be  
9 awarded no later than October 31, 2000. The second unit NO<sub>x</sub> emission control  
10 system(s) shall be awarded no later than October 31, 2001.
- 11 i. Commencement of physical onsite construction activity for the first unit NO<sub>x</sub>  
12 emission control system(s) shall commence no later than August 31, 2001.  
13 Commencement of physical onsite construction activity for the second unit NO<sub>x</sub>  
14 emission control system(s) shall commence no later than August 31, 2002.
- 15 j. NO<sub>x</sub> control equipment startup testing shall be commenced no later than October  
16 31, 2001 and October 31, 2002, for the first and second units, respectively.
- 17 k. The NO<sub>x</sub> controls shall be installed and fully operational for the first unit no later  
18 than December 31, 2001 and for the second unit no later than December 31, 2002.

19 **RECORDKEEPING AND REPORTING**

- 20 42. THAT, a comprehensive test plan shall be submitted to SWAPCA for review and  
21 approval at least five business days prior to performance of any periodic testing beyond  
22 CEMS monitoring required in this Order. SWAPCA shall be notified at least three days  
23 in advance of any testing so that personnel may be present during testing. A minimum  
24 of three test runs shall be performed at a minimum of 500 MW gross to establish that



collected data is representative of normal operation. Compliance shall be determined by averaging the results of individual test runs. The results of required emissions testing shall be provided to SWAPCA by no later than 45 days following completion of testing. All gaseous emissions shall, as a minimum, be reported in parts per million by volume, pounds per hour, and pounds per million Btu of heat input. Emissions data shall be reported as corrected to 7% O<sub>2</sub>. The test report shall include a summary of operating conditions for each test run to include, as a minimum: (1) estimated heat input into furnace (MBtu/hr), (2) estimated fuel consumption rate (lb/hr), (3) air discharge flowrate in dry standard cubic feet, (4) exhaust temperature of emissions out the stack, (5) estimated sulfur content of coal, (6) estimated SO<sub>2</sub> reduction in percent, as a result of controls, and (7) unit load in megawatts on an hourly basis. Initial source testing of the SO<sub>2</sub> control system shall be completed no later than 90 days after demonstration of successful operation of that SO<sub>2</sub> technology.

43. THAT, Respondent shall submit quarterly emission reports by no later than the end of the month following the end of each calendar quarter of the calendar year. These reports shall contain, as a minimum, the following information:

- a. Total gallons of fuel oil burned in each boiler (Boiler #1, Boiler #2 and auxiliary boiler) and certification of sulfur content in fuel oil;
- b. Information required under 40 CFR 75;
- c. CEMS/DAHS data for NO<sub>x</sub> and SO<sub>2</sub> corrected to the units of measure and averaging times, including rolling averages, consistent with the emission limits established by this Order and applicable federal requirements. The date, time and measured oxygen content in percent shall be provided for each reported hourly value;



- d. Quarterly average CO concentrations for each boiler;
- e. Quarterly opacity excess emissions over 20%, if opacity monitoring is possible under stack conditions, otherwise report results of quarterly Method 9 test;
- f. Year to date totals for SO<sub>2</sub> emissions and average NO<sub>x</sub> emission rate for Units #1 and #2 under all operating conditions; and
- g. Estimated monthly average fuel heating values (Btu/lb) for coal burned in Boiler #1 and Boiler #2 to assist with periodic compliance checks.

#### **HSB 1257 TAX ABATEMENT REQUIREMENTS**

44. THAT, Respondent shall report progress to SWAPCA on meeting the requirements of House Substitute Bill (HSB) 1257 annually by June 1 of each year during the construction period of the SO<sub>2</sub> control equipment (both units) and then monthly after the SO<sub>2</sub> control equipment is operational. Such report shall contain sufficient data and/or documentation to demonstrate compliance with HSB 1257 for tax abatement purposes.

#### **VOLUNTARY EMISSION LIMIT**

45. THAT, the total annual fuel oil combusted in the auxiliary boiler shall not exceed 600,000 gallons per year. Consumption shall be reported quarterly to SWAPCA. The auxiliary boiler shall have a separate fuel meter to monitor the total amount of fuel it consumes in that boiler. Emissions of SO<sub>2</sub> from the auxiliary boiler shall be included in the 10,000 tons per year emission limit of Item 18. Emissions shall be calculated based on fuel consumption and fuel sulfur content.

#### **GENERAL PROVISIONS**

46. THAT, the owners of the Centralia Plant shall have sole discretion to select the control technology which complies with the emission limitations herein specified.



1 47. THAT, any physical changes of the boilers and draft systems, including fans for the  
2 purpose of installing NO<sub>x</sub> and SO<sub>2</sub> emissions control equipment, will not trigger New  
3 Source Performance Standards (NSPS) or BACT/PSD under New Source Review as a  
4 modification per 40 CFR 60.14(e), WAC 173-400-110, or SWAPCA 400-110. Any  
5 physical changes associated with the installation of pollution controls to meet the emission  
6 limitations of this Order shall not be major modifications because such changes are  
7 exempted for electric utility boilers in 40 CFR 52.21(b)(2)(iii)(h) from the Prevention of  
8 Significant Deterioration (PSD) program under WAC 173-400-141, SWAPCA 400-141,  
9 and 40 CFR 51 Subpart I and 40 CFR 52.21.

10 48. THAT, at all times, including periods of startup, shutdown, and malfunction, the plant  
11 shall, to the extent practicable, maintain and operate air pollution control equipment in  
12 a manner consistent with good air pollution control practice for minimizing emissions.  
13 Determination of whether acceptable operating and maintenance procedures are being used  
14 will be based on information available to SWAPCA which may include, but is not limited  
15 to, monitoring results, review of operating and maintenance procedures and records, and  
16 inspection of the source.

17 49. THAT, the emission limits and conditions of this Order supersede all previously issued  
18 Regulatory Orders including SWAPCA 90-934E.

19 50. THAT, the Centralia Plant shall submit an annual emission inventory to SWAPCA in  
20 accordance with SWAPCA 400-105.

21 51. THAT, this RACT Regulatory Order is subject to SWAPCA's authority to review and  
22 revise this Order pursuant to RCW 70.94.153 and 70.94.154 and shall not limit  
23 SWAPCA's authority under RCW 70.94 or other applicable federal and state laws and  
24 regulations.



1 52. THAT, if any provision of this Regulatory Order shall be declared invalid by any court  
2 of competent jurisdiction, all unaffected provisions shall remain in effect and be  
3 enforceable.

4 53. THAT, for the purpose of ensuring compliance with this Regulatory Order, duly  
5 authorized representatives of the Southwest Air Pollution Control Authority shall be  
6 permitted access to Respondent's premises and the facilities being constructed, owned,  
7 operated and/or maintained by Respondent during regular business hours for the purpose  
8 of inspecting said facilities. These inspections are required to determine the status of  
9 compliance with the terms of this Regulatory Order.

10 54. THAT, the provisions, terms and conditions of this Regulatory Order shall be deemed to  
11 bind Respondent, its officers, directors, agents, servants, employees, successors and  
12 assigns, and all persons, firms and corporations under or for it.

13 55. THAT, the requirements of this Order shall survive any transfer of ownership of the  
14 Centralia Plant or any portion thereof.

15 56. THAT, this Order does not supersede requirements of other agencies with jurisdiction and  
16 further, this Order does not relieve Respondent of any requirements of any other  
17 governmental agency. In addition to this Order, Respondent may be required to obtain  
18 other permits or approvals from other Agencies with jurisdiction.

19 57. THAT, compliance with this Order and its requirements does not relieve the Respondent  
20 from responsibility of compliance with Southwest Air Pollution Control Authority General  
21 Regulations for Air Pollution Sources, RCW 70.94, WAC Title 173 or any other  
22 applicable air contaminant emission control requirements, nor from the resulting liabilities  
23 and/or legal remedies for failure to comply.



1 58. THAT, the Centralia Plant shall provide annual written certification that the requirements  
2 of this Regulatory Order have been met. Certification of truth, accuracy and  
3 completeness shall be provided by a responsible official, as defined in WAC 173-401  
4 "Operating Permit Regulation", and shall be submitted with each report. This certification  
5 shall state that, "based on the information and belief formed after reasonable inquiry, the  
6 statements and information in the report are true, accurate and complete."

7 59. THAT, for good cause shown, SWAPCA may, in its discretion and after meeting any  
8 public involvement requirements under SWAPCA 400-171 and any other applicable law  
9 or regulation, modify or stay the project milestones, effective dates, or Order. A request  
10 to modify or stay the project milestones, effective dates, or Order should include an  
11 explanation of the reasons why the current project milestones, effective dates, or Order  
12 cannot be met, whether the reasons for the modification or stay were beyond the control  
13 of the Centralia Plant, what efforts were taken to avoid and/or mitigate the need for a  
14 modification or stay, and a proposed schedule that can be met.



1 60. THAT, this Order, once signed and issued, may be appealed pursuant to RCW  
2 43.21B.230. An appeal must be filed with the Pollution Control Hearings Board (PCHB)  
3 at PO Box 40903, Olympia, WA 98504-0903, and shall be served on SWAPCA within  
4 thirty (30) days from the date of the notice of this Order. This Order may also be  
5 appealed as provided in SWAPCA 400-250.

6 DATED this 26th day of February, 1998.



Reviewed by:

Paul T. Mairose, P.E.

Chief Engineer

11 EXPIRES: 08-4-98

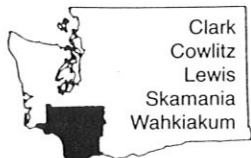
12 Approved by:

13 Robert D. Elliott

14 Executive Director

15 Southwest Air Pollution Control Authority





## Southwest Air Pollution Control Authority

1308 NE 134th Street • Vancouver, WA 98685-2747

(360) 574-3058 • Fax: (360) 576-0925

TDD Accessible

February 26, 1998

Mr. Richard C. Woolley, Plant Manager  
PacifiCorp  
913 Big Hanaford Road  
Centralia, WA 98531

Subject: Revised Final RACT Order for the Centralia Plant

Dear Mr. Woolley:

Enclosed is Regulatory Order to Establish RACT SWAPCA 97-2057R1 for the Centralia Plant in response to your RACT Submittal and subsequent Petition for Reconsideration. Final action was taken on this matter by the Board of Directors after the conclusion of a public hearing at its February 17, 1998 meeting. We have incorporated into this revised Regulatory Order comments from PacifiCorp and the public as noted in the attached Responsiveness Summary consistent with the action of the Board.

Based on the fact that more than 30 days time has passed since the notice to the public for the revision to this Regulatory Order was placed in the newspaper of record and approval has been granted by the Board of Directors, we are pleased to issue your final Regulatory Order to Establish RACT.

This Regulatory Order to Establish RACT may be appealed directly to the Pollution Control Hearings Board (PCHB) within 30 days from the date of this Order at P.O. Box 40903, Olympia, Washington 98504-0903 as provided in RCW 43.21B. This Order may also be appealed as provided in SWAPCA 400-250.

Thank you for your attention in this matter.

Sincerely,

Robert D. Elliott  
Executive Director

Enclosure

c: Doug Hardesty, Manager  
Federal & Delegated Air Programs Unit  
U.S. EPA Region X  
1200 6th Avenue, AT-082  
Seattle, WA 98101



RESPONSIVENESS SUMMARY

PETITION FOR RECONSIDERATION  
OF  
REASONABLY AVAILABLE CONTROL  
TECHNOLOGY (RACT) FOR NO<sub>x</sub>

SWAPCA 97-2057R1

FEBRUARY 26, 1998



GENERAL COMMENTS ON THE PETITION FOR RECONSIDERATION OF NO<sub>x</sub> LIMITATIONS

A. *PacifiCorp (Richard C. Woolley, February 13, 1998)*

1. Comment: We have reviewed your letter of January 15, 1998 and find the proposed language for the RACT Order acceptable. We ask that the SWAPCA Board approve this proposal at the February 17, 1998 meeting so that we may proceed with plans to comply with the order.

Response: SWAPCA recommended approval of the proposed language at the February 17, 1998 Board of Directors meeting.

B. *G.H. Bowers Engineering (Gregory H. Bowers, February 14, 1998)*

1. Comment: Pursuant to SWAPCA 400-250(1)(c), PacifiCorp's petition was refused if not acted on in 15 calendar days. If it was not acted upon, PacifiCorp's petition has been denied, and further proceedings should be halted.

Response: SWAPCA indicated its willingness to act upon the Petition for Reconsideration within the 15 calendar day time period. In late December 1997, SWAPCA communicated its willingness to meet with PacifiCorp representatives to discuss and act upon a resolution of their petition. This meeting was held on January 7, 1998. SWAPCA had drafted for that meeting proposed language that served as the basis for today's public hearing. The January 7th date is the day on which the 15 calendar day time period for a response from SWAPCA was required. SWAPCA believes that this provision has been satisfactorily met.

2. Comment: As I have already asserted in the ongoing appeal of SWAPCA 97-2057 to the Pollution Control Hearings Board, a NO<sub>x</sub> limit of 0.30 lb/million Btu is excessive. A limit of 0.35 lb/million Btu is only more excessive and more unacceptable. Economic and human health impacts mandate further reductions.

Response: SWAPCA does not agree that the proposed NO<sub>x</sub> emission limits are excessive or that economic and human health impacts mandate further reductions. SWAPCA's actions are resulting in improvements to the environment rather than the opposite as implied by this comment. The current NO<sub>x</sub> emission limit applicable to the Centralia Plant has been established at the national level as part of the Acid Rain Program under Title IV of the Federal Clean Air Act. The current limit is 0.45 lb/million Btu through an early election decision by PacifiCorp which decreases to 0.40 lb/million Btu in 2008. The NO<sub>x</sub> emission limits proposed in response to the PacifiCorp Petition for Reconsideration are significantly below the federal emission limit applicable to the Centralia Plant. For



high load operating conditions (i.e., greater than 50% load) under which the most tons of NO<sub>x</sub> are emitted, the applicable limit is still 0.30 lb/million Btu, two-thirds of the level mandated by the federal Acid Rain Program.

3. Comment: In years that the Centralia Plant frequently runs above the proposed 360 MW demarcation point, the proposed mechanism is ineffective; emissions in low load hours are effectively unrestricted. The proposed revision encompasses more than the hours in which a problem is claimed to exist with the proposed control mechanism and, unless neither unit operates at over 360 MW in some year, it does not set a fixed maximum limit on the claimed problem hours.

Response: SWAPCA does not agree that the proposed mechanism is ineffective and allows emissions in low load hours to be effectively unrestricted. It appears that this comment is suggesting that an emission limit for low load conditions should be restricted to just that condition. If SWAPCA used such an approach, we would have been consistent with the basis used by PacifiCorp's vendor in deriving 0.30 lb/million Btu and propose an emission limit of at least 0.37 lb/million Btu for only low load conditions (i.e., less than 50% load). SWAPCA concluded that a better outcome for the environment would be to impose a two tiered emission limit which requires that a NO<sub>x</sub> emission rate of 0.30 lb/million Btu be achieved for all gross loads of 360 MW or above, but that total annual average emissions not exceed 0.35 lb/million Btu for all hours of operation and load levels. PacifiCorp must comply with both of these emission limits, not just one or the other.

4. Comment: Enclosed is a publication titled, "Spatial and Temporal Patterns of Fine (PM<sub>2.5</sub>) Particles in Western Washington State," by Kevin D. Perry and Thomas A. Cahill, dated March 12, 1996.

Response: The document referenced above was not attached to the comment letter sent by facsimile to SWAPCA prior to the February 17, 1998 public hearing. However, the document was received later in the mail and reviewed by SWAPCA. Analysis presented in this document uses data from the PREVENT study, the validity of which SWAPCA has not assessed. Although different data reduction techniques such as principal component analysis are used to apportion fine aerosol mass, the results of this paper are consistent with those of the PREVENT report, which is referenced in the RACT Order Technical Support Document, and data analysis from the IMPROVE network. Therefore, there is no additional information that would support a change in the RACT conclusions.

5. Comment: It is my professional opinion that the fine particulate pollution to be allowed (and now possibly increased) under SWAPCA 97-2057 will cause the deaths of hundreds of souls. This impact is clearly established by existing data.



Response: SWAPCA's proposed action under SWAPCA 97-2057 and also under the petition response is going to significantly reduce any potential existing impacts which the Centralia Plant may be causing. Sulfur dioxide and nitrogen oxide emissions are going to be dramatically reduced at the Centralia Plant after compliance with SWAPCA 97-2057R1 is achieved. This outcome is consistent with the authority of SWAPCA to impose RACT.

#### COMMENTS RECEIVED AFTER THE CLOSE OF THE PUBLIC HEARING\*

A. *Northwest Environmental Advocates (Nina Bell, February 17, 1998)*

1. Comment: NWEA opposes SWAPCA's decision to allow nitrogen oxides (NO<sub>x</sub>) emissions from the Centralia Plant at an annual rate of 0.35 lbs/mmBtu. While NWEA is sensitive to concerns that PacifiCorp may not be able to meet the 0.30 lb/mmBtu rate initially established by SWAPCA in the RACT Order, NWEA believes that SWAPCA's preliminary determination to approve revisions to the RACT Order goes too far. As we understand the issue, PacifiCorp is concerned that at times when the Plant is operating at less than 360 MW, PacifiCorp will not be able to meet the 0.30 lb/mmBtu NO<sub>x</sub> annual emission rate. SWAPCA's preliminary resolution requires 0.30 lb/mmBtu annual rate for hours when Centralia is operating at 360 MW or greater and then allows 0.35 lb/mmBtu for all operating hours. NWEA suggests that SWAPCA could satisfy both PacifiCorp and NWEA by altering the second half of this requirement to allow PacifiCorp to operate the plant at an annual emission rate of 0.35 lb/mmBtu only when the plant is operating at less than 360 MW. In this way, SWAPCA will be able to address PacifiCorp's concerns regarding compliance during low operating periods and NWEA's concerns regarding human health and compliance with the federal CAA. Accordingly, NWEA suggests the following change in language to paragraph 30 of the preliminary determination: In proposed paragraph 30, line 6 strike the words "For all operating hours" and insert "For those hours when the plant's operating load is less than 360 MW."

Response: SWAPCA does not agree that the NO<sub>x</sub> emission rate should be revised such that the 0.35 lb/million Btu limit applies only for hours when operating loads are less than 360 MW. SWAPCA considered the potential emissions rates that would be appropriate for only those hours when operating loads are less than 360 MW, and concluded, based on vendor information on effectiveness at low-load conditions, that an emission rate of at least 0.37 lb/million Btu would have been consistent with the 0.30 lb/million Btu emission rate for 50% load and above. Therefore, a limit of 0.37 lb/million Btu would be appropriate for loads less than 360 MW. SWAPCA concluded, however, that its proposed two-tiered limit, with a maximum emission rate for all hours, would result in lower total emissions than if there were one emission limit of 0.37 lb/million Btu for low-load



conditions only and another limit of 0.30 lb/million Btu for high-load conditions only. As a final point, it should be emphasized that the Centralia Plant must comply with both emission limits, not just one or the other. For high-load hours--i.e., those hours with the most emissions--the Plant must meet the 0.30 lb/million Btu limit. For all hours--including low-load hours when fewer emissions are generated--the Plant must also meet the 0.35 lb/million Btu limit.

2. Comment: NWEA is also concerned about SWAPCA's preliminary determination regarding revision of the NO<sub>x</sub> emission limits based on actual control technology operation. Although NWEA recognizes SWAPCA's general authority over RACT Order decisions, NWEA cautions SWAPCA to remember that SWAPCA and other state and federal agency's have asked NWEA to use this forum to resolve issues that would otherwise be resolved in a RACT determination. As a result, NWEA asks that SWAPCA make clear in paragraph 33 that any changes it might make to the NO<sub>x</sub> emissions rate would comply with the limits expressed in the December 5, 1996 Final Collaborative Decision Making document. Without this express reservation in paragraph 33, SWAPCA can not assure NWEA that the Centralia Plant will meet the CAA's visibility requirements. NWEA suggests the following language to be added to paragraph 33: "Any modifications made pursuant to this paragraph will comply with limits discussed in the final Collaborative Decision Making document dated December 5, 1996."

Response: SWAPCA participated actively in the Collaborative Decision Making (CDM) process and remains committed to achieving the results of that process, including the efforts to reduce NO<sub>x</sub> emissions. The CDM target solution called for installation of low NO<sub>x</sub> burner modifications to meet an emission limit of 0.38 lb/million Btu, while the RACT Order establishes a two-tiered emission limit which requires more reduction of NO<sub>x</sub> emissions than did the CDM process. SWAPCA must, however, look to Washington's Clean Air Act in determining the requirements for RACT and in determining whether or not a revision to any RACT requirement is appropriate. SWAPCA does not agree that the RACT Order should expressly incorporate the suggested language because RACT regulations are the appropriate legal authority and the comment language is not as stringent as the established requirement.

3. Comment: NWEA again asks SWAPCA to incorporate language we provided in our November 17, 1998 comment letter on the Preliminary RACT Order regarding this Order's compliance with the CAA's visibility requirements. NWEA understands that SWAPCA believes that the language we provided is consistent with SWAPCA's position on the matter, but because the Board already voted to approve the other language, SWAPCA was unwilling to ask the Board to reconsider our suggested language changes. Now that the Board is in a position to reconsider other language changes, it seems reasonable to request that SWAPCA ask the Board to incorporate NWEA's language changes as well. To facilitate such changes, NWEA is resubmitting the language; asking SWAPCA to



replace paragraph 17 with the following language: "SWAPCA finds that, while no formal BART determination has been made, based on the requirements in this Order and documentation in the Technical Support Document, the proposed emissions limits in this RACT Order satisfy BART requirements under 40 CFR 51 Subpart P, WAC 173-400-151 and SWAPCA 400-151 for emissions of sulfur dioxide, particulate matter, and nitrogen oxides."

Response: SWAPCA does not consider NWEA's suggested language to be materially different from the language of the original RACT Order. The RACT Order clearly states that there has been no formal BART determination. Because of NWEA's concerns over possible precedential effects of the RACT Order, SWAPCA has agreed to make the following change to the RACT Order as a means of clarifying it.

Paragraph 17 is revised to delete the phrase "or exceeding" in the last line of the paragraph.

SWAPCA considers this change to be a minor clarification to the RACT Order and does not affect any substantive RACT requirement applicable to the Centralia Plant.

\* The public hearing was opened by the SWAPCA Board of Directors at approximately 3:30 p.m. and was closed at approximately 3:45 p.m. The NWEA comment letter was received by facsimile at SWAPCA's office at 4:01 p.m. and was then placed in the Executive Director's in-basket for mail and was not discovered by the Executive Director until 5:30 p.m. well after the Board of Directors had adjourned and left SWAPCA's office.



