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OCT 19 1992

Reply To
Attn Of: AT-082

Don L. Whitson
March Point Cogeneration Company
Post Office Box 1229
Anacortes, Washington 98221

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Re: New Source Performance Standards

Dear Mr. Whitson:

This letter is in response to your letter of September 22, 1992 with respect to New Source Performance Standards (NSPS) for Stationary Gas Turbines, Subpart GG.

As discussed in the September 17, 1992 letter to you from Ms. Ann Pontius, regulations for the NSPS require source testing and fuel gas monitoring to demonstrate compliance. I understand, through Ms. Olga Loera's conversation with Mr. Tom McMaster, that your facility has completed the required source tests and has submitted them to Northwest Air Pollution Control Agency (NWAPA). In addition, nitrogen oxide and sulfur dioxide continuous emission monitoring systems (CEMS) have been installed as a substitute for daily monitoring of nitrogen and sulfur in the fuel gas. The installation of these CEMS satisfies the NSPS requirements for daily fuel gas monitoring.

Therefore, the requirement for daily monitoring of nitrogen and sulfur content of the fuel being fired in the turbine is waived. This waiver is contingent upon the continued use of the nitrogen oxide and sulfur dioxide CEMS for monitoring the exhaust gases associated with the turbines.

If you have questions regarding this matter, please call me at (206) 553-4152. If your staff have questions, have them call Olga Loera at (206) 553-1817.

Sincerely,

Jim McCormick acting
for Jim McCormick, Director
Air and Toxics Division

cc: J. Randles, NWAPA



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

JUL 29 1994

OFFICE OF
AIR AND RADIATION

D.L. Whitson
March Point Cogeneration
P.O. Box 1229, 600 S Texas Rd
Anacortes, WA 98221

Dear Mr. Whitson:

The Acid Rain Division has received your request for an applicability determination for the March Point Cogeneration facility in Anacortes, Washington ("March Point") under 40 CFR Part §72.6(c). This letter represents EPA's official determination of applicability for March Point (ORISPL number 54268).

As described in your letter, the March Point facility is a qualifying facility (QF91-221) consisting of three combined cycle turbines. The facility is the subject of a June, 1989 power purchase agreement with Puget Sound Power & Light for 80 MWe and a second power purchase agreement in December, 1990 with Puget Sound. As of November 15, 1990, as documented by the building permit application, March Point was planned to have a total output capacity of approximately 140 MWe. The facility has an installed net output capacity of 140 MWe.

For the information above, I believe that the three units at the March Point facility are not affected under the Acid Rain Program. Section 405(g)(6) of the Act, implemented at 40 CFR §72.6, provides that qualifying facilities with power purchase commitments prior to November 15, 1990 are exempt from all requirements under Title IV. The implementing regulations require that the power purchase commitment(s), as of November 15, 1990, represent at least 15 percent of the total planned net output capacity. This condition is met by the MPCC-Puget Sound Power & Light June, 1989 agreement. However, the regulations limit the exempted facility to 130 percent of the total planned net output capacity. Thus, if more than 182 MWe of net output capacity is ever constructed at the facility, one or more units serving the capacity in excess of 182 MWe will become affected by the Acid Rain Program requirements. (See 40 CFR §72.6(b)(5)(ii).)



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This determination is based solely on the representations made in your letter of June 27, 1994. This determination is final Agency action and is appealable under 40 CFR part 78. Under the requirement of 40 CFR §72.6(c), you are required to send copies of this letter to each owner or operator of March Point. If you have further questions regarding the Acid Rain Program, please contact Kathy Barylski of my staff at (202) 233-9074.

Sincerely,

A handwritten signature in cursive script that reads "Brian J. McLean". The signature is written in dark ink and is positioned above the typed name and title.

Brian J. McLean, Director
Acid Rain Division