



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

June 26, 2000

G. Dwain Waters, QEP
Air Quality Programs Coordinator
Gulf Power
One Energy Place
Pensacola, Florida 32520

Dear Mr. Waters:

Subject: NOx Testing at the Pea Ridge Facility

Your May 9 letter described the proposed method for NOx testing of combustion turbines subject to Subpart GG of 40 CFR 60. The use of a dilution extractive stack sampling system for NOx and CO₂ is acceptable for conducting EPA Method 20. The moisture content of the stack gases shall be obtained using at least a one-hour run with EPA Method 4 or equivalent. The data should also be corrected to 15% oxygen using equation 20-5 from EPA Method 20.

Your letter also requested the use of RATA test data for the annual compliance test demonstration. In 40 CFR 60 Appendix B, Performance Specification 2, Section 7.1.2, there is a note which allows for the use of relative accuracy test data for performance testing purposes provided that the source test conditions are consistent with the applicable regulations. If this provision is not currently allowed by permit condition, or authorized by the Northwest District, you may request a permit amendment.

If you have further questions please contact me by E-mail
(martin.costello@dep.state.fl.us) or phone 850/921-9511.

Sincerely,

Martin Costello, P.E.
Emissions Monitoring Section

MC/mc
cc: R. Kriegel