



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

OFFICE OF  
AIR AND RADIATION

Tom Vaught  
Vice President Manufacturing Services  
Longview Fibre Company  
Longview, WA 98632

Dear Mr. Vaught:

This letter is U.S. EPA's official response to your April 20, 1998 letter in which you requested an applicability determination under the Acid Rain Program for a combustion turbine (CT) located at the Longview Mill cogeneration plant in Longview, Washington. Based on review of the information you have provided, EPA has determined that the CT is not an affected unit under the Acid Rain Program.

According to your April 20 letter and follow-up information submitted on August 11 and September 9 and by telephone, the Longview Fibre plant CT is a 65 MW combined-cycle, natural-gas fired combustion turbine that is used to produce electricity and steam for processes at the Longview Mill plant. (The exhaust from the CT is passed through a heat recovery steam generator and routed to the plant's high pressure mill steam system.) The unit was originally owned by Idaho Power Company who commenced commercial operation of the unit in 1974 and then used it as a peaking unit. In 1992, Longview Fibre Company purchased the unit from Idaho Power Company and moved it to the Longview Mill plant in Washington. The unit commenced operation at the Longview Mill plant in 1994.

At this time, Longview Fibre Company has no contracts to sell electricity generated by the CT nor are any contracts expected in the foreseeable future. However, Longview Fibre Company has in the past and may in the future sell contracted power. The CT is not currently and never has been auxiliary-fired.

Forty CFR 72.6(b)(1) provides that a simple combustion turbine that commenced commercial<sup>1</sup> operation before November 15,

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<sup>1</sup>Forty CFR 72.6(b)(1) actually uses the term "commenced operation"; however, this term is interpreted to mean commence commercial operation to make the provision consistent with the

1990 is not an affected unit subject to the requirements of the Acid Rain Program. A "simple combustion engine" is defined in 40 CFR 72.2 as a unit that is a rotary engine driven by a gas under pressure that is created by the combustion of any fuel. The term includes combined cycle units without auxiliary firing. A "unit" is defined as a fossil fuel-fired combustion device.

Because the CT fires natural gas, does not have auxiliary firing, and otherwise qualifies as a simple combustion turbine, and because it commenced commercial operation before November 15, 1990,<sup>2</sup> the CT meets the requirements of 40 CFR 72.6(b)(1). Therefore, it is not an affected unit under the Acid Rain Program. Note, however, that if the CT uses auxiliary firing in the future, it may become an affected unit subject to the Acid Rain Program requirements.

In your letter, you suggested other bases, e.g., the cogeneration provision in 40 CFR 72.6(b)(4), for concluding that the CT is an unaffected unit. Because the CT is an unaffected unit under 40 CFR 72.6(b)(1), the question of whether these additional bases for this conclusion apply is moot.

This determination is based on the representations in your letters of April 20, 1998, August 11, 1998, and September 9, 1998, and follow-up conversations with you, is made in reliance on the accuracy and completeness of those representations, and is appealable under 40 CFR part 78. If you have questions about this letter, please contact Donna Deneen at (202) 564-9089.

Sincerely,

/s/ (October 9, 1998)

Brian J. McLean, Director  
Acid Rain Division

cc: Elizabeth Waddell, US EPA Region X  
Marc Heffner, Department of Ecology, Industrial Section

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definitions of "existing unit" and "new unit" in section 402 of the Clean Air Act Amendments of 1990.

<sup>2</sup> The fact that the CT had a different owner when it commenced commercial operation and was located at a different site is not relevant under 40 CFR 72.6(b)(1).