

**TECHNICAL REVIEW DOCUMENT**  
**for**  
**OPERATING PERMIT 95OPFR076**

**MINOR MODIFICATION**

WestPlains Energy (Division of UtiliCorp United)  
**W N Clark Power Plant**  
Fremont County  
Source ID 0430003

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This document establishes the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered within the Operating Permit proposed for this site. It is designed for reference during review of the proposed permit by the EPA and during Public Comment. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

This is a small power plant in Cañon City, Colorado. The plant uses two old steam boilers that burn only coal. The plant currently is required to have a COM on only one of the boiler stacks.

When the plant operators started to develop procedures for the implementation of the permit requirements some difficulties with the permit requirements were identified. A major problem was created by the permit conditions defined for opacity observations for the boiler not equipped with a continuous opacity monitor. Permit Condition 1.7 required a visual observation of the emissions and a recording of the results during any of the special conditions of startup, fire building, cleaning of fire boxes, soot blowing, process modification and adjustment of control equipment. Condition 1.8 required the compliance with good air pollution control practices by a calculation to demonstrate an exceedance time of less than 0.8% of the total operating time. In order to accomplish the calculation, Condition 1.8 required a record of the type, date, start time and stop time of each and every special condition.

At time the permit was prepared, the special conditions were presumed to occur infrequently during boiler operation but might exist for an extended period of time. For example, it was presumed that the lack of natural gas or fuel oil burners could require fire building and startup to require one or more calendar days. Also, it was not made apparent from the application or the review comments that the plant was operated as a load following plant, which requires frequent adjustment of the boilers and associated control equipment in response to the demand for electricity.

As the boiler operators reviewed the permit conditions they determined that the requirement for

logging the special events was going to require extensive record keeping. Each calendar day of operation could include several adjustments of the control equipment in response to the load following operation of the plant, sonic removal of the soot from the superheater three (3) to six (6) times per hour, and a night time removal of the bottom ash from the boilers. The combination of the special events each day might result in the need to keep the stack without the opacity monitor under almost constant visual observation. That was not the Division's intent.

Since the date the permit was initially issued the Division has re-examined the Regulation No. 1 opacity provisions for coal-fired electric utility boilers as they apply to a boiler stack without an opacity monitor. The Division finds that the calculation procedure prescribed for the demonstration of good air pollution control practices is impractical for boilers not equipped with a continuous opacity monitor (COM). The permit was, therefore, modified to reflect that the Regulation No. 1 provisions for good air pollution control practices did not apply to Unit 55, the Unit without a COM.

The Conditions of the permit were modified to remove the requirement for recording the date, type, start time, stop time and duration for the special events for both boilers. The Conditions for Unit 55 were modified to require a Method 9 opacity observation each calendar week and when visible emissions are detected for at least an hour in time.

The modification was also used as an opportunity to incorporate updated permit language required by EPA, correct grammar errors detected, and improve the formatting of the document.