

MEMORANDUM

Date: April 15, 2020

Subject: Stakeholder Communications Regarding the COVID-19 Emergency

From: Jeremy Schreifels, EPA/OAR/OAP/CAMD/EMB

To: David Lifland, EPA/OAR/OAP/CAMD

I. Introduction

In March 2020, EPA analysts in the Clean Air Markets Division received several inquiries from power companies, consultants, data acquisition and handling system (DAHS) vendors, and state air agencies about alternate procedures for quality assurance (QA) activities required under 40 CFR part 75. Due to the public health emergency regarding COVID-19, travel and site-access restrictions are making it difficult for power companies to perform quality assurance activities. Some of these activities require third-party consultants to perform tests on site or state air agency personnel to approve and observe the activities. If the tests are not performed by deadlines established in part 75, the regulation requires power companies to replace the measured data with substitute data that get progressively more conservative (i.e., biased high) as more time passes. At its most conservative, the substitute data require power companies to report the maximum potential emissions.

II. Communications

EPA analysts received communications from the following organizations in March 2020:

Power companies and plant operators

- Southern Company
- Xcel Energy
- AES
- Calpine
- Black Hills Corporation
- Kansas City Board of Public Utilities
- Dairyland Power Cooperative
- Alliant Energy
- Consolidated Asset Management Services

Consultants

- All4Inc
- Trinity Consultants

DAHS vendors

- CEMTEK

States

- Pennsylvania Department of Environmental Protection

- Virginia Department of Environmental Quality

III. Summary of communications

The following topics were raised in the communications:

- Some power plants have restricted site access to key power plant personnel, meaning stack testing personnel will not be able to perform the required quality assurance activities by the deadlines specified in part 75. In addition, EPA and state air agency personnel will not be able to observe the quality assurance activities.
- Stack testing firms have notified plant operators that they are not performing stack tests at this time due to COVID-19 and, once they resume normal operations, will service power plants and facilities that were scheduled for testing in Q1 and Q2 2020 but was postponed due to COVID-19 before scheduling new tests.
- Some power plants may have difficulty procuring and/or accepting delivery of calibration gas cylinders, meaning power plant personnel will not be able to perform some required quality assurance activities after consuming their existing supply of calibration gases.
- Some state agencies are under shelter-in-place orders and/or are travel restrictions, meaning state air agency personnel may not be able to review and approve quality assurance activity plans nor to observe the quality assurance activities.
- Some laboratories that test fuel samples for sulfur content, density, and gross calorific value (GCV) have closed temporarily or stopped accepting new samples, meaning power plants will not be able to determine fuel quality required for part 75 reporting.

EPA staff responded that the Agency is aware of the difficulties performing the required quality assurance activities by the deadlines established in the regulation and is evaluating options to address the concerns.