42-001-00024

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RRI Energy

Writer's Direct Dial Number
724-235-4619

January 18, 2010

Mr. Jerome Curtin
Air Protection
U.S. EPA, Region III
3 AP12
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Mr. Curtin:

Subject: ***RRI Energy Wholesale Generation, LLC - Hunterstown Station, CT101, CT201 and CT301 40 CFR 60 Subpart GG Quarterly NO_x and SO_2 Exceedance Reports for, 4th Quarter 2009.***

Please find attached the subject quarterly NO_x and SO_2 exceedance reports. Please note that this report is intended to satisfy the requirements of 40 CFR 60 Subpart GG for CT101, CT201 and CT301. In addition the attached SO_2 excess emission statement is intended to meet both 40 CFR 60 Subpart GG and 40 CFR 60, Subpart Da requirements, since the Hunterstown Units also utilize Duct Burners (DB101, DB201 and DB301) as supplemental heat to each of the three corresponding heat recovery steam generators (HRSG).

PADEP is the administrator of the Hunterstown operating permit, in accordance with 40 CFR 60, Subpart Da, specifically (60.49a(j)) electronic quarterly NOx emission reports have been submitted to PADEP for this reporting quarter in the format specified by PADEP. There were no runback periods in this quarter as defined by the plan approval.

If you have any questions in regards to the attached reports, please contact Luke Beachler (724) 597-8058.

Sincerely,

Vincent J Brisini
Alternate Designated Representative Hunterstown Station
RRI Energy Wholesale Generation, LLC

Attachments

cc: PADEP Southcentral Regional Office
(Dave Gher)

Checklist of Attached Reports
RRI Energy Hunterstown LLC, SO_2 Exceedance Reporting For
40 CFR 60, Subpart Da and NO_x exceedance Reporting for 40 CFR 60, Subpart GG

In accordance with 40 CFR 60 Subpart GG and Da, the following hard copy reports are included with this submission.

Reporting Period Covered: 4th Quarter 2009

- ☒ Report 1 – NO_x Summary Report of Excess Emissions and hourly down time (4 hour rolling avg., Subpart GG)
- ☐ Report 2 – Excess Emissions Reason Report (Subpart GG)
  (Submitted only when Excess emissions are >1% of the operating time in the period. Part II, Line H. of Report 1)
- ☐ Report 3 - Data downtime Reason Report
  (Submitted only when Data Downtime is >5% of the operating time in the period. Part III, Line M. of Report 2)
- ☒ **Report 4 - SO_2 Excess Emissions Summary Report (Subparts GG and Da)**

Certification Statement

I certify that the information contained in this report is true, accurate and complete.

Vincent J Brisini
Alternate Designated Representative Hunterstown Station
RRI Energy Wholesale Generation, LLC

Signature

1/16/10

Date

Summary Report for 40 CFR 60
Sulfur Emissions

Company: RRI Energy Wholesale Generation, LLC – Hunterstown Station

Address: 1731 Hunterstown Road
Gettysburg, PA 17325

Reporting Period: 4th Quarter 2009

Process Units:
Combustion Turbine 101, Duct Burner 101, Combustion Turbine 201, Duct Burner 201, Combustion Turbine 301, Duct Burner 301

SO_2 Emission Limitations:
0.8% Sulfur (40 CFR 60.333) and 0.20 lb/mmbtu SO_2 (40 CFR 60.43a(b)(2)

Compliance Demonstration with alternate fuel monitoring, as approved by EPA Region III, on July 1, 2003:

I certify that the Process Units at RRI Energy Hunterstown, LLC, have only combusted Pipeline Natural Gas during this Reporting Period. Therefore by meeting the definition of Pipeline Natural Gas, as specified in the EPA Region III approved alternate fuel monitoring schedule, dated July 1, 2003, compliance with the SO_2 Emission Limitations has been demonstrated for this Reporting Period.

Name: Vincent J Brisini

Title: Alternate Designated Representative Hunterstown Station
RRI Energy Wholesale Generation, LLC

Signature: _____

Date: 1/18/10

CEMS Performance Summary

Company: Hunterstown
Address: 1890 Granite Station Road
Gettysburg, PA 17325

Source: CT101
Pollutant: CNOXISO (NOx in ppm - ISO Corrected) PPM
Interval: 4 Hour
Limit: 96.0

Report Period: 10/01/2009 00:00 Through 12/31/2009 23:59
Total Source Time in Report Period: 377.32 Hours
Time Online Criteria: 1 Minute(s)

Manufacturer:
Model Number:
Cert. Date:

Causes of CEMS Excess Emissions	Duration of Excess Emissions (Hours)	Percent of Operating Time
(default exceedance)	0.00	0.00
Changing Fuels	0.00	0.00
Control Equip. Malf.	0.00	0.00
Startup	0.00	0.00
Shutdown	0.00	0.00
Changing Operating Level	0.00	0.00
Clean Process Equip.	0.00	0.00
Clean Control Equip.	0.00	0.00
Normal Operation	0.00	0.00
Total (A+B+C+D+E+F+G)	0.00	0.00
Total duration of excess emission	**0.00**	**0.00**

Causes of CEMS Downtime	Duration of Downtime (Hours)	Percent of Operating Time
(default downtime)	0.00	0.00
Required Adjustment not made	0.00	0.00
Excess Drift Primary Analyzer	0.00	0.00
Excess Drift Ancillary Analyzer	0.00	0.00
Recalibration	4.98	1.32
Preventive Maintenance	0.00	0.00
Primary Analyzer Malfunction	0.00	0.00
Ancillary Analyzer Malfunction	0.00	0.00
Data Handling System Malfunction	0.00	0.00
Sample Interface Malfunction	0.00	0.00
Corrective Maintenance	0.00	0.00
Other	0.00	0.00
Total duration of downtime	**4.98**	**1.32**

CEMS Performance Summary

Company: Hunterstown
Address: 1890 Granite Station Road
Gettysburg, PA 17325

Source: CT201
Pollutant: CNOXISO (NOx in ppm - ISO Corrected) PPM
Interval: 4 Hour
Limit: 96.0

Report Period: 10/01/2009 00:00 Through 12/31/2009 23:59
Total Source Time in Report Period: 495.42 Hours
Time Online Criteria: 1 Minute(s)

Manufacturer:
Model Number:
Cert. Date:

Causes of CEMS Excess Emissions	Duration of Excess Emissions (Hours)	Percent of Operating Time
(default exceedance)	0.00	0.00
Changing Fuels	0.00	0.00
Control Equip. Malf.	0.00	0.00
Startup	0.00	0.00
Shutdown	0.00	0.00
Changing Operating Level	0.00	0.00
Clean Process Equip.	0.00	0.00
Clean Control Equip.	0.00	0.00
Normal Operation	0.00	0.00
Total (A+B+C+D+E+F+G)	0.00	0.00
Total duration of excess emission	**0.00**	**0.00**

Causes of CEMS Downtime	Duration of Downtime (Hours)	Percent of Operating Time
(default downtime)	0.00	0.00
Required Adjustment not made	0.00	0.00
Excess Drift Primary Analyzer	0.00	0.00
Excess Drift Ancillary Analyzer	0.00	0.00
Recalibration	4.70	0.95
Preventive Maintenance	0.00	0.00
Primary Analyzer Malfunction	0.00	0.00
Ancillary Analyzer Malfunction	0.00	0.00
Data Handling System Malfunction	0.00	0.00
Sample Interface Malfunction	0.00	0.00
Corrective Maintenance	0.00	0.00
Other	0.00	0.00
Total duration of downtime	**4.70**	**0.95**

CEMS Performance Summary

Company: Hunterstown
Address: 1890 Granite Station Road
Gettysburg, PA 17325

Source: CT301
Pollutant: CNOXISO (NOx in ppm - ISO Corrected) PPM
Interval: 4 Hour
Limit: 96.0

Report Period: 10/01/2009 00:00 Through 12/31/2009 23:59
Total Source Time in Report Period: 486.93 Hours
Time Online Criteria: 1 Minute(s)

Manufacturer:
Model Number:
Cert. Date:

Causes of CEMS Excess Emissions	Duration of Excess Emissions (Hours)	Percent of Operating Time
(default exceedance)	0.00	0.00
Changing Fuels	0.00	0.00
Control Equip. Malf.	0.00	0.00
Startup	0.00	0.00
Shutdown	0.00	0.00
Changing Operating Level	0.00	0.00
Clean Process Equip.	0.00	0.00
Clean Control Equip.	0.00	0.00
Normal Operation	0.00	0.00
Total (A+B+C+D+E+F+G)	0.00	0.00
Total duration of excess emission	**0.00**	**0.00**

Causes of CEMS Downtime	Duration of Downtime (Hours)	Percent of Operating Time
(default downtime)	0.00	0.00
Required Adjustment not made	0.00	0.00
Excess Drift Primary Analyzer	0.00	0.00
Excess Drift Ancillary Analyzer	0.00	0.00
Recalibration	6.88	1.41
Preventive Maintenance	0.00	0.00
Primary Analyzer Malfunction	0.00	0.00
Ancillary Analyzer Malfunction	0.00	0.00
Data Handling System Malfunction	0.00	0.00
Sample Interface Malfunction	0.00	0.00
Corrective Maintenance	0.00	0.00
Other	0.00	0.00
Total duration of downtime	**6.88**	**1.41**

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RRI Energy

Writer's Direct Dial Number
724-235-4619

October 27, 2009

Mr. Jerome Curtin
Air Protection
U.S. EPA, Region III
3 AP12
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Mr. Curtin:

Subject: ***RRI Energy Wholesale Generation, LLC - Hunterstown Station, CT101, CT201 and CT301 40 CFR 60 Subpart GG Quarterly NO_x and SO_2 Exceedance Reports for, 3rd Quarter 2009.***

Please find attached the subject quarterly NO_x and SO_2 exceedance reports. Please note that this report is intended to satisfy the requirements of 40 CFR 60 Subpart GG for CT101, CT201 and CT301. In addition the attached SO_2 excess emission statement is intended to meet both 40 CFR 60 Subpart GG and 40 CFR 60, Subpart Da requirements, since the Hunterstown Units also utilize Duct Burners (DB101, DB201 and DB301) as supplemental heat to each of the three corresponding heat recovery steam generators (HRSG).

PADEP is the administrator of the Hunterstown operating permit, in accordance with 40 CFR 60, Subpart Da, specifically (60.49a(j)) electronic quarterly NOx emission reports have been submitted to PADEP for this reporting quarter in the format specified by PADEP. There were no runback periods in this quarter as defined by the plan approval.

If you have any questions in regards to the attached reports, please contact Luke Beachler (724) 597-8058.

Sincerely,

Vincent J Brisini
Alternate Designated Representative Hunterstown Station
RRI Energy Wholesale Generation, LLC

Attachments

cc: PADEP Southcentral Regional Office
(Dave Gher)

Checklist of Attached Reports
RRI Energy Hunterstown LLC, SO_2 Exceedance Reporting For
40 CFR 60, Subpart Da and NO_x exceedance Reporting for 40 CFR 60, Subpart GG

In accordance with 40 CFR 60 Subpart GG and Da, the following hard copy reports are included with this submission.

Reporting Period Covered: 3rd Quarter 2009

- ☑ Report 1 – NO_x Summary Report of Excess Emissions and hourly down time (4 hour rolling avg., Subpart GG)

- ☐ Report 2 – Excess Emissions Reason Report (Subpart GG)
  (Submitted only when Excess emissions are >1% of the operating time in the period. Part II, Line H. of Report 1)

- ☐ Report 3 - Data downtime Reason Report
  (Submitted only when Data Downtime is >5% of the operating time in the period. Part III, Line M. of Report 2)

- ☑ **Report 4 - SO_2 Excess Emissions Summary Report (Subparts GG and Da)**

Certification Statement

I certify that the information contained in this report is true, accurate and complete.

Vincent J Brisini
Alternate Designated Representative Hunterstown Station
RRI Energy Wholesale Generation, LLC

Signature

October 26, 2009
Date

CEMS Performance Summary

Company: Hunterstown
Address: 1890 Granite Station Road
Gettysburg, PA 17325

Source: CT101
Pollutant: CNOXISO (NOx in ppm - ISO Corrected) PPM
Interval: 4 Hour
Limit: 96.0

Report Period: 07/01/2009 00:00 Through 09/30/2009 23:59
Total Source Time in Report Period: 1433.32 Hours
Time Online Criteria: 1 Minute(s)

Manufacturer:
Model Number:
Cert. Date:

Causes of CEMS Excess Emissions	Duration of Excess Emissions (Hours)	Percent of Operating Time
(default exceedance)	0.00	0.00
Changing Fuels	0.00	0.00
Control Equip. Malf.	0.00	0.00
Startup	0.00	0.00
Shutdown	0.00	0.00
Changing Operating Level	0.00	0.00
Clean Process Equip.	0.00	0.00
Clean Control Equip.	0.00	0.00
Normal Operation	0.00	0.00
Total (A+B+C+D+E+F+G)	0.00	0.00
Total duration of excess emission	**0.00**	**0.00**

Causes of CEMS Downtime	Duration of Downtime (Hours)	Percent of Operating Time
(default downtime)	0.00	0.00
Required Adjustment not made	0.00	0.00
Excess Drift Primary Analyzer	0.00	0.00
Excess Drift Ancillary Analyzer	0.00	0.00
Recalibration	0.00	0.00
Preventive Maintenance	0,00	0.00
Primary Analyzer Malfunction	0.00	0.00
Ancillary Analyzer Malfunction	0.00	0.00
Data Handling System Malfunction	0.00	0.00
Sample Interface Malfunction	0.00	0.00
Corrective Maintenance	0.00	0.00
Other	0.00	0.00
Total duration of downtime	**0.00**	**0.00**

CEMS Performance Summary

Company: Hunterstown
Address: 1890 Granite Station Road
Gettysburg, PA 17325

Source: CT201
Pollutant: CNOXISO (NOx in ppm - ISO Corrected) PPM
Interval: 4 Hour
Limit: 96.0

Report Period: 07/01/2009 00:00 Through 09/30/2009 23:59
Total Source Time in Report Period: 1405.30 Hours
Time Online Criteria: 1 Minute(s)

Manufacturer:
Model Number:
Cert. Date:

Causes of CEMS Excess Emissions	Duration of Excess Emissions (Hours)	Percent of Operating Time
(default exceedance)	0.00	0.00
Changing Fuels	0.00	0.00
Control Equip. Malf.	0.00	0.00
Startup	0.00	0.00
Shutdown	0.00	0.00
Changing Operating Level	0.00	0.00
Clean Process Equip.	0.00	0.00
Clean Control Equip.	0.00	0.00
Normal Operation	0.00	0.00
Total (A+B+C+D+E+F+G)	0.00	0.00
Total duration of excess emission	**0.00**	**0.00**

Causes of CEMS Downtime	Duration of Downtime (Hours)	Percent of Operating Time
(default downtime)	0.00	0.00
Required Adjustment not made	0.00	0.00
Excess Drift Primary Analyzer	0.00	0.00
Excess Drift Ancillary Analyzer	0.00	0.00
Recalibration	9.23	0.66
Preventive Maintenance	0.00	0.00
Primary Analyzer Malfunction	0.00	0.00
Ancillary Analyzer Malfunction	0.00	0.00
Data Handling System Malfunction	0.00	0.00
Sample Interface Malfunction	0.00	0.00
Corrective Maintenance	0.00	0.00
Other	0.00	0.00
Total duration of downtime	**9.23**	**0.66**

CEMS Performance Summary

Company: Hunterstown
Address: 1890 Granite Station Road
Gettysburg, PA 17325

Source: CT301
Pollutant: CNOXISO (NOx in ppm - ISO Corrected) PPM
Interval: 4 Hour
Limit: 96.0

Report Period: 07/01/2009 00:00 Through 09/30/2009 23:59
Total Source Time in Report Period: 1406.55 Hours
Time Online Criteria: 1 Minute(s)

Manufacturer:
Model Number:
Cert. Date:

Causes of CEMS Excess Emissions	Duration of Excess Emissions (Hours)	Percent of Operating Time
(default exceedance)	0.00	0.00
Changing Fuels	0.00	0.00
Control Equip. Malf.	0.00	0.00
Startup	0.00	0.00
Shutdown	0.00	0.00
Changing Operating Level	0.00	0.00
Clean Process Equip.	0.00	0.00
Clean Control Equip.	0.00	0.00
Normal Operation	0.00	0.00
Total (A+B+C+D+E+F+G)	0.00	0.00
Total duration of excess emission	**0.00**	**0.00**

Causes of CEMS Downtime	Duration of Downtime (Hours)	Percent of Operating Time
(default downtime)	0.00	0.00
Required Adjustment not made	0.00	0.00
Excess Drift Primary Analyzer	0.00	0.00
Excess Drift Ancillary Analyzer	0.00	0.00
Recalibration	3.00	0.21
Preventive Maintenance	0.00	0.00
Primary Analyzer Malfunction	0.00	0.00
Ancillary Analyzer Malfunction	0.00	0.00
Data Handling System Malfunction	0.00	0.00
Sample Interface Malfunction	0.00	0.00
Corrective Maintenance	0.00	0.00
Other	0.00	0.00
Total duration of downtime	**3.00**	**0.21**

Summary Report for 40 CFR 60
Sulfur Emissions

Company: RRI Energy Wholesale Generation, LLC – Hunterstown Station

Address: 1731 Hunterstown Road
Gettysburg, PA 17325

Reporting Period: 3rd Quarter 2009

Process Units:
Combustion Turbine 101, Duct Burner 101, Combustion Turbine 201, Duct Burner 201, Combustion Turbine 301, Duct Burner 301

SO_2 Emission Limitations:
0.8% Sulfur (40 CFR 60.333) and 0.20 lb/mmbtu SO_2 (40 CFR 60.43a(b)(2)

Compliance Demonstration with alternate fuel monitoring, as approved by EPA Region III, on July 1, 2003:

I certify that the Process Units at RRI Energy Hunterstown, LLC, have only combusted Pipeline Natural Gas during this Reporting Period. Therefore by meeting the definition of Pipeline Natural Gas, as specified in the EPA Region III approved alternate fuel monitoring schedule, dated July 1, 2003, compliance with the SO_2 Emission Limitations has been demonstrated for this Reporting Period.

Name: Vincent J Brisini

Title: Alternate Designated Representative Hunterstown Station
RRI Energy Wholesale Generation, LLC

Signature: _____

Date: October 26, 2009