

CLEAN AIR ACT STATIONARY SOURCE INSPECTION FINDINGS, ALLEGED VIOLATIONS AND PROPOSED PENALTY FORM

Table 1 - Inspection Information	
Inspection/ Report Finalized Date:	Docket Number:
January 28, 2020	C A A - 0 1 - 2 0 2 1 - 0 0 7 4
Respondent Address:	Facility Name(s):
2 Mechanic Street	Green Mountain Power Corporation
City:	Inspector(s) Name(s):
Vergennes	Darren Fortescue
State:	EPA Delegated Official:
VT	James Chow
Zip Code:	EPA Attorney Contact(s):
05491	Tom Olivier, (617) 918-1737
Respondent Name:	
Green Mountain Power Corporation	

Table 2 – Alleged Violations
<p>Green Mountain Power Corporation (“GMP”) operates two General Motors Corporation, Electro-Motive Division, compression ignition (“CI”), 2,700 brake horsepower, reciprocating internal combustion engines (“RICE”).</p> <p>Units 5 and 6 are fitted with oxidation catalysts for the purpose of limiting or reducing carbon monoxide (“CO”) emissions. Units 5 and 6 do not meet the definitions of emergency stationary RICE or black start engines. See 40 C.F.R. § 63.6675. Units 5 and 6 have been operated for less than 100 hours per year, for the years 2014 through 2019, and meet the definition of limited use stationary RICE. See 40 C.F.R. § 63.6675</p> <p>Units 5 and 6 are affected sources under 40 C.F.R. Part 63, Subpart ZZZZ (“Subpart ZZZZ”) and subject to the provisions for existing, non-emergency, non-black start, limited use, stationary, CI RICE, greater than 500 horsepower, located at an area source of hazardous air pollutants. See 40 C.F.R. § 63.6590(a)(1)(iii). The Subpart ZZZZ compliance deadline for Units 5 and 6 was May 3, 2013. See 40 C.F.R. § 63.6595(a).</p> <p>EPA alleges that GMP violated the following Subpart ZZZZ provisions:</p> <ol style="list-style-type: none"> 1. Forty C.F.R. § 63.6640 by failing to either: <ol style="list-style-type: none"> a. Collect the catalyst inlet temperature data for Units 5 and 6, either as required by 40 C.F.R. § 63.6625(b), reduce the temperature data to 4-hour rolling averages, maintain the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature and demonstrate once per month that the pressure drop across the catalyst is

CAA Stationary Source GMP Inspection Findings, Alleged Violations and Proposed Penalty

- within the operating limitation established during the performance test for Units 5 and 6;
or
- b. Request to use alternative monitoring procedures as allowed under 40 C.F.R. § 63.8(f)(4).
2. Forty C.F.R. §§ 63.6625(b) by not preparing a Site-specific Monitoring Plan (“SSMP”) required for Units 5 and 6.
 3. Forty C.F.R. §§ 63.6620(i), 63.6645 and 63.9(h) by failing to submit to EPA a Notification of Compliance Status (“NOCS”) and Average Percent Load Report for Units 5 and 6.
 4. Forty C.F.R. § 63.6650 by not submitting semiannual compliance reports for Units 5 and 6.

Table 3 - Penalty and Required Corrective Action	
Penalty	\$28,800
Required Corrective Action	Establish compliance with 40 C.F.R. Part 63, Subpart ZZZZ.