

Transmittal (GHE322)

November 4, 2019

Mr. Kyle Overton  
Energy Facility Siting Specialist  
Energy Facility Site Evaluation Council  
P.O. Box 47250  
Olympia, WA 98504-7250

**RE: EFSEC 2001-01, Prevention of Significant Deterioration Amendment 4 (PSD 4), Source Evaluation and Relative Accuracy Test Audits (RATA)**

Dear Mr. Overton:

Robert Moody of the Olympic Region Clean Air Agency (ORCAA) conducted a review of our March 2019 RATA submittal and brought to our attention that the NH<sub>3</sub> Analyzer (lb/hr) results for Gas Turbine 2 did not meet the performance standards in PPS-001.

We re-evaluated the March 2019 RATA data and discovered two issues. The issues are as follows:

1. The natural gas analysis in the original RATA report yielded results that are not representative of the natural gas burned at Grays Harbor.
2. The 1-minute GCV values, used in the DAHS for the RATA test run emissions calculations, had not been updated to reflect the GCV value measured in the sample collected during the month of March.

The natural gas sample results were not representative because the sample showed elevated concentrations of Oxygen and Nitrogen, indicating that the sample was diluted. This belief is further supported by the methane concentration and associated GCV value being much lower than what is traditionally measured and used at Grays Harbor on a monthly basis.

For the 1-minute CEMS emissions data, reported in the RATA runs, the DAHS was using a GCV value of 1097 Btu/SCF. The GCV value measured during the month of March was 1077 Btu/SCF. The hourly values had been updated to 1077 but the 1077 value did not trickle down to the 1-minute values and the associated 1-minute emissions calculations.

As a result of the above, the Reference Method lb/hr calculations in the report were revised and are now based on the GCV value measured by Grays Harbor during the month of March, as was specified in Section 3.1.5 of the test protocol. Likewise, the 1-minute GCV values were updated in the DAHS and the CEMS emissions reports for each test run were regenerated.

Attached is a revised RATA report reflecting those changes. We ask that you review and assess RATA compliance based on the revised report (enclosed) and not the report that was previously submitted.

If you have any questions or if you require any additional information, please feel free to call me at 360-482-6292 or via email at [EPace@invenergyllc.com](mailto:EPace@invenergyllc.com).

Sincerely,



Eric Pace  
Plant Engineer

Cc: Mr. Robert Moody, Compliance Manager  
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