

## Question 24.12

**Topic:** Use of Default NO<sub>x</sub> Emission Factor

**Question:** Our company is building a new combined-cycle gas turbine, which is subject only to the Acid Rain Program. We want to operate the turbine in the simple cycle mode for several months while the Heat Recovery Steam Generator (HRSG) is being built. We intend to use a CEMS to monitor NO<sub>x</sub> emissions from the HRSG stack, only.

May we use a default emission factor for NO<sub>x</sub>, while the HRSG is being constructed since the NO<sub>x</sub> CEMS will reside on a stack that will not be available until the HRSG is finished?

**Answer:** Yes. However, note that such reporting will only be necessary if the period of simple cycle operation extends beyond the CEMS certification deadline specified in § 75.4 (b)(2) -- since you must begin reporting NO<sub>x</sub> emissions data if the NO<sub>x</sub> CEMS has not been certified by the deadline (see § 75.64 (a)). For a new Acid Rain Program unit, the certification deadline is 90-unit operating days or 180 calendar days (whichever occurs first) from the date on which the unit commences commercial operation.

If simple cycle operation extends beyond the CEMS certification deadline, report the maximum potential NO<sub>x</sub> emission rate (MER) for each unit operating hour until the CEMS is certified. Determine the MER in accordance with Section 2.1.2.1(b) of Appendix A, and report this value, using a Method of Determination Code (MODC) of "12".

**References:** § 75.4(b)(2), § 75.64(a); Appendix A, Section 2.1.2.1(b)

**History:** First published in October 1999 Revised Manual; revised in October 2003 Revised Manual; revised in 2013 Manual