



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
AIR AND RADIATION

Janice McElvain
IES Utilities Inc.
300 Sheridan Ave.
Centerville, IO 52544

Dear Ms. McElvain:

I am responding to your June 15, 1994 letter to Jon Knodel requesting clarification regarding the combustion turbines at Burlington Generating Station. This letter represents EPA's official determination of applicability for Burlington Combustion Turbines 1, 3, 3, and 4. (ORISPL 1104)

As described in your letter, the Burlington Combustion Turbines are turbines that originally commenced commercial operation in 1970 as Rotterdam turbines G13, G15, G17, and G18 as part of the Niagara Mohawk power system. The turbines were purchased by Iowa Southern Utilities in 1991. From your discussions with Kathy Barylski, I understand that EPA was informed of the purchase and move of the turbines in 1992 and that IES filed Department of Energy, Energy Information Administration forms using the new names, ORISPL, and new operation date for the turbines.

Although our guidance, "Do the Acid Rain SO₂ Regulations Apply to You?" recommends not changing the name and commencement date of moved units, I understand that IES Utilities took these actions long before the guidance was issued. The purpose of the guidance was to improve the ability to track turbines that have been moved.

As you have certified, the four Burlington Combustion Turbines are the same turbines as were used at the Rotterdam facility. These turbines originally commenced commercial operation in 1970. Thus, the turbines are unaffected by the Acid Rain requirements due to §72.6(b)(1).

This determination is based solely on the representations made in your letter and attachments of June 15, 1994. According to 40 CFR 72.6(c)(5), this decision may be appealed under 40 CFR part 78. Under the requirement of 40 CFR §72.6(c), you are required to send copies of this letter to each owner or operator of the Burlington Combustion Turbines. If you

have further questions regarding the Acid Rain Program, please contact Kathy Barylski of my staff at (202) 233-9074.

Sincerely,

/s/ (December 20, 1994)

Brian J. McLean, Director
Acid Rain Division