

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 7

11201 Renner Boulevard Lenexa, Kansas 66219

October 21, 2021

Ms. Emily Vsetecka, P.E. Manager, Environmental & Laboratory Services Sunflower Electric Power Corporation 2440 Holcomb Lane P.O. Box 430 Holcomb, Kansas 67851-0430

Dear Ms. Vsetecka:

This letter is in response to your request dated September 15, 2021, to waive the stack test requirement for particulate matter (PM) and hydrogen chloride (HCl) at Holcomb Station Unit 1 to demonstrate that the unit continues to meet the low emitting EGU (LEE) eligibility requirements in 40 CFR 63.10005(h). The Mercury and Air Toxics Standard (40 CFR Part 63 Subpart UUUUU) requires testing once every 3 years for this demonstration. At least 1,050 calendar days, measured from the test's end date, must separate performance tests. 40 CFR 63.10006(f)(1).

Holcomb Unit 1 was tested for PM and HCl on February 13, 2019. Therefore, the next test would have been required between December 29, 2021, and February 13, 2022. Instead, the unit was tested on July 21, 2021, which is 890 days after the previous test. Testing was performed early to coordinate the test mobilization with other required performance tests at the unit and to coincide with a time period more likely to accommodate the routine operation of the unit. Results from this test shows compliance with the PM and HCl emission limits and that the unit would continue to meet the LEE eligibility requirements.

Therefore, we are using our delegated authority in 40 CFR 63.7(h) to waive the requirement for the test that would have been required between December 29, 2021, and February 13, 2022, provided that the July 21, 2021, PM and HCl tests are treated as the compliance test. The test for the next 3-year demonstration should be completed 1,050 calendar days to 3 years from the July 21, 2021, test unless the MATS rule is revised to provide for a different time frame.



If you have any further questions regarding this test waiver, please contact Mr. Ward Burns at (913) 551-7960.

Sincerely,

Digitally signed by Algoe-Eakin, Amy Date: 2021.10.21 07:32:55 -05'00'

Amy Algoe-Eakin Chief Air Permitting and Standards Branch Air and Radiation Division

cc: Ms. Connie Ellis, KDHE