

December 1, 2004

Mr. Vincent J. Brisini
Alternate Designated Representative
Reliant Energy
121 Champion Way
Canonsburg, Pennsylvania 15317

Dear Mr. Brisini:

This is in response to your November 19, 2004 letter requesting EPA approval of your use of the rectangular duct wall effects conditional test method (CTM-041). You have provided all of the required information to begin using the correction factor on January 1, 2004 on the power plant and associated unit and stacks/ducts in the attached table, provided that you perform CTM-041 in calendar year 2004.

Your wall effects adjusted data will be considered valid quality-assured data, retroactive to the start date and time of the rectangular duct wall effects adjustment, provided that: (1) all other Part 75 requirements are met; and (2) you do not adjust the rectangular duct cross-sectional area to account for any build-up of particulate matter or other material in the bottom of the duct when calculating stack gas volumetric flow.

We recommend that you follow the updated EDR reporting instructions dated July 1, 2004 available at the following internet address: www.epa.gov/airmarkets/monitoring, and scroll to "Rectangular Duct Wall Effects" under Monitoring Guidance for All Programs, and that you run your EDR reports through the MDC software tool available at the same web site prior to submitting the EDRs to EPA. A spreadsheet to calculate rectangular duct wall effects is also available at the same web site. If you have any questions or concerns about this matter, please contact John Schakenbach of my staff at 202-343-9158 or at (schakenbach.john@epa.gov).

Sincerely,

/s/

Reynaldo Forte, Chief
Emissions Monitoring Branch

Attachment

cc: John Schakenbach, EPA, CAMD, EMB
Louis Nichols, EPA, CAMD, EMB
Cindy Walke, EPA, CAMD, MOB
Cecilia Mijares, EPA Region V
Todd Brown, Ohio EPA

Attachment

Plant	Unit/Stack ID	ORISPL	Start Date/Time
Avon Lake	Unit 10	002836	1/1/2004 / 0000