



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

March 29, 2004

OFFICE OF  
AIR AND RADIATION

Mr. Robert A. Fenech  
Designated Representative  
Consumers Energy  
1945 W. Parnall Road  
Jackson, MI 49201-2277

Dear Mr. Fenech:

This is in response to your March 18, 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 four power plants and associated units and stacks/ducts in the attached table. We understand that the wall effects testing may not be completed by the end of the first quarter and therefore may not be reflected in the quarterly electronic data report (EDR) for the first quarter of 2004. You may resubmit the first quarter EDRs for those units that are tested after the first quarter.

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.

Once your testing is completed, we recommend that you follow the EDR reporting instructions available at the following internet address:

[www.epa.gov/airmarkets/monitoring/rectangularductwalleffects/rectangularwalleffects.html](http://www.epa.gov/airmarkets/monitoring/rectangularductwalleffects/rectangularwalleffects.html)

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](mailto:schakenbach.john@epa.gov)).

Sincerely,

/s/

Reynaldo Forte, Chief  
Emissions Monitoring Branch

Attachment

cc: Louis Nichols, EPA, CAMD, EMB/MOB

