October 16, 2006

Jesse Locklar, Jr.
Authorized Account Representative
Dominion Energy Services Company, Inc.
Morgantown Energy Facility
555 Beechurst Avenue
Morgantown, WV 26505

Re: Use of Single-load Flow RATAs to Quality-Assure Ozone Season Data at the Morgantown Energy Facility (Facility ID (ORISPL) 10743)

Dear Mr. Locklar:

The purpose of this letter is to notify you that EPA is treating recent telephone conversations between your staff and EPA staff during the week of August 14, 2006 as a petition to use single-load relative accuracy test audits (RATAs) of the flow monitor installed at Morgantown Energy Associates' Morgantown Energy Facility to validate the data recorded by the monitor during the 2004, 2005 and 2006 ozone-seasons, instead of using missing data substitution. EPA approves the petition, with conditions, as discussed below.

Background

Morgantown Energy Associates (MEA) owns two fluidized bed combustion units, Units CFB1 and CFB2, which are located at the Morgantown Energy Facility in Morgantown, West Virginia. The units are operated by Dominion Energy Services Company, Inc. According to MEA, Units CFB1 and CFB2 are subject to the NO_x Budget Trading Program. Therefore, MEA is required to monitor and report NO_x mass emissions and heat input for these units, in accordance with Subpart H of 40 CFR Part 75.

The monitoring plan for the unit indicates that Units CFB1 and CFB2 share a common stack. To meet the emission monitoring requirements of Part 75, MEA has installed and certified NO_x-diluent and flow rate continuous emission monitoring systems (CEMS) at the common stack (which is known as CS1) to measure the hourly NO_x emission rates, in lb/mmBtu, and the hourly heat input rates, in mmBtu/hr. For each operating hour, the NO_x mass emissions are calculated as the product of the NO_x emission rate and heat input rate, using Equation F-24 in Appendix F of Part 75.

The monitoring plan further indicates that MEA has elected to report NO_x mass emissions for these units only during the ozone season, i.e., from May 1 through September 30. According to §75.74(c), when the ozone season-only reporting option is selected, certain quality-assurance (QA) tests of the monitoring systems are required prior to the ozone season,

and certain other QA tests are required inside the ozone season.

It has come to EPA's attention that the flow monitoring system installed on CS1 has not met all of the quality-assurance test requirements for the 2004, 2005 and 2006 ozone seasons. In particular, the requirement of §75.74(c)(2)(ii)(C) to perform a 2-load RATA of the flow monitoring system prior to the ozone season has not been met. In 2004, 2005, and 2006, the pre-season flow RATAs were done at only one load level.

MEA indicated to EPA that it misunderstood the flow monitor QA requirement in §75.74(c)(2)(ii)(C) for ozone season-only reporters. The source of the misunderstanding centers around a provision in section 2.3.1.3(c)(3) of Appendix B to Part 75. That section allows single-load flow RATAs to be performed in lieu of the 2-load tests if the unit has operated within one load range (i.e., low, mid, or high) for at least 85 percent of the time since the previous annual flow RATA.

In all of the aformentioned instances in which MEA performed single-load flow RATAs instead of 2-load tests, the 85 percent criterion was met, and in every case MEA submitted the results of the load analyses, in the quarterly reports required under §75.64, to document that the units qualified for the reduced testing requirement. However, MEA was apparently unaware that the single-load flow RATA option is not available to sources that report data on an ozone season-only basis.

The QA provisions in Appendix B of Part 75 were written for Acid Rain Program sources, all of which are required to report emissions data year-round. The concept of ozone season-only reporting was first introduced into Part 75 in 1998, the year in which the EPA Administrator issued the NO_x SIP Call, requiring states in the Eastern U.S. to reduce their sources' NO_x emissions during the ozone season (i.e., from May through September). In response to the NO_x SIP Call, EPA added a new Subpart H to Part 75 (i.e., §§75.70-75.75), containing monitoring, recordkeeping and reporting provisions for NO_x mass emissions. Subpart H has since been adopted for use under the NO_x Budget Program.

Section 75.74 specifies the annual and ozone season monitoring and reporting requirements for sources in the NO_x Budget Trading Program. Paragraph (b) of §75.74 allows sources (such as the Morgantown facility) that are not in the Acid Rain Program and for which year-round NO_x mass reporting is not otherwise required to report year-round to report NO_x mass emissions data on an ozone season-only basis. When a qualifying source elects to use the ozone season-only reporting option and uses CEMS to meet the Part 75 monitoring requirements, the CEMS data must be quality-assured according to §§75.74(c)(1) through (c)(3).

Section 75.74(c)(1) states that "[e]xcept where otherwise noted, the provisions of paragraphs (c)(2) and (c)(3) of this section apply instead of the quality assurance provisions in sections 2.1 through 2.3 of appendix B to this part, and shall be used in lieu of those appendix B provisions." In other words, ozone season-only reporters are not to follow the QA provisions of Appendix B unless otherwise specified in §§75.74(c)(2) or (c)(3). MEA's apparent misunderstanding of this provision resulted in a misinterpretation of the QA requirements for

ozone season-only reporters.

For flow monitors, the RATA load-level requirements in §75.74(c)(2)(ii)(C) for ozone season-only reporters are basically the same as the load level requirements in section 2.3 of Appendix B for year-round reporters, with one notable exception. Section 2.3.1.3(c)(3) of Appendix B allows the use of load data from the past year to justify performing this year's annual flow RATA at a single load instead of two loads. However, this single-load flow RATA provision is not found in §75.74(c)(2)(ii)(C). Therefore, consistent with §75.74(c)(1), the single-load RATA option is not available to ozone season-only reporters.

EPA's Determination

EPA conditionally approves MEA's request to use single-load flow RATAs to quality-assure the flow rate data for the 2004, 2005 and 2006 ozone seasons at the Morgantown Energy Facility.

EPA is granting this as a one-time exception to the QA requirements of §75.74(c)(2)(ii)(C), for the following reasons. First, as shown in Table 1, below, all of the single-load flow RATAs reported by MEA in 2004, 2005, and 2006 met the 85 percent criterion in section 2.3.1.3(c)(3) of Appendix B for year-round reporters. Second, in 2003, for the initial certification of the flow monitor in question, MEA performed a 3-load RATA. Third, the flow monitor has been quality-assured by means of daily calibration error tests, daily interference checks, and quarterly flow-to-load ratio tests during each ozone season since 2003. Taken together, these considerations provide reasonable assurance of the quality of the data generated by the flow monitor in the 2004, 2005, and 2006 ozone seasons. Finally, EPA notes that the Agency's Monitoring Data Checking (MDC) software, which is used to provide sources with feedback on the quality-assurance (QA) status of the emissions data each quarter, did not flag any of MEA's single-load RATAs as invalid. Rather, the feedback reports consistently indicated that the QA status of the flow rate data was acceptable. EPA is taking steps to correct this flaw in the MDC programming.

Table 1. Flow RATA History at Morgantown Energy

Facility	**Stack ID**	**2004 Flow RATA**		**2005 Flow RATA**		**2006 Flow RATA**	
		No. of Loads Tested	% of Data in One Load Band[1]	No. of Loads Tested	% of Data in One Load Band[1]	No. of Loads Tested	% of Data in One Load Band[1]
Morgantown Energy	CS1	1	100.0	1	99.3	1	99.7

[1] In order to qualify for a single-load flow RATA, at least 85.0 percent of the operating loads since the previous annual flow RATA must be within a single load band (low, mid, or high). Use of this single-load RATA provision is normally restricted to year-round reporters.

Therefore, for the purposes of quality-assuring the 2004, 2005, and 2006 ozone season NO_x mass emissions and heat input data for Morgantown Energy, EPA conditionally approves the use of the single-load flow RATAs performed at the facility in 2004, 2005, and 2006. As a

condition of this approval, starting in 2007, MEA shall perform 2-load and 3-load flow RATAs at this facility, as required by §75.74(c)(2)(ii)(C). Single-load flow RATAs will no longer be accepted for this facility unless MEA switches from ozone season-only reporting to year-round reporting.

Please be advised that this is a one-time waiver of the QA requirements of §75.74(c)(2)(ii)(C) and applies only to the 2004, 2005, and 2006 ozone seasons. In 2007 and beyond, as long as MEA continues to report on an ozone season-only basis, EPA expects the QA test requirements for that reporting option to be fully met for the Morgantown Energy Facility. Otherwise, missing data substitution will be required, without exception. If you have any questions about this determination, please contact Robert Vollaro at (202) 343-9116. Thank you for your continued cooperation.

Sincerely,

/s/
Sam Napolitano, Director
Clean Air Markets Division

cc:

Charles Wishart, Dominion Energy Services Company, Inc.
Jerome Curtin, EPA Region III
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