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

MAR - 7 2002

OFFICE OF
AIR AND RADIATION

Mr. Tim Goldman
Brazos Electric Cooperative
2404 LaSalle Avenue
P.O. Box 2585
Waco, Texas 76702-2585

Re: Petition to modify CEMS recertification requirements for R.W. Miller, Units 1 through 5

Dear Mr. Goldman:

The United States Environmental Protection Agency (EPA) has reviewed Brazos Electric Cooperative's (BEC) December 13, 2001 petition requesting approval for modifications to part 75 continuous monitoring emission (CEMS) recertification requirements. BEC recently completed modifications and upgrades to the nitrogen oxides (NO_X) CEMS for R.W. Miller Units 1, 2, 3, 4 and 5. As discussed below, EPA approves the petition in part.

Background

BEC completed modifications and upgrades to the NO_X CEMS for R.W. Miller Units 1, 2, 3, 4 and 5 on December 10, 2001. Upgrades include, for Units 1, 2 and 3, replacing the existing hot-wet extractive CEMS with new dry-extractive CEMS and the existing data acquisition and handling system (DAHS) with a new one. For Units 4 and 5, the DAHS and the CEMS probes and umbilicals were replaced with like-kind equipment. Under §75.20(b), BEC is required to recertify the NO_X CEMS at the units. If all the required certification tests (beginning with the probationary calibration error test) are successfully completed with no failures and within the specified time periods, the CEMS is considered quality assured starting from the hour of the probationary calibration error test.

In order to complete the majority of the required recertification tests (i.e., probationary calibration error test, cycle time test, linearity check and relative accuracy test audit (RATA)), BEC operated the units despite a reduced need for load due to unusually warm weather. The probationary calibration error tests were performed on December 6, 11 and 12, 2001 for Units 3, 4 and 5 respectively and on December14, 2001 and January 10, 2002 for Units 1 and 2. The

remaining, required recertification test (i.e., the 7-day calibration error test) must be completed under §75.20(b)(3)(iv)(C) at each unit within 21 consecutive unit operating days after the probationary calibration error test. According to BEC, the infrequent operation of these units will prolong the calibration error test period required to complete the 7-day calibration error test.

BEC requests that, if infrequent unit operation prevents completion of the 7-day calibration error test for the units by March 31, 2002, EPA either (1) waive the requirements for such a test or (2) allow BEC to submit calibration error test data that includes as many consecutive unit operating days as are recorded from December 10, 2001 through March 31, 2002, even if there are less than 7 such unit operating days.

EPA's Determination

The 7-day calibration error test described in sections 6.3.1 and 6.3.2 of appendix A of part 75 is required for initial certification and recertification and occasionally as a diagnostic test. It is not required as a routine, periodic test. Section 6.3 of appendix A specifies that the 7-day calibration error test data must be recorded while the unit is operating and within 21 consecutive operating days after the probationary calibration error test.

The Agency believes that the 7-day calibration error test has value for frequently-operated units, and the test can, in most instances, be completed in 7 consecutive calendar days. The purpose of the 7-day test is to ensure that, from day-to-day, a continuous emission monitor does not drift excessively while it is operating and actually measuring emissions. Consequently, the test must be performed with the unit operating. The test provides a one-time demonstration that a monitor is capable of consistently passing daily calibrations at a specification twice as stringent as the allowable calibration error for daily monitor operation. Monitors that cannot meet this requirement are disqualified for use under part 75. When the test can be completed in 7 consecutive days, for example in base-load or cycling units, it achieves its purpose.

Nevertheless, EPA acknowledges that for some peaking and infrequently used units, the requirement for a unit to be operating during the test can be problematic. Because of the infrequent and unpredictable nature of such units operation, the 7-day test may take weeks or even months to complete, since the test must be done with the unit in operation. In cases where a 7-day calibration error test may take several months to complete, the test loses its meaning.

BEC has provided data showing that R.W. Miller Units 1 through 5 have been operating infrequently due to unusually warm weather. BEC also showed that this may significantly prolong the recertification test period required to complete the 7-day calibration error for these units.

In view of these considerations, EPA has decided to approve the petition in part. For each unit, EPA approves waiver of the 7-day calibration error test if the test is not completed by March 31, 2002, which date is three to four months after the probationary calibration error test. The Agency's decision is based on the difficulties associated with performing the 7-day calibration error test in a timely manner for the R.W. Miller Units 1 through 5 under the present

circumstances. However, there is no basis for assuming that current, unusual weather conditions will continue and that BEC will not be able to complete future 7-day calibration error tests within reasonable time. Consequently EPA is not waiving any other 7-day calibration error test that may be required in the future at these units. Further, EPA notes that the Agency recently proposed to revise appendix A of part 75 concerning the requirements to perform the 7-day calibration error test. The final rule may revise those requirements and will determine the extent to which BEC must perform any other 7-day calibration error tests in the future.

EPA's determination relies on the accuracy and completeness of the information in the December 12, 2001 petition and is appealable under part 78 of the Acid Rain regulations. If you have any further questions or concerns about this matter, please contact Ruben Deza at (202) 564-3956 or deza.ruben@epa.gov.

Sincerely,

Brian J. McLean, Director
Clean Air Markets Division

cc: Joseph Winkler, Region VI
John R. Smith, State of Texas