



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

JAN 28 2003

OFFICE OF  
AIR AND RADIATION

Mr. David F. Hughes  
Authorized Account Representative  
Carneys Point Office  
5 Collins Drive-Suite 3600  
Carneys Point, NJ 08069

Re: Petition for data validation following a span change at Vineland Cogeneration Plant

Dear Mr. Hughes:

The United States Environmental Protection Agency (EPA) has reviewed the November 19, 2002 petition of Conectiv Operating Services Company (Conectiv) under §75.66(a) for Unit 001001 at the Vineland Cogeneration Plant (Vineland). Conectiv requests the validation of data collected following a span change where the required linearity check was not performed within 168 unit operating hours following the change. As discussed below, EPA approves the petition.

Background

The unit at Vineland is a dual-fuel fired cogeneration unit that is subject to the NO<sub>x</sub> Budget Trading Program and is located in New Jersey. As required, the source upgraded the data acquisition and handling system (DAHS) software to electronic data report (EDR) version 2.1 earlier this year. As part of the upgrade to meet requirements under Subpart H of Part 75, a span evaluation (under Part 75, Appendix A, §2.1.1.5) was performed in March, 2002. The result of this span evaluation for the nitrogen oxide (NO<sub>x</sub>) concentration monitoring component indicated that the span for the low range NO<sub>x</sub> measurement should be lowered from 50 ppm to 40 ppm to improve the accuracy of the data measurement when the unit combusts natural gas. During such time, the NO<sub>x</sub> concentrations are typically 4 - 5 ppm. Because of difficulties in obtaining the required protocol gasses needed for daily calibration and linearity tests, the span change could not be implemented until July 9, 2002 (99 calendar days following the end of the quarter in which the need to adjust the span was identified). This was nine days past the deadline established in Part 75, Appendix A, §2.1.2.5.

Once the calibration gasses were received, the span change was implemented by conducting a calibration error test on the NO<sub>x</sub> analyzer using the new high level calibration gas. The high level calibration gas concentration changed from 42 ppm to 37 ppm. There were no

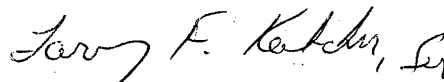
other modifications made to the monitoring system, including the analyzer range setting which remains at 50 ppm. All calibration error tests were conducted and passed daily as required following the span change on July 9, 2002. However, Conectiv did not realize that the span change also requires the submitting of record type 556 (RT556) in the quarterly EDR and for a diagnostic linearity test to be completed within 168 unit operating hours of the span change (Part 75, Appendix A, §2.1.2.5(c) and §75.20(b)(3)). A regularly scheduled quarterly linearity test was conducted and passed on September 9, 2002 (547 unit operating hours after the span change). Conectiv first realized in October 2002 that there was a linearity requirement that had been missed.

#### EPA's Determination

EPA, in consultation with the New Jersey Department of Environmental Protection (NJDEP), approves Conectiv's petition to validate the monitored hours following the span change. In this case, the span change only constituted a modification of the unit's monitoring plan records, and the monitoring system was not modified in any other way (i.e., the analyzer range and all other monitoring parameters were left unchanged). Furthermore, Conectiv's original span of 50 ppm was acceptable for monitoring under Part 75. Conectiv undertook the span adjustment to enhance the quality assurance (QA) practices for the NOx monitoring system. Because the span adjustment in this case was not mandatory, and given the fact that the subsequent calibration error tests and the September 9, 2002 quarterly linearity test were passed without any need for adjustments, EPA has found no evidence to suggest that the data quality for the NOx monitoring system was at anytime compromised in this situation.

EPA's determination in this letter relies on the accuracy and completeness of Conectiv's November 19, 2002 submission and is appealable under Part 78. If you have any questions regarding this correspondence, please contact Matthew Boze at (202) 564-1975.

Sincerely,



Sam Napolitano, Acting Director  
Clean Air Markets Division

cc: Ann Zownir, USEPA Region 2  
John Preczewski, NJDEP  
Frederick Ballay, NJDEP-BTS  
Monica Lopes, Conectiv