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

APR - 3 2012

Mr. Mark Gouveia
Vice President, PJM South Coal Operations
GenOn Potomac River, LLC
8301 Professional Place, Suite 230
Landover, MD 20785

OFFICE OF
AIR AND RADIATION

Re: Petition to Accept the Results of June 2010 Relative Accuracy Test Audits at the Potomac River Station (Facility ID (ORISPL) 3788)

Dear Mr. Gouveia:

The United States Environmental Protection Agency (EPA) has reviewed the July 1, 2011 petition (as amended on December 22, 2011) submitted under §75.66 by GenOn Potomac River LLC (GenOn), in which GenOn requested that EPA accept the results of June 2010 relative accuracy test audits (RATAs) of certain continuous emission monitoring systems (CEMS) at the Potomac River Power Station. EPA approves the petition, as discussed below.

Background

GenOn owns and operates five coal-fired units, known as Units 1, 2, 3, 4, and 5, at the Potomac River Power Station (Potomac River), located in Alexandria, Virginia. These units are subject to the Acid Rain Program and to the Clean Air Interstate Rule (CAIR) annual and seasonal emissions trading programs. Therefore, GenOn is required to continuously monitor and report sulfur dioxide (SO_2), nitrogen oxides (NO_x), and carbon dioxide (CO_2) emissions and heat input for Potomac River Units 1 through 5 in accordance with 40 CFR Part 75. To meet these monitoring and reporting requirements, GenOn has installed and certified CEMS for SO_2, NO_x, CO_2, and stack gas flow rate at two common stacks, i.e., CSC12 (which serves Units 1 and 2) and CSC345 (which serves Units 3, 4, and 5).

Part 75 requires periodic (semiannual or annual) RATAs of the gas and flow rate monitoring systems, for quality-assurance purposes. During the June 2010 annual RATAs of the SO_2, NO_x, and CO_2 CEMS, reference method gas samples were collected at a single measurement point in each of the common stacks, without having conducted 12-point stratification tests prior to the RATAs, as required by section 6.5.6(b)(4) of Appendix A to Part 75. In order to qualify for single-point reference method (RM) sampling, a pre-test 12-point stratification test must be performed and passed to demonstrate that stratification is absent. However, GenOn's test contractor performed 3-point long-line stratification traverses instead of the required 12-point traverses prior to the June 2010 RATAs and assumed (incorrectly) that single-point sampling could be used because the three stratification test points met the acceptance criterion for single-point RM testing in Appendix A, section 6.5.6.3(b), i.e., for each

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