

January 18, 2005

Robert H Miller, III
Authorized Account Representative
Graphics Packaging Corporation
1500 N. Pitcher Street
Kalamazoo, MI 49007

Re: Off-Season Linearity Check Results to Quality Assure Ozone Season Data for
Unit BLR08 at Graphics Packaging (Facility ID (ORISPL) 10698)

Dear Mr Miller:

The purpose of this letter is to notify you that EPA is treating your recent telephone conversation with EPA staff, concerning the April, 2004 linearity checks of gas monitors on Unit BLR08 as a petition to use these linearity checks to meet the 2nd quarter, 2004 “inside-the-ozone-season” linearity check requirement of §75.74(c)(3)(ii) and to report quality-assured NO_x emission data for certain hours, instead of using missing data substitution.

Unit BLR08 is subject to the NO_x Budget Trading Program. Therefore, Graphics Packaging Corporation (GPC) is required to monitor and report NO_x mass emissions for this unit, in accordance with subpart H of 40 CFR part 75. The monitoring plan for this unit indicates that you have elected to report NO_x mass emissions 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 NO_x monitoring system 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 NO_x monitoring system installed on Unit BLR8 has not met all of the quality-assurance test requirements for the 2004 ozone season. In particular, the requirement of §75.74(c)(3)(ii) to perform a 2nd quarter linearity check of the monitoring system inside the ozone season (i.e., in May or June) was not met. Failure to meet this QA test requirement causes data from the NO_x monitoring system to be invalidated, beginning on July 1st and continuing until a linearity check is performed and passed. The use of missing data substitution is required during this period.

Apparently, the QA requirements in §§75.74(c)(2) and (c)(3) for ozone season-only reporters have been misunderstood by the owners or operators of several sources, including Unit

BLR08. It appears that several owners or operators conducted the pre-ozone season linearity checks required by §75.74(c)(2)(i) in April (i.e., in the 2nd quarter), but did not understand that §75.74(c)(3)(ii) requires an additional 2nd quarter linearity check in May or June, inside the ozone season.

EPA's Determination

EPA conditionally approves GPC's request to use the April 2004 linearity checks of the gas monitors installed on Unit BLR8 to meet the 2nd quarter, 2004 "inside-the-ozone-season" linearity check requirement of §75.74(c)(3)(ii). EPA is granting this one-time exception to the requirement of §75.74(c)(3)(ii), for the following reasons. First, the pre-season linearity checks (which could have been performed any time from October 1, 2003 through April 30, 2004) were actually performed within the 2nd quarter of 2004 (April), and the monitors were operated and quality-assured by means of daily calibration error checks for the remainder of the quarter. This provides reasonable assurance of the quality of the 2nd quarter data generated by the gas monitors. Second, for sources that report emissions data year-round, Part 75 requires only one linearity check per quarter, under normal circumstances (e.g., in the absence of monitor replacements under §75.20(b)), to provide assurance that the monitors are generating accurate data. Therefore, EPA believes that the emissions data for Unit BLR8 should be treated as quality-assured in the time period extending from July 1, 2004 to the completion of the 3rd quarter, 2004 linearity checks, and the Agency waives the requirement of §75.74(c)(3)(ii) to perform missing data substitution in that time period. The conditions of this approval are as follows:

- (1) If, as a result of the missed 2nd quarter "inside-the-ozone-season" linearity checks, GPC used missing data substitution in the 3rd quarter, 2004 electronic data report (EDR) for Unit BLR8, GPC may resubmit the 3rd quarter, 2004 EDR within 7 days of the date of receipt of this letter, replacing the substitute data with the actual emissions data recorded by the gas monitors; and
- (2) In the resubmitted 3rd quarter, 2004 report, GPC shall include a note in EDR record type 910, indicating that EPA approved the use of the April, 2004 linearity checks to satisfy both the pre-ozone season linearity check requirement of §75.74(c)(2)(i) and the 2nd quarter "inside-the-ozone-season" linearity check requirement of §75.74(c)(3)(ii).

Please be advised that this is a one-time waiver of the QA requirements of §75.74(c)(3)(ii) and applies only to the 2004 ozone season. In 2005 and beyond, EPA expects the QA test requirements for ozone season-only reporters to be fully met. Otherwise, missing data substitution will be required, without exception. If you have any questions about this determination, please contact Louis Nichols at (202) 343-9008. Thank you for your continued cooperation.

Sincerely,

/s/

Sam Napolitano, Director
Clean Air Markets Division

cc: Constantine Blathras, Region 5
Karen Kajiya-Mills, MDEQ
Louis Nichols, CAMD