

MAR - 6 2001

Jerry Walker  
Vice-President  
Environmental Services  
Designated Representative  
P.O. Box 33695  
Denver, Colorado, 80233-0695

Re: Petition to use flow data for Tri-State's Escalante Station

Dear Mr. Walker:

The United States Environmental Protection Agency (EPA) has received your January 21, 2001 petition, under §75.66(a) of the Acid Rain regulations, for the Tri-State Generation and Transmission Association, Inc.'s (Tri-State) Escalante Station (Escalante), ORIS Code 000087. The petition requests that certain flow data, obtained after the unit failed to pass quality-assurance tests, be treated as valid emissions data. For the reasons discussed below, EPA denies in part and approves in part the petition.

#### Background

On June 20, 2000, an annual relative accuracy test audit (RATA) was conducted at Escalante. During the RATA, the flow monitor apparently failed to meet the requirement of 10% or less relative accuracy high load level. This RATA was not completed at mid-level because of this failure. The flow monitor probe was then relocated without any adjustments to the monitor. A second RATA was conducted on June 22, 2000, during which the flow monitor apparently met the relative accuracy requirement for all three loads. However, Tri-State learned on July 12, 2000 that the stack testing consultant used the wrong stack diameter in evaluating the RATAs and that the flow monitor had actually met the relative accuracy requirement at high load on June 20. Tri-State also learned that the June 22 RATA passed on high load, but not mid and low load..

On July 18, 2000, Tri-State returned the flow monitor probe to its original location, without any adjustments to the monitor, and a probationary calibration error test was passed. Finally, on July 21, 2000, a two-load RATA was conducted that met the 10% relative accuracy requirement at both loads (high and mid-loads). As required under part 75 of the Acid Rain regulations, Tri-State treated all of the flow data up to the July 18, 2000 probationary calibration error test as invalid data. See 40 CFR part 75, appendix B, section 2.3.2(e) and (f) .

In the January 31, 2000 petition, Tri-State requests that all of the hours of flow data when Escalante was operating at high load (i.e., 466 hours out of 532 hours of invalidated flow data) be treated as valid data. According to Tri-State, this is warranted because the flow monitor had passed the high load portion of the RATAs on both June 20 and June 22, 2000. Also, data at all loads, starting with the probationary calibration test done on July 18, 2000 would be treated as valid data.

#### EPA's Determination

As discussed above, the flow monitor at Escalante failed to pass RATAs on June 20 and on July 12, 2000. Tri-State's petition requests that, with regard to data from the monitor during the period from the initial RATA failure on June 20, 2000 until the passage of the probationary calibration error test on July 18, 2000, EPA treat some of the data as valid and some of it as invalid. EPA rejects this request as contrary to the purposes of the regulations.

The purposes of part 75 include ensuring that each continuous emission monitoring system provides consistent, accurate emission data throughout the operations of the affected unit. To this end, the part 75 regulations take the conservative approach of requiring that the quality-assurance criteria for a RATA to be satisfied at each applicable load level before any data is accepted from a monitor. Under 40 CFR part 75 appendix A, section 3.3.4, in order to be certified, a flow monitor must achieve relative accuracy of 10% or less in a RATA at each load for which the RATA is required. Unless and until the monitor is certified, none of the data from the monitor is valid data. See, e.g., 40 CFR part 75 appendix B, section 2.3.2 (e) and (f).

This approach recognizes that a monitor failing to meet relative accuracy requirements at a required load level may need adjustment and that such adjustment could affect the monitor's readings at the other load levels. Accepting data from a monitor for one load level, even though the data from the monitor for other load levels is inaccurate and requires monitor adjustment, runs the risk that the accepted data would be inconsistent with subsequent data for the same load after the monitor is adjusted. In Tri-State's case the probe was relocated after each RATA, which increases the likelihood of inconsistent data. Because the proposal in Tri-State's petition could result in acceptance of inconsistent data from the same monitor, this aspect of the proposal is contrary to the purposes of part 75.

Tri-State also requests that all data starting from July 18, 2000 probationary calibration error test be treated as valid data. Under part 75, the change in the location of the probe is an event that triggers a recertification process requiring a three-load RATA. See 40 CFR 75.20 (b) (stating that monitor probe relocation requires recertification) an Appendix A, section 6.5.2

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(requiring 3 load RATA for recertification) However, Tri-State performed a two-load RATA on July 21, 2000 even though the monitoring probe had been relocated. Because of the following circumstances, EPA believes that the monitor is accurate: the monitor probe was relocated on July 18, 2000, back to the probe's original location, no adjustments were done to the monitor during any of the relocations(i.e. during the period June 20 -July 18, 2000); and the monitor passed the July 22, 2000 RATA with excellent levels of accuracy, (high, -1.6%, and mid, -1.4 %). Consequently EPA approves the treatment of emissions data as valid as of the date and hour of the start of the provisional calibration test on July 18, 2000.

For these reasons, EPA approves in part and denies in part Tri-State's petition. EPA's determination relies on the on the accuracy and completeness of the information in the January 31, 2001 petition and is appealable under part 78 of the Acid Rain regulations. If you have any further questions about this matter, please contact Ruben Deza at (202) 564-3956.

Sincerely,

Brian J. McLean, Director  
Clean Air Markets Division

cc. Joseph Winkler, Region VI

CONCURRENCES							
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