

June 2, 2004

Mr. Vincent J. Brisini
Alternate Designated Representative
Reliant Energy
121 Champion Way
Canonsburg, PA 15317

Dear Mr. Brisini:

This is in response to your May 18, 2004 letter requesting EPA approval of your use of the rectangular duct wall effects conditional test method (CTM-041). You have provided all of the required information to begin using the correction factor on January 1, 2004 on the two power plants and associated units and stacks/ducts in the attached table, provided that you perform CTM-041 in calendar year 2004.

Your wall effects adjusted data will be considered valid quality-assured data, retroactive to the start date and time of the rectangular duct wall effects adjustment, provided that: (1) all other Part 75 requirements are met; and (2) you do not adjust the rectangular duct cross-sectional area to account for any build-up of particulate matter or other material in the bottom of the duct when calculating stack gas volumetric flow.

We recommend that you follow the EDR reporting instructions available at the following internet address: www.epa.gov/airmarkets, click on "Recent Additions" (in the upper left corner), scroll down and click on "Rectangular Duct Wall Effects", and that you run your EDR reports through the MDC software tool available at the same web site prior to submitting the EDRs to EPA. A spreadsheet to calculate rectangular duct wall effects is also available at the same web site. If you have any questions or concerns about this matter, please contact John Schakenbach of my staff at 202-343-9158 or at (schakenbach.john@epa.gov).

Sincerely,

/s/

Reynaldo Forte, Chief
Emissions Monitoring Branch

Attachment

cc: Bob Vollaro, EPA, CAMD, EMB
Ujjval Shukla, EPA, CAMD, MOB
Jerry Curtin, EPA Region III
Joseph Nazzaro, PADEP

Attachment

Plant	Unit/Stack ID	ORISPL	Start Date/Time
New Castle	3	3138	1/1/2004 0000
New Castle	4	3138	1/1/2004 0000
New Castle	5	3138	1/1/2004 0000
Portland	1	3113	1/1/2004 0000
Portland	2	3113	1/1/2004 0000