



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

JUN 24 2004

OFFICE OF  
AIR AND RADIATION

Mr. J. Thomas Horan  
Alternate Authorized Account Representative  
PPG Industries, Inc.  
Post Office Box 191  
New Martinsville, WV 26155

Re: Petition to Use Off-Season Linearity Check Results to Quality Assure Ozone  
Season Data for Units 002 and 003 at the PPG Plant in Natrium, WV (Facility ID  
(ORISPL) 50491)

Dear Mr. Horan:

This is in response to your March 3, 2004 letter, in which PPG Industries, Inc. (PPG) requested permission to use linearity checks done prior to the 2003 ozone season to quality-assure data within the ozone season, for Units 002 and 003 at the Natrium facility in New Martinsville, West Virginia. EPA approves the petition, in part, and with conditions, as discussed below.

Background

PPG owns and operates two coal-fired boilers, Units 002 and 003, at its Natrium, West Virginia facility. Units 002 and 003 are subject to the NO<sub>x</sub> Budget Program requirements of the West Virginia Division of Air Quality (WVDAQ) Series 1 regulation. This regulation requires PPG to continuously monitor and report nitrogen oxides (NO<sub>x</sub>) mass emissions and heat input for Units 002 and 003 during each ozone season (i.e., from May 1<sup>st</sup> through September 30<sup>th</sup> of each year), in accordance with Subpart H of 40 CFR Part 75. This monitoring and reporting requirement became effective on May 1, 2003.

The Series 1 NO<sub>x</sub> Budget Program rule allows two emission reporting options for non-electrical generating units (non-EGUs), such as Units 002 and 003. The owner or operator may either report quarterly NO<sub>x</sub> mass emissions and heat input data year-round or may report data only for the ozone season months. For Units 002 and 003, PPG has chosen the latter option, i.e., ozone season-only reporting.

For sources that report data on an ozone season-only basis, the quality-assurance requirements for the continuous emission monitoring systems (CEMS) are found in §75.74(c). For gas monitors, one of the required quality-assurance tests is a linearity check. Under §75.74(c)(2)(i), a linearity check of each gas monitor is required prior to each ozone season. Further, §75.74(c)(3)(ii) requires linearity checks to be done within the ozone season, in the 2<sup>nd</sup> and 3<sup>rd</sup> calendar quarters, if those quarters are “QA operating quarters”, i.e., quarters in which the unit operates for 168 hours or more.

In 2003, PPG performed two linearity checks of the Unit 002 and 003 gas monitors prior to the ozone season, one in January and one in April. For both Units 002 and 003, the 2<sup>nd</sup> and 3<sup>rd</sup> quarters of 2003 were “QA operating quarters”, thus triggering the requirement of §75.74(c)(3)(ii) to perform linearity checks in each of these quarters, inside the ozone season. However, PPG did not meet this requirement. The 2<sup>nd</sup> quarter linearity checks were not done inside the ozone season. Rather, the tests were completed on April 30<sup>th</sup>, a few hours before the start of the ozone season, and the next linearity checks were not performed until mid-July, 2003. According to §75.74(c)(3)(ii), since the 2<sup>nd</sup> quarter tests were not done inside the ozone season as required, data from the monitoring systems are considered invalid beginning with the first operating hour in the 3<sup>rd</sup> quarter, and remain invalid until a linearity check is passed. In this case, the NO<sub>x</sub> emission rate data for Units 002 and 003 would be invalidated in the periods from July 1, 2003, hour 00 through July 14, 2003, hour 10 (for Unit 003) and from July 1, 2003, hour 00 through July 15, 2003, hour 09 (for Unit 002), and missing data substitution would be required in accordance with §75.74(c)(7).

In the March 3, 2004 petition, PPG requested permission to use the April 30, 2003 linearity checks to meet both the pre-ozone season test requirement of §75.74(c)(2)(i) and the 2<sup>nd</sup> quarter “within-the-ozone season” test requirement of §75.74(c)(3)(ii). PPG noted that if the tests had been completed one day later (on May 1<sup>st</sup>), the results could have been used, according to §75.74(c)(3)(viii), to satisfy both of these requirements. According to PPG, the test results would have been the same on May 1<sup>st</sup> as on April 30<sup>th</sup>, and there would be no adverse effects if EPA were to approve the petition.

#### EPA’s Determination

EPA approves PPG’s request to use the April 30, 2003 linearity checks of the Unit 002 and Unit 003 gas monitors to meet the 2<sup>nd</sup> quarter, 2003 “within-the-ozone season” linearity check requirement of §75.74(c)(3)(ii). The Agency is granting this one-time exception to the requirement of §75.74(c)(3)(ii) in view of the fact that, because of PPG’s misunderstanding of the regulations, the April 30, 2003 tests were completed a few hours before (rather than after) the start of the 2003 ozone season. However, EPA notes that it does not intend to grant this exception to PPG again. With this exception, EPA considers the Unit 002 and Unit 003 emissions data to be quality-assured in the time period extending from the end of the 2<sup>nd</sup> quarter, 2003 to the completion of the 3<sup>rd</sup> quarter, 2003 linearity checks. Therefore, 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) PPG shall resubmit the 2<sup>nd</sup> and 3<sup>rd</sup> quarter electronic data reports (EDRs) for Units 002 and 003, within 7 days of the date of receipt of this letter; and
- (2) The 2<sup>nd</sup> quarter, 2003 reports shall include the results of both the January, 2003 and April 30, 2003 linearity checks of the Unit 002 and Unit 003 gas monitors; and
- (3) The January, 2003 linearity checks, rather than the April 30, 2003 linearity checks, shall be used to satisfy the pre-ozone season linearity check requirements of §75.74(c)(2)(i); and
- (4) In the resubmitted 3<sup>rd</sup> quarter, 2003 reports for Units 002 and 003, PPG shall include EDR record type 910, indicating that for the 2<sup>nd</sup> quarter of 2003, EPA approved the use the April 30, 2003 linearity checks to satisfy the “inside ozone season” linearity check requirement of §75.74(c)(3)(ii).

EPA's determination in this letter relies on the accuracy and completeness of the information provided by PPG in the March 3, 2004 petition and is appealable under Part 78. If you have any questions about this determination, please contact Robert Vollaro, at (202) 343-9116. Thank you for your continued cooperation.

Sincerely,



Sam Napolitano, Director  
Clean Air Markets Division

cc: Jerry Curtin, EPA Region III  
Laura Crowder, West Virginia DEP, Division of Air Quality  
Robert Vollaro, CAMD