

May 9, 2005

Mr. Tom Bokeno
Authorized Account Representative
Smart Papers, LLC
601 North B Street
Hamilton, OH 45013

Re: Petition for Alternative Method of Missing Data Substitution for Unit B010 at Smart Papers' Hamilton, Ohio Paper Mill (Facility ID (ORISPL 50247))

Dear Mr. Bokeno:

EPA has reviewed your February 2, 2004 petition under §75.66 in which Smart Papers, LLC (Smart) requested to use an alternative method of missing data substitution for Unit B010 at the Hamilton, Ohio paper mill. EPA disapproves the petition, for the reasons given below.

Background

Smart Papers, LLC owns and operates a coal-fired boiler, Unit B010, at its Hamilton, Ohio paper mill. Unit B010 is subject to the NO_x Budget Program, under 3745-14-08 of the Ohio Administrative Code. Therefore, Smart is required to continuously monitor and report nitrogen oxides (NO_x) emissions data and heat input for this unit, in accordance with 40 CFR Part 75. To meet these requirements, Smart has installed a NO_x concentration monitor, a flow monitor, and a carbon dioxide (CO₂) monitor. The NO_x and flow monitors are used to determine the NO_x mass emissions, and the flow and CO₂ monitors are used to determine the unit heat input.

On June 18, 2003, Smart performed a required linearity check of the CO₂ monitor. However, the monitor failed to meet the performance specification in section 3 of Part 75, Appendix A. According to section 2.2.3 of Part 75, Appendix B, when a linearity check is failed, the monitor is considered to be out-of-control until a subsequent linearity check is passed. The next linearity check of the CO₂ monitor was performed on September 24, 2003. The test was passed, ending the out-of-control period.

Section 75.30 requires missing data substitution to be used whenever a monitor is out-of-control and unable to provide quality-assured data. In this case, the missing data period extended from June 18 to September 24, 2003, which caused the percent monitor data availability (PMA) of the CO₂ monitor to fall below 80.0%. When the PMA is less than 80.0%, the standard CO₂ missing data procedures in § 75.36 require the maximum potential concentration (MPC) to be reported for each hour of the missing data period.

In the February 2, 2004 petition, Smart requested to apply the missing data substitution

routine that is ordinarily used for PMA values between 80.0% and 90.0%, in lieu of reporting the MPC. Smart also requested that the substitute data reported during the out-of-control period from June 18 to September 24, 2003 not be counted against the PMA of the CO₂ monitor.

EPA's Determination

EPA denies Smart's petition to use an alternative CO₂ missing data substitution methodology for Unit B010 in the out-of-control period extending from June 18 to September 24, 2003. The petition is denied because Smart failed to provide any technical or legal basis upon which to justify the proposed alternative methodology. Therefore, Smart must use the standard CO₂ missing data procedures in §75.36, and the maximum potential CO₂ concentration must be reported for each hour of the missing data period.

The Part 75 missing data procedures are designed to encourage sources to avoid extended missing data periods by keeping their continuous monitoring systems well-maintained and by ensuring that all required quality-assurance tests are performed on-time. As the length of a missing data period increases, the PMA decreases and the substitute data values that must be reported become increasingly conservative. In the case of Unit B010, a linearity check was failed on June 18, 2003 but was not followed up with a successful linearity check until September 24, 2003. This resulted in an out-of-control period of more than 3 months, and dropped the PMA of the CO₂ monitor below 80.0%. Therefore, it is appropriate for Smart to report the MPC for this missing data period. The Agency notes, however, that applying the standard CO₂ missing data routines during the out-of-control period does not affect the 2003 ozone season NO_x mass emissions reported for Unit B010, because, as noted above, the CO₂ data are used only to determine the unit heat input and not to calculate NO_x mass.

EPA's determination relies on the accuracy and completeness of the information provided by Smart in the February 2, 2004 petition and is appealable under Part 78. If you have any questions or concerns about this determination, please contact Louis Nichols, at (202) 343-9008.

Sincerely,

/s/

Sam Napolitano, Director
Clean Air Markets Division

cc: Constantine Blathras, EPA Region V
Todd Brown, Ohio EPA
Louis Nichols, CAMD