

From: Robert Moody
To: [Kristina Schafer](#)
Cc: [Bumpus, Sonia \(UTC\)](#); [Rottler, Daniel](#); [Sherin, Christopher](#); [Frank Sarduy](#); [Cook, Shawn](#); [Jim Carroll](#); [Hughes, Paul](#)
Subject: Re: Grays Harbor Test Plan
Date: Wednesday, July 11, 2018 2:18:43 PM

Hello Kristina

As a contractor for EFSEC I do have a few comments on the test plan for the Grays Harbor Energy facility in Elma Washington (your document Number 021AS-386089-PP-34).

Table 1-1 on page 5 lists SO₂/H₂SO₄ as part of the test program. Referring to Table 2-1 on page 8, it does not include the emission limit for sulfuric acid mist (0.984 kg/hr, rolling annual average calculated monthly). Moving to Table 2-4, the SO₂ method can provide the H₂SO₄ values as well, though no mention is made of the H₂SO₄. Section 4.1.8 Sulfuric Acid Mist and SO₂, page 18, states the test runs will provide results for emissions of sulfur dioxide and sulfuric acid mist. Will you be reporting sulfuric acid mist?

Table 2-3, Summary of Performance Specifications, does not list NH₃. The NH₃ CEMS must meet a relative accuracy of 35%, when the mean RM values are used, or be no greater than 20% when the applicable emission standard is used.

I concur with the use of EPA Conditional Test Method 013/NCASI Method 8A and the substitution of ion chromatography in CTM -13 and Bay Area AQMD Method ST-1B.

It would be appreciated if you could correct our agency name on page 7, we are Olympic Region^{al} Clean Air Agency.

Thanks,
Robert

Robert Moody, Compliance Manager

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Olympic Region Clean Air Agency - *"Clean Air is Everyone's Business!"*

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On Mon, Jul 9, 2018 at 11:44 AM, Kristina Schafer <kschafer@montrose-env.com> wrote:
Sonia and Robert,

The test plan for the testing at Grays Harbor Energy Center in Elma, WA, is attached.
Please contact me with any questions or concerns.

Thank you,

Kristina Schafer, QSTI

District Manager

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