

Comments on Reserve NAP protocol  
J. Ambrose  
RTK Midwest

7.3: What is the purpose of the second bullet (“Copies of all ...”)? This seems excessively intrusive. I think it is more appropriate that the facility sign an affirmation that N<sub>2</sub>O control is not required by regulation or any other agreement.

6.2.1 – This requirement should exclude weekends and scheduled plant holidays. This activity would normally be done by maintenance personnel, not 24/7 operations personnel.

6.4 – There are numerous frequency requirements that assume that the facility is on a Distributed Control System. Our plants and I suspect others may have legacy instrumentation. It seems that readings every minute is excessive. Normal operations data logging is every two hours. This is especially important in section 5.1.1 where hourly data is required for 5 historical campaigns. This is not currently available.

5.1.1 – see above.

6.1.1 to 6.1.3- we suggest part 60 instead of part 75. Our CEMS do not meet the requirements of 40 CFR 75 (acid rain program). These requirements are very extensive, especially in terms of CEMS equipment maintenance and recordkeeping. If we are required to follow the 40 CFR 75, the frequency of RATA and linearities may be more than annual. Specific “major” maintenance activities that are performed on the analyzer system require a linearity and/or RATA be performed to verify analyzer performance following repair. Also, if the results of a RATA test exceed 7.5% relative accuracy, the frequency of testing goes from annual to semi-annual.