

Periodic Monitoring Workgroup Notes from October 9, 1998 Meeting

Consensus Criteria - Definitions

Criteria will be used to develop monitoring for source categories, exceptions, and sources not covered in guidelines (group may revisit other possible uses).

Compliance Assurance

Monitoring that assures compliance is designed to

- 1) Monitor key parameters which determine compliance
- 2) Be done at a frequency consistent with the likely variability of emissions and margin of compliance
- 3) Detect deviations within specific time limits (provide information to operator to correct problems promptly)
- 4) Provide information that public could use for direct enforcement (Note: research CAM, see action item 3)

Margin of Compliance

- 1) Amount of monitoring varies based on how unit is operating with respect to emission limits (x% of emission limit); less monitoring if there is a comfortable margin of compliance.
- 2) In determining margin of compliance, consider accuracy of emission estimation method -- less monitoring if reliable emission factors exist. Consider
 - a) Reference method accuracy range e.g. 10% error, and below 90% of limit
 - b) AP-42 or other emission factor accuracy e.g. rating and range of emission factor
- 3) Consider existence of control equipment

Variability

- 1) Look at emissions over time under normal/upset conditions (within an individual unit)
 - a) More variability more monitoring; less variability less monitoring
 - b) Variability within margin of compliance is O.K.
- 2) Also consider variability
 - a) Within a source category
 - b) Caused by equipment failure or degradation
e.g. less ongoing MRR for units without external control devices

Source Size

Vary monitoring based on unit size as a lb/day or ton/year threshold based on potential uncontrolled emissions, e.g. more monitoring if uncontrolled emissions exceed major source threshold.

Burden/Cost to Permittee

- 1) Cost of equipment, personnel (training, time spend on job, etc) administrative costs (e.g. time and expense of MRR), cost/ton
- 2) Consider the least cost monitoring method that meets other criteria; means of reducing burden/cost include
 - a) Don't require substantial deviations from current unit operations
 - b) Allow data from representative units to be used upfront to determine appropriate monitoring and on an ongoing basis to reduce monitoring costs

Reasonableness (Does it make sense?)

Examples

- 1) Burden on agency i.e. inspections, record review: Time to
 - a) Implement condition
 - b) Review condition
 - c) Review data generated by condition
- 2) Technical feasibility of monitoring and test methods e.g. stack testing of fugitive emissions
- 3) Existing burden for monitoring

Consistency

Consistency means monitoring may be different but consistently meets the established criteria. Consistency is important between similar or identical sources e.g. with regard to size, source emission unit category, and emission limits.

New Issues

- 1) Opacity is not as important as quantity of emissions
- 2) NAAQS and increment
- 3) Compliance assurance (direct enforceability) and CAM consistency on excursions

Action Items

- 1) Martha -- finalize 7 consensus criteria
- 2) Martha -- coordinate next meeting, November 9, 10, or 13 at EPA's San Francisco offices
Group -- call or e-mail Martha with availability for each date
- 3) Pang, Martha and Seyed -- research CAM issue for next meeting
- 4) Martha -- remove language "past history of noncompliance" from top of "Agreements"

- 5) Revisit later in process -- consider ranking/weighting criteria if necessary
- 6) Revisit later in process - agree on Principles?

Action Items - Subgroups
(To develop recommendations within one month)

- 1) Material handling equipment (opacity and PM) Rick, Pang, Beverly, Martha (lead), Alex
- 2) Liquid fueled combustion equipment (opacity) Brenda (lead) Mike, Steven B or Steve F, Rick, Steve M., Beverly
- 3) Gas Flares (opacity) Pang (lead) San Joaquin (care of Rick), ARB (care of Ray), EPA (Stan or Tom)