Parametric Monitoring
Related Issues

Title V Workgroup 4
September 22, 2011
Issue #1 - Parametric monitoring ranges not always present in the permit.

Issue #2 – No justification may be present in the operation permit preliminary determination linking parametric monitoring ranges to compliance with applicable requirements.

Issue #3 – The parametric monitoring frequency may not match the time period of the applicable requirement.
Title V Workgroup 4 – Issue #1

Problem

Issue #1 - Parametric monitoring ranges not always present in the permit.

- Location of parametric monitoring ranges
  - Operation permit
  - Off-permit document (such as MPAP)

- Processing changes to monitoring ranges
  - Title I versus Title V
Title V Workgroup 4 – Issue #1 Proposal

- Avoid placement of parametric monitoring ranges in construction permits. Require submittal of ranges in order to complete the operation permit application for the constructed source(s). Include alternate range language.

- Include parametric monitoring ranges in operation permits. Include alternate range language.
Title V Workgroup 4 – Issue #1
Processing Issues

- Monitoring ranges derived from an existing Title I permit would use Title I procedures to modify in conjunction with Title V renewal or revision procedures.

- Monitoring ranges submitted to complete operating permit application would use Title V procedures to modify.

- Monitoring ranges derived from a Title V permit would use Title V procedures to modify.
Title V Workgroup 4 – Issue #1
Additional Discussion

- Charge for Title I revisions for authority-expired permits if at the request of the applicant? Change ch. NR 410.
- Tracking revised construction permits?
- Issuance of revised construction permits?
- Use of Title V minor revision procedures to change ranges not set by Title I?
- Modification of existing sources whose parametric monitoring ranges are not expected to change?
- Use Title I action to replace existing permit language with proposed language?
- Enforcement versus operation permit issuance timing for revisions to ranges?
- Modify ch. NR 406 to allow revision for administrative mistakes?
Title V Workgroup 4 – Issue #2

Problem

Issue #2 – No justification may be present in the operation permit preliminary determination linking parametric monitoring ranges to compliance with applicable requirements.

- Justification of monitoring range
  - Little or no justification of monitoring range in technical support document
  - Compliance testing, manufacturer’s recommendations, operational experience
Title V Workgroup 4 – Issue #2 Proposal

- For new or modified sources, the permittee will provide written justification in order to complete the operation permit application.

- For existing sources, the permittee would provide justification:
  - Application for revision of an operation permit (for the affected sources)
  - Application for renewal of an operation permit
  - At the request of the Department
Title V Workgroup 4 – Issue #2

Discussion

- Level of justification?
- Workload for permittee
- Tracking by the Department
Issue #3 – The parametric monitoring frequency may not match the time period of the applicable requirement.

- Does ch. NR 439.055 need updating?
- Cost vs. Environmental Impact vs. Compliance Assurance
Title V Workgroup 4 – Issue #3

Discussion

- Continued use of ch. NR 439.055, with improved justification
  - Revision of ch. NR 439.055?
  - Level of justification? Should permittee provide justification?
  - Implementation schedule?
  - Develop implementation guidance?

- Use of CAM
  - Ch. NR 439.055 to apply only to non-Title V sources?
  - CAM provides justification. Use in conjunction with ch. NR 439.055 for Title V sources?

- Three prong approach (Xcel Energy Petition VIII-2010-XX (EPA Region 8))
- Use of CEMs/COMs beyond current requirements