



Parametric Monitoring Related Issues



**Title V Workgroup 4
October 12, 2011**

Title V Workgroup 4 – Issue #1

Problem

Parametric monitoring ranges not always present in the operation permit.

Title V Workgroup 4 – Issue #1

Final Proposal

- Parametric monitoring ranges (PMR) will be placed in the operation permit.
- The Department will not place PMR in future Title I permits, unless requested by the applicant.
- At the request of the permittee, existing Title I-derived PMR language will be replaced using Title I procedures with alternate language.

Title V Workgroup 4 – Issue #1

Implementation

- Operation Permits
 - PMR will be returned to op permits upon renewal or revision, as necessary.
 - Title I-derived PMR could be modified through Title I revision procedures in conjunction op permit significant revision procedures.
 - PMR not derived from Title I could be modified with op permit minor or significant revision procedures.

Title V Workgroup 4 – Issue #1

Implementation

- Construction Permits
 - New emission unit
 - Submit PMR to complete op permit application
 - Modified emission unit
 - New PMR – submit to complete op permit app
 - Existing PMR – replace Title I condition with alternate language
 - Existing emission unit
 - Option 1: maintain Title I as source of PMR
 - Option 2: replace Title I condition with alternate language

Title V Workgroup 4 – Issue #2

Problem

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

Title V Workgroup 4 – Issue #2

Final Proposal

- The permittee will provide written justification of the parametric monitoring range (PMR).

Title V Workgroup 4 – Issue #1

Implementation

- Justification Submittal Schedule
 - Operation Permits – existing sources
 - Revision (for sources affected by the revision)
 - Renewal (all other sources)
 - At the request of the Department
 - Construction Permits
 - New or Modified Sources – new PMR
 - To complete the operation permit application
 - Modified Source – no PMR change
 - With construction permit application

Title V Workgroup 4 – Issue #2

Processing Issues

- Review of justification would be case-by-case
- Department guidance document for reviewers

Title V Workgroup 4 – Issue #3

Problem

The parametric monitoring frequency may not match the time period of the applicable requirement.

Title V Workgroup 4 – Issue #3

Draft Proposal

- Short Term
 - Focus on Title V major sources
 - Require submittal of CAM or CAM-like justification of monitoring frequency for applicable sources
 - Change monitoring frequency, as necessary
 - Minor sources would continue to use 439.055

Title V Workgroup 4 – Issue #3

Draft Proposal

- Long Term
 - Replace 439.055 with CAM and CAM-lite
 - Use PSEU thresholds
 - Above 100 TPY after controls
 - Above 100 TPY before controls
 - All other controlled sources

Title V Workgroup 4 – Issue #3

Discussion

- Consistency issue
- Department-approved CAMs?
- Ch. 439 and SIP
- Ch. 439 and Part 70 program approval
- CAM attached vs. CAM incorporated
- SIP limitation discussion