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.
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 with permit revision procedures.
- PMR not derived from Title I could be modified with op permit minor or significant revision procedures.
• 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