



Parametric Monitoring Related Issues



**Title V Workgroup 4
November 8, 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. The authority to have a PMR range will stay in the Title I, while the actual range will be an operation permit condition.

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).
- 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 #3

Problem

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

Title V Workgroup 4 – Issue #3

Discussion

- Should parametric monitoring match the frequency of the relevant time period?
 - One piece of the overall compliance demonstration requirements.
 - Parametric monitoring is a reflection of the proper operation of the control device or other equipment.
 - Operation within the range offers a reasonable assurance of compliance.
 - Does a one-size-fits-all approach for monitoring parameters and frequencies make sense?

Title V Workgroup 4 – Issue #3

Discussion

- EPA using petition responses to give guidance to states.
- Xcel Energy – Colorado – Region 8
 - Xcel Energy, Hayden Station - 2009
 - Xcel Energy, Pawnee Station - 2010
 - Xcel Energy, Cherokee Station - 2010
 - Xcel Energy, Valmont Power Plant - 2010

Title V Workgroup 4 – Issue #3

Discussion

- Petitioner claims regarding Xcel permits
 - Title V permit does not require actual monitoring of PM emissions
 - PM emission limit of 0.1 lb/MMBtu - SIP limit
 - Facility used COMS to monitor PM
 - Stack testing is too infrequent, even if it could demonstrate compliance
 - Varies between annually to every 5 years
 - Cannot rely on CAM to meet Title V monitoring requirements
 - Contends no relationship supported between opacity and PM in the permit

Title V Workgroup 4 – Issue #3

Discussion

- EPA Petition Response – “Three Prong Approach” is acceptable for assuring compliance
 - Performance testing to demonstrate that the specified limit is being met.
 - Operation and maintenance of the control device to ensure that it continues to operate properly.
 - CAM plan to provide a mechanism for assessing the performance of the control device on an ongoing basis.

Title V Workgroup 4 – Issue #3

Final Proposal

- Title V Source – PSEU subject to CAM
 - Compliance testing (minimum once every 5 years)
 - Operation and maintenance requirements
 - CAM
- Title V Source – PSEU not subject to CAM
 - Initial test; Requirement to use control device;
 - Operation and maintenance requirements
 - CAM-like justification of monitoring parameters and frequency (CAM-lite)

Title V Workgroup 4 – Issue #3

Final Proposal

- Minor Sources
 - Initial test; Requirement to use control device
 - Operation and maintenance requirements
 - Ch. NR 439.055 monitoring (minimum)

Title V Workgroup 4 – Issue #3

Issues

- Title V CAM-lite justification would address:
 - The applicability of existing monitoring equipment and procedures.
 - The ability of the monitoring to account for process and control device operational variability.
 - The level of actual emissions relative to the compliance limitations.
- Should industry or trade groups develop presumptive CAMs?
- Should the Department provide approved presumptive CAMs similar to the printing TSD document?
- CAM attached to the permit vs. CAM incorporated into the permit.