

Voluntary Superior Monitoring

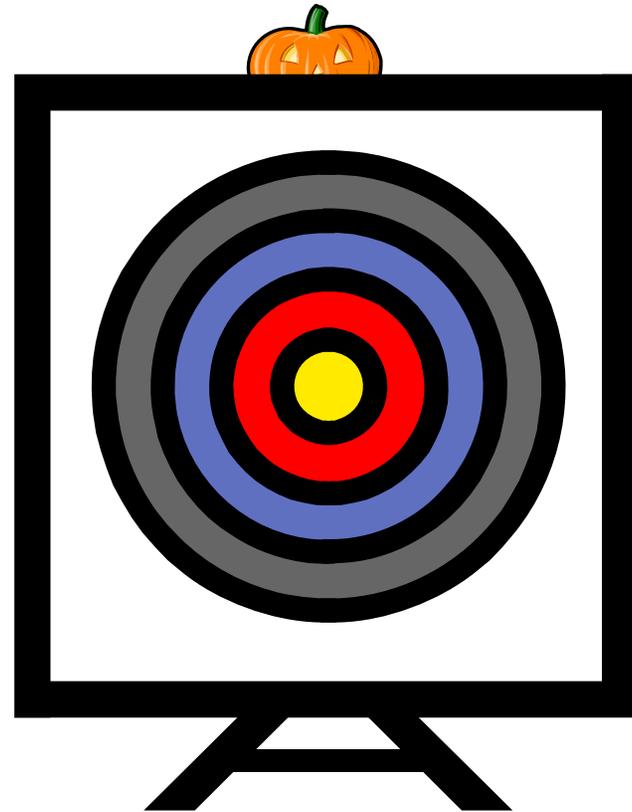
Source Testing in the New Regulatory World IV



October 30, 2002

Goal of Presentation

- Informational
 - Identified Need for better monitoring
 - Team Formed
 - Approach
 - Incentives
 - Industry feedback
 - Project Status – October 2002
 - Outstanding issues
 - Next steps



Convinced That Better Monitoring Gives...

- Reduced emissions!
- Better control of processes
- More and better information to agencies and public



Opportunities Scarce

- MACT Standards out the door
- No resources available to repropose existing standards
- Old monitoring outdated in existing standards



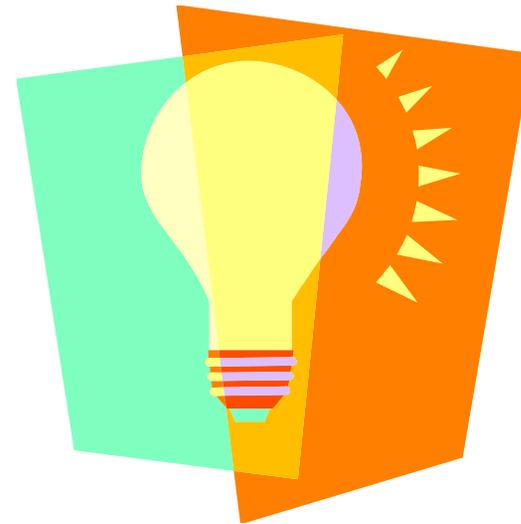
OAQPS/OECA Forms Innovative Team

- Cross Divisional Team and OECA
- Searched OAQPS programs for opportunities
- Settled on one idea – Superior Monitoring Option



Approach

- General Provisions Option
 - Parts 60, 61, and 63
 - Voluntarily improved or superior monitoring
 - Incentives given



Example Incentives

- No “credible evidence” during testing of proposed monitoring
- Existing monitoring requirements eliminated
 - Why do all the parameter monitoring if you can monitor for the pollutant of concern?
- Less reporting and recordkeeping



Certainty of compliance must be equal to or better than required under existing rule!

Incentives Continued...

- Less frequent compliance testing
- QA for monitoring proposed by source
- Source may propose averaging period
- Source may propose an equivalent standard
- Streamlining



Certainty of compliance must be equal to or better than required under existing rule!

Industry Feedback

- Does better monitoring exist? Yes
- Incentives for better monitoring? \$'s
- Mechanisms for better monitoring? Liked our idea of GP option!
- Level of interest? Get vendors to promote



Project Status – October 2002

- Contractor help
 - Rule language
 - Criteria
 - Incentives
 - Guidance
 - Statistics
- Rough draft form now
 - Outline of preamble
 - Rough General Provisions language



Outstanding Issues

- Ability to write clear criteria that don't conflict with Agency policies and existing regulations
- Getting folks to move "outside the box"



Next Steps

- Draft of guidance and statistics – December 2002
- Continue talking with industry, EPA, and states/locals
- Draft of preamble and rule language – December 2002
- Proposal in FR – Summer 2003

