

# **Compliance Assurance Monitoring (CAM) Panel**

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# Topics

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- Where we are
- What we have heard (FAQs)
- What to expect
- What you want us to address

# Where we are

- CAM implementation on track
  - Many title V permits being renewed
- Satellite broadcast in August
  - Swan song (?) for EMC video outreach
- Strong demand for live course
  - States, A&WMA

# FAQs are FAQs

Responses to Frequently Asked  
Questions About CAM and Other  
Title V Monitoring

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# Topics

- Basic TV monitoring principle
- Control device definition
- CAM vs CEMS vs CEMS/PEMS
- Combined or merged permits
- Compliance certification
- Excess emissions vs excursions

## What is the Title V and Compliance Assurance Monitoring principle?

*Monitoring sufficient to provide a reasonable assurance of compliance with the applicable requirements (e.g., emissions limits) and to ensure operators pay the same level of attention to pollution control measures as to production*

**CAM - Raising the monitoring floor, not setting a ceiling.**

# What is CAM rule?

40 CFR Part 64 - Compliance Assurance Monitoring

- ***Regulation implementing the Title V monitoring principle***
- ***Targets facilities with add-on control devices***
- ***Requires source owners to design monitoring to fit site and include in permits***

## When is a control device not a control device?

- Control device – mechanical, electrical, chemical process to remove, reduce, or transform pollutant (will trigger part 64)
- Inherent process equipment – looks like control device but operation critical to production (justification hurdles to cross)
- Other control measures – passive and manual means to meet emissions limits (everything else)

## Doesn't Part 64 require PEMS or CEMS?

- Nope

# What is the difference between Part 64, CEMS, PEMS, and CCDMs?

- Part 64 – site-specific monitoring of control devices to provide a reasonable assurance of compliance, can include at source owner's option:
  - Control device operating parameter monitoring (CAM indicator ranges representative of compliance)
  - CEMS – required if specified by rule
  - PEMS – required if specified by rule
- Continuous compliance determination method (CCDM)
  - CEMS/PEMS specified by underlying rule as performance test method (e.g., Da for SO<sub>2</sub>)
  - Exempt from part 64 (beyond CAM)

## What happens to part 64 schedule in merged (TV and NSR) permits?

Common sense? Build conditions into permit to require source owner to:

- Submit monitoring plan x days before process startup
- Commence monitoring upon start-up or
- Establish indicator ranges and commence monitoring within 180 days of start-up (relates to part 64 allowance for data collection)

## What else is included in a permit for monitoring?

Permit elements (EPA guidance has examples):

- ***Description of monitoring (what is measured, how, frequency, averaging time),***
- ***What defines excursions and consequences (e.g., excursion triggers corrective action and reporting obligation),***
- ***Rudimentary QA/QC schedules and procedures.***

## What is required for compliance certification?

40 CFR 70.6(c)(5) - annual or more frequent certification requires the source owner (responsible official) to:

- ***Certify as to status of compliance for each permit term or condition, and***
- ***Indicate whether compliance is continuous or intermittent (as per 1999 Court decision, rule change due later this year).***

## What is the difference between excursions and exceedances?

- ***Exceedance (excess emissions) – condition detected by monitoring in terms of applicable standard that emissions are beyond limit - e.g., CEMS or PEMS data***
- ***Excursion – departure from indicator range established in accordance with part 64 - control device parameter data***

## What is the source's compliance status during excursions?

- *Potential problem in the operation and maintenance of the control - corrective action obligation,*
- *Possible exception to compliance with applicable requirements - reporting obligation, but*
- *Not necessarily a failure to comply with the underlying emissions limitation or standard.*

## What is source's compliance status during exceedances?

- *Reporting requirements already established in existing requirements in many cases, may have to specify an appropriate time period for averaging data to report exceedances,*
- *Exceptions to compliance noted in compliance certification.*

**Next?**



# What we have heard

- Periodic Monitoring
  - Proposed rule change creates ‘sufficiency monitoring’ per 70.6(c)(1)
  - Periodic monitoring remains in 70.6(a)(3)(i)(B)
- If Periodic Monitoring not applicable, then Sufficiency Monitoring is applicable

# Proposed Part 70 rule change

- THIS DATA CURRENT AS OF THE FEDERAL REGISTER DATED OCTOBER 25, 2002
- 40 CFR - CHAPTER I - PART 70
- View Part
- § 70.6 Permit content.
- (a) Standard permit requirements. Each permit issued under this part shall include the following elements:
- (3) Monitoring and related recordkeeping and reporting requirements. (i) Each permit shall contain the following requirements with respect to monitoring:
  - (B) *Where the applicable requirement does not require periodic testing or instrumental or noninstrumental monitoring (which may consist of recordkeeping designed to serve as monitoring), periodic monitoring sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit, ....*
- (c) Compliance requirements. All part 70 permits shall contain the following elements with respect to compliance:
  - (1) *Consistent with paragraph (a)(3) of this section,* compliance certification, testing, monitoring, reporting, and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit...

## What we have heard (continued)

- Interim final rule to suspend the phrase for 60 days  
Proposal to remove the phrase permanently
  - 30 day comment period closed Oct 17<sup>th</sup>
- Another notice-and-comment rulemaking to follow
  - “to consider more comprehensively means of meeting the statutory monitoring requirements”

## What we have heard (continued)

- Why is this needed?
  - Weave NRDC and Appalachian Power decisions with Pacificorp and Fort James orders
- Impact on CAM rule
  - None
  - CAM satisfies PMon and PMon satisfies SM

# What to expect

- Satellite Workshop Case Studies Summary
  - On-Site Coordinator
- CAM Protocols
  - EPRI's relationship among ESP COMS, model output, and PM emissions
  - AAM's relationship between oxidizer temperature and VOC emissions from ovens and spray booths

# What to expect

- Printer's TSD parameters with a relationship to VOC emissions for
  - Incinerators (catalytic and thermal)
  - Solvent recovery systems (2)
  - Unenclosed capture systems (2)
  - Permanent total enclosure capture systems (3)

# What you want us to address

- More candidates for FAQs ?