

Regulatory Update: EPA, PADEP, and SCAQMD

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40 CFR 60 Performance Specification 2

SO₂/NO_x RATA

- ▶ 13.2 *“Relative Accuracy Performance Specification. The RA of the CEMS must be no greater than 20 percent when RM is used in the denominator of Eq. 2-6 (average emissions during test are greater than 50 percent of the emission standard) or 10 percent when the applicable emission standard is used in the denominator of Eq. 2-6 (average emissions during test are less than 50 percent of the emission standard).”*
- ▶ The applicable specification depends on your average emissions during testing relative to your emission standard
- ▶ Ask your state agency if you can use an absolute mean difference criteria
 - ▶ Precedence in 40 CFR 75
 - ▶ Low emissions and emissions limits

7-Day Calibration Error Test

- ▶ Previous EPA CAMD Guidance
 - ▶ If a unit trips and the unit is not restarted there's no need to restart the 7-day drift
- ▶ New EPA CAMD Guidance
 - ▶ Since guidance was given in "good faith", there is no need to revisit any 7-day drift tests that followed previous guidance
 - ▶ "Approximately 24 hours apart" = 20-28 hours apart preferably after 24 clock hours rather than before
 - ▶ In the event of a trip or forced shutdown you may need to restart the 7-day drift

Fuel Flow Meter Calibration Fluid

- ▶ Are water calibrations valid for gas applications and vice-versa?
- ▶ Have documentation from the manufacturer of the fuel flow meter explaining in detail how to account for the fact that natural gas is compressible and the calibration fluid was not, the policy group would be willing to review the documentation and consider it.
- ▶ White paper: “Why Micro Motion Water Calibrations Are Valid for Gas Applications” by Keven Dunphy
- ▶ Clarify the standard used to verify your flowmeter accuracy, if method is traceable to NIST that’s acceptable but you must submit a petition to the EPA



Pennsylvania Department of Environmental Protection (PADEP)

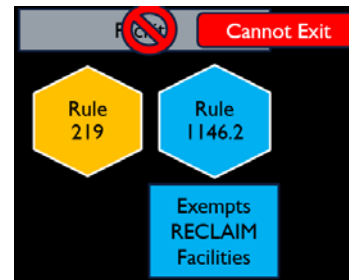
- ▶ Phase I
 - ▶ Application
 - ▶ Electronic Monitoring Plan
 - ▶ QA/QC Manual
 - ▶ Equipment Protocol
- ▶ Phase II
 - ▶ Certification Protocol (hard-copy and electronic)
 - ▶ Operational Test Period
 - ▶ DAHS Accuracy Verification - 9 hours
 - ▶ CO Cycle Time Test rather than Response Time Test
 - ▶ Linearity and CTT on each analyzer and range
- ▶ Phase III
 - ▶ Certification Report (hard-copy and electronic)

NH₃ Slip – Determination vs Calculation (PADEP)

- ▶ First NH₃ CEMS to use the NH₃ slip calculation method in PA was built by CiSCO
- ▶ Took around 6 months to obtain approval
- ▶ Ultimately, PADEP required initial certification and QA/QC of the SCR inlet analyzers and the NH₃ injection flow meter

South Coast Air Quality Management District (SCAQMD) – RECLAIM

- ▶ As of January 5, 2018 SCAQMD adopted the proposed amendments to Rules 2001 and 2002.
 - ▶ Rule 2001 was amended to prohibit facilities from entering the RECLAIM program.
 - ▶ Rule 2002 amendments establish the process for notifying and transitioning RECLAIM facilities to a command-and-control regulatory structure.
- ▶ New proposed amendments to Rules 2001 and 2002 as of 09/05/18
 - ▶ Rule 2001 - Establishes eligibility criteria and procedures for facilities to opt-out of RECLAIM
 - ▶ Rule 2002 - Revised eligibility criteria for facilities to be identified as ready to exit.



- ▶ Link to Proposed Amendments: <http://www.aqmd.gov/home/regulations/rules/proposed-rules#RegXX>

Questions/Comments?

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