

Comments/Response Document
Applicability Determination and Implementation Procedures for Continuous Source
Monitoring Manual Revision No. 8 (274-0300-005)

<u>Commentator No.</u>	<u>Name and Company</u>
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Comment 1: One commentator (1) asked for clarification with respect to **Page 3, Technical Guidance, Item 5** under the "TECHNICAL GUIDANCE" section. Specifically, how does the requirement that "... the following types of sample hourly data be submitted:

- A. Valid hours
- B. Invalid hours
- C. Hours of operation..."

differ from the requirement that "A sample quarterly report should also be prepared and submitted to the Department?"

What would be the format and submittal method for the "Valid hours, Invalid hours, Hours of operation"?

How many "sample" hours must be submitted?

Response: These specific types of hours will be requested, in addition to the standard sample report, to confirm that the minimum cycle time of the continuous emission monitoring system (CEMS) stored data supports the operating, partial operating, invalid, and process down hour values. Each type of hourly average will be reviewed to ensure that multiple operational scenarios are reported correctly. Data substituted hours (where applicable) will also be reviewed to confirm the use of proper procedures. A few hours of each type of "sample" hours should be submitted to the Department.

Comment 2: One commentator (1) asked for clarification with respect to **Page 3, Technical Guidance, Item 5** under the "TECHNICAL GUIDANCE" section. Specifically, with respect to the statement "... Documentation of the accuracy of computations performed by the data acquisition system (DAS)...must be conducted for those CEMSs in which the calculation of emissions...are impacted."

Wouldn't all CEMS results be "impacted"? If not, for which CEMS results must the documentation be conducted?

Response: The Department concurs, and the language has been changed to read as follows:

"Document the accuracy of computations performed by the data acquisition system (DAS), in accordance with the procedures contained in Revision No. 8 of the Manual."

Comment 3: Two commentators (1, 2) asked for clarification with respect to **Page 4, Technical Guidance, Item 11** under the "TECHNICAL GUIDANCE" section. Specifically, does the statement, "The Disconnected Client Application and instructions are available on the CEM Homepage (see Web address, above)" mean that the items will be available when the guidance is published as final in the PA Bulletin or should it be available now? The information does not currently (09/15/08 AM) appear on the CEM Homepage.

Comments/Response Document
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Monitoring Manual Revision No. 8 (274-0300-005)

Response: The Disconnected Client Application and installation instructions are now posted on the CEM Homepage.

Comment 4: Page i, Applicability, Paragraph D, states that this technical guidance document “serves as the official announcement by the Bureau of Air Quality (BAQ), that the upgraded CEMDPS has become functional”.

One commentator (2) indicated that based upon their experience with the Beta testing, it is not evident that the CEMDPS is completely functional. Of special concern is the ability of the owners/operators of facilities to validate and submit quarterly emission summaries and EDRs for the approximately 1,000 CEMs.

Response: The Department has received several monitoring plans, test protocols, test results, and quarterly emission summaries that facilities have been able to validate and submit. The CEMDPS is functional, but there will be a learning curve for the owners/operators of facilities to submit information into the system. The Department will develop instructions to assist users in this effort, and they will be posted to the CEM Homepage (view the link contained in the “Applicability Determination and Implementation Procedures for Continuous Source Monitoring Manual Revision No. 8”).

Comment 5: One commentator (2) stated that based upon the dates provided in the below passage, the owners/operators of a regulated company could possibly not know prior to the compliance deadline of April 1, 2009, whether they have received an extension to implement Revision 8 of the Manual.

Page 2, Technical Guidance, Item 2B, states that “The owners/operators of facilities that are unable to comply with the requirements of Revision No. 8 of the Manual by April 1, 2009, should submit an implementation plan to the Chief of the CEM Section **no later than** January 31, 2009. The implementation plan will be reviewed and a formal response provided within 60 days of receiving the request. If the request is denied, the owners/operators of the facility will be provided a reasonable timeframe to comply with the requirements of Revision No. 8 of the Manual.”

Response: The Department concurs with the commentator’s assessment and will accommodate in providing extensions to implement Revision No. 8 of the Manual. We also recognize that the owners/operators of sources that are required to submit electronic data records for Federal purposes must also comply with a new reporting format. Therefore, **Item 2B,** has been changed to read as follows:

“The owners/operators of facilities that are unable to comply with the provisions of Revision No. 8 of the Manual by July 1, 2009, should submit an implementation plan to the Chief of the CEM Section by March 31, 2009. The implementation plan will be reviewed and a formal response provided within 30 days of receiving the request. If the request is denied, the owners/operators of the facility will be provided a reasonable timeframe to fulfill the provisions of Revision No. 8 of the Manual.”

Comments/Response Document
Applicability Determination and Implementation Procedures for Continuous Source
Monitoring Manual Revision No. 8 (274-0300-005)

Comment 6: One commentator (2) recommended that the Department state the preferred method of communication for the notification required in **Page 2, Technical Guidance, Item 3**.

Response: The Department concurs. The second paragraph in **Technical Guidance** will now read as follows:

“All monitoring systems and emissions reports should comply with the requirements of Revision No. 8 of the Manual in accordance with the below procedures. Information should be tendered by either letter or through e-mail, as provided, for the following:”

Comment 7: One commentator (2) recommended that the Department state the preferred method of communication for the notification required in **Page 3, Technical Guidance, Item 4**.

Response: See response to Comment 8.

Comment 8: One commentator (2) recommended that the Department state the preferred method of communication for the information requested in **Page 3, Technical Guidance, Item 5**. They also inquired if the owners/operators of facilities will receive confirmation and approval from the Department prior to the implementation of the requirements of Revision No. 8 of the Manual.

Response: The preferred method of communication for the information requested will vary by facility and current capabilities. Furthermore, it is not mandatory that approval be provided for this item prior to implementation of Revision No. 8 provisions. Quarterly emission summaries will not be submitted until after the completion of the first quarter under Revision No. 8 provisions and the owners/operators of facilities should have the ability to make any necessary data corrections prior to submittal to the Department. The following language has been added to **Item 5**:

“The Department and the owners/operators of the facility will discuss/determine the most appropriate method of submittal for the information requested in Item 5. Confirmation/approval may be provided prior to or after the implementation of Revision No. 8 of the Manual.”

Comment 9: One commentator (2) recommended adding language to **Page 3, Technical Guidance, Item 8**, stating that facilities that participated in the Alpha and Beta testing of the CEMDPS that already have access will not need to obtain a new user account.

Comments/Response Document
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Monitoring Manual Revision No. 8 (274-0300-005)

Response: The Department concurs and has added the following language to **Item 8**:

“The owners/operators of facilities that took part in the Alpha and Beta testing of the CEMDPS and already have user accounts will not need to obtain a new user account, but will be required to confirm who should continue to have access to the CEMDPS Online Application and if their security role should change.”

Comment 10: One commentator (2) recommended adding language to **Page 4, Technical Guidance, Item 10**, indicating how facilities should handle errors and corrections to migrated data.

Response: This situation is addressed on **Page 4, Technical Guidance, Item 8**, which states that “Upon obtaining Portal Access, the Department will work with the owners/operators of affected facilities to make any necessary data/information corrections in the current CEMDPS and, ultimately, migrate all facility data/information into the new CEMDPS”.

Please keep in mind that facility and configuration information may be migrated by the Department into the new CEMDPS more than once if corrections are necessary.

Comment 11: One commentator (2) indicated that as of October 10, 2008, the procedures cited on **Page 4, Technical Guidance, Item 13** to assist users of the new CEMDPS with the completion of general activities in the CEMDPS have not been posted on the CEM Homepage. The commentator indicated that the procedures are necessary to ensure better compliance with Department requirements.

Response: It is the Department’s intent to post the procedures to the CEM Homepage prior to the publishing of this document as final in the *PA Bulletin*.