



# MATS

## Emission Testing and Monitoring Requirements

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McIlvaine MATS Webinar, Aug 7, 2014

# Testing and Initial Compliance Requirements

- Comply by 4-16-2015, Demonstrate within 180 days
- Performance Tests to demonstrate compliance
  - Stack Testing at max normal load – 3 one-hour runs
  - CMS - 30 days of data
    - HCl, HF, Hg – CEMS or sorbent traps
    - SO<sub>2</sub>, PM – CEMS (or PM CPMS)
- If CMS, must be certified before that 30-day period (for example, PM by PS-11 – a week of testing)
- If PM or Metals CPMS, must show Continuous Compliance with an Operating Limit (or limits at other loads)

# Performance Test Decisions

- You might include testing for other issues in the same program – PM2.5, RATA, etc.  
(be sure the test methods chosen will cover all the regulations and objectives)
- Other possibilities:
  - Low Emitting EGU – test to qualify as LEE  
(advantage: less frequent subsequent testing)
- PM CPMS – may reduce testing frequency; annual rather than quarterly
- PM CEMS – certification and audits

# Continuous Compliance Requirements

- If CEMS used for initial compliance:
  - use CEMS with quarterly audits and annual RATA
- If stack tests used for initial compliance:
  - Quarterly tests - FPM (or metals), HCl/HF
- Exceptions...

# Continuous Compliance Requirements

- Exceptions...
- PM CPMS with Operating Limit
  - test annually, not quarterly
- If LEE for Hg, just annual Method 30B test
- If LEE for non-Hg, test once in 3 years

# Reporting and Recordkeeping

- **Emissions Averaging Plans** – Due 120 days before 4/16/2015
- **Site Specific Monitoring Plans** – Due 60 days before Initial Performance Test
- **Performance test Notification** – Due 60 days before performance test
  - Initial & Ongoing performance tests
  - Initial certification, RATAs, RCAs, RRAs
- **CEMS QA/QC Plans** - No specific dates – before certification
  - PM CEMS, Hg CEMS, HCl CEMS
- **Notification of Compliance Status** – Due **60 days** after completion of performance tests and/or compliance demonstration
  - Submitted via **ERT/CEDRI** – ***this will take time!***
- **Semi-Annual Compliance Reports** – Due every 7/31 or 1/31 – First report 1/31/2016
- **Quarterly Reports** – Due 30 days after the end of each quarter

# Summary

- Decide how to conduct performance test
  - stack test, CEMS, CPMS?
  - FPM or metals, HCl or SO<sub>2</sub>, etc.
- Decide how to determine continuous compliance (this likely drives the decision)
  - Quarterly tests, CEMS, CPMS, etc.
- Plan carefully – operations, testing schedule, notifications and reporting
  - Quality testing will save overall cost!
  - Consider pre-compliance engineering tests (may be more important than compliance tests!)
- Prepare differently for S/N 1, latest monitor