



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
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December 24, 2009

**To: RECLAIM Facilities with Major Sources and CEMS Vendors**

**Subject: Extension of Deadline For Mass Emission Rate Calculation for RECLAIM Major Sources**

The South Coast Air Quality Management District (AQMD) distributed a Compliance Advisory dated November 13, 2009 (copy enclosed) advising operators of RECLAIM major sources and Continuous Emissions Monitoring System (CEMS) vendors of the proper calculation methodology for reducing raw CEMS data to a mass emission rate for each 15-minute period. The purpose of this letter is to:

- **Extend the deadline for implementing any required changes to CEMS Data Acquisition System/Remote Terminal Unit (DAS/RTU) software from the January 1, 2010 date specified in the enclosed Compliance Advisory to either one of the two following dates, whichever is later:**
  - **The facility's first 2010 RATA due date for each major source; or**
  - **March 31, 2010.**
- Clarify that when stack flow is calculated from other measured parameters (e.g., from stack oxygen concentration and fuel flow using the F factor approach), the proper calculation order is to average all of the values for each parameter recorded for a 15-minute period then to calculate average stack flow from the average parameter values (not to calculate individual stack flows for each data point then average them for the 15-minute period).
- Further clarify that no application for modification to the CEMS is required to implement changes to the CEMS software called for by the Compliance Advisory, provided no other changes are made to the CEMS hardware or the CEMS software. Instead, the proposed changes to be made to the CEMS DAS/RTU software as a result of the Compliance Advisory, shall be documented in a "Notice of Intent" sent to AQMD at the address on this letter head and attention to Mr. Rudy Eden, Senior Enforcement Manager describing the following:
  - Details of the changes to be incorporated in the CEMS DAS/RTU software, and
  - Timeline of when the changes are to be implemented.

The complete RATA test report referenced above, showing the successful completion of the software modifications stipulated in the Compliance Advisory shall be submitted within sixty days of the completion of the RATA.

- **Clarify that if there are any emissions changes as a result of changes to a facility's CEMS DAS/RTU software in order to comply with the Compliance Advisory, the facility is required to submit revisions to all applicable Quarterly Certification of Emissions Reports (QCERs) and Annual Permit Emissions Program (APEP) reports retroactive to the starting date of January 1, 2010.**

Sincerely,

Mohsen Nazemi, PE  
Deputy Executive Officer  
Engineering and Compliance

MN:MH:DN

cc: Rudy Eden  
Enclosure

*Cleaning the air that we breathe...*