

# **Proposed Amended Rule 218.2**

**Continuous Emission Monitoring System: General Provisions**

# **Proposed Amended Rule 218.3**

**Continuous Emission Monitoring System: Performance Specifications**

**Working Group Meeting #1**

**January 27, 2022**

**Join Zoom Meeting - from PC or Laptop**

**<https://scaqmd.zoom.us/j/99223468352>**

**Zoom Webinar ID: 992 2346 8352 (applies to all)**

**Teleconference Dial In +1 669 900 6833**

# Agenda

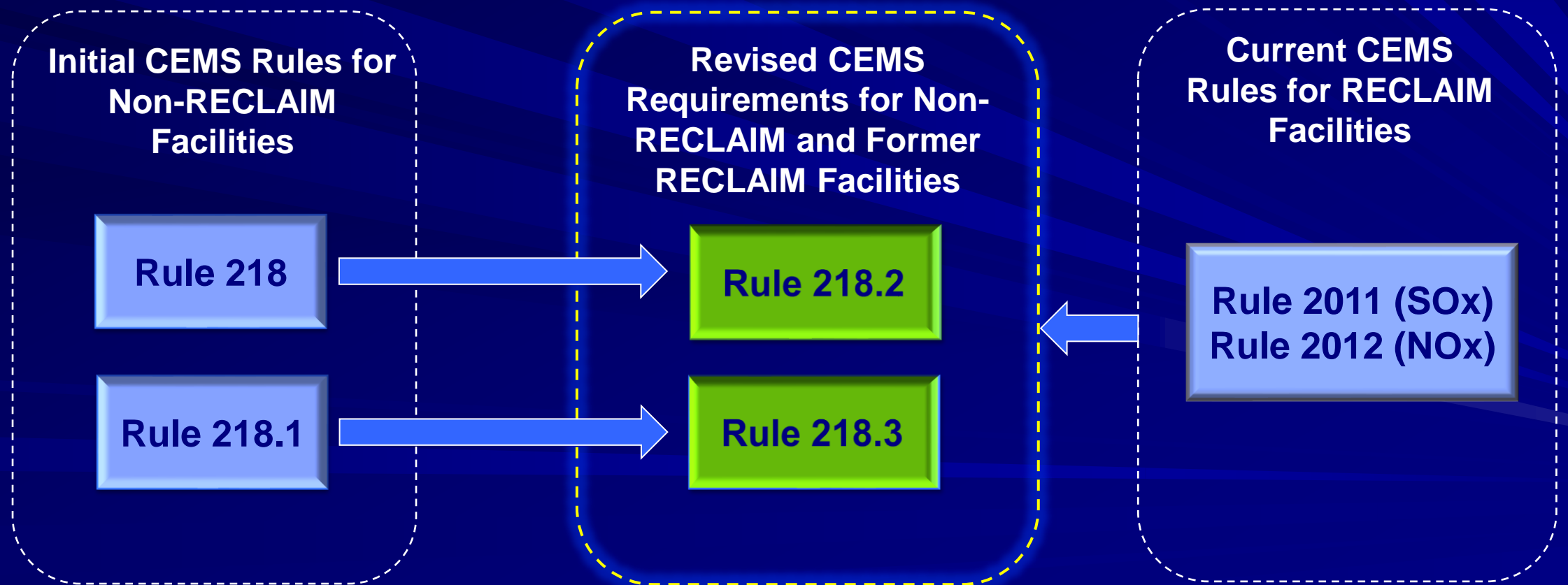
- Background
- Implementation monitoring
- Address concerns
- Update on Implementing CROMERR for Electronic Reporting
- Staff recommendation
- Next steps

# Background

- Various rules and permits require continuous emission monitoring system (CEMS) to monitor pollutant concentrations or emissions on a continuous basis for larger combustion units
- Rules 218.2 and 218.3, applicable to non-RECLAIM and former RECLAIM facilities, were adopted in March 2021 with a purpose to:
  - Align CEMS requirements for RECLAIM facilities as they transition to command and control
  - Streamline and provide more clarity to existing CEMS provisions
  - Codify existing practices to provide more transparency
- While in RECLAIM, Rules 2011 and 2012 are applicable to RECLAIM facilities
  - Rule 2011- Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Sulfur (SO<sub>x</sub>) Emissions
  - Rule 2012 – Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NO<sub>x</sub>) Emissions

# Background - Rule Approach

Rules 218.2 and 218.3 are applicable to CEMS in Non-RECLAIM and former RECLAIM facilities with an implementation schedule



# Background - Implementation Schedule

All CEMS will transition to Rules 218.2 and 218.3 by one of the following three pathways (whichever is later)

## Pathway 1

**New or Modified CEMS within Specified Window**

- Certification or recertification applications submitted between 1/1/2022 and 1/1/2025 for Non-RECLAIM CEMS
- 24 months after exiting RECLAIM for RECLAIM CEMS

## Pathway 2

**If No Recertification During Timeframe of Pathway 1**

- January 1, 2025 for Non-RECLAIM CEMS
- 24 months after exiting RECLAIM for RECLAIM CEMS

## Pathway 3

**Rule Compliance Date**

- Implementation date in landing rule for CEMS certification or recertification

# Implementation Monitoring

- Staff has been monitoring Rules 218.2 and 218.3 implementation by:
  - Discussing the implementation with facilities with applications for CEMS certification under evaluation;
  - Meeting with CEMS vendors regarding their progress on software adjustment and customer feedbacks; and
  - Monitoring pending rule amendments and proposals as related to CEMS
- Some concerns have been raised that a rule modification would be necessary

# Mass Emission Calculation

## Issue

- Mass emission calculation methodology is currently not addressed in Rules 218.2 and 218.3
- However, mass emission calculation is needed as mass emission limits are specified for CEMS monitored sources in some landing rules (e.g., Rule 1117, 1135 and Rule 1109.1)

## Initial recommendation

- Add specifications on determining pollutant mass emission rates and missing data procedure
- Calculate pollutant hourly mass emission rates using averages of pollutant concentration and other required data
- Apply missing data procedures similar as required by Rules 2011 and 2012
- Allow reporting zero emissions without requiring missing data procedures when CEMS is not operating during unit non-operation hours

# Dual range span analyzer

## Issue

- For a dual range span analyzer, when 95 percent of the lower span does not overlap with 10 percent of the higher span providing a monitoring gap, facilities over report the emissions as 10 percent of the higher span
- Adding a third range to fill the gap could be a solution for over reporting the emissions, however, this approach could be challenging for certain analyzer models

## Initial recommendation

- Staff proposes to specify a criteria to validate and accept data as monitored within a range
- The validation steps may include tests such as Low-Level Calibration Error, Low Level Spike Recovery/ Bias Factor Determination, and Low-Level RATA testing as specified in South Coast AQMD Rule 218



Any Other Issues?

# Update on Implementing CROMERR\* for Electronic Reporting

- Rule 218.2 (i) specifies reporting requirements, and reports are typically submitted by phone for certain notifications, or mail for hard copies
- Future implementation of electronic reporting suggested during rulemaking
- Responsible officials should register through CROMERR in order to be designated with specific reporting responsibility
- Any additional reporting responsibility (e.g., reporting for a rule that was not initially registered) would require a new registration through CROMERR
- Staff is working with internal resources to build an integrated form submittal system that also integrates with CROMERR

\* CROMERR - Cross-Media Electronic Reporting Rule by EPA to provide the legal framework for electronic reporting (<https://www.epa.gov/cromerr>)

# Staff Recommendation

- Initiate a rule amendment process to address such concerns raised as:
  - Mass emission calculation, and
  - Data handling for dual span range analyzers
- Continue to monitor the rule implementation and its integration with landing rules
- Continue to work towards building an electronic reporting system

# Next Steps – Rulemaking Process

- Working Group Meeting #2 – February 2022
- Public Workshop – April 2022
- Public Hearing – June 3, 2022

# Staff Contacts

- Yanrong Zhu  
Air Quality Specialist  
(909) 396-3289  
[yzhu1@aqmd.gov](mailto:yzhu1@aqmd.gov)
- Gary Quinn, P.E.  
Program Supervisor  
(909) 396-3121  
[gquinn@aqmd.gov](mailto:gquinn@aqmd.gov)
- Michael Krause  
Assistant Deputy Executive  
Officer  
(909) 396-2706  
[mkrause@aqmd.gov](mailto:mkrause@aqmd.gov)