



Cross State Air Pollution Rule Monitoring Overview

September 22, 2011



Monitoring and Reporting



Monitoring Deadlines

- TR NO_x annual and SO₂ trading programs begin January 1, 2012.
 - Monitoring systems must be certified in accordance with Part 75 by January 1, 2012.
- TR NO_x ozone season trading program begins May 1, 2012.
 - If a unit is not subject to the Acid Rain Program (ARP) or a TR NO_x annual emissions limitation, the unit has the option to monitor and report NO_x emissions for the entire year or on an ozone season basis only in accordance with 40 CFR Part 75, Subpart H.
 - For both annual or ozone season monitoring, monitoring systems must be certified by May 1, 2012.

Monitoring and Reporting for Units Already Meeting Part 75



- Most covered existing units (i.e., CAIR or ARP units) will have no changes to their monitoring and reporting requirements and will continue to monitor and report as they have under CAIR or ARP.
 - Monitoring systems previously certified and quality assured in accordance with 40 CFR Part 75 are exempt from the initial certification requirements of the TR trading programs.
 - Prior to the applicable compliance deadline, designated representatives (DRs) and agents must register units in the CAMD Business System (CBS). DR forms are currently available at the following link:
 - <http://www.epa.gov/airmarkets/business/forms.html#cair>

Monitoring and Reporting for Units Not Already Meeting Part 75



- Units not previously subject to 40 CFR Part 75 monitoring and reporting (e.g., non-ARP, non-CAIR and generally units that begin commercial operation after January 1, 2010) must:
 - First, register a DR and may register an alternate DR or assign agents (DR forms currently available in CBS)
 - DR ?'s contact - Laurie DeSantis, desantis.laurel@epa.gov
 - Second, submit a monitoring plan electronically to EPA via the Emission Collection and Monitoring Plan System (ECMPS)
 - ECMPS was recently upgraded and can now receive monitoring plans, certification tests, and qualification records from **all** units subject to the Transport Rule(s)

Monitoring and Reporting for Units Not Already Meeting Part 75



- Provide written notification of initial testing at least 21 days prior to start of certification testing (40 CFR 75.61).
- Provide hardcopy and electronic XML monitoring plan at least 21 days prior to start of certification testing (40 CFR 75.62).

Monitoring and Reporting for Units Not Already Meeting Part 75



- Unit subject to TR annual programs that commences commercial operation on or after July 1, 2011 must complete certification testing by the later of:
 - January 1, 2012; or
 - 180 calendar days after commencement of commercial operation

Monitoring and Reporting for Units Not Already Meeting Part 75



- TR NO_x ozone season unit that commences commercial operation on or after July 1, 2011 that monitors and reports on control period basis must complete certification testing by:
 - 180 calendar days after commencement of commercial operation; or
 - If compliance date is not during the control period, May 1 immediately after the above compliance date

Monitoring and Reporting for Units Not Already Meeting Part 75



- For CEM systems or excepted monitoring systems under 40 CFR Part 75, appendix D or E.
 - Submit test results electronically to EPA via ECMPS within 45 days after completing certification testing (40 CFR 75.63(a)(1)(i)(A))
 - Submit hardcopy test results to EPA regional office and State and/or local air pollution control agency within 45 days after completing certification testing (40 CFR 75.63(a)(1)(i)(B))

Monitoring and Reporting for Units Not Already Meeting Part 75



- For units qualifying for low mass emission (LME) monitoring under 40 CFR 75.19
 - Submit qualification records to EPA via ECMPS no later than 45 days before commencing use of LME methodology (75.63(a)(1)(ii)(A))
 - Submit hardcopy and other information required by 40 CFR 75.63(a)(1)(ii)(B) to EPA regional office and State agency no later than 45 days before commencing use of LME methodology
- Submit first XML quarterly emissions data report EDR by April 30, 2012

Initial and Ongoing CEMS Quality Assurance (QA)



- For units monitoring and reporting on an **ozone season basis only**,
 - Complete the initial linearity check required by 40 CFR 75.74 in April 2012
 - Pass the initial RATA required by 40 CFR 75.74 (c)(2)(ii) between January 1 and April 30, 2012
 - Perform QA according to 40 CFR 75.74(c)(3)
- For units monitoring and reporting NO_x on an annual basis, see Subpart H of 40 CFR Part 75.
- For units monitoring and reporting SO₂ on an annual basis, see Appendix B of 40 CFR Part 75.

Useful Links



- Clean Air Markets Website
 - <http://www.epa.gov/airmarkets/index.html>
- Part 75 Rules, Policies, Instructions
 - <http://www.epa.gov/airmarkets/emissions/rules.html>
- ECMPS
 - Overview, Download Software, Additional Information
<http://www.epa.gov/airmarkets/business/ecmps/index.html>
 - Tutorials
http://ecmps.camdsupport.com/learn_tutorials.shtml
 - Request Technical Support
http://ecmps.camdsupport.com/help_support_request.shtml
- For questions, please contact your appropriate EMB Analyst:
<http://www.epa.gov/airmarkets/emissions/cem-contact.html>