COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

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FAX COVERSHEET

DATE: May 4, 1994

TO: Jim Hagedorn, Liaison
EPA Region III

FROM: Steve Hepler, Liaison
PADER SWRO AQC

TOTAL PAGES INCLUDING COVER 3

COMMENTS

As requested...
Note: other package went out in the mail yesterday... should be getting soon...

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MAY 4 1994

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Commonwealth of Pennsylvania
Environmental Resources
February 25, 1994

Subject: USX 'Enhanced Monitoring Plan'
For NOx

To: Stephen D. Hepler
Compliance Specialist
Southwest Regional Office
Field Operations- Air Quality Control

From: Joseph G. Nazzaro, Chief
Continuous Emission Monitoring Section
Division of Source Testing and Monitoring
Bureau of Air Quality Control

Through: Chief, Division of Source Testing and Monitoring
Regional Air Quality Program Manager, Pittsburgh

As we discussed during our telephone conversation of February 25, 1994, the 'enhanced monitoring plan' which you forwarded to us from the Allegheny County Health Department raises several issues:

1. EPAs enhanced monitoring regulations will not be finalized until September of 1994. Thus, no review of enhanced monitoring plans is possible at the present time.

2. No decision has been made thus far as to who will be responsible for review/approval, auditing or data processing for enhanced monitoring systems when the regulations are finalized (Regions vs Central Office).

3. 'Parametric monitoring systems' cannot currently be approved by us (as alternatives to conventional CEMSs) unless they meet all design, performance, quality assurance, recordkeeping and reporting requirements as for CEMSs (in other words, we treat them as 'black boxes' identical to CEMSs).

4. When we develop specific requirements for parametric monitoring systems, the areas of design specifications, performance specifications (and associated testing requirements), periodic quality assurance requirements, record keeping and reporting requirements will all be addressed in a manner analogous to CEMSs. Thus, rather than parametric monitoring being simpler/cheaper than CEMSs, some aspects of operation/maintenance of parametric monitoring systems may be more difficult/costly than for CEMSs.

   The area of periodic quality assurance could be one of these aspects since each measurement device must undergo periodic (daily, quarterly, yearly, etc.) checks of calibration/integrity. While, for NOx, a CEMS requires only two measurement devices (NOx and a diluent like O2 or CO2), parametric monitoring systems may require many more devices. Thus, periodic quality assurance activities could require more resources for parametric monitoring.

Demonstration of design and performance specifications (appropriate range, resolution of data readings on both units and time scales, frequency of recording data, response times, linearity, drift, etc.) will also have to be addressed for each measurement device. Testing will be required to demonstrate compliance with the design/performance requirements and to demonstrate accuracy relative to reference measurements of the 'underlying emissions standard' (relative accuracy).

Recordkeeping and reporting will be essentially identical to that for CEMSs. Floppy disk reporting of hourly averages will be required. Should we determine that a daily average would be appropriate in some instances, we would require the daily average to be reported for all operational hours in the day (for uniformity in our processing of the data).

The bottom line is that, popular opinion notwithstanding, parametric monitoring is not a 'free ride' for a company.

5. Significant resources will be required to support the Bureau's enhanced monitoring program activities. The fact that monitoring may be done using systems other than conventional CEMSs will not significantly reduce the resources necessary for approval, quality assurance auditing or data processing (CEMSs are now essentially evaluated as 'black boxes' as long as they meet the design/performance specifications, quality assurance requirements and recordkeeping/reporting requirements). Thus, if Allegheny County wants us to conduct some of these activities for them, there would probably have to be some sort of official agreement between them and our Bureau.

6. An 'enhanced monitoring plan' is not necessary in order to meet the requirements of the NOx RACT regulation. Conventional CEMSs are being used to comply with these requirements. In fact, another steel company, Bethlehem Steel's Bethlehem plant, has submitted their proposal to use conventional CEMSs for this monitoring.

I am returning the USX plan to you. Should you have any further questions concerning this matter, please feel free to contact me at 717-783-9247.

Attachment

JCN:jcn USXEMP.WPF February 25, 1994 13:20:39

cc: Reading File - CEM
File ST5
Don Kerstetter, DCB through: Chief, DCE