From: Hess, Alana
To: Little, David
Subject: FW: MATS ESP Continuous Compliance
Date: Monday, April 3, 2017 2:18:49 PM

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From: Burns, Ward [mailto:Burns.Ward@epa.gov]
Sent: Monday, April 03, 2017 11:02 AM
To: Hess, Alana; Cheever, Robert
Subject: RE: MATS ESP Continuous Compliance

I do not believe that the periodic monitoring requirements in 70.6(a)(3)(i)(B) apply to the MATS requirements. MATS does require periodic testing or monitoring. I did find two statements in the Dec. 2001 Response to Public Comments document regarding the adequacy of the monitoring and they are quoted below. Although neither one was exactly on point with your question about having to add periodic monitoring, I think the quotes show EPA's thinking about the rule's monitoring adequacy.

> The rule also provides the option to use frequent manual performance testing with the premise the frequent testing (e.g., quarterly) will ensure that sources must maintain the process and control technologies in condition consistent with compliance performance on a continuous basis. This includes units that comply with emissions limits with no add on control devices.
>
> The EPA establishes the limits based on the maximum achievable control technology, not the specific timeframe over which health risks from the applicable hazardous air pollutants may manifest themselves. The monitoring and testing provisions are established to ensure continuous compliance with those standards. The EPA believes that the final rule's monitoring and testing provisions provide a cost-effective means of ensuring continuous compliance with the standards, and take advantage of a range of options, with significantly reduced monitoring and testing where the margin of compliance indicates a reduced

likelihood for potential noncompliance situations.

Sincerely,

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From: Hess, Alana [mailto:Alana.Hess@dnr.mo.gov]
Sent: Friday, March 31, 2017 12:49 PM
To: Cheever, Robert <cheever.robert@epa.gov>; Burns, Ward <Burns.Ward@epa.gov>
Subject: MATS ESP Continuous Compliance

Bob and Ward,

I'm drafting AECI – New Madrid's Part 70 renewal and MATS has me a little bit flummoxed. They are using an ESP to achieve compliance with the MATS PM limit and demonstrating compliance via quarterly stack testing.

The only requirements in MATS for the ESP that I have found are:

§63.10000(b) At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the EPA Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

§63.10005(b)(5) For each performance test based on stack test data, you certify, and keep documentation demonstrating, that the EGU configuration, control devices, and fuel(s) have remained consistent with conditions since the prior performance test was conducted.

If they comply with paragraph (2) of the definition of start-up they have to record the number of fields in service, as well as each field's secondary voltage and secondary current during each hour of startup per §63.10020(e)(3)(i)(C), but they aren't required to record these values during normal operation or if the comply with paragraph (1).

§63.10032(g) You must keep records of the occurrence and duration of each malfunction of an operation (i.e., process equipment) or the air pollution control and monitoring equipment.

§63.10032(h) You must keep records of actions taken during periods of malfunction to minimize emissions in accordance with §63.10000(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

The language in the rule does not appear to me to be sufficient under §70.6(a)(3)(i)(B) to ensure that the ESP is being properly maintained and operated during the 2,187 hours each calendar quarter they are not stack testing. Is there something I'm missing?

Thanks,

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