

Voluntary Superior Monitoring



February, 2003

Purpose of Briefing

- Recall history
- Provide recommended approach
- Discuss incentives ideas
- Discuss criteria ideas
- List outreach activities
- Describe outstanding issue
- Next steps

Superior Monitoring Team

- Office of Air Quality, Planning, and Standards
 - Representing all Divisions and programs
- Office of Enforcement and Compliance Assurance
- Office of Policy and Environmental Innovation

Expected Outcomes

- Reduced emissions
- Better control of processes
- Fine tuning of control equipment and maintenance programs
- More and better information for agencies and public

History - Why form an Team?

- MACTS are out the door
- No resources available to repropose existing standards
- Old monitoring outdated in Parts 60 and 61 standards
- New standards going out w/o superior monitoring
- Need some innovative thinking!



History- Team Charge

- Identify OAQPS program areas that have potential for implementing better monitoring
- NSPS, NESHAPS, MACTS, SIPs, NSR
- Identify potential implementation methods
- **General Provisions Option Idea!**
 - **Revise Parts 60, 61, 63, 70, and 71**
 - **Voluntarily put on superior monitoring**
 - **Provide incentives for doing so**

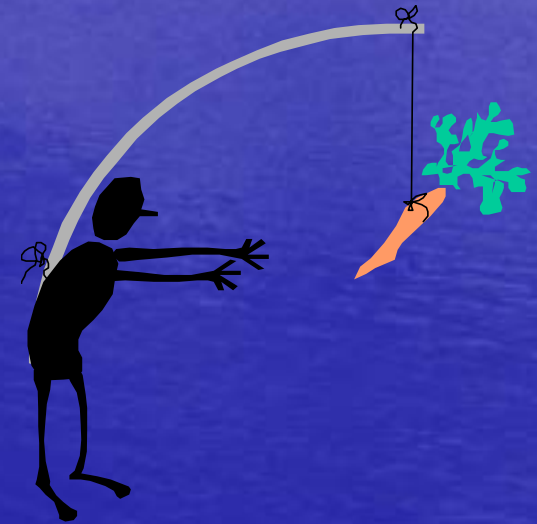


Superior Monitoring Examples

- Once per permit period performance testing replaced with CEMS
- Continuous parameter monitoring replaced with CEMS
- Continuous opacity monitoring replaced with PM CEMS or bag leak detectors

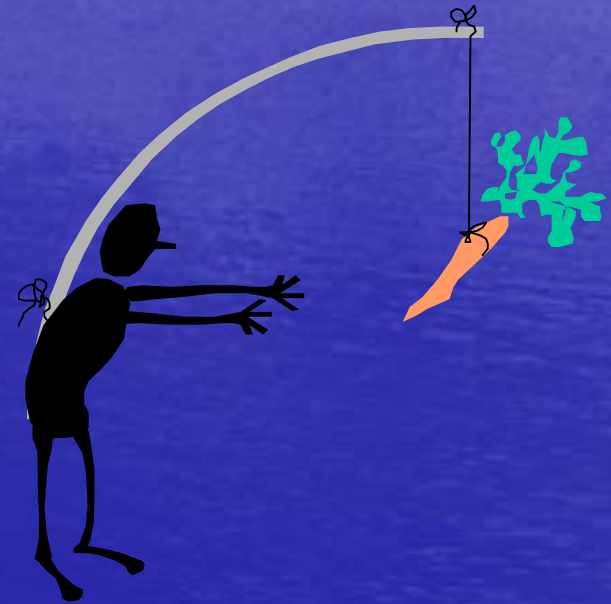
Incentives Ideas

- No “credible evidence” during testing or experimentation with proposed monitoring
- Existing monitoring requirements eliminated
 - Why do all the parameter monitoring if you can monitor for the pollutant of concern?
- Flexibility in reporting and recordkeeping, e.g., less frequent reporting based on good compliance record



Incentive Ideas Continued...

- Less frequent performance testing
- QA for monitoring proposed by source
- Flexibility in averaging period
- Flexibility in format of emission limit
- Flexibility in process operations as compared to parameter monitoring w/operating limits
- Streamlining monitoring requirements in permits
- Tax credits



Acceptance Criteria

- Important not make the hurdle too high
- Simple as possible
- Clear
- Guidance to help in meeting criteria
- Performance based



Outstanding Issues

- Ability to write clear criteria that doesn't conflict with Agency policies and existing regulations
- Ability to provide incentives that will incite industry to volunteer
- Ability to develop acceptance criteria that is satisfactory to all stakeholders



Where are we going from here?

- Planning stakeholder meetings/workshops
- Draft guidance on superior monitoring
- Preamble and rule language



Schedule/Products

- Stakeholder meetings – February-April 2003
- Draft of guidance – June 2003
- Draft of preamble and rule language – July 2003
- Proposal in FR – October 2003

