



San Diego County Air Pollution Control District

May 17, 2023

NOTICE OF PUBLIC WORKSHOP

FOR DISCUSSION OF DRAFT PROPOSED AMENDED RULE 19.2 – CONTINUOUS EMISSION MONITORING REQUIREMENTS

The San Diego County Air Pollution Control District (District) invites you to participate in the following online public workshop to provide input about draft amendments to Rule 19.2 – Continuous Emission Monitoring Requirements. Comments and questions concerning this proposal may be submitted in writing before or during the workshop, which is scheduled for:

DATE: Wednesday, June 14, 2023
TIME: 10:00 a.m. to 11:30 a.m.
HOW TO PARTICIPATE: Register via web browser or mobile device at:
<https://bit.ly/3O0DGG0> (Meeting ID: 865 5922 0797, Passcode: 190627)

Proposed amendments to Rule 19.2 apply to continuous emission monitoring systems (CEMS) that are required by the District, the U.S. Environmental Protection Agency (EPA) or the California Air Resources Board (CARB) and are subject to a gas concentration or emission rate standard. The amendments are being proposed to update the rule and to ensure it aligns with federal CEMS requirements in 40 CFR Parts 51, 60 and 75. The rule amendments will provide clarity to those subject to the rule when used in conjunction with federal regulations. In summary, the proposed amendments to Rule 19.2 specify:

- Quality assurance/quality control operating programs for CEMS
- Equipment sampling and recording frequencies
- Record keeping requirements for various data
- A requirement that data reports contain at least 95% of the source's operating hours
- Testing methods and a compliance schedule

Permit holders that operate CEMS are encouraged to distribute this workshop notice with contractor(s) that maintain their CEMS so they may also attend the workshop.

Draft Documents

Copies of proposed amendments to Rule 19.2 are available on the District's Rule Development website at <https://bit.ly/workshops-public-notice>. Those unable to access the document may contact Janet McCue at (858) 586-2712 or Janet.McCue@sdapcd.org.

Comment Deadline

Comments and questions regarding proposed amendments to Rule 19.2 may be verbally made during the public workshop, or in writing before the workshop. All written comments must be submitted no later than Wednesday, June 21, 2023. Please email all written comments directly to Archi dela Cruz at Archi.delaCruz@sdapcd.org. Please contact Archi dela Cruz at (858) 586-2894 with any questions.

**ASSISTANCE FOR PERSONS WITH DISABILITIES

Agendas and records are available in alternative formats upon request. Contact Janet McCue at (858) 586-2712 with questions or to request a disability-related accommodation including sign language interpretation. To the extent reasonably possible, requests for accommodation or assistance should be submitted at least 72 hours in advance of the meeting so that arrangements may be made.

10124 Old Grove Rd. San Diego California 92131-1649
(858) 586-2600 Fax (858) 586-2601
www.sdapcd.org

RULE 19.2. CONTINUOUS EMISSION MONITORING

REQUIREMENTS ~~(Effective 4/20/77: Rev. Effective 1/12/79)~~

(Rev. Adopted & Effective (date of adoption))

(a) APPLICABILITY

This rule shall apply to an owner or operator of any emission unit that is required to install a continuous emission monitoring system (CEMS) by the San Diego County Air Pollution Control District (District), U.S. Environmental Protection Agency (EPA) or California Air Resources Board (CARB) and subject to gas concentration standard or emission rate standard.

(b) RESERVED

~~(a-c) **DEFINITIONS.** Definitions used shall be those given in CFR 40, Part 51, or equivalent ones established by mutual agreement of the Air Pollution Control District, Air Resources Board, and Environmental Protection Agency. "CFR" as used in this rule means Code of Federal Regulations.~~

For the purposes of this rule, the following definitions shall apply:

(1) “**Calibration Drift**” means the difference in the CEMS output readings from the established reference value after a stated period of operation during which no unscheduled maintenance, repair, or adjustment took place. The reference value may be supplied by a cylinder gas, gas cell, or optical filter and need not be certified.

(2) “**CFR**” means Code of Federal Regulations.

(3) “**Continuous Emission Monitoring System (CEMS)**” means the total combined equipment and systems, including the sampling interface, analyzers, and data acquisition and handling system, required to continuously determine air contaminants and diluent gas concentrations and/or mass emission rate from an emission unit (as applicable).

(4) “**Data Recorder**” means that portion of the CEMS that provides a permanent record of the analyzer output. The data recorder may include automatic data reduction capabilities.

(5) “**Diluent Analyzer**” means that portion of the CEMS that senses the diluent gas (i.e., carbon dioxide (CO₂) or oxygen (O₂)) and generates an output proportional to the gas concentration.

(6) “**Diluent Gas**” means a major gaseous constituent in a gaseous pollutant mixture. For combustion sources, CO₂ or O₂ or combination of these two gases are the major gaseous constituents of interest.

(7) “**NO_x**” means the same as defined in Rule 2 – Definitions.

(8) “**Pollutant Analyzer**” means that portion of the CEMS that senses the pollutant gas and generates an output proportional to the gas concentration.

(9) “**Relative Accuracy**” means the absolute mean difference between the gas concentration or emission rate determined by the CEMS and the value determined by the reference method plus the 2.5% error confidence coefficient of a series of tests divided by either the mean of the reference method tests or the applicable emission limit. The 2.5% error confidence shall be determined in accordance with 40 CFR Part 60, Appendix B, Performance Specification 2.

(10) “**Sample Interface**” means that portion of the CEMS used for one or more of the following: sample acquisition, sample delivery, sample conditioning, or protection of the analyzer from the effects of the stack effluent.

(11) “**Span Value**” means the calibrated portion of the measurement range as specified in the applicable regulation or other requirement. If the span is not specified in the applicable regulation or other requirement, then it shall be a value approximately equivalent to two times the emission standard. For span values less than 500 parts per million (ppm), the span value may either be rounded upward to the next highest multiple of 10 ppm, or to the next highest multiple of 100 ppm such that the equivalent emission concentration is not less than 30% of the selected span value.

(12) “Zero, Low-Level, and High-Level Values” means the CEMS response values related to the source specific span value. Determination of zero, low-level, and high-level values is defined in 40 CFR Part 60 Standards of Performance for New Stationary Sources, Appendix B – Performance Specifications.

~~(b) **SOURCES AND EMISSIONS TO BE MONITORED.** The owner or operator of any source listed below for which these Rules and Regulations require a permit shall provide, properly install, maintain in good working order, and operate continuous monitoring systems to measure and record the emissions from the source as follows:~~

~~(1) Fossil fuel fired steam generators with a heat input of 250 million BTU (63 million kilogram calories) or more per hour with a use factor of at least 30 percent per year. The emissions to be monitored are:~~

- ~~(i) Oxides of nitrogen;~~
- ~~(ii) Carbon dioxide or oxygen;~~
- ~~(iii) Visible emissions, as opacity, except:~~
 - ~~(A) when gaseous fuel is the only fuel burned, or~~
 - ~~(B) when oil or a mixture of gaseous fuel and oil is the only fuel burned; and the source has a heat input of less than 1000 million BTU (252 million kilogram calories) per hour and is able to comply with all applicable particulate matter and visible emission rules herein without collection equipment; and the source has not been found since December 31, 1970, through administrative or judicial proceedings, to be in violation of Rule 50 or any other applicable visible emission standard.~~
- ~~(iv) Sulfur dioxide (SO₂), if SO₂ control equipment is used.~~

~~(2) All sulfur recovery plants. The emission to be monitored is sulfur dioxide.~~

~~(3) Carbon monoxide (CO) boilers or regenerators of fluid catalytic cracking units. The emissions to be monitored are:~~

- ~~(i) Sulfur dioxide;~~
- ~~(ii) Visible emissions, as opacity.~~

~~(4) Carbon monoxide (CO) boilers of fluid cokers if feed rate is greater than 10,000 barrels (1,500,000 liters) per day. The emissions to be monitored are:~~

- ~~(i) Sulfur dioxide;~~

(ii) ~~Visible emissions, as opacity.~~

(e) ~~**INSTALLATION AND STARTUP.** Owners or operators of sources required to have continuous emission monitors shall have installed all necessary monitoring and recording equipment and shall have begun monitoring and recording by October 6, 1978.~~

(d) **REQUIREMENTS**

(1) Each owner or operator shall develop and submit a quality assurance/quality control (QA/QC) program for the CEMS, except monitoring systems approved under Appendix D or E of 40 CFR Part 75 - Continuous Emission Monitoring, and alternative monitoring systems under Subpart E of 40 CFR Part 75, and their components. The QA/QC program shall be submitted to, reviewed by and approved in writing by the Air Pollution Control Officer. As a minimum, include in each QA/QC program, a written protocol that describes in detail, complete, step-by-step procedures and operations for each of the following activities:

(i) Calibration of CEMS,

(ii) Calibration drift determination and adjustment of CEMS,

(iii) Preventive maintenance of CEMS (including spare parts inventory),

(iv) Data recording, calculations, and reporting,

(v) Accuracy audit procedures including sampling and analysis methods,

and

(vi) Program of corrective action for malfunctioning CEMS.

(2) Data from monitored parameters required in 40 CFR Part 60 shall be recorded at least once every minute. Such parameters include, but are not limited to:

(i) Air pollutant concentration (in ppm),

(ii) Volumetric flow rate (in standard cubic feet per hour (scfh)),

(iii) NO_x mass emissions (in pounds per million British thermal units (pounds per mmBtu)),

(iv) O₂ and/or CO₂ concentrations (% O₂ or % CO₂),

(v) Air pollutant mass emissions (in pounds per hour),

(vi) CO₂ mass emissions (in tons per hour), and

(vii) Fuel flow rate (in standard cubic feet per hour (scfh)).

(3) The data acquisition rate shall be set at a constant rate such that the data points are equally spaced.

(4) Each CEMS shall be installed, calibrated, and maintained in good working order in accordance with the requirements of this rule.

(5) Utilize all valid data points to determine compliance with applicable limit(s), certification testing, and relative accuracy test audit(s) (RATA(s)).

(6) The District shall be notified at least two weeks prior to any replacement, modification, or change to the CEMS that affect the measurement, calculation or correction of data displayed and/or recorded by the CEMS.

(e) **MONITORING REQUIREMENTS**

(1) Data Averaging

For CEMS used to demonstrate compliance for an hourly average, the hourly average shall cover the 60-minute period commencing on the hour. An hourly average shall contain at least 16 data points and be computed utilizing all valid data.

For CEMS used to demonstrate compliance for an interval greater than one hour, emission data may be averaged for the required interval utilizing hourly averages computed in accordance with this subsection. All hours used in the greater than one hour interval shall contain at least 16 data points and be computed utilizing all valid data.

(2) CEMS data shall be reported in the units of the applicable standard for a minimum of 95% of the emission unit operating hours for each reporting period.

(d-f) RECORD KEEPING AND REPORTING REQUIREMENTS

(1) File of Records:

~~Owners or operators subject to the provisions of these Rules and Regulations shall maintain for a period of at least two years a record in a permanent form suitable for inspection and shall make such record available upon request to the State Air Resource Board and the Air Pollution Control District. The record shall include~~ Each owner or operator shall maintain the following:

(i) Occurrence and duration of any startup, shutdown, maintenance, repairs, breakdown or malfunction in the operation of any ~~affected facility.~~ emission units required to have a CEMS,

(ii) Performance testing, evaluations, calibrations, checks, adjustments, and maintenance of any ~~continuous emission monitors~~ CEMS that have been installed pursuant to these rules, and

(iii) Emission measurements shall be retained in electronic and/or hardcopy format on-site for at least five years and made available to the District upon request.

(2) Quarterly Report:

~~Owners or operators subject to provisions of these Rules and Regulations~~ Each owner or operator shall submit a written report for each calendar quarter to the Air Pollution Control Officer-District. The report is due by the 30th day following the end of the calendar quarter and shall include:

(i) Time intervals, date and magnitude of excess emissions, nature and cause of the excess (if known), corrective actions taken and preventive measures adopted;

(ii) Averaging period used for data reporting corresponding to averaging period specified in the emission test period used to determine compliance with an emission standard for the pollutant/source category in question;

(iii) ~~Time intervals and date of each period during which the continuous monitoring system CEMS was inoperative, except for zero and span CD, calibration drift, cylinder gas audit (CGA) and converter checks, and the nature of system repairs and adjustments-, and~~

(iv) Time intervals and date during which the emission unit was inoperative and the reason(s) the emission unit was inoperative.

(iv) A negative declaration when no excess emissions occurred.

~~(v) Reports on opacity monitors giving the number of three minute periods during which during the average opacity exceeded the standard for each hour of operation. The averages may be obtained by integration over the averaging period or by arithmetically averaging a minimum of four equally spaced instantaneous opacity measurements per minute. Any time period exempted shall be subtracted before determining the excess averages of opacity.~~

(3) Reports of Violations-

Any violation of any emission standard ~~to which the stationary source is required to conform~~, as indicated by the ~~records of the monitoring device CEMS~~, shall be reported by the owner or operator of the source to the District within 96 hours after such occurrence. The District shall, in turn, report the violation to ~~the State Air Resources Board (CARB)~~ within five working days after receiving the report of the violation from the owner or operator.

~~(4) Emission Reporting Units (Effective 1/12/79)~~

~~All emission data shall be reported in the units of the applicable standards.~~

(e) DATA REDUCTION

~~Data shall be reduced according to the procedure established in 40 CFR Part 51, Appendix P, paragraph 5.0 through 5.3.3, or by other methods deemed equivalent by joint decision of the Air Pollution Control Officer, Air Resources Board CARB and the U.S. Environmental Protection Agency.~~

(f) STANDARDS OF PERFORMANCE FOR MONITORING SYSTEMS

~~(1) Systems shall be installed, calibrated, maintained and operated in accordance with the following sections of CFR 40.~~

- (i) ~~Fossil-fuel Fired Steam Generators: Section 60.45.~~
- (ii) ~~Petroleum Refineries: Section 60.105.~~

~~Equivalent standards may be used by mutual agreement of the Air Pollution Control District, Air Resources Board and Environmental Protection Agency.~~

~~(2) Calibration gas mixtures shall meet the specifications in CFR 40, Part 51, Appendix P, Section 3.3, and Part 60, Appendix B, Performance Specification 2, Section 2.1; or shall meet equivalent specifications established by mutual agreement of the Air Pollution Control District, Air Resources Board and Environmental Protection Agency.~~

~~(3) Cycling times shall be those specified in CFR 40, Part 51, Appendix P, Section 3.4, 3.4.1 and 3.4.2; or shall meet equivalent specifications established by mutual agreement of the Air Pollution Control District, Air Resources Board and Environmental Protection Agency.~~

~~(4) The continuous sulfur dioxide and oxides of nitrogen monitors shall meet the applicable performance specification requirements in CFR 40, Part 51, Appendix P, and Part 60, Appendix B; or shall meet equivalent specifications established by mutual agreement of the Air Pollution Control District, Air Resources Board and Environmental Protection Agency.~~

~~(5) The continuous carbon dioxide and oxygen (O₂) monitoring system shall meet the performance specification requirements in CFR 40, Part 51, Appendix P, and Part 60, Appendix B; or shall meet equivalent specifications established by mutual agreement of the Air Pollution Control District, Air Resources Board and Environmental Protection Agency.~~

~~(6) The continuous opacity monitoring system shall meet the performance specification requirements in CFR 40, Part 51, Appendix P, and Part 60, Appendix B; or shall meet equivalent specifications established by mutual agreement of the Air Pollution Control District, Air Resources Board and Environmental Protection Agency.~~

(g) **TEST METHODS**

Each owner or operator shall perform and meet all applicable requirements of the following test methods for each CEMS.

(1) Calibration Drift

Check the zero (or low-level value between 0 and 20 percent of span value) and span (or high-level value between 50 to 100 percent of span value) calibration drifts in accordance with a written procedure. Analyzers that automatically adjust the data to the corrected calibration values (e.g., microprocessor control) shall be programmed to

record the unadjusted concentration measured in the calibration drift prior to resetting the calibration, if performed, or record the amount of adjustment.

(2) Cylinder Gas Audit (CGA)

(i) Challenge the pollutant analyzer and diluent analyzer of the CEMS, if applicable, with an audit gas of known concentration at two points within the following ranges:

<u>Audit Point</u>	<u>Audit Range</u>		
	<u>Pollutant Analyzer</u>	<u>Diluent Analyzer</u>	
		<u>CO₂</u>	<u>O₂</u>
<u>1</u>	<u>20 to 30% of span value</u>	<u>5 to 8% by volume</u>	<u>4 to 6% by volume</u>
<u>2</u>	<u>50 to 60% of span value</u>	<u>10 to 14% by volume</u>	<u>8 to 12% by volume</u>

(ii) Introduce each of the audit gas three times each for a total of six challenges, if applicable. Introduce the gases in such a manner that the entire CEMS is challenged. The same gas concentration shall not be introduced to the CEMS twice in succession.

(iii) A separate audit gas cylinder for audit points 1 and 2 shall be used. Gas from audit gas cylinder shall not be diluted when challenging the CEMS.

(iv) The CEMS shall be challenged at each audit point for a sufficient period of time to assure adsorption-desorption of the CEMS sample transport surfaces has stabilized.

(v) Operate each CEMS in its normal sampling mode, i.e., pass the audit gas through all filters, scrubbers, conditioners, and other CEMS components used during normal sampling, and as much of the sampling probe as is practical. At a minimum, the audit gas should be introduced at the connection between the probe and the sample line.

(vi) Certified Reference Materials (CRMs) (See 40 CFR Part 60 Appendix F, Section 8, Citation 1) audit gases that have been certified by comparison to National Institute of Standards and Technology (NIST) Standard Reference

Materials (SRMs) or EPA Protocol Gases following the most recent edition of the EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (See 40 CFR Part 60 Appendix F, Section 8, Citation 2) shall be used. Procedures for preparation of CRMs are described in Citation 1. Procedures for preparation of EPA Protocol Gases are described in Citation 2. If a suitable audit gas level is not commercially available, Method 205 (See 40 CFR Part 60 Appendix F, Section 8, Citation 3) may be used to dilute CRMs or EPA Protocol Gases to the required level. The difference between the actual concentration of the audit gas and the concentration indicated by the analyzer shall be used to assess the accuracy of the CEMS.

(3) Relative Accuracy Test Audit (RATA)

RATAs shall be performed using the following performance specifications, as specified in 40 CFR Part 60, Appendix B and the quality control limits in Section (h) – Quality Control Requirements:

- (i) NO_x analyzer – Performance Specification 2
- (ii) CO analyzer – Performance Specification 4A
- (iii) O₂ and CO₂ analyzer – Performance Specification 3
- (iv) Other analyzer – approved in writing by the Air Pollution Control Officer prior to use.

(4) NO₂ converter efficiency

A check of the NO₂ to nitric oxide (NO) converter with the method prescribed the by manufacturer shall be performed. CRMs (See 40 CFR Part 60 Appendix F, Section 8, Citation 1) audit gases that have been certified by comparison to National Institute of Standards and Technology (NIST) Standard Reference Materials (SRMs) or EPA Protocol Gases following the most recent edition of the EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (See 40 CFR Part 60 Appendix F, Section 8, Citation 2) shall be used. Procedures for preparation of CRMs are described in 40 CFR Part 60 Appendix F, Section 8, Citation 1. Procedures for

preparation of EPA Protocol Gases are described in 40 CFR Part 60 Appendix F, Section 8, Citation 2.

(h) QUALITY CONTROL REQUIREMENTS

Each owner or operator shall perform the following quality control checks and meet all applicable requirements for all analyzers and concentration ranges. To the extent possible, quality control checks shall be performed during normal operation and not during startup and shutdown.

(1) Calibration Drift

(i) Quality Control Frequencies

(A) For CEMS subject to 40 CFR Part 75, the calibration drift shall be checked, recorded, and quantified in the frequencies in accordance with the applicable regulation.

(B) For CEMS not subject to 40 CFR Part 75, the calibration drift shall be checked, recorded, and quantified at least once a day (approximately 24 hours) in accordance with the manufacturer's specifications.

(ii) Quality Control Limits

(A) For pollutant analyzers, the zero, low-level or high-level calibration drift result shall not exceed 5.0% of the span value.

(B) For diluent analyzers, the zero, low-level or high-level calibration drift result shall not exceed 1.0% O₂ or CO₂.

(2) Cylinder Gas Audit (CGA)

(i) Quality Control Frequencies

(A) For CEMS subject to 40 CFR Part 75, the CGA check frequency shall align with 40 CFR Part 75, Appendix B linearity check frequency.

(B) For CEMS not subject to 40 CFR Part 75, the CGA shall be checked, recorded, and quantified for three of four calendar quarters, but in no more than three quarters in succession. Successive quarterly CGA checks shall occur no closer than 2 months. CGA checks are not required for calendar quarters when the emission unit does not operate in the calendar quarter.

(C) For O₂ CEMS subject to 40 CFR Part 75, the linearity check may be performed in lieu of a CGA check in accordance with 40 CFR Part 75, Appendix B.

(ii) Quality Control Limits

(A) For pollutant analyzers, the CGA absolute accuracy shall not exceed 15%. Alternatively, the absolute value of the difference between the average response and the audit value shall not exceed 0.5 ppm.

(B) For diluent analyzers, the CGA absolute accuracy shall not exceed 15%.

(3) Relative Accuracy Test Audit (RATA)

(i) Quality Control Frequencies

(A) For CEMS subject to 40 CFR Part 75, the RATA frequency shall align with 40 CFR Part 75 RATA frequency.

(B) For CEMS not subject to 40 CFR Part 75, the RATA shall be at least once every four calendar quarters except when the emission unit does not operate in the fourth calendar quarter since the quarter of the previous RATA. In this case, the RATA check shall be performed in the quarter in which the emission unit recommences operation.

(ii) Quality Control Limits

(A) For NO_x analyzers, the relative accuracy shall be 20.0% or less when the reference method value is used to calculate relative accuracy or

10.0% or less when the applicable emissions standard is used to calculate relative accuracy.

(B) For CO analyzers, the relative accuracy shall be 10% or less when the reference method value is used to calculate relative accuracy or 5.0% or less when the applicable emissions standard is used to calculate relative accuracy. Alternatively, a de minimis value calculated as the absolute value of the difference between the reference method and CEMS in units of parts per million by volume, dry (ppmvd) corrected to 15% O₂ plus the confidence coefficient may be used in lieu of all relative accuracy calculations in the applicable emissions standards if the calculated de minimis value does not exceed 0.50 ppmvd.

(C) For O₂ and CO₂ analyzers, the relative accuracy shall be 20.0% or less when the reference method value is used to calculate relative accuracy or <1.0% absolute difference between the average reference method value and average CEMS value.

(D) For other monitors, in accordance with the applicable performance specification approved in writing by the Air Pollution Control Officer.

(4) NO₂ converter efficiency

(i) Quality Control Frequencies

NO₂ to NO converter efficiency shall be checked, recorded, and quantified at least once annually. Successive annual audits shall occur no closer than 4 months from each other.

(ii) Quality Control Limits

The converter efficiency shall be >90% of the certified audit gas concentration.

(i) **CORRECTIVE ACTIONS**

(1) If any of the above requirements are not met, the owner or operator shall take the necessary corrective action(s) to eliminate the problem as soon as practicable, but not to exceed 96 hours.

(2) If any quality control limits are exceeded, the CEMS is considered out of control from the time of completion of the failed audit, until the successful completion of a repeat audit.

(3) Whenever quality control limit exceedences occur for two consecutive quarters, excluding calibration drift, the current QA/QC CEMS program shall be modified or the CEMS shall be modified or replaced to correct the deficiency causing the quality control limit exceedences as soon as practical, but not to exceed 96 hours. The modified written procedures shall then replace the previous written procedures upon approval of the Air Pollution Control Officer.

(j) **COMPLIANCE SCHEDULE**

(1) Each owner or operator of new CEMS shall comply with all applicable requirements of this rule upon initial start up.

(2) Each owner or operator of an existing CEMS shall submit to the Air Pollution Control Officer current documentation which demonstrates the CEMS is in compliance with all applicable requirements of this rule by June 30, 2024.