



San Diego County Air Pollution Control District

Proposed Amendments to Rule 19.2 – Continuous Emission Monitoring Requirements

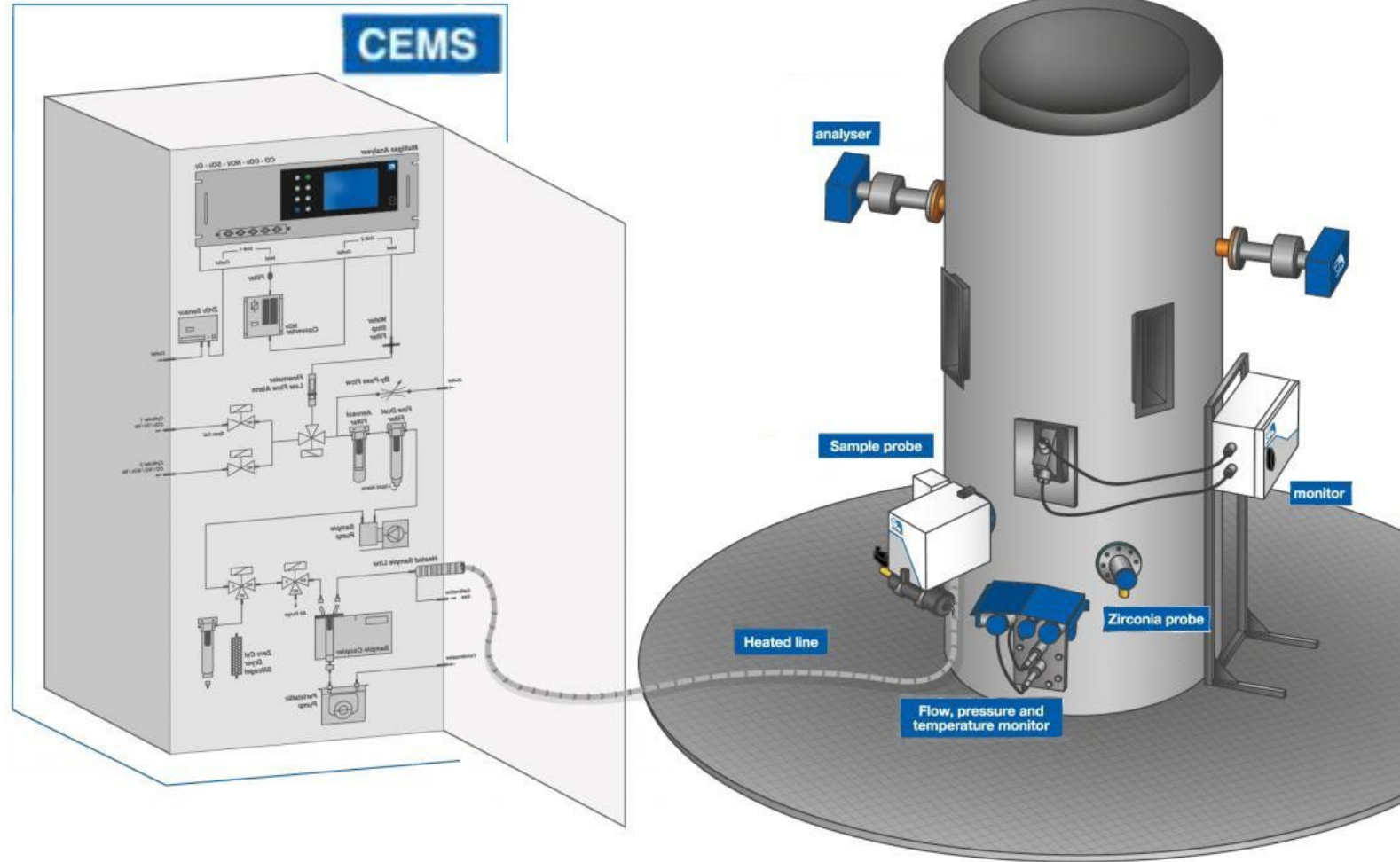
Public Workshop – June 14, 2023

2023



Overview

- Background information
- Summary of proposed amendments
- Compliance schedule
- Impacts of rule adoption
- Next steps



Background

- Rule 19.2 was last amended on January 12, 1979
- 40 CFR was amended many times since 1979
 - Part 51, Appendix P
 - Part 60, Appendices B and F
 - Part 75, Appendices A through G
- Federal requirements for various continuous emission monitoring systems (CEMS) are very technical and voluminous (more than 400 pages)
- Update needed to clarify implementation of federal requirements



Background (cont.)

- Current version of rule is not technically applicable to facilities since it is so outdated
- District has been including CEMS permit conditions to implement the requirements in 40 CFR
- Facilities are already complying with most or all of the proposed amendments
- Complete rewrite of rule



Proposed Requirements

- Applicability - Section (a)
 - Rule no longer specifies which emission units shall have CEMS
 - Rule no longer specifies which pollutants shall be monitored
 - Rule no longer requires opacity to be monitored
 - Rule 19.2 regulates how CEMS should be installed, operated, and maintained and how the gathered data shall be used
- Definitions – Section (c)
 - Definitions are in-line with 40 CFR
 - CEMS include all equipment used to determine a gas concentration or emission rate standard



Proposed Requirements (cont.)

- Requirements - Section (d)
 - QA/QC program shall be submitted, reviewed and approved by District
 - CEMS installed, operated, calibrated and maintained properly
 - Notify the District at least 2 weeks prior to any CEMS modifications

- Monitoring Requirements - Section (e)
 - Data averaging procedures
 - Data gathered for a minimum of 95% of the emission unit operating hours for each reporting period



Proposed Requirements (cont.)

- Record Keeping and Reporting Requirements - Section (f)
 - Emission measurements, emission unit down time, and maintenance records
 - Records kept for at least five years
 - Quarterly reports
 - Report violation of standard(s)
- Test Methods and Quality Control Requirements - Sections (g) and (h)
 - Calibration drift
 - Cylinder gas audit (CGA)
 - Relative accuracy test audit (RATA)
 - NO₂ converter efficiency



Proposed Requirements (cont.)

- Corrective Action - Section (i)
 - Corrective action taken as soon as practicable but not to exceed 96 hours
 - If QC limits are exceeded, CEMS is considered out-of-control
 - When QC limits are exceeded in two consecutive quarters, the QA/QC program shall be modified or the CEMS shall be modified or replaced.

- Compliance Schedule – Section (j)
 - Existing CEMS shall submit documentation demonstrating compliance by June 30, 2024 (contingent on Governing Board approval)
 - New CEMS are required to comply upon initial startup



Impacts of Rule Adoption

- Affects approximately 30 CEMS
- Most of existing permits are complying with all or most of the amendments
- Some permits may have to be modified
- No emission reduction or increase



Next Steps

- Submit comments by COB by Wednesday, June 21, 2023
- Workshop Report
- Copy to Workshop Report to attendees and other interested parties
- Consideration of Adoption by the Governing Board – by end of 2023



Contact Information

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