

SAN DIEGO COUNTY
AIR POLLUTION CONTROL DISTRICT

DRAFT PROPOSED AMENDMENTS
RULE 19.2 – CONTINUOUS EMISSION MONITORING REQUIREMENTS

WORKSHOP REPORT

The San Diego County Air Pollution Control District (District) held a virtual public workshop on June 14, 2023, to discuss and receive input on draft proposed amendments to Rule 19.2 – Continuous Emission Monitoring Requirements. A meeting notice was mailed to known owners or operators of continuous emission monitoring systems (CEMS) in San Diego County. The notice requested owners and operators to share the notice with their CEMS contractors and consultants. Additionally, the notice was posted on the District’s website, on social media, and distributed to interested parties via the District’s electronic mail service.

The virtual workshop was attended by 19 people. A summary of the comments and District responses are provided below:

1. **WORKSHOP COMMENT**

Is the standard in Subsection (e)(2) to have CEMS data collected for a minimum of 95% of the emission unit operating hours in each reporting period intended to be for a calendar quarter?

DISTRICT RESPONSE

Yes, the intent of the proposed amendments to Subsection (e)(2) is for CEMS data to be collected for each reporting period, which will typically be for each calendar quarter. Calendar quarterly reporting was already a District requirement pursuant to existing Rule 19.2, Subsection (d)(2), which is associated with the quarterly report required to be submitted to the District. The District has added clarifying language to Subsection (e)(2), as noted in District Comment #2 below, that further clarifies the cadence of this reporting.

2. **PUBLIC COMMENT**

The District should consider the applicability of Subsection (e)(2), Monitoring Requirements, for *qualifying* quarters (i.e., when a unit operates 168 hours in a quarter).

DISTRICT RESPONSE

The District agrees. Amended Subsection (e)(2) is modified as follows:

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 as specified in Subsection (f)(2) of this rule.

3. PUBLIC COMMENT

Hours tallied in Subsections (f)(1)(i) and (f)(1)(ii), Record Keeping and Reporting Requirements, should be excluded in the demonstration that the CEMS is operating properly for a minimum of 95% of the time.

DISTRICT RESPONSE

The District's intent is to require CEMS to continuously operate properly for a minimum of 95% of the time when the emission unit is in operation. An emission unit is considered in operation when it is emitting. Therefore, the record keeping and reporting requirements of Subsections (f)(1)(i) and (f)(1)(ii) shall be included in the demonstration that the CEMS is operating properly for a minimum of 95% of the time pursuant to Subsection (e)(2). The time when the emission unit is not in operation (i.e., not emitting) is excluded from the minimum of 95% requirement. The 95% requirement is intended to allow the CEMS to have short periods of downtime for various reasons such as to perform required maintenance or rectify unexpected problems.

4. DISTRICT COMMENT

The following Subsections in proposed Rule 19.2 were modified for clarification purposes after the June 14 workshop. Post-workshop modifications are shown below using double-strikeout/double-underline:

Subsection (c)(1): “40 CFR” means Title 40 of the Code of Federal Regulations.

Subsection (c)(2~~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.

Subsection (c)(2): ~~“CFR” means Code of Federal Regulations.~~

Subsection (d)(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. At a minimum, include in each QA/QC program, shall include a written protocol that describes in detail, complete, step-by-step procedures and operations for each of the following activities:

Subsection (d)(2)(iv): O₂ and/or CO₂ concentrations (% O₂ and/or % CO₂),

Subsection (e)(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 as specified in Subsection (f)(2) of this rule.

Subsection (e)(3): CEMS data shall be reported for a minimum of 95% of the time the emission unit is in operation.

Subsection (f)(2)(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

Subsection (g)(3)(ii): Carbon monoxide (CO) analyzer – Performance Specification 4A

Subsection (g)(4): Nitrogen dioxide (NO₂) converter efficiency

5. CARB COMMENT

CARB has no official comments at this time.

6. EPA COMMENT

EPA has no official comments at this time.

NC:AQD:jl
07/25/23