

Part 75 Certification Administrative Processes for CAIR NO_x Units and CAIR NO_x Ozone Season Units

EPA is planning to release a new version of the Monitoring Data Checking (MDC) software in the first week of May 2007 to accommodate CAIR NO_x units and CAIR NO_x ozone season units for which initial monitoring plans, revised monitoring plans, and initial certification applications must be submitted this year. Procedures for those submissions are provided below.

If you have any questions about these procedures, please address them to the Emissions Monitoring contact for your EPA Region (see <http://www.epa.gov/airmarkets/emissions/cem-contact.html>).

(Important Note: Before any required submittals are made concerning a CAIR NO_x unit or CAIR NO_x ozone season unit, the owner or operator must have selected a CAIR designated representative for the CAIR NO_x source that includes the CAIR NO_x unit or CAIR NO_x ozone season unit, using the Clean Air Markets Division (CAMD) Business System. Each CAIR NO_x source must have a CAIR designated representative. The owner or operator should contact Laurel DeSantis, at desantis.laurel@epa.gov, or at (202) 343-9191 if there are any questions about designating representatives.)

The CAIR designated representative must submit electronic monitoring plans and electronic certification applications to CAMD. Electronic Monitoring Plan submittals should include all applicable 100, 500, and 900 level record types. Electronic Certification Application files should include all applicable 100, 500, 600 and 900 level record types. The CAIR designated representative also must submit hardcopy portions of the monitoring plan and hardcopy certification test data to the appropriate State/Local Agency and USEPA Regional Office.

Table 1 below is a summary of the administrative process for **initial** certifications under 40 CFR Part 75. Table 1 applies to all Part 75 monitoring methodologies except for the low mass emissions (LME) option in §75.19. For a discussion of the LME certification process, see Section 6 of the “Plain English Guide to the Part 75 Rule”, which is available on the CAMD web site. For information on electronic monitoring plan submittals for LME units, see Table A-14 in Appendix A of the “Revised EDR Version 2.2 Reporting Instructions”, also available on the CAMD web site.

Table 1: Initial Certification

Submittal Requirement	Rule Citation(s)	Contents of Submittal	Submit to Whom?	Submit When?	Comments
Certification Test Notification	§ 75.61 (a)(1)(i) § 75.20 (g)(2)	Written notification of date(s) of initial certification tests	CAMD, EPA Region, State	≥ 21 days prior to commencement of certification testing	Test date may be rescheduled if notice is provided ≥ 7 days before the earlier of original or new date Tests may be repeated without notification Notification is not required for Appendix D fuel flowmeter accuracy testing

(cont.)

Table 1: Initial Certification (cont.)

Submittal Requirement	Rule Citation(s)	Contents of Submittal	Submit to Whom?	Submit When?	Comments
Initial Monitoring Plan	§ 75.53 (e) and (f), § 75.62, and § 75.73 (e)	Hardcopy and electronic monitoring plan in format "specified by the Administrator"	Hardcopy portion to EPA Region and State Electronic portion to CAMD	≥ 45 days prior to commencement of certification testing	Electronic transmittal of information in hardcopy portion is acceptable Send CAIR NO_x electronic test results and monitoring plan by email to mp-cair@epa.gov
Certification Application	§ 75.62 and § 75.63	Hardcopy application form (EPA 7610-14), monitoring plan, certification test results	Form 7610-14 to CAMD, EPA Region, State Hardcopy test results to EPA Region, State Electronic test results to CAMD Complete electronic monitoring plan to CAMD Hardcopy monitoring plan changes (if any) to EPA Region, State	≤ 45 days after completion of certification testing	For Subpart E alternative monitoring systems, submit hardcopy test results to CAMD For other certifications, submit hardcopy test results to CAMD only upon request Send CAIR NO_x electronic test results and monitoring plan by email to mp-cair@epa.gov
Notice of Approval or Disapproval	§ 75.20 (a)(4)	Written notice of approval or disapproval of certification application	Administrator or permitting authority (as applicable) provides notice to owner or operator	≤ 120 days after receipt of a complete certification application	120 day clock starts upon receipt of a complete application
Notice of Incomplete Application	§ 75.20 (a)(4)(ii)	Notification that the certification application is incomplete	Administrator or permitting authority (as applicable) provides notice to owner or operator	If application is found to be incomplete	A reasonable time is provided to submit the missing information. Non-compliance with this notice may result in disapproval of application.

Procedures for Electronic Submittals

1. Electronic **initial** monitoring plan submittals and/or **initial** certification application submittals are required **only** for CAIR NO_x units and CAIR NO_x ozone season units that do not have the certified Part 75 monitoring systems necessary to monitor and report NO_x mass emissions and heat input. This includes:
 - Affected units that are not in either the Acid Rain Program or the current NO_x Budget Program (NBP);

- Affected units that are in the NBP, but have not been required by the State NBP rule to monitor and report unit heat input (HI). For such units, a Part 75-compliant HI methodology must be in place by the CAIR NO_x compliance deadline (i.e., January 1, 2008 for units subject to the CAIR NO_x annual program or May 1, 2008 for units subject to only the CAIR NO_x ozone season program)¹; and
 - Affected units in the Acid Rain Program that are not in the NBP and that elect to quantify NO_x mass emissions as the product of NO_x concentration times stack gas flow rate. Such units must certify a NO_x concentration (NOXC) monitoring system¹.
2. For affected units that are in the Acid Rain Program that are not in the NBP and that elect to quantify NO_x mass emissions as the product of NO_x emission rate (lb/mmBtu) times heat input rate (mmBtu/hr), only a revised monitoring plan submittal is required (see Table 3, below)². The monitoring plan revisions should be reflected in all subsequent quarterly electronic data reports (EDRs).
 3. For CAIR NO_x units and CAIR NO_x ozone season units that are in the NBP and are already monitoring and reporting NO_x mass emissions and heat input according to Subpart H of Part 75, make no adjustments to the current monitoring plans. No additional initial certification application submittals or revised monitoring plan submittals are required for these units in 2007. EPA notes, however, that these units must have met, and must continue to meet, all applicable Part 75 quality assurance and quality control requirements. Also, if any of these units currently report data on an ozone season-only basis and are in a CAIR state with an annual NO_x cap, these units will have to switch to year-round reporting in 2008.
 4. **Please submit all required Electronic Monitoring Plan and Initial Certification Application files to the following CAMD email address:**

mp-cair@epa.gov

If you have previously made any of these required submittals through MDC-FTP or to a different email address, please resubmit them to the mp-cair@epa.gov mailbox address, and prior to resubmitting, ensure that all monitoring plan RTs 505 are filled out according to the procedures below.

5. For all of the required electronic submittals, follow the EDR version 2.1 or 2.2 Reporting Instructions (as applicable) for all record types **except** for RT 505. For RT 505, report the essential information for each CAIR NO_x unit as follows:
 - **If the CAIR NO_x unit or CAIR NO_x ozone season unit is not in either the Acid Rain Program (ARP) or the NBP**, report RT 505 as shown in Table 2 below:

¹ If the additional monitoring systems are installed at a currently-monitored location, submittal of an initial monitoring plan \geq 45-days in advance of the certification testing is not required; only notification of certification testing and a certification application are required in such cases.

² Provided that all required Part 75 monitoring systems for the Acid Rain Program have been certified and have met, and will continue to meet, all applicable quality assurance and quality control requirements. See 40 CFR §§96.171(a) and 96.371(a) and the corresponding sections in the State SIP regulation, which exempt previously-certified Part 75 monitoring systems from the initial certification requirements of the CAIR NO_x programs.

Table 2: RT 505 Reporting Procedures for Units not in Either the ARP or NBP¹

Applicable CAIR NO _x Program(s)	Program Code (Column 10)	Unit Classification (Column 20)	Reporting Frequency (Column 22)	Program Participation Date (Column 24)
Annual and Ozone Season	SUBH	AS	Q	20080101
Annual, only ²	SUBH	A	Q	20080101
Ozone Season, only ³ (Year-round reporting to begin early, on 1/1/08) ⁴	SUBH	S	Q	20080101
Ozone Season, only ³ (Year-round reporting to begin on 5/1/08) ⁴	SUBH	S	Q	20080501
Ozone Season, only ³ (Ozone season-only reporting to begin on 5/1/08)	SUBH	S	OS	20080501

¹ For these units, submit only **one** RT 505, with a SUBH program code

² Three CAIR states (GA, MN, TX) are subject only to the CAIR NO_x annual program

³ Three CAIR states (AR, CT, MA) are subject only to the CAIR NO_x ozone season program

⁴ Under §96.374 of the CAIR NO_x ozone season model rule, NO_x mass reporting is not required until May 1, 2008 for units subject only to the CAIR NO_x ozone season program. However, EPA is allowing these units to begin reporting NO_x mass data on January 1, 2008, if the unit will report year-round. Please notify your ETS analyst if you intend to start reporting on January 1, 2008. For units in AR, the ETS analyst is Ujjval Shukla, who may be reached at shukla.ujjval@epa.gov or at (202) 343-9196. For units in CT or MA, the ETS analyst is Craig Hillock, who may be reached at hillock.craig@epa.gov or at (202) 343-9105.

- **If the unit is in the ARP but not in the NBP**, report RT 505 as shown in Table 3, below:

Table 3: RT 505 Reporting Procedures for ARP Units not in the NBP¹

Applicable CAIR NO _x Program(s)	Program Code (Column 10)	Unit Classification (Column 20)	Reporting Frequency (Column 22)	Program Participation Date (Column 24)
Annual and Ozone Season	SUBH	AS	Q	20080101
Annual, only ²	SUBH	A	Q	20080101
Ozone Season, only ³ (Year-round reporting to begin early, on 1/1/08) ⁴	SUBH	S	Q	20080101
Ozone Season, only ³ (Year-round reporting to begin on 5/1/08) ⁴	SUBH	S	Q	20080501

¹ For these units, submit one RT 505 with the SUBH program code, in addition to the existing RT 505 for the Acid Rain Program

² Three CAIR states (GA, MN, TX) are subject only to the CAIR NO_x annual program

³ Three CAIR states (AR, CT, MA) are subject only to the CAIR NO_x ozone season program.

⁴ All CAIR NO_x units in the Acid Rain Program must report NO_x mass data year-round. However, under §96.374 of the CAIR NO_x ozone season model rule, NO_x mass reporting is not required until May 1, 2008 for units subject only to the CAIR NO_x ozone season program. EPA is allowing these units to begin reporting NO_x mass data on January 1, 2008. Please notify your ETS analyst if you intend to start reporting on January 1, 2008. For units in AR, the ETS analyst is Ujjval Shukla, who may be reached at shukla.ujjval@epa.gov or at (202) 343-9196. For units in CT or MA, the ETS analyst is Craig Hillock, who may be reached at hillock.craig@epa.gov or at (202) 343-9105.

- **If the unit is in the NBP and must implement a Part 75-compliant heat input methodology**, make no adjustments to RT 505. Address the implementation of the heat input methodology in the other applicable monitoring plan records (e.g., RT 510, 520, 530, 585, etc.)
- Do **not** report RT 505 for the CAIR SO₂ program and do **not** report any other monitoring plan information or hourly SO₂ data in EDR format for that program in 2008. In 2008, EPA will accept and process hourly SO₂ data **only** from Acid Rain Program units. EPA will provide additional procedures at a later date for CAIR SO₂ Program monitoring plan and certification application submittals.

Procedures for Electronic Submittals Using MDC v4.2.56

The unit classification codes **A, S, or AS** are not currently in MDC. Therefore, if you use the current version of MDC (v 4.2.56), to create or import/edit your monitoring plan, you will need to add the appropriate unit classification code using the following steps:

1. On the main menu, go to Utilities > Tables Maintenance. This brings up the "List of Tables" screen.
2. On the "List of Tables" screen, scroll down to and double click on "Unit Classification (RT 505)".
3. Click the "Add" button and in the Table Entry screen, enter the required unit classification code as either **AS, A, or S**. The Description for each code is as follows: For code **AS**, "**CAIR NO_x, annual & ozone season**"; for code **A**, "**CAIR NO_x annual, only**", and for code **S**, "**CAIR NO_x ozone season, only**".
4. Hit "Enter" or "Tab" to activate the Save button and then click on it. The new Unit Classification should now appear in the list. Close the "Unit Classification (RT 505)" screen by clicking on the exit icon in the top right corner.
5. Back on the "List of Tables" screen, scroll up to and double click on "NBP Unit Classification (RT 505)". Then repeat Steps 3 and 4 to add the same code to this table.
6. Close the "List of Tables" screen by clicking on the exit icon in the top right corner.

Note that this will allow you to enter the appropriate codes in RT 505 and will allow you to import a monitoring plan file with those codes, but it will not enable the current version of MDC to perform the appropriate evaluations for CAIR.