



# **Parametric Monitoring Related Issues**



**Title V Workgroup 4  
September 22, 2011**

# Title V Workgroup 4 - Issues

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Issue #1 - Parametric monitoring ranges not always present in the permit.

Issue #2 – No justification may be present in the operation permit preliminary determination linking parametric monitoring ranges to compliance with applicable requirements.

Issue #3 – The parametric monitoring frequency may not match the time period of the applicable requirement.

# Title V Workgroup 4 – Issue #1

## Problem

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Issue #1 - Parametric monitoring ranges not always present in the permit.

- Location of parametric monitoring ranges
  - Operation permit
  - Off-permit document (such as MPAP)
- Processing changes to monitoring ranges
  - Title I versus Title V

# Title V Workgroup 4 – Issue #1

## Proposal

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- Avoid placement of parametric monitoring ranges in construction permits. Require submittal of ranges in order to complete the operation permit application for the constructed source(s). Include alternate range language.
- Include parametric monitoring ranges in operation permits. Include alternate range language.

# Title V Workgroup 4 – Issue #1

## Processing Issues

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- Monitoring ranges derived from an existing Title I permit would use Title I procedures to modify in conjunction with Title V renewal or revision procedures.
- Monitoring ranges submitted to complete operating permit application would use Title V procedures to modify.
- Monitoring ranges derived from a Title V permit would use Title V procedures to modify.

# Title V Workgroup 4 – Issue #1

## Additional Discussion

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- Charge for Title I revisions for authority-expired permits if at the request of the applicant? Change ch. NR 410.
- Tracking revised construction permits?
- Issuance of revised construction permits?
- Use of Title V minor revision procedures to change ranges not set by Title I?
- Modification of existing sources whose parametric monitoring ranges are not expected to change?
- Use Title I action to replace existing permit language with proposed language?
- Enforcement versus operation permit issuance timing for revisions to ranges?
- Modify ch. NR 406 to allow revision for administrative mistakes?

# Title V Workgroup 4 – Issue #2

## Problem

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Issue #2 – No justification may be present in the operation permit preliminary determination linking parametric monitoring ranges to compliance with applicable requirements.

- Justification of monitoring range
  - Little or no justification of monitoring range in technical support document
  - Compliance testing, manufacturer's recommendations, operational experience

# Title V Workgroup 4 – Issue #2

## Proposal

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- For new or modified sources, the permittee will provide written justification in order to complete the operation permit application.
- For existing sources, the permittee would provide justification :
  - Application for revision of an operation permit (for the affected sources)
  - Application for renewal of an operation permit
  - At the request of the Department

# Title V Workgroup 4 – Issue #2

## Discussion

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- Level of justification?
- Workload for permittee
- Tracking by the Department

# Title V Workgroup 4 – Issue #3

## Problem

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Issue #3 – The parametric monitoring frequency may not match the time period of the applicable requirement.

- Does ch. NR 439.055 need updating?
- Cost vs. Environmental Impact vs. Compliance Assurance

# Title V Workgroup 4 – Issue #3

## Discussion

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- Continued use of ch. NR 439.055, with improved justification
  - Revision of ch. NR 439.055?
  - Level of justification? Should permittee provide justification?
  - Implementation schedule?
  - Develop implementation guidance?
- Use of CAM
  - Ch. NR 439.055 to apply only to non-Title V sources?
  - CAM provides justification. Use in conjunction with ch. NR 439.055 for Title V sources?
- Three prong approach (Xcel Energy Petition VIII-2010-XX (EPA Region 8))
- Use of CEMs/COMs beyond current requirements