

Recent Regulatory Clarifications and Lessons

~~Kelly Sullivan~~

~~Andrew Moscovich~~

Reggie Williams

Environmental Scientist

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40 CFR Part 60 Changes

- Effective 5/30/2023:
 - In PS 2 Section 8.3.3 and App F Procedure 1 section 4.1: A sentence was added to clarify that during a calibration, the reference gas is to be introduced into the sampling system prior to any sample conditioning or filtration equipment and must pass through as much of the probe as is practical.
 - App F Section 5.2.3(2) refined the alternative CGA criteria to be dependent on analyzer span.

Analyzer span	Alternative CGA criteria (ppm)
≥50 ppm	±5
>20 ppm, but ≤50 ppm	±3
≤20 ppm	+2

40 CFR Part 60 Changes

Frequently Asked Questions (FAQs) for Procedure 1

5/4/2023

1. There appears to be an error in the March 29, 2023 [Federal Register Notice](#) with the latest changes to Procedure 1. In this notice, the table in section 5.2.3 of Procedure 1 gives two different values for the CGA criteria when the analyzer span is equal to 50 ppm – can you verify this please? Also, according to the same table, the CGA criteria for values less than or equal to 20 ppm says it is “+2ppm”, is this correct?

There are errors in section 5.2.3 of Procedure 1 in the Federal Register Notice published on March 29, 2023. The table should read as follows:

Analyzer Span	Alternative CGA Criteria
> 50 ppm	± 5 ppm
>20 ppm, but ≤ 50 ppm	± 3 ppm
≤ 20 ppm	± 2 ppm

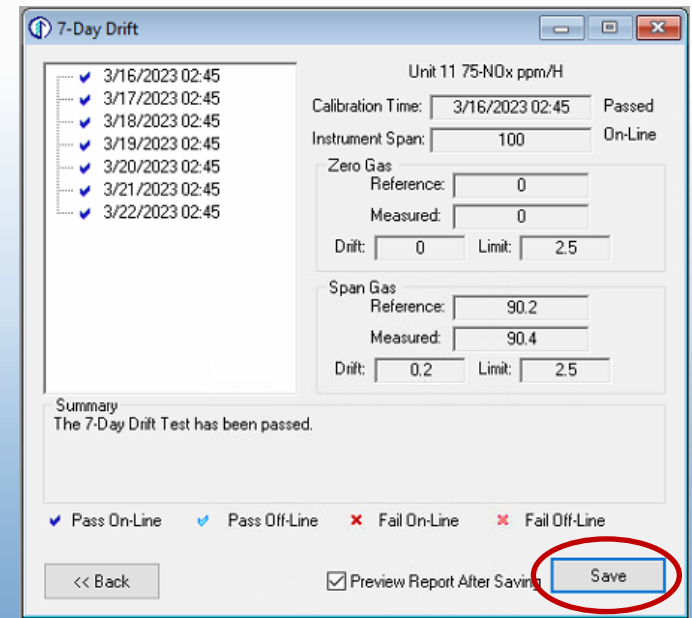
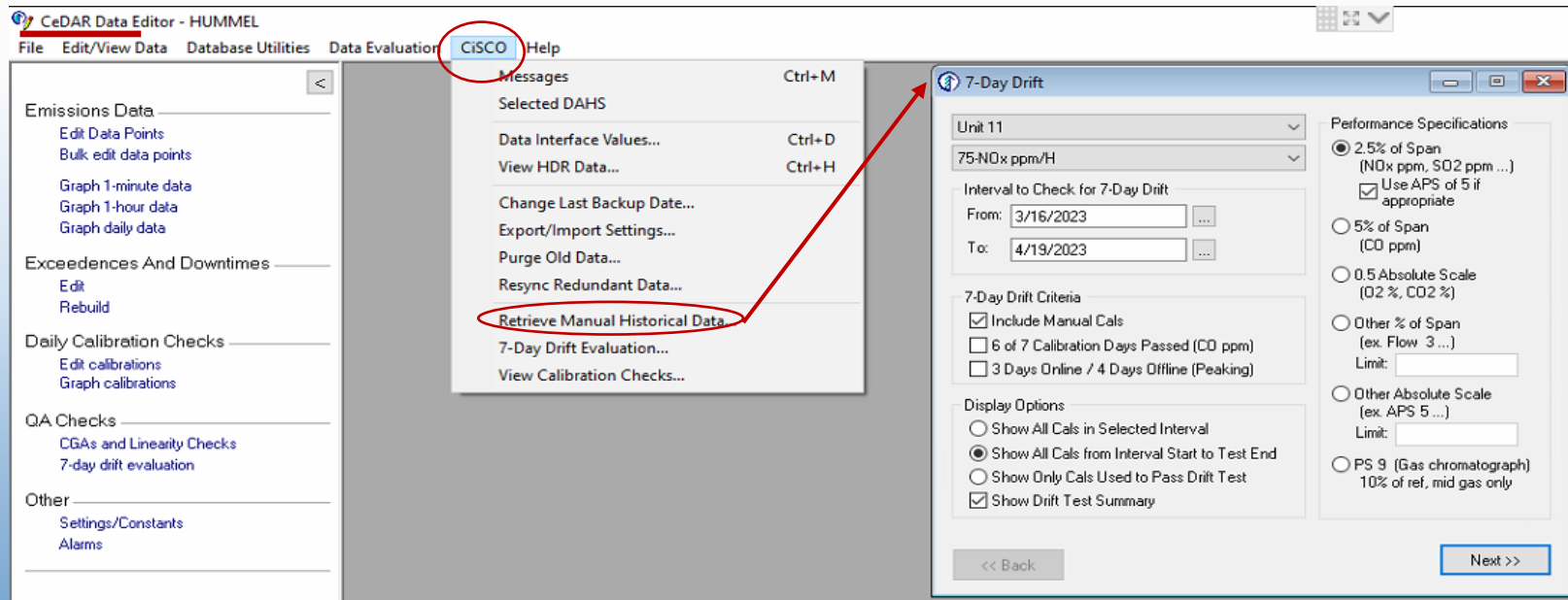
The changes promulgated in this Federal Register Notice take effect on May 30, 2023. We will correct these errors in our next method update package, which will probably be promulgated in late 2024.

40 CFR Part 60 Changes

- Effective 5/30/2023:
 - In Performance Specification 1, references to ASTM D6216-12 in numerous sections are replaced with ASTM D6216-20. Note: If the initial certification of the continuous opacity monitoring system (COMS) has already occurred using D6216-98, D6216-03, D6216-07, or D6216-12, it will not be necessary to recertify using D6216-20.

7-Day Drift Evaluation New Feature

- No longer need to manually enter Part 75 7DD results
- No Need to confirm operational status
- Defaults to Save as PDF, but XML is now an option in drop down menu
- Make sure latest MP is saved in Breez75x MP folder



Analyzer Replacements & Linearity Tests

- Previous guidance: If the existing Part 75 analyzer will operate more than 168 hours in the quarter, perform a linearity prior to replacement.
- New guidance: Linearity on existing analyzer not required.

For example, an analyzer replacement during the 4th week of April (more than 168 op hours). Since the linearity check performed on an analyzer validates data in the following quarter, as opposed to the current quarter, the linearity performed on the new analyzer in Q2 (as part of the recertification process) is sufficient to validate Q3. No need to do the test on both.

Switching Monitor Methodologies

- Switching from LME or Appendix E to CEMS is considered a recertification not an initial certification
 - Impacts test deadlines
 - QA Cert Event Code 120 “New Gas Monitor System (Complete Replacement or Methodology Change)”
- ECMPS is not designed to allow methodology changes mid quarter
 - Recently EPA CAMD attempted to accommodate a facilities request to change mid quarter. ECMPS Support provided guidance, but ultimately after much work for all involved parties, an EDR with two methods could not be submitted. Reverted back to historical guidance of switching on quarter boundary.

Part 60 Equipment Compliance Guidelines

- Unlike 40 CFR 75, 40 CFR Part 60 does not address recertification, diagnostic testing, or temporary analyzer replacements
- EPA holds the position that the state or local agency should determine what testing is required because they are responsible for enforcing 40 CFR 60.
- CiSCO contacted each state to understand their testing requirements following CEMS component repairs and replacements.

Table of Regulatory Responses

<https://ciscocems.com/part-60-equipment-compliance-guidelines/>

Regulatory Agency Responses by State

State/Local Agency	Regulatory Agency	Primary Email	Phone	Guidance from Regulatory Agency	Date Agency Provided Guidance
USA	EPA List of State Agencies	Kim Garnett	(919) 541-1158	Recertification/Diagnostic Testing/Temporary Analyzer Replacement: Final determination of certification on this matter is deferred to the state and local agencies.	7/6/2020
Alabama	Alabama Department of Environmental Management	Doug Carr	(334) 271-7899	Recertification/Diagnostic Testing/Temporary Analyzer Replacement: The agency determines testing on a case-by-case basis but is agreeable to using Part 75 Emissions Monitoring Technical Q&A procedures. Contact the agency and request to use Part 75 Emissions Monitoring Technical Q&A as a guideline.	7/6/2021
Alaska	Alaska Department of Environmental Conservation	Moses Cross	(907) 451-2163	Recertification/Diagnostic Testing: Refer to the permit. If additional testing isn't specified, continual passing of normal QA requirements is sufficient. Temporary Analyzer Replacement: Sites may use Part 75 Emissions Monitoring Technical Q&A guidelines.	9/10/2021
Arizona	Arizona Department of Environmental Quality	David Kim	(602) 771-4365	Recertification/Diagnostic Testing/Temporary Analyzer Replacement: Sites may use Part 75 Emissions Monitoring Technical Q&A guidelines.	6/23/2021
Arkansas	Arkansas Department of Environmental Quality	Alan Breshears	(501) 837-2209	Recertification/Diagnostic Testing: A RATA must be performed any time an event triggers a recertification, as dictated in the Part 75 Emissions Monitoring Technical Q&A. Part 75 Emissions Monitoring Technical Q&A guidelines may be followed for diagnostic events with CGAs being substituted for linearities.	6/9/2021



Other Stuff

- Automating the CTT/CO RTT
- General QA write-up for use of scrubbed instrument air
- NO/NOX analyzer mode issue during calibration/linearity

Questions?

Reggie Williams

Environmental Scientist



O: [\(303\) 790-1000](tel:(303)790-1000)

D: [\(720\) 419-0177](tel:(720)419-0177)

<https://ciscocems.com>

[7841 S Wheeling Ct](#)

[Englewood, CO 80112](#)

rwilliams@ciscocems.com

Kelly Sullivan

Environmental Scientist



O: [\(303\) 790-1000](tel:(303)790-1000)

D: [\(720\) 419-0148](tel:(720)419-0148)

<https://ciscocems.com>

[7841 S Wheeling Ct](#)

[Englewood, CO 80112](#)

ksullivan@ciscocems.com

Andrew Moscovich

Environmental Engineer



O: [\(303\) 790-1000](tel:(303)790-1000)

D: [\(720\) 419-0199](tel:(720)419-0199)

<https://ciscocems.com>

[7841 S Wheeling Ct](#)

[Englewood, CO 80112](#)

amoscovich@ciscocems.com

