

EPRI Stakeholder Meeting Review

June 2, 2015

Richmond Marriott

Panelists:

- Charles Frushour (CAMD)
- Rey Forte (CAMD)
- Barrett Parker (OAQPS)
- Ketan Patel (OAQPS)

I: ECMPS MATS Update: Chris Worley, SRA

- 2015Q1 ECMPS Client Tool release included MATS functionality for Monitoring Plans, QA Tests, Emissions, and PDF submissions.
 - The Q2 release, scheduled for June 17th, will include feedback reports for the PDF Submissions
- Industry is encouraged to continue to raise potential issues in ECMPS with members of ECMPS technical support staff.

II: MATS Rule Update: Charlie Frushour, EPACAMD

- Attendees can request a copy of the presentation by emailing Charlie Frushour at frushour.charles@epa.gov
- The first initial semiannual compliance report a source submits will cover the time period from April 16 to December 31, a longer period of time than future compliance reports, which will only cover six months.
 - Malfunctions are defined in the General Provisions of the MACT Rules (§63.2) and must be included in the semiannual compliance report.
- MATS Startup Shutdown Rule
 - Effective November 19, 2014
 - Includes changes to definition of startup, use of diluent caps and default electrical load.
- PDF Submissions
 - PDF submissions can be made in ECMPS at any time except for the few days each year when the EPA Host is down for upgrades. These periods of downtime are posted in advance on the ECMPS Support website.
 - If a required report (e.g. a RATA) was submitted through CEDRI prior to when the PDF requirement became effective, that report does not need to be submitted a second time through the ECMPS PDF Module.
 - RATAs required by MATS for SO₂, HCl, HF and Hg must be reported as PDFs in addition to the RATA tests reported in an .xml format per Part 75 or Appendices

A and B of the MATS rule. Per 40 CFR 63.10031(f)(1) a RATA must be submitted in a PDF format and include calibration error testing, drift checks, and other information required in the performance evaluation (i.e. RATA) as described in §63.2. “Other” Part 75 systems such as stack gas flow rate, CO₂, moisture, etc. are not required to be reported in a PDF format but rather would be reported in accordance with Part 75.

- MATS Technical Corrections Rule Package
 - The proposed technical corrections package was published February 17th 2015. The comment period ended in April. OAQPS is still reviewing the comments received. A final package is expected to be released late summer 2015.
 - Changes in the Technical Corrections may affect Appendices A and B, LEE reporting, and Stack Test procedures and frequency.
- Frequency Asked MATS Questions
 - EPA is considering how and where to post MATS FAQs and is currently reviewing and editing responses to questions received from industry and stakeholders.
 - Sources are encouraged to continue to submit questions to the Agency. SRA will continue to collect MATS related questions via the ECMPS Support queue. Questions related directly or indirectly to monitoring or reporting MATS information into ECMPS are encouraged to use the ECMPS Support queue in addition to sending questions directly to the Agency.

III. Industry Perspective to MATS “Second Phase” Electronic Reporting Initiative: Steve Norfleet, RMB

- RMB has been managing a workgroup consisting of members from the industry, software vendors, and stack testers with the goal of improving, streamlining, and simplifying the MATS electronic reporting requirements.
- Industry expressed the need to identify specific data elements that would be reported in an .xml format.

ACTION ITEMS:

1. OAQPS will review the General Provisions and determine whether a Notice of Compliance Status must be a bundle of all the information necessary to initially demonstrate compliance or if the pieces can be submitted as they become available, keeping in mind the 60-day reporting deadline from the date of a Performance Test which is specified in the general provisions and possibly conflicts with the “bundling” approach.
2. EPA will further discuss the possible differences in the definition of Boiler Operating Day as it pertains to the monitoring method (i.e. use of a single sorbent trap monitoring system as opposed to two sorbent trap systems or CEMS and how this may or may not impact what constitutes a “boiler operating day”).