

"Specifications & Test Procedures for Continuous Parameter Monitoring Systems at Stationary Sources – PS-17,"

&

"Quality Assurance Requirements for Continuous Monitoring Systems at Stationary Sources -- Procedure 4"

CAPCA Spring Meeting

April 15, 2009 Asheville, North Carolina

Bob Bessette. Council of Industrial Boiler Owners

What are we talking about today?

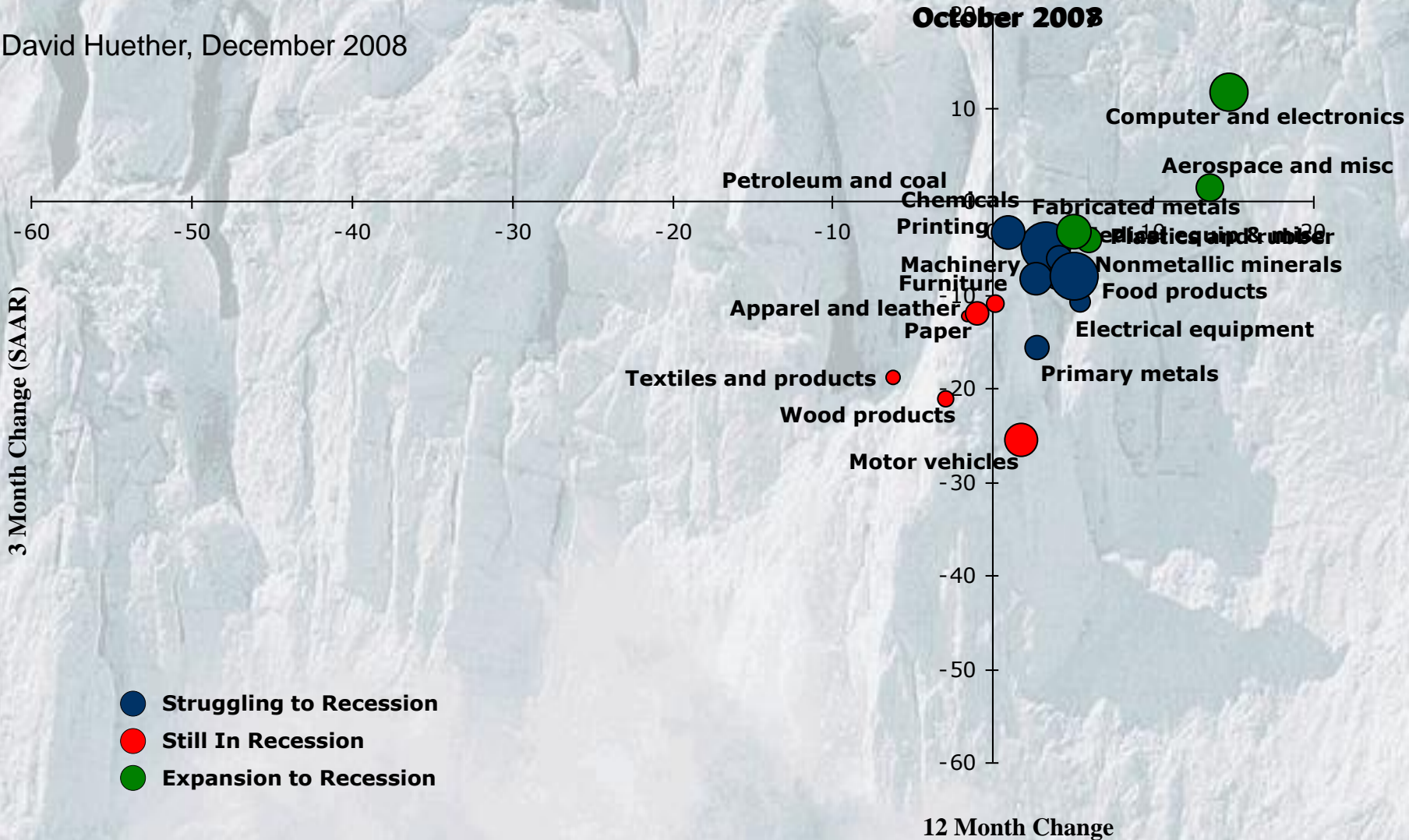
- **A little on where we are today.**
- **What is PS-17 & CPMS/CEMS-P4?**
- **The implications for Industrial, Commercial & Institutional (ICI) boiler Owners .**
- **A search for the benefits.**
- **What's next? "0" is too much or real progress.**

Where are we today?

- Asheville, North Carolina.
- What is different than last year?

National Association of Manufacturers

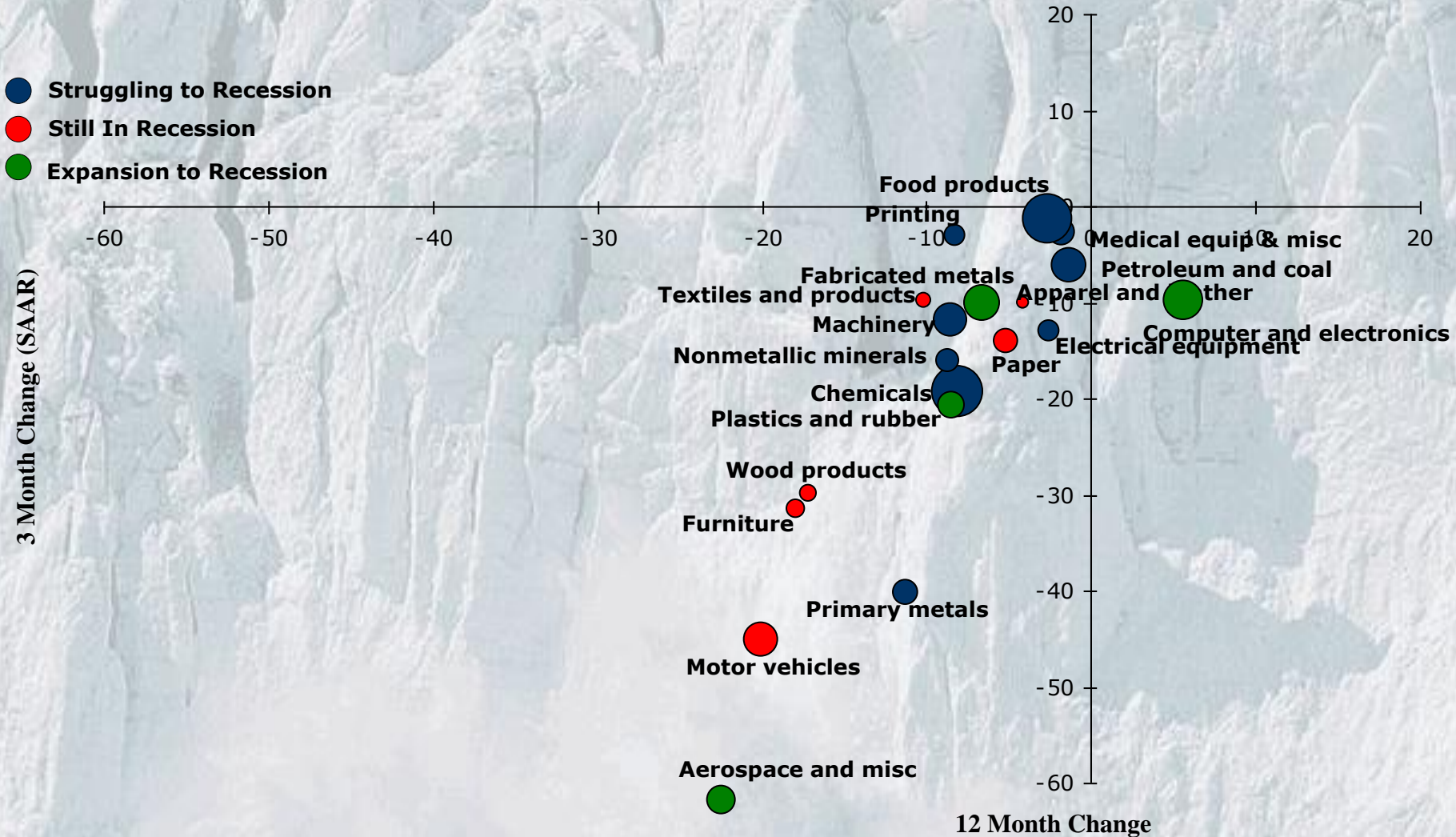
David Huether, December 2008



National Association of Manufacturers

David Huether, December 2008

December 2008



What is PS-17 & CPMS/CEMS-P4?

- EPA's rulemaking proposes amendments to 40 C.F.R. Part 60, Performance Specification 17, Specifications and Test Procedures for Continuous Parameter Monitoring Systems at Stationary Sources" ("PS-17"), and Procedure 4, "Quality Assurance Requirements for Continuous Monitoring Systems at Stationary Sources" ("Procedure 4").
- The proposal requirements establish procedures that EPA believes will "ensure that the systems are properly selected, installed, and placed into operation."

Implications for (ICI) boilers?

- **Incorrectly Emphasize Accuracy over Repeatability.**
- **Quarterly Inspection and Verification Are Overly Burdensome.**
- **Provides Unpredictable and Uncertain Compliance Triggering Events.**
- **Initial Installation and Calibration on New, Pre-Calibrated Equipment Is Duplicative.**

Implications for (ICI) boilers (continued)?

- **May Require Title V Permit Modification.**
- **Redundant Sensors Cannot Always Be Deployed.**
- **Lack of Sensing Element Location Flexibility.**
- **Alternative Means of Validating CPMS Accuracy Are Too Narrow.**
- **The Prescribed Validation Methods Are Impractical.**

Where are the benefits?

- **Environmental Benefits**
 - “Where’s the Beef?” – Health Benefits?
- **Government Benefits**
 - Increasing Enforcement Possibilities
 - Jobs
- **Industry Benefits**
 - Proving what is already the standard.

What's next? 0's too much or real progress.

- **The Proposal Constitutes a Major Rulemaking.**
- **There Is No Need for the Proposal.**
- **Boilers are Not Simple Machines.**
- **For Some, “ZERO” is Not Enough; and, “I will Believe Only Who I Believe.”**
- **Real Progress can be Made with Industry, the States and EPA working together.**

COMBUSTION PERFORMANCE AS A FUNCTION OF EXCESS O₂

