

APPLICATION TO USE A NEW OR ALTERNATE QUANTIFICATION PROTOCOL

INSTRUCTIONS: Complete this form to provide notice to the Division of Air Quality (DAQ) and US EPA Region III regarding the emission monitoring and quantification protocol proposed to be used to quantify the baseline and emission reduction credit (ERC) generation methods or uses in a manner consistent with the provisions of 45CSR28.

A quantification protocol describes the proposed procedures of data collection/use and basis of acceptability including uncertainty, QA/QC, and bias towards conservative results as required by rule. The quantification protocol does not include many of the site-specific details required as part of a Notice of Emission Reduction Credit Generation, or Notice of Emission Reduction Credit Use or Retirement. A demonstration of meeting the requirements of Sections 6 and 8 of 45CSR28 must be made.

It is recommended that this form be reviewed in its entirety before attempting to complete the individual form entries. By their nature, open-market emission trading programs involve many eligibility criteria and data needs; your responses may indicate that the necessary data are not available, and therefore your source may not eligible to participate in the program.

THIS FORM MUST BE SUBMITTED TO THE DAQ AND US EPA REGION III AT LEAST 30 DAYS PRIOR TO SUBMISSION OF THE NOTICE OF EMISSION REDUCTION CREDIT GENERATION, OR NOTICE OF EMISSION REDUCTION CREDIT USE/RETIREMENT IF AN EXISTING FEDERALLY APPROVED EMISSION MONITORING AND QUANTIFICATION PROTOCOL IS NOT PROPOSED FOR GENERATION OR USE.		
1. Concurrent with submittal of this application to the DAQ, a copy must be submitted to US EPA Region III. Has the US EPA submittal been made (See mailing address at end of form)? <input type="checkbox"/> YES <input type="checkbox"/> NO		
2. PURPOSE OF APPLICATION: <input type="checkbox"/> NEW QUANTIFICATION PROTOCOL <input type="checkbox"/> ALTERNATE TO FEDERALLY APPROVED QUANTIFICATION PROTOCOL		
3. This application is to propose methods to quantify (check one): <input type="checkbox"/> ERC Baseline and Generation <input type="checkbox"/> ERC Baseline and Use		
4. BUSINESS CONFIDENTIALITY CLAIMS: Does this notice include information which has been claimed confidential per 45CSR31? <input type="checkbox"/> YES <input type="checkbox"/> NO If YES, identify each segment of such information on each page of this request and all attachments that are claimed confidential in this submittal, and provide justification for each segment claimed confidential using the criteria specified by 45CSR31.4.1, and in accordance with the DAQ's "Precautionary Notice - Claims of Confidentiality" guidance.		
COMPANY INFORMATION		
5. Company Name (as registered with the Secretary of State's Office)		
6. Company Mailing Address (Street, City, State, Zip Code)		
7. Name of Facility (if different from above)		
8. DAQ Facility ID Number (existing facility) -	9. Contact Person Name & Title	10. Contact Person Telephone Number () -
SOURCE INFORMATION		
11. Source Name		

12. Source Location (if non-point source reduction, identify area). Include street address, city, county, state, and zip code. Include detailed directions on how to reach the source including all road or street designations as well as a clear copy of a map (a general county highway map will suffice).

13. Source Description (include information about process or equipment used to generate reductions. Attach additional pages, if necessary)

point source
 non-point source
 fugitive source

14. List all current 45CSR13, 45CSR14, 45CSR19, 45CSR30 (Title V) permit numbers and consent orders associated with this source, *if applicable*.

15. Emission Point ID Number(s), *if applicable*

16. Affected Source Classification Code(s) (SCC), *if applicable*

QUANTIFICATION PROTOCOL

17. **Affected Pollutant(s)** (check all that apply):
 VOC
 SO₂
 NO_x
 PM₁₀
 CO
 Lead

18. Implementation Dates and Duration of Emissions Reduction or Use Strategy:

18A. Baseline Years	18B. Beginning Date	18C. Ending Date	18D. Duration (mos/years)
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Note: 45CSR28-6.2.a states "The baseline shall be established for the 2-year period or two (2) ozone seasons before the date that an emission reduction occurs, unless it can be demonstrated to the director that a different time period is more representative of historical operations and is consistent with the state implementation plan."

19. Identify all applicable requirements that the source, process, or process equipment implementing the emission reduction or use strategy is subject to, if applicable, for the affected pollutant(s). Describe all emission standards and limitations, quantification methods and procedures, monitoring, recordkeeping, and reporting requirements specified by each applicable requirement identified. **Attach additional pages if necessary.**

If you are unsure whether the source, process or process equipment is subject to any applicable requirements, contact the Division of Air Quality PRIOR to completing this notice.

20. ERC BASELINE: Attach a detailed submittal consistent with emissions monitoring data and the Quantification Protocol, and based on a time period specified by each applicable requirement, including:

- A detailed description and quantification of all emission standards and limitations.
- The quantification methods for each source and process from which ERCs are proposed to be generated. Include data such as continuous emission monitoring (CEM) reports, stack testing, etc.
- Quantify the amount of emissions allowed by the applicable requirement (including a permit limit).
- Quantify actual emissions.

If there is no applicable requirement for this purpose, propose an appropriate averaging time that does not exceed a 30-day rolling average determined on a daily basis and complete the required baseline analysis on this basis.

This submittal must meet the requirements of Section 6 of 45CSR28.

If you are unsure whether the source, process or process equipment is subject to any applicable requirements, contact the Division of Air Quality PRIOR to completing this notice.

21. Description of Proposed Emission Reduction or Use Strategy (attach additional pages if necessary).

a. Describe the operations of the source, process, or process equipment prior to initiating the emission reduction or use strategy.

b. Describe the emission reduction or use strategy including process and process equipment changes to be implemented.

22. Quantification Methods and Procedures (attach additional pages if necessary).

a. Describe all quantification methods and procedures considered.

b. Explain the reason for selection of the proposed quantification method or procedure. Where such measurement is practicable and reasonable or where specified by an applicable requirement, continuous emission monitoring (CEM), or other direct measurement shall be used. Where direct measurement is not used, parametric monitoring or other surrogates for measurement may be used*. Attach technical documentation to demonstrate that the proposed method or procedure is the most credible, accurate, workable, enforceable, and replicable for the source, process, or process equipment and where applicable, at least as credible, accurate workable, enforceable, and replicable as the quantification method or procedure specified by an applicable requirement.

Be sure to make these methods and procedures consistent with identifying and tracking the maximum short-term emissions as required by any applicable requirement, including limits proposed under 45CSR28 in conjunction with any air impact analyses required or otherwise. A demonstration of compliance must also be provided to show that the ERCs are real, surplus, quantifiable, enforceable, and permanent.

c. Identify all areas of uncertainty associated with the proposed quantification method or procedure. Include a discussion on conservatism and bias. Methods, procedures, and calculations used to quantify emissions and emission reductions must ensure that conservative results are obtained.

* Site-specific data is nearly always a more reliable indicator of emissions than emission factors; sources should use site-specific information whenever available or feasible. The following hierarchy for the various approaches to emission monitoring and quantification protocols is recommended:

- continuous emissions monitoring, parametric monitoring, recent stack testing, sampling of fuels and materials, or other direct and indirect measurement methods;

- calculations using equations that are a function of process and control equipment design and operation;
- mass-balance calculations;
- emission factors (where allowed), emission calculation methods, or emission quantification protocols approved for use at the time of emission reduction generation by the Director and the Administrator of EPA.

23. Emission Calculation Methodology (attach additional pages if necessary).	
a.	Describe the emission calculation methodology. Identify all steps in the emission calculation methodology and all assumptions made including how uncertainty in the measurement technique has been addressed in the calculations. Support the description of the methodology with detailed sample calculations representative of actual emissions expressed in tons per year or tons per ozone season for NO _x or VOCs. Include a discussion on conservatism and bias.

Note: for Questions 22 & 23 - Emission measurement protocols that cover nonattainment areas that are NALD (Needing and Lacking an approved attainment Demonstration) are prohibited from using emission factors. For a list of nonattainment areas in WV that are currently considered to be NALD, please contact the Air Monitoring Section of DAQ. If you use emission factors to quantify emissions use the following guidance:

EPA's AP-42 Emission Factor Rating	ERC Generation – Discount Emission Reductions by at Least
A	50%
B	60%
C	70%
D	80%
E	90%
U	95%

RESPONSIBLE OFFICIAL CERTIFICATION I certify that I am authorized (per 45CSR28.2.33) to act on behalf of the company named in Box 4 above. I further certify that, to the best of my knowledge, the information contained in this request and all attachments is true, accurate, and complete.	
24. SIGNATURE OF RESPONSIBLE OFFICIAL (<i>PLEASE USE BLUE INK</i>)	25. DATE
26. NAME & TITLE OF RESPONSIBLE OFFICIAL (printed or typed)	27. TELEPHONE NUMBER () -
28. RESPONSIBLE OFFICIAL MAILING ADDRESS (Street, City, State, Zip Code)	

Send completed form via certified mail to:

EMISSION TRADING PROGRAM
WVDEP - DIVISION OF AIR QUALITY
601 57th Street, SE
CHARLESTON, WV 25304
– and –
DIANA ESHER, DIRECTOR OF AIR PROTECTION DIVISION
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III, MAIL DROP 3AP00
1650 ARCH STREET
PHILADELPHIA, PA 19103-2029