Compliance Assurance Monitoring Review

I. CAM Submittal Requirements

Any "No" response indicates the CAM submittal does not meet the requirements of 40 CFR part 64.

| 64. | 64.4(a) Indicator Ranges, Designated Conditions, and Performance Criteria | | | | | | |
|-----|---|-----|----|----|--|--|--|
| Do | es the submittal contain: | Yes | No | NA | | | |
| 1. | Indicators that satisfy the design criteria at §§ 64.3(a)(1)-(2)? | | | | | | |
| 2. | Ranges or designated conditions for the indicators, or the process by which such indicator ranges or designated conditions be established? | | | | | | |
| 3. | Performance criteria that satisfy § 64.3(b)? <i>(see § 64.3(b) below)</i> | | | | | | |
| 4. | Indicator ranges and performance criteria that will be used pursuant to § 64.3(d) for monitoring to be conducted by CEMS , COMS or PEMS ? <i>(if applicable; see</i> § 64.3(d) below) | | | | | | |

| 64.3 | 64.3(b) Performance Design Criteria | | | | | |
|------|---|-----|----|----|--|--|
| Doe | es the submittal contain: | Yes | No | NA | | |
| 5. | Specifications that provide for obtaining data representative of the emissions or parameters being monitored (e.g., detector location, installation specifications)? | | | | | |
| 6. | Quality assurance and quality control practices that are adequate to ensure the continuing validity of the data? | | | | | |
| 7. | Specifications for the frequency of monitoring? (see 11 and 12 below) | | | | | |
| 8. | Specifications for the data collection procedures that will be used? | | | | | |
| 9. | For new or modified monitoring equipment, verification procedures to confirm the operational status of the monitoring? <i>(if applicable)</i> | | | | | |
| 10. | Specifications for the data averaging period for determining whether an excursion or exceedance has occurred? <i>(if applicable)</i> | | | | | |
| 11. | For large PSEUs, specifications for collecting four or more data values per hour (or a reduced data collection frequency approved pursuant to $64.3(b)(4)(ii)$) on each parameter monitored and for averaging the values, as applicable, over the period determined pursuant to $64.3(b)(4)(i)$? <i>(if applicable)</i> | | | | | |
| 12. | For other than large PSEUs, specifications for collecting one or more data values at least once per day? (<i>if applicable</i>) | | | | | |

| Does the submittal contain: | | No | NA |
|--|--|----|----|
| 13. The use of CEMS , COMS , or PEMS to satisfy part 64 requirements if such systems are already required under other authority of the Clean Air Act or state or local law? <i>(if applicable)</i> | | | |
| 14. A requirement for reporting exceedances (or excursions if applicable to a COMS used to assure compliance with a particulate matter standard), consistent with any period for reporting of exceedances in an underlying requirement (or consistent with the averaging period established pursuant to 64.3(b)(4) if an underlying requirement does not contain a provision for establishing an averaging period)? <i>(if applicable)</i> | | | |
| 15. For COMS used to assure compliance with a particulate matter standard, an indicator range consistent with paragraph 64.3(a)? <i>(if applicable)</i> | | | |

| 64.4(b) Justification | | | | |
|--|-----|----|----|--|
| Does the submittal contain: | Yes | No | NA | |
| 16. Justification for the proposed elements of the monitoring? | | | | |
| 17. All data used to support the justification? | | | | |
| 18. Explanation of any differences from manufacturer recommendations for performance specifications proposed to satisfy § 64.3(b)(2) or (3)? <i>(if applicable)</i> | | | | |
| 19. Justification for the use of any " presumptively acceptable monitoring " approach? <i>(if applicable)</i> | | | | |

| 64.4(c) Existing Operating Parameter Data | | | | | |
|---|-----|----|----|--|--|
| Does the submittal contain: | Yes | No | NA | | |
| 20. Existing operating parameter data obtained during compliance or performance testing, a test plan , or engineering assessment ? <i>(see 22 and 23 below)</i> | | | | | |
| 21. Documentation that no changes to the PSEU, including the control device and capture system, have taken place since any performance or compliance tests were conducted? <i>(if applicable)</i> | | | | | |

| 64.4(d) Test Plan and Schedule for Obtaining Data | | | | | |
|--|-----|----|----|--|--|
| Does the submittal contain: | Yes | No | NA | | |
| 22. If there are no existing test data, either: - a test plan and schedule for obtaining such data, or - indicator ranges (or procedures for establishing indicator ranges) that rely on engineering assessments and other data? <i>(if applicable)</i> | | | | | |
| 23. If indicator ranges (or procedures for establishing indicator ranges) that rely on engineering assessments and other data are used (rather than test data or a test plan and schedule for obtaining data), a demonstration that factors specific to the type of monitoring, control device, or PSEU make compliance or performance testing unnecessary to establish indicator ranges? <i>(if applicable)</i> | | | | | |

| 64.4(e) Plan and Schedule for Installation & Testing of Equipment | | | | |
|--|-----|----|----|--|
| Does the submittal contain: | Yes | No | NA | |
| 24. A plan and schedule for installing, testing and performing any other appropriate activities prior to use of the monitoring? <i>(if applicable)</i> | | | | |

II. CAM Permit Content Requirements Any "No" response indicates the title V permit does not meet the requirements of 40 CFR part 64.

| 64. | 64.6(c) Minimum Requirements | | | | | |
|-----|--|--|----|----|--|--|
| Do | Does the permit specify: | | No | NA | | |
| 1. | Indicator(s) to be monitored? | | | | | |
| 2. | Means or device to be used to measure the indicator(s)? | | | | | |
| 3. | Performance requirements established to satisfy § 64.3(b) or (d)? | | | | | |
| 4. | Means by which the owner or operator will define an exceedance or excursion ? | | | | | |
| 5. | Obligation to conduct the monitoring and fulfill the other obligations specified in §§ 64.7 through 64.9 ? | | | | | |
| 6. | Minimum data availability requirement? (if applicable) | | | | | |

| 64. | 64.6(d) Enforceable Schedule | | | | |
|-----|--|-----|----|----|--|
| Do | es the permit specify: | Yes | No | NA | |
| 7. | An enforceable schedule for any required installation, testing, or final verification of operational status? <i>(if applicable)</i> | | | | |

| 64 | 64.6(e) Submittal Disapproved by Permitting Authority | | | | | | |
|----|--|-----|----|----|--|--|--|
| De | pes the permit specify: | Yes | No | NA | | | |
| 8. | At a minimum, monitoring that satisfies § 70.6(a)(3)(i)(B) if the permitting authority disapproved the proposed monitoring? <i>(if applicable)</i> | | | | | | |
| 9. | A compliance schedule for the source owner to submit an acceptable plan if the permitting authority disapproved the proposed monitoring? <i>(if applicable)</i> | | | | | | |