



Performance Specifications and Quality Assurance Requirements for CPMS

Carolinas Air Pollution Control
Association



PS-17 and QA Procedure 4

- EPA proposed performance specifications and quality assurance requirements for continuous parameter monitoring systems (CPMS) on October 9th
 - Contains selection, installation, and operation requirements
 - Will ensure instruments provide quality data on an ongoing basis



Background

- CPMS supply data to demonstrate compliance on a continuous basis as defined by regulation
 - CPMS provide a check on process or control device operation
- CPMS covered by proposal include
 - Temperature, flow rate, pH, and conductivity



Proposal Tidbits

- Installation or operation of additional CPMS not required
- About 60,000 affected facilities
 - Estimated source annual compliance costs are \$870



Comments

- 48 commenters from industry, trade associations, government, and others
 - Significant underestimation of costs
 - Applicability unclear
 - Consider performance based approach
 - Calibration frequency too frequent
 - Roll back compliance date



Next Steps

- Review comments and develop responses
- Brief management / make changes if necessary
- Move promulgation package through system
- Earliest anticipated release date – late this year



CAM Rule

- Revising CAM rule to expand applicability
 - Draft rule undergoing internal review
 - Anticipated proposal in 2009
 - Contact: Peter Westlin