

## **Frequently Asked Questions Concerning the CAM Rule:**

- 1) *The recently proposed Boiler MACT has monitoring requirements similar to CAM. Can boiler operators wait until the MACT is promulgated to conduct monitoring?*

When the boiler Maximum Achievable Control Technology (MACT) standard is promulgated, the source owner does not become exempt from the part 64 CAM requirements for the existing emissions limits but in fact must conduct monitoring to assure compliance with both the existing requirements of CAM and the MACT. As per part 64, the source owner is exempt from meeting part 64 requirements in monitoring for compliance with the MACT rule emissions limitations only; monitoring for all other requirements remain in effect (section 64.2(b)(i)). The source owner is not exempt from part 64 simply because the facility is subject to a MACT rule if the existing requirements remain in place.

For the particular case of boilers, DAQ recommends that the operator submit a CAM Plan patterned after the monitoring requirements of the boiler MACT.

- 2) *Are furniture finishing operations exempt from CAM?*

The requirements of part 64 do not apply to emission standards proposed after November 15, 1990 pursuant to section 111 or 112 of the act. This includes emission standards for furniture finishing operations under 40 CFR 63, Subpart JJ. However, please note that CAM would apply to furniture finishing operations, if they were subject to an emission limitation or standard other than an emission limitation or standard that is exempt under 64.2 (b)(1). [See section 40 CFR 64.2 (b).]

- 3) *Must the CAM Plans address New Source Review regulations and state air toxic regulations?*

The CAM plan should address all applicable regulation, emission limits and the monitoring requirements for the emission unit under consideration. Please note that CAM plans are required to meet submittal requirements of 40 CFR 64.4.

- 4) *Will the Division of Air Quality (DAQ) accept the existing regulation limits as the indicator ranges?*

The DAQ will accept the existing regulation limits as the indicator range, if the emission unit uses a continuous emission monitoring system (CEMS), continuous opacity monitoring system (COMS) or predictive emission monitoring system (PEMS) that satisfies the monitoring requirements according to 40 CFR 64.3 (d). We would suggest, however, that choosing an indicator range at the emission limit does not in most cases satisfy the intent of CAM. The purpose of CAM is to keep the operator out of trouble with the emission standard. If the action level is set at the emission standard this objective is not met.

Please note that monitoring under CAM may be used for your Part 70 monitoring requirement as well.

5) *Will one indicator be sufficient for a control device?*

The DAQ will make the determination on a case by case bases, provided the indicator range and the indicator of emission control performance for the control device satisfy monitoring design criteria requirements of 40 CFR 64.3.

6) *Is an “excursion” as defined by CAM the same as “deviation” as interpreted by DAQ?*

No. An “excursion” as defined by CAM means that the parameter being measured went outside the indicator range. Deviation means a departure from some term or condition of the permit. Generally speaking these are not the same. A more pertinent question is do you have to report an excursion as a deviation? Generally speaking we would say no since the CAM requirements in the permit are expected to require certain corrective actions if you go outside the indicator range. If you do that, then you have done what the permit says and that’s not a deviation. Therefore, in general, an excursion does not need to be reported as a deviation. However, please note that emission units subject to CAM are required to submit a semiannual report for monitoring in accordance with 40 CFR 64.9. This includes, at a minimum, summary information on the number, duration and cause of excursions or exceedances as applicable, and the corrective actions taken. [See section 40 CFR 64.9 - Reporting and recordkeeping requirements.]

Deviations and excursions are both required to be reported and according to 15A NCAC 2Q .0508 (t)(3) they are required to be reported in the same report. However, this still does not mean that they are the same thing.

As a caveat, the specific language of the permit may have some bearing how the excursion is regarded. Also, please consider the answer to question number 4. If the indicator range is set at the emission standard, then an excursion is a violation at the time it occurs, regardless of the corrective action.

Also, please note that deviations must be reported irrespective of whether CAM applies.

7) *Does an “excursion” constitute failure to properly operate and maintain the control equipment and therefore constitute a violation of the permit condition typically identified as “B-6” (General Conditions And Limitations of the permit)?*

If you are taking corrective action in accordance with the CAM plan and 40 CFR 64.7, then that essentially defines proper operation maintenance and a B-6 violation should not be alleged.

[See section 40 CFR 64.7 - Operation of approved monitoring.]

8) *Does CAM apply to multiple sources vented to one control device?*

CAM applies to pollutant specific emissions units. The rule appears to be written such that it envisions one source vented to one control device, however, the answer depends on how the applicable requirement is structured. What this means is that if an emissions limit applies to

each individual processing unit (e.g., coater), then each coater is a PSEU regardless of whether the emissions are ducted to a common control device or to separate control devices. On the other hand, if the emissions from the collection of woodworking processes (e.g., saws, planers, shapers, sanders) are subject to a single facility emissions limit, then the collection of processes (e.g., an entire room or building) is the PSEU whether the emissions are routed to a common control device or to separate control devices.

9) *Does CAM apply to State TAPs (State-Enforceable only limits)?*

CAM does not apply to State TAPs. However, please note that CAM does apply to major source threshold HAPs, if the PSEU is not excluded from the CAM rule.

10) *Does CAM apply to Low NO<sub>x</sub> burner technology?*

No. CAM does not apply to Low NO<sub>x</sub> burner technology since it is not included in the definition of “control device” under 40 CFR 64.1. For most large emissions units, such as utility boilers that employ Low NO<sub>x</sub> burner technology, separate applicable requirements already specify the use of CEMS or similar monitoring through part 70 that is sufficient to meet part 64 requirements.

11) *Does CAM apply to combustion turbines equipped with dual-fuel dry-low NO<sub>x</sub> combustors for NO<sub>x</sub> control when firing natural gas and water injection for NO<sub>x</sub> control when firing No. 2 fuel oil?*

Yes. CAM applies to combustion turbines equipped with dual-fuel dry-low NO<sub>x</sub> combustors for NO<sub>x</sub> control when firing natural gas and water injection for NO<sub>x</sub> control when firing No. 2 fuel oil.

Please note that CAM does not apply to combustion turbines, if they are equipped with a CEMS that qualifies as a continuous compliance determination method in accordance with 40 CFR 64.1.

12) *Does CAM apply to a PSEU that is subject to both exempt (40 CFR 64.2(b)) and non- exempt emission limits?*

Yes. CAM applies to a PSEU that is subject to both exempt (40 CFR 64.2(b), e.g. MACT or NESHAP emission limits) and non- exempt emission limits (e.g. a state rule or an older NSPS emission limits). We believe that for many situations, in which both exempt and non-exempt emissions limits apply to a PSEU, the monitoring for the exempt limits may be adequate to satisfy part 64 for the other non-exempt emission limits. While strictly speaking a CAM plan is required, the rule allows you to offer an affirmative statement in writing that the monitoring for the exempt emission limits is sufficient to represent CAM plan for the other non-exempt emission limits.

Please note that the level of details required to demonstrate compliance with part 64 requirements for the non-exempt emission limits will vary depending on the format of the

two emissions limits. For example, the monitoring (SO<sub>2</sub> and flow CEMS) of emission unit for acid rain compliance provides data in units of lb/hr and tons /year, but does not provide data for showing compliance with the NSPS standard, which has units of lb/MMBtu and usually requires a diluent CEMS. Differences in averaging time also factor into the determination of whether the monitoring for the exempt emission limits will be sufficient to show compliance with another non-exempt emission limits.

*13) How do we calculate “potential pre-control device emissions” for the CAM applicability under 40 CFR 64.2(a)(3)?*

For purposes of the CAM applicability under 40 CFR 64.2(a)(3), “potential pre-control device emissions” have the same meaning as “potential to emit” (PTE) as defined in 40 CFR 64.1. The definition of potential to emit in Part 64 refers to Part 70. The Part 70 definition of PTE says it is "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design." It goes on to say that any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by the Administrator."