



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: 9900022

Category: NSPS
EPA Office: Region 3
Date:
Title: Like-for-like replacement of pieces of CEMs
Recipient: Stover, Jay
Author: McFadden, Angela

Subparts: Part 60, A, General Provisions
Part 60, Appen,
Part 60, Db, Indust.-Comm.-Inst. Steam Gen. Units

References: 60.13(c)
PS 2

Abstract:

Q: Does a company have to conduct a CEM performance evaluation after replacement of parts in the CEM system?

A: Yes. If EPA considers the system to be altered in such a way that monitor accuracy is in question, it could require a monitor performance evaluation via a Section 114 letter.

Letter:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

In Reply Refer To: 3AP13

Union Carbide Corp.
437 MacCorkle Ave.
South Charleston, WV 25303
Attention: Jay Stover, Building 300, Room 105

Dear Mr. Stover,

This letter is in follow up to our telephone conversation of March 5, 1998, during which you asked if monitor performance evaluation is required after like-for-like replacement of pieces of a continuous emission monitoring system (CEMS). The nitrogen oxides (NOx) CEMS we discussed is required by the Standards of Performance for New Stationary Sources (NSPS) and must meet the requirements of Performance Specification 2, provided in Appendix B to 40 C.F.R. 60. The performance evaluation of a CEMS required under the NSPS must be conducted upon initial installation and operation of the CEMS.

As provided under 40 C.F.R. 60.13(c), EPA may require, under Section 114 of the Clean Air Act, that CEMS performance evaluations be conducted at times other than the initial CEMS performance evaluation. However, the NSPS does not automatically require CEMS performance evaluations after the replacement of a part of monitoring equipment. Conducting a performance evaluation after replacement of a CEMS part may be required if EPA considers the replacement to be an alteration to the CEMS that could affect its performance. The like-for-like replacement of a CEMS part should not cause deterioration of CEMS performance. However, if in the future EPA considers a performance evaluation of the NOx CEMS necessary, such an evaluation may be required as part of an information request issued to Union Carbide under Section 114 of the Clean Air Act.

I apologize for the delay in providing this information to you in writing, as you requested during our conversation. If you have any questions about this letter, please call me at (215) 566-2324.

Sincerely,

Angela McFadden, Environmental Engineer Area II Enforcement Branch