|  |  |
| --- | --- |
| Minnesota Pollution Control Agency (MPCA), 520 Lafayette Road North, St. Paul, MN 55155-4194 | GI-09H  Requirements: CAM (40 CFR pt. 64)  Air Quality Permit Program  *Doc Type: Permit Application* |

Compliance Assurance Monitoring (CAM) (40 CFR pt. 64)

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| AQ Facility ID number: | |  | Agency Interest ID number: |  |
| Facility name: |  | | | |

The CAM rule applies to certain emission units at facilities required to obtain a Part 70 permit.

In general, CAM applies to emission units meeting the following criteria:

1. The emission unit is subject to an emission limit or standard (including limits and standards in Minnesota Rules contained in the State Implementation Plan) for an air pollutant regulated by Part 70.

2. Compliance with the applicable limit or standard is achieved through the use of add-on control equipment.

3. The emission unit has pre-controlled potential emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the Part 70 major source level for that pollutant (in tons per year).

For exemptions, see Table C at the end of this form.

Use of continuous emissions monitoring system (CEMS), continuous opacity monitoring system (COMS), or predictive emission monitoring system (PEMS) does not automatically qualify as an exemption to the Compliance Assurance Monitoring (CAM) rule. In situations where the use of CEMS, COMS, or PEMS is not exempt from CAM, 40 CFR §64.3(d) states that use of CEMS, COMS, or PEMS meets the requirements of CAM.

CAM applicability is determined on a pollutant-by-pollutant basis for each “pollutant specific emissions unit,” (PSEU) defined at 40 CFR § 64.1 as “an emissions unit considered separately with respect to each regulated air pollutant.” For purposes of CAM submittal requirements, a “large PSEU” is an emissions unit with potential *controlled* emissions equal to or greater than 100 percent of the major source threshold amount for a given regulated pollutant. (“Major source threshold amount” as it applies to Minnesota, means 100 tons per year of particulate matter (PM), particulate matter smaller than 10 microns in aerodynamic diameter (PM10), particulate matter smaller than 2.5 microns in aerodynamic diameter (PM2.5), sulfur dioxide (SO2), nitrogen oxides (NOX), volatile organic compounds (VOC), carbon monoxide (CO), or lead; 10 tons per year of any hazardous air pollutant (HAP); or 25 tons per year of any combination of HAPs. The levels may be different in current or future nonattainment areas. Refer to 40 CFR § 70.2 under the definition of “major source” for further detail. “Other PSEUs” are those units whose uncontrolled potential emissions may be equal to or greater than 100 percent of the major source threshold amount, but controlled emissions are less than that threshold.

* **If you are applying for the first time for a Part 70 permit**, after determining the uncontrolled and controlled potential emissions of the emissions units, questions 1-3 must be considered for each large PSEU, as defined above.
* **If you are applying for an amendment to an existing Part 70 permit**, after determining the uncontrolled and controlled potential emissions of the emissions units, questions 1-3 must be considered for any PSEU, as defined above, to which the amendment is applicable.
* **If you are applying for reissuance of an existing Part 70 permit:**

CAM applicability has already been determined for all PSEUs and CAM has been incorporated in the permit where necessary, and this permit application requests no changes affecting CAM applicability. Done with this form. Submit this form with your application.

CAM applicability has already been determined and incorporated in the permit where necessary, but I would like to request some changes to the existing CAM. Done with this form. Submit this form and a new CAM Plan reflecting your requested changes with the application. Also show changes on CD-01-R and the Compliance Plan CD-01 received from the Minnesota Pollution Control Agency.

CAM applicability has been determined for some but not all PSEUs at the facility. After determining the uncontrolled and controlled potential emissions of the emissions units for which CAM applicability has not already been determined through a Part 70 permit action, questions 1-3 must be considered for each of those PSEUs (large and other).

**1)** Is the unit subject to an emission limitation or standard, specified in either a rule or permit? For existing emission units, check your current permit to see if there are any emission limits specified for the emission unit.

Yes, the emission unit is subject to an emission limitation or standard. Go on to question 2.

No, the emission unit is not subject to CAM. Record the EU number and reason CAM doesn’t apply in Table B. Repeat question 1 for next emission unit.

**2)** Is an add-on control device used to achieve compliance with that limitation or standard? (For example, a boiler may have a NOX limit and an SO2 limit. If the boiler uses lime injection for SO2 control but relies on a low-NOX burner to meet the NOX limit, then the emission unit would be subject to CAM for SO2 but not for NOX.)

Yes. Go on to question 3.

No, the emission unit is not subject to CAM. Record the EU number and reason CAM doesn’t apply in Table B. Return to question 1 and repeat for next emission unit.

**3)** There are some exemptions allowed by the rule. Review the list of exemptions in Table C, then answer the following question.

Yes, the PSEU is exempt from CAM for all applicable standards. List the PSEU in Table B and repeat questions 1 through 3 for the next PSEU. When each PSEU has been considered, go on to complete the rest of Table A and Table B.

No, the PSEU is subject to CAM for at least one applicable standard. List the PSEU in Table A and repeat questions 1 through 3 for the next PSEU. When each PSEU has been considered, go on to complete the rest of Table A and Table B.

**Table A. PSEUs subject to CAM at this time**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **EU #** | **Emission Unit** | **CE #** | **Description of control equipment** | **Pollutant(s) which are subject to CAM** | **Large PSEU or “Other” PSEU?** |
|  |  |  |  |  | Large  Other |
|  |  |  |  |  | Large  Other |
|  |  |  |  |  | Large  Other |
|  |  |  |  |  | Large  Other |
|  |  |  |  |  | Large  Other |
|  |  |  |  |  | Large  Other |
|  |  |  |  |  | Large  Other |
|  |  |  |  |  | Large  Other |
|  |  |  |  |  | Large  Other |
|  |  |  |  |  | Large  Other |

If you are applying for an amendment to an existing permit, you must prepare a CAM submittal for each large-PSEU listed in Table A and provide it with the application. If you are applying for a first-time Part 70 permit or reissuance to a Part-70 permit, you must prepare a CAM submittal for each PSEU listed in Table A and provide it with the application. The CAM submittal, also referred to as the monitoring approach submittal, should include:

1. information on indicators (gauges, meters, or other devices used to monitor operating parameters of control equipment)
2. indicator ranges, or the process by which indicators are to be established
3. performance criteria
4. justification for the proposed monitoring
5. control device operating data recorded during a performance test, supplemented by engineering assessments or manufacturer’s recommendations to justify the proposed indicator range
6. a test plan and schedule for obtaining data if performance test data are not available
7. an implementation plan, if monitoring requires installation, testing or other activities prior to implementation

Some of this information will be incorporated into the operating permit. The permit will specify the approved monitoring approach and the indicator range(s), including the averaging periods.

**Table B. PSEUs not subject to CAM at this time**

|  |  |
| --- | --- |
| **EU #** | **Why?** (unit is uncontrolled, uncontrolled emissions are below the thresholds, not a large PSEU, exemption category from Table C, etc.) |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |

**Table C. CAM rule exemptions and exceptions**

* The CAM rule does not apply to units subject to emission limitations or standards proposed by U.S. Environmental Protection Agency (EPA) after November 15, 1990, pursuant to section 111 or 112 of the Clean Air Act. In situations where some portions of a facility operate control devices in order to comply with emission standards issued prior to November 15, 1990, only those portions of the facility must comply with the requirements of the CAM rule.
* The CAM rule does not apply to Stratospheric ozone protection requirements.
* The CAM rule does not apply to Acid Rain Program requirements.
* The CAM rule does not apply to emission limitations or standards that apply solely under an emissions trading program.
* The CAM rule does not apply to municipally-owned utility peak-shaving units where
* the unit is exempt from all Acid Rain Program monitoring requirements, and
* the unit operates for the sole purpose of providing electricity during periods of peak electrical demand or emergency situations, and
* the unit will be operated consistent with that purpose throughout the permit term, and
* emissions from the unit are less than 50 percent of the amount required for the source to be classified as a major source, based on an average of the last 3 years, and are expected to remain so.
* The CAM Rule does not apply to emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method (CCDM), as defined in §64.1. A CCDM is typically a CEMS, COMS, or PEMS that meets the definition in §64.1, but it can be another form of monitoring that meets this definition. In situations where continuous compliance monitoring is already specified in an operating permit or applicable requirement, the CAM rule exempts the Permittee from additional monitoring requirements and directs the Permittee to use the continuous compliance monitoring data to fulfill the CAM rule monitoring and certification requirements. (This means that your CAM plan should include the already-required compliance monitoring, not that the PSEU is exempt from CAM.)

Exemption from CAM for one standard does not ensure exemption from CAM for another standard that applies to the same PSEU.

Additional information, including a Technical Guidance Document that includes example submittals, is available on the EPA website at [https://www.epa.gov/air-emissions-monitoring-knowledge-base/compliance-assurance-monitoring](https://gcc01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.epa.gov%2Fair-emissions-monitoring-knowledge-base%2Fcompliance-assurance-monitoring&data=02%7C01%7Cgail.skowronek%40state.mn.us%7C88a12fbbc34e40832e7d08d750c400de%7Ceb14b04624c445198f26b89c2159828c%7C0%7C0%7C637066675069378016&sdata=yIhJ2ggPUCgyzWW4sNrgTM2e7hLrmRH2gK%2BsxCAxASM%3D&reserved=0).