Attenuator Calibrations Guidance

Issue

Minn. R. 7017.1210, subp. 4 with regard to Continuous Opacity Monitoring Systems (COMS) Attenuator Calibrations states:

The owner or operator shall have an independent testing company conduct calibrations of each of the neutral density filters used in the calibration error audit according to the procedure in Code of Federal Regulations, title 40, part 60, appendix B, section 7.1.3., within the time frame of opacity stability guaranteed by the attenuator manufacturer. The manufacturer’s guarantee of stability shall be on site available for inspection.

40 CFR Part 60, appendix B, section 7.1.3., referenced in the Minnesota rule, has been repealed. Most permits with COMS requirements also reflect the outdated language. Due to this change in the federal rules, the Minnesota Pollution Control Agency (MPCA) provides the following guidance and proposed course of action to deal with this situation.

Solution

The MPCA will propose to amend Minn. R. 7017.1210, subp. 4 to state:

The owner or operator shall have an independent testing company conduct calibrations of each of the neutral density filters used in the calibration error audit according to the procedures in Code of Federal Regulations (CFR), title 40, part 60, appendix B, section 7. National Institute of Standards and Technology (NIST) calibrations shall be on site available for inspection. Other calibrations shall be submitted as required by Minn. R. 7017.1220.

The MPCA also proposes to amend Minn. R. 7017.1220 to state:

A summary of the results of each COMS calibration error audit and each attenuator calibration other than those calibrated by NIST shall be submitted on an appropriate form approved by the commissioner within 30 days following the end of the calendar quarter in which the audit and/or calibration was performed.

The MPCA proposal to amend these two rules will be included in the next “Omnibus” rulemaking. There is no schedule for the rulemaking at this time.

As permits are opened, permit writers will update the language in permits with COMS requirements to the language proposed above. The permitting Helpfiles will also be updated to reflect these changes and provide guidance for the language change as well as structuring reporting requirements.

Compliance

In the interim, facilities are required to calibrate their attenuators as described in Code of Federal Regulations, title 40, part 60, appendix B, section 7. Attenuators designated as primary need either to be calibrated by NIST or calibrated every six months according to the procedures outlined in section 7.1. Attenuators designated as secondary need to be calibrated every six months according to the procedures outlined in section 7.2.

As the proposed rules change states, if calibrated by NIST, the facility must keep a copy of the calibration on site to be presented during inspections. A results summary of the semi-annual (non-NIST) calibrations for both primary and secondary attenuators will be submitted along with the Excess Emission Report (EER) for the quarter in which the calibration took place, similar to the reporting procedure for the COMS Calibration Error Audit results, Relative Accuracy Test Audit results, Cylinder Gas Audit results, etc. If a facility has NIST calibrated attenuators it would be helpful to make note of this in a cover letter or as part of the quarterly EER packet to aide in communicating to the MPCA why attenuator calibration results are not being routinely submitted.

For questions regarding this matter, please contact any member of the MPCA Stack Test and Monitoring Program (STAMP). Contact information can be found on the STAMP Web site at www.pca.state.mn.us/air/performanceetest.html or by calling the MPCA at 651-296-6300 or 800-657-3864.