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Strategies for Dealing with Random Emission Standard Exceedances in Certifying Continuous Compliance

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ABSTRACT

Electric power plants subject to Title V permitting requirements must annually certify continuous compliance with the applicable opacity, SO₂ and NO_x emission standards among others. Under 40 CFR Part 75, all Affected Units have installed continuous emission monitoring systems to measure these emissions. With such continuous measurement, there is significant potential for emission rates to exceed the applicable standards. This means that many electric power plants are facing the prospect of certifying only Intermittent Compliance instead of Continuous Compliance in their annual Certification Statements.

This paper discusses strategies for how to certify Continuous Compliance in the presence of random exceedances of the applicable standards.

We discuss how to use the substantial time series of emissions monitoring data each electric power plant has together with Monte Carlo simulation techniques to determine the minimum frequency of exceedance per period that needs to be allowed so that Continuous Compliance can be certified.

Under the final Compliance Certification rule, such exceedances can occur and still permit certification of Continuous Compliance if these exceedances are specifically allowed in the source's Title V permit or allowed under state regulation.