

CAMD Comments on WRAP Monitoring Rule: Summary and Response

Section	Comment	Type	Response
1.(a)(2)(A) & (B)	Insert for parallelism with 1.(a)(1): "with respect to monitoring, recording and reporting SO ₂ mass emissions, and use the data to comply with this section"	Structural/ Substantive	<p>Disagree. This change would imply that these systems would have to meet Part 75 reporting requirements. See response to similar comments under Sections 2.(b) and 8.(a), below for further discussion.</p> <p>Instead of these changes, refer only to monitoring methods here. Add paragraph in Recordkeeping section to clarify that must keep all applicable Part 75 records if use a Part 75 monitoring method (and to clarify types of records that must be kept if use other than Part 75 monitoring method).</p>

CAMD Comments on WRAP Monitoring Rule: Summary and Response (cont.)

Section	Comment	Type	Response
1.(a)(2)(C)	Delete entire paragraph. Many of these units could qualify as LMEs covered by (A) & (B); estimation methods used to set allocations are very imprecise and if used for monitoring, then units involved should not be allowed to sell allowances	Substantive	<p>Agree. Based on a review of the inventory data, most of these small units are process heaters at refineries (covered by a separate protocol), or small boilers and turbines that would be required to use the Part 75 LME provisions even if this paragraph was included.</p> <p>The remaining units are non-combustion units (such as brown stock washers at a pulp mill) or flares. For these units, the underlying emission factors are not precise, and the option to treat these as non-trading units already provides a mechanism for the units to avoid additional monitoring. Also, for states/tribes, administration will be easier if all of these types of units are handled under the non-tradeable allowance option, rather than having some of these units use emission estimation methods for tradeable allowances and some for non-tradeable allowances.</p>
1.(a)(2)(E)	Modify this provision to use petition approval process instead of site-specific SIP revision.	Substantive	Accept. Provides streamlined approach that still provides for EPA approval. See related comment under 8.(e).
1.(a)(3)	Insert: "if such unit was permanently retired and had no emissions for the entire period for which the WEB source implements this paragraph (3) and"	Clarifying	Accept

CAMD Comments on WRAP Monitoring Rule: Summary and Response (cont.)

Section	Comment	Type	Response
1.(a)(3)	Replace: "shall certify" with "certifies" and "such unit was retired and had no emissions for the entire period for which the WEB source implements this paragraph (3)" with "these conditions were met"	Clarifying	Accept
1.(a)(3)	Comment: CAMD notes that Section L2 will need to be modified to implement a certification statement about retired units as opposed to retired sources.	Substantive	Modify section L2(c) of Feb. 7th draft model rule; see draft revision at the end of this table.
1.(a)(4)	Strike entire paragraph for reasons in 1.(a)(2)(C)	Substantive	See discussion above under 1.(a)(2)(c).
1.(b)(1)(C)	Insert: "(and reducible allocation) "	Clarifying	Accept
1.(b)(2)	Replace: "Section I5.(a)" with "Section I6.(a) "	Cross reference correction	Accept
1.(b)(6)	Replace: "Section I7" with "Section I8 "	Cross reference correction	Accept
1.(b)	This special treatment for sources under paragraph (b) should be referenced in other relevant provisions in the Rule, such as provisions for allowance transfers and compliance with allowance limitations.	Substantive	Modify G1, L1.(a), L1.(d) of Feb. 7th draft model rule; see draft language at end of this table.
1.(c)(4)(C)	Insert: ", and the owner or operator recertifies thereafter a replacement monitoring system in accordance with the applicable provisions of this Section"	Clarifying	Accept

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2.(b)	Modifications: Would make any unit that opts to use Part 75 monitoring subject to the monitoring plan process and content requirements in Part 75.	Substantive/ Structural	<p>Disagree. Maintain requirement for an initial monitoring plan for all non-existing Part 75 sources. Also, keep the language here: (1) there is no need for sources to go to Part 75 to see requirements, and (2) excludes a few Part 75 elements that are not applicable to this program (such as NO_x controls or stack height above sea level).</p> <p>Since EPA is not administering this program, monitoring plan elements and submittal procedures are better suited for the WRAP rule to specify. Note that most of the provisions in the draft rule are taken verbatim from Part 75, and likely would be modified after the program trigger to coordinate with any Part 75 changes so that sources could use same DAHS software.</p>
2.(b)	Replace: "this Section" with "Section I2.(a)-(f)"	Clarifying	Accept
2.(c)(1)(E)	Comments: "[note: it is unclear what is meant by "process materials", e.g., is this process product that is combusted?]" Also, strike out Part 75 reference given changes in 2.(b).	Question/ Note	Not just combustion as the program is not limited to combustion units. For Part 75 reference, see discussion above under 2.(b).
2.(c)(2)	Replace: "source" with "site"	Editorial	Accept
2.(c)(2)	Replace: "I1.(a)(2)(D)" with "I1.(a)(2)(E)"	Cross reference correction	Moot given other, related edits.

CAMD Comments on WRAP Monitoring Rule: Summary and Response (cont.)

Section	Comment	Type	Response
2.(d)(3)	Delete: "The owner or operator of a low mass emissions unit for which the owner or operator is using the optional low mass emissions excepted methodology in section 75.19(c) of 40 CFR Part 75 is not required to report such formulas." as unnecessary because of CAMD proposed change in 2.(b)	Substantive	Disagree. See discussion above under 2.(b).
2.(d)(6)	Delete: "or excepted methodology" as unnecessary because of CAMD proposed change in 2.(b)]	Substantive	Disagree. See discussion above under 2.(b).
2.(d)(6)(I)	Delete: entire paragraph unnecessary because of CAMD proposed change in 2.(b)	Substantive	Disagree. See discussion above under 2.(b).
2.(d)(8)	Delete: entire paragraph unnecessary because of CAMD proposed change in 2.(b)	Substantive	Disagree. See discussion above under 2.(b).
2.(e)	[Note: there is no paragraph (e)]	Structural	Modify paragraph lettering.
2.(f)	Delete: entire paragraph unnecessary because of CAMD proposed change in 2.(b)	Substantive	Disagree. See discussion above under 2.(b).
3.(c)	Redesignate: 3.(c) as 4. entitled "Ongoing Quality Assurance and Quality Control" and replace "The WEB source shall satisfy applicable periodic calibration, accuracy testing, and other quality assurance/quality control requirements" with "The WEB source shall satisfy the applicable quality assurance and quality control requirements of Part 75 or, if the WEB source is subject to a WEB protocol in Appendix A, the applicable quality assurance and quality control requirements in Appendix A"	Clarifying	Accept
4.	Redesignate: 4. as 5.	Structural	Accept

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Section	Comment	Type	Response
5.(a)	Replace: "or Appendix A, as applicable" with "or, if the WEB source is subject to a WEB protocol in Appendix A, with substitute data in accordance with Appendix A"	Clarifying	Accept
5.(b)	Replace: "new unit" with "an SO ₂ emitting unit" and insert "for which the unit is subject to the WEB Trading Program" after "control period"	Clarifying	Accept
5.	Redesignate: 5. as 6.	Structural	Accept
6.(a)	Insert: "The monitoring plan or, for a WEB source that is not using 40 CFR Part 75 under this WEB Trading Program," at start of paragraph	Substantive	Disagree. See discussion above under 2.(b) with respect to monitoring plan requirements.
6.(b)(3)	Replace: "by" with "the earlier of 90 unit operating days or 180 calendar days after"	Substantive	Accept
6.	Redesignate: 6. as 7.	Structural	Accept
7.(a)	Comment: uncertain what is being referenced in 4.(b)	Substantive	Clarify that reference is to newly redesignated 7(b).
7.	Redesignate: 7. as 8.	Structural	Accept

CAMD Comments on WRAP Monitoring Rule: Summary and Response (cont.)

Section	Comment	Type	Response
8.(a)	<p>Insert: "in a format specified under 40 CFR Part 75 if the SO₂ emitting unit is using 40 CFR Part 75 under the WEB Trading Program. If the SO₂ emitting unit is not using 40 CFR Part 75 under the WEB Trading Program, the report shall be" after "The report shall be"; and "If the SO₂ emitting unit is not using 40 CFR Part 75 under the WEB Trading Program," before "[State or tribe]"</p> <p>Comment: [Note: it would be easier for sources, the public, and states and tribes if a standard format and standard QA/QC data were required by all states and tribes.]</p>	Substantive	<p>Disagree about requiring use of Part 75 format if use Part 75 monitoring method. Like the monitoring plan provisions, the use of Part 75 monitoring by some sources should not necessarily dictate that they submit data in the same format since EPA does not have an administrative role.</p> <p>As a practical matter, WRAP expects to use the Part 75 format or something very similar to streamline reporting and allow sources to use same software. Will modify the rule to make reporting of hourly data and QA information comparable to Part 75 the standard, but will leave ultimate format open given long time window before implementation.</p>
8.(b)	Replace: "withdrawal" with "deduction"	Clarifying	Accept
8.(b)	Replace: "Section I1.(b)(5)" with "Section I1.(b)(6)"	Cross reference correction	Accept
8.(e)	Replace: "To the extent such petition would modify an element of 40 CFR Part 75 as applied to the WEB source, the" with "The petition"	Substantive	Accept

**Response to CAMD Comments on Draft Monitoring Rule:
Modifications to Non-Monitoring Sections in the February 7th Draft Model Rule**

- (1) Inserts/Modifications for 2/7/03 Model Rule Language to Address Retired Units Monitoring Exemption in Section I1(a)(3)

Section L2(c): Add new Section L2(c)(5) and modify other subparagraphs as follows:

(4) Whether all the SO₂ emissions from the WEB source if applicable, were monitored or accounted for either through the applicable monitoring or through application of the appropriate missing data procedures; ~~and~~

(5) If applicable, whether any SO₂ emitting unit for which the WEB source is not required to monitor in accordance with Section I1.A.(3) of this rule remained permanently retired and had no emissions for the entire applicable period; and

(~~5~~6) Whether there were any changes in the method of operating or monitoring the WEB source that required monitor recertification. If there were any such changes, the report must specify the nature, reason, and date of the change, the method to determine compliance status subsequent to the change, and specifically, the method to determine sulfur dioxide emissions.

- (2) Inserts/Modifications for 2/7/03 Model Rule Language to Address Non-Tradeable Allowance Option under Section I1(b)

Section G1: Add following new sentence to end of this paragraph:

If applicable, the Tracking System Administrator will record a portion of the SO₂ allowances for a WEB source in a special reserve account assigned to the [state or tribe] to account for any allowances to be held by the [state or tribe] in accordance with Section I1(b) of this Rule.

Section L1(a): Modify this section to read as follows:

The WEB source must hold allowances, in accordance with Section L1(b) and Section K of this Rule, as of the allowance transfer deadline in the WEB source's compliance account (together with any current control year allowances held for the WEB source by the [state or tribe] under Section I1(b) of this Rule) in an amount not less than the total SO₂ emissions for the control period from the WEB source, as determined under the monitoring and reporting protocols in Section I of this Rule.

Section L1(d): Add the following to the end of this subparagraph:

The allowances held by the [state or tribe] for compliance at a WEB source pursuant to Section I1(b) of this Rule shall be deducted as specified in that Section.