

EPA Office of Air Quality Planning and Standards Updates
Source Evaluation Society – EPA Updates Webinar
April 21, 2021



Measurement Technology Group Updates:

Test Method Revisions Rulemaking – We continually collect and catalogue errors and other necessary revisions to our test methods, performance specifications, and associated regulations in 40 CFR parts 51, 60, 61, and 63. Many of the revisions are brought to our attention by affected parties and end users. Our most recent test methods update rule was promulgated on October 7, 2020 (85 FR 63394). The rule includes corrections to inaccurate testing provisions, updates to outdated procedures, and approved alternative procedures that provide testers enhanced flexibility. The rule addresses Methods 201A, 4, 5, 7C, 7E, 12, 16B, 16C, 24, 25C, 26, 26A, 107, 301, 308, 311, 315, 316, and 323; Performance Specifications 4B, 5, 6, 8, 9, and 18 of Appendix B; and Procedure 1 of Appendix F.

Contact: Lula Melton, MTG, melton.lula@epa.gov

Broadly Approved Alternative Test Methods Federal Register Notice – These alternative test method approvals, published on the EPA/EMC website at <https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods>, are broadly applicable alternatives to the methods required under 40 CFR parts 59, 60, 61, 63, and 65 as set forth in the General Provisions and/or subparts therein. As such, they may be used by sources for determining compliance with the requirements of these parts as per the applicability provisions specified in the approval without further EPA approval; however, the approval letter or memo should be included in the test plan and test report. The Administrator’s delegated authority (leader of the Measurement Technology Group) has approved these methods for the specified applications. These methods include quality control and quality assurance procedures that must be met.

- **Federal Register Notice for Broadly Applicable Alternative Test Method Approvals** – The first of these notices, published on January 30, 2007 (72 FR 4257), announced broadly applicable alternative test method approval decisions EPA made prior to 2007 to support New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP). This notice describes the alternative test method approval process and underlying regulatory requirements as well as announces the publication of the broad approvals on the EMC website and in the *Federal Register*. These broadly applicable alternative test method approvals provide options and flexibility for the regulated community to reduce the burden on source owners/operators in making site-specific alternative test method requests in addition to the permitting authorities and the EPA Administrator in processing those requests. Announcements of the broadly applicable approval decisions are published in the *Federal Register* on an annual basis; the most recent was published on February 8, 2021 (86 FR 8627). Broad approvals made in 2020 are as follows:
 - ALT-136: Alternative to use High-Performance Liquid Chromatography (HPLC) to measure acetic acid, formic acid, and lactic acid under Method 18 in lieu of Gas Chromatography (GC) in Method 18 for sources subject to 40 CFR parts 59, 60, 61, 63, and 65.
 - ALT-137: Alternative to use ASTM D6377-16 and ASTM D6378-20 in accordance with provisions in approval letter dated June 19, 2020 in lieu of ASTM D2879 for sources



EPA Office of Air Quality Planning and Standards Updates
Source Evaluation Society – EPA Updates Webinar
April 21, 2021

subject to 40 CFR part 60, subparts K, Ka, and Kb; 40 CFR part 61, subpart FF; 40 CFR part 63, subparts G, Y, CC, WW, EEEE, and GGGG; and 40 CFR part 65, subpart C.

- ALT-138: Alternative to use Other Test Method-39 in lieu of ASTM D6522-00 for sources subject to 40 CFR part 60, subpart JJJJ and 40 CFR part 63, subparts ZZZZ and DDDDD.
- ALT-139: Alternative to use Method 30B in lieu of Method 29 for sources subject to 40 CFR part 63, subpart LL.

Contacts: Lula Melton, MTG, melton.lula@epa.gov and Robin Segall, MTG, segall.robin@epa.gov.

PM 2.5 Method Development for Wet Stacks – In the past several years, EPA has participated in three projects attempting to develop one or more test methods for fine particulate that can be performed under wet stack conditions. One project has focused on the development of an instrumental method, another project would use a manual sampling train based on Method 201A, and one would utilize a camera to photograph droplets determine their size. The development of these methods is important for the state implementation plan (SIP) PM fine implementation program and for emission factor development.

- The development work on the instrumental method utilized an in-stack droplet separator followed by a dilution chamber with an ambient air Federal Reference Method (FRM) at the end to measure PM 2.5. A prototype CEMS was successfully evaluated under dry stack conditions and has been tested under wet stack conditions. We have performed modeling to optimize the design of the inertial droplet separator (IDS) and performed monodisperse testing on the resulting IDS at the University of Minnesota. Results showed promise but this project is currently on hold due to a lack of funding.
- The manual method was funded by API and NCASI and the results were at one time posted on the MTG website as OTM-36. As discussed in the caveats posted with the method, we have concerns about the validity of this method as written. **In 2017, the University of Minnesota performed monodisperse testing on the pre-cutter nozzle and demonstrated that the current version of OTM-36 has a significant negative bias.** As a result, we have removed OTM-36 from our website. Work is being done to correct this negative bias. We are planning to begin work on designing and developing a new nozzle for the OTM-036 sampling train in the near future, once funding is secured.
- With the help of a contractor, EPA is assessing the ability of current camera technology to measure water droplet size distribution. This project is currently assessing at the ability of both a camera and probe prototype built by our contractor and a commercially available camera developed primarily for use in the pharmaceutical industry - called a SOPAT. With the prototype, we have successfully captured photographs of water droplets generated in the lab. We have also taken the prototype camera to a facility with a wet stack to determine its limitations in such an

EPA Office of Air Quality Planning and Standards Updates
Source Evaluation Society – EPA Updates Webinar
April 21, 2021



inhospitable environment. We have performed initial testing with the SOPAT on the wet-stack exhaust of a boiler at EPA's research facility in RTP with some success. We had hoped to perform additional testing using both cameras, but at the moment any field work has been postponed or cancelled due to COVID-19. Once travel resumes, we will evaluate our position and decide how to move forward. The next steps will be to attempt to understand the potential precision of the method, to identify data quality indicators to be used in the future refinement of this methodology and develop an SOP for using the camera as a measurement device.

Contacts: Kim Garnett, MTG, garnett.kim@epa.gov and Jason DeWees, MTG, dewees.jason@epa.gov

Method 23 Revisions – We are currently working on extensive revisions to Method 23 for measurement of dioxins and furans. These revisions are designed to make the analytical portion of Method 23 as performance based as possible. This will, in turn, provide additional flexibility in performing the method as well as allow for advances in technology without the need for changes to the method. Method 23 will include measurement of PCB and PAH compounds. MTG conducted 13 informal stakeholder calls to discuss possible revisions and give stakeholders an opportunity to provide their input and expertise. Revisions to the Method 23 proposal are complete. Revisions were proposed in January of 2020. The comment period for proposed revisions closed on March 16, 2020. Response to comments and a final rule is in preparation for release in late Summer or Fall of 2021.

Contact: Ray Merrill, MTG, Merrill.raymond@epa.gov

Method 202 Revisions – In 2015, EPA conducted stakeholder meetings to collect feedback and information on the best practices to minimize sampling train blank bias. In 2016, EPA posted a best practices handbook for Method 202 on the EMC website at <https://www.epa.gov/emc/method-202-condensable-particulate-matter>. EPA proposed revisions to Method 202 to codify these best practices on September 8, 2017 (82 FR 42508). We expect to finalize Method 202 by summer of 2021.

Contacts: Ned Shappley, MTG, shappley.ned@epa.gov, Ray Merrill, MTG, merrill.raymond@epa.gov and Jason DeWees, MTG, dewees.jason@epa.gov.

Revisions to Methods 18, 25A and 320 – In late 2016, we identified a need for updates to three of our methods that measure volatile organic compounds (VOC): Methods 18, 25A, and 320. To accomplish this, we have engaged interested stakeholders and formed working groups. Having received substantial and meaningful feedback from these groups, revisions are in progress. Once these revisions begin to approach completion, EPA will reach out to stakeholders again for comment.

Contacts: Dave Nash, MTG, nash.dave@epa.gov and Ned Shappley, MTG, shappley.ned@epa.gov

EPA Office of Air Quality Planning and Standards Updates
Source Evaluation Society – EPA Updates Webinar
April 21, 2021



Condensable Particulate Method Comparison Project – In an effort to further understand condensable particulate matter (CPM) formation, EPA will be conducting method comparison and kinetics research. Comparison of an impinger-based method (Method 202) and a dilution-based method (OTM-037) will inform the potential for bias due to the principle behind each method. Additionally, in an attempt to quantify any possible bias, an aerosol mass spectrometer (AMS) will be used at various points along each method sampling setup to speciate CPM and examine if the measurement approach itself affects the amount of CPM sampled. The AMS, used in conjunction with a flow tube in which variables such as residence time, humidity, dilution ratio, and reactant concentration can be varied, will also be utilized to examine the kinetics of CPM formation. This might inform whether a particular sampling approach is more beneficial depending upon near-stack conditions. Initial shakedown testing has begun. To date, flow tube work has involved verifying conditions requisite for steady-state operations under a variety of reactant concentrations and interaction times. Particle size distributions (determined via SMPS) and speciation (via AMS) have been measured in the laboratory; the next step is moving the setup to EPA’s multi-pollutant control research facility (MPCRF) for the method comparison component of this work. Shakedown tests have been run with the OTM-037 setup as well, on the MPCRF, and the goal for additional testing to start is late Summer 2021.

Contacts: David Nash, MTG, nash.dave@epa.gov, Ned Shappley, MTG, shappley.ned@epa.gov, Jason DeWees, MTG, deweese.jason@epa.gov

RICE Engine Emissions Measurement Workgroup – In an effort to determine if it is possible to establish a list of individual compounds that would represent total hydrocarbon emissions from RICE engines, a workgroup has been established. In 2017 and 2018 there were several stakeholder calls discussing speciating measurements, specifically Fourier Transform Infrared Spectroscopy (FTIR) and if it is possible to use these approaches to determine total hydrocarbons from these engines. At this point, EPA seeks any data testers can provide to make a scientifically based/informed decision. Ideally, the data would represent engines of different sizes and ages, operating under ideal and non-ideal conditions. Until sufficient data is received, stakeholder calls will remain on hold.

Contact: David Nash, MTG, nash.dave@epa.gov

ASTM / NTTAA Activities – EMC staff continue to participate as committee members on ASTM subcommittees, primarily to encourage development of new stack test methods, especially where we anticipate a need that is not met by a current EPA method. In addition, under the National Technology Transfer Advancement Act (NTTAA), EPA considers all available voluntary consensus methods during the process of rulemaking and offers appropriate methods as regulatory alternatives. We are currently participating in or following ASTM standard development efforts for: (1) methods for low mass fireplaces, masonry heaters, hydronic heaters, wood heaters (cord wood), and pellet stoves (Committee E06); (2) the method for controlled condensate measurement of sulfuric acid under development (Committee D22); (3) a general standard for method detection limits (Committee D22); and (4) methods for VOC and low VOC in coatings (Committee D01). We continue to follow workgroup activities in subcommittees D22.03 (Ambient and Stationary Source Standards) and D22.05 (Indoor Air Standards) to

EPA Office of Air Quality Planning and Standards Updates
Source Evaluation Society – EPA Updates Webinar
April 21, 2021



develop and revise standards applicable to EPA's mission. We are also updating our database of approved Voluntary Consensus Standard methods with the overall goal of providing approval to the latest ASTM and other Consensus Body Standards for use in compliance with EPA regulations, where the consensus standard method is deemed technically appropriate.

Contacts: Ray Merrill, MTG merrill.raymond@epa.gov, Mike Toney, MTG, toney.mike@epa.gov and Ned Shappley, MTG shappley.ned@epa.gov.

OTM's – Other Test Methods

OTM-36: Method for the Determination of Filterable PM_{2.5} Emissions from Moisture Saturated and/or Droplet-laden Stationary Source Gas Streams (Constant Sampling Rate Procedure) - This test method was designed to measure filterable particulate matter emissions equal to or less than a nominal aerodynamic diameter of 2.5 micrometers (PM_{2.5}) in moisture saturated (wet) and/or droplet-laden gas streams from stationary sources. The method addresses the equipment, preparation, and analysis necessary to measure filterable PM_{2.5} emissions in droplet-laden and/or moisture-saturated gas streams. Since originally being posted on the EMC website, additional testing has been performed that demonstrates that the current version of OTM – 36 has a significant negative bias. As a result, we have removed it from our website. Work is being done to try and correct this negative bias. As part of the PM 2.5 Method Development for Wet Stacks, we plan to begin work on designing and developing a new nozzle for the OTM-036 sampling train in the near future, once funding is secured.

Contact Kim Garnett at 919-541-1158 or garnett.kim@epa.gov

OTM-37: Measurement of Direct PM_{2.5} and PM₁₀ Emissions at Low Concentrations by Dilution Sampling (Constant Sampling Rate Procedure) - This method for measurement of primary PM_{2.5/10}, builds upon CTM-039's capabilities by applying more sensitive ambient air gravimetric sampling and analysis methods to the diluted and cooled stack gas samples, achieving greater sensitivity (improved precision) than can be achieved with CTM-039 alone. Specifically, the condensable portion of Direct PM is collected on polytetrafluoroethylene (PTFE) membrane filters with a diameter of 47 mm (1.9 inches), and then analyzed according to procedures used in EPA's Ambient PM_{2.5} Monitoring Program.

Contacts: David Nash, MTG, nash.dave@epa.gov, Ned Shappley, MTG, shappley.ned@epa.gov, Jason DeWees, MTG, deweese.jason@epa.gov

Other Test Method 45 (OTM-45) Measurement of Selected Per- and Polyfluorinated Alkyl Substances from Stationary Sources. OTM-45 is a performance-based method applicable to the collection and quantitative analysis of specific semivolatile (Boiling point > 100°C) and particulate-bound per and polyfluorinated alkyl substances (PFAS) in air emissions from stationary sources. This method can also be used for the collection and recovery of other ionic and covalent PFAS for nontargeted analysis (NTA) of PFAS compounds. This method describes

EPA Office of Air Quality Planning and Standards Updates
Source Evaluation Society – EPA Updates Webinar
April 21, 2021



the sampling, sample recovery and analysis procedures used to measure individual semivolatile PFAS from stationary source air emissions.

Contacts: Ray Merrill, MTG merrill.raymond@epa.gov, Jason DeWees, MTG, dewees.jason@epa.gov

Measurement Policy Group Updates:

Electronic Reporting

- **Implementation of Electronic Reporting** – We have already incorporated electronic reporting into 64 subparts in 40 CFR parts 60 (18), 62 (1), and 63 (45). Some of these subparts limit electronic reporting to stack test reports and performance evaluation reports, while other rules require additional reports to be submitted electronically. A complete list of these rules and the reports that must be submitted electronically within each subpart can be found at <https://www.epa.gov/electronic-reporting-air-emissions/cedri#list>.
In the past two years, EPA finalized electronic reporting requirements into rules for the following sectors:
 - Ethylene Production (40 CFR part 63, subpart YY)
 - Municipal Solid Waste Landfills (40 CFR part 63, subpart AAAA)
 - Plywood and Composite Wood Products (40 CFR part 63, subpart DDDD)
 - Organic Liquids Distribution (OLD) (40 CFR part 63, subpart EEEE)
 - Miscellaneous Organic Chemical Manufacturing (MON) (40 CFR part 63, subpart FFFF)
 - Solvent Extraction for Vegetable Oil Production (40 CFR part 63, subpart GGGG)
 - Auto and Light Duty Truck (40 CFR part 63, subpart IIII)
 - Paper and Other Web Coatings (40 CFR part 63, subpart JJJJ)
 - Metal Can (40 CFR part 63, subpart KKKK)
 - Plastic Parts and Products (40 CFR part 63, subpart PPPP)
 - Metal Coil (40 CFR part 63, subpart SSSS)
 - Cellulose Products Manufacturing (40 CFR part 63, subpart UUUU)
 - Boat Manufacturing (40 CFR part 63, subpart VVVV)
 - Reinforced Plastics and Composites Production (40 CFR part 63, subpart WWWW)
 - Rubber Tire Manufacturing (40 CFR part 63, subpart XXXX)
 - Stationary Combustion Turbines (40 CFR part 63, subpart YYYY)
 - Lime Manufacturing (40 CFR part 63, subpart AAAAA)
 - Iron and Steel Foundries (40 CFR part 63, subparts EEEEE and ZZZZZ)
 - Integrated Iron and Steel Manufacturing (40 CFR part 63, subpart FFFFF)
 - Site Remediation (40 CFR part 63, subpart GGGGG)
 - Miscellaneous Coating Manufacturing (40 CFR part 63, subpart HHHHH)
 - Asphalt Processing and Roofing Manufacturing (40 CFR part 63, subpart LLLLL)
 - Miscellaneous Metal Parts and Products (40 CFR part 63, subpart MMMM)
 - Hydrochloric Acid Production (40 CFR part 63, subpart NNNNN)
 - Engine Test Cells/Stands (40 CFR part 63, subpart PPPPP)
 - Taconite Iron Ore Processing (40 CFR part 63, subpart RRRRR)

EPA Office of Air Quality Planning and Standards Updates
Source Evaluation Society – EPA Updates Webinar
April 21, 2021



EPA took additional steps to implement electronic reporting in the Reclassification of Major Sources to Area (MM2A) final rule. Under EPA's Once In, Always In (OIAI) policy, a source could only reclassify from major source status to area source status prior to the first substantive compliance date for a given subpart. With the rescission of the OIAI policy, EPA stated that a source can reclassify between major source status and area source status at any time. MM2A provided the process for reclassification. MM2A added two new electronic reporting requirements to the 40 CFR part 63 General Provisions (GP) - 40 CFR 63.9(b), the initial notification for an area source that used to be a major source switching back to major source status, and 40 CFR 63.9(j), notification of a change in information already provided when a source is reclassifying from major source status to area source status. Additionally, the MM2A packaged added the electronic reporting procedures to 40 CFR 63.9(k). While adding the electronic reporting procedures to the GP does not add any additional electronic reporting requirements in itself, it makes it easier to add these provisions in future revisions of subparts within part 63, as the electronic reporting procedures will not need to be added to the individual subparts. The electronic reporting procedures added to the GP include general CEDRI submission language; requests for extensions of electronic submissions due to a CEDRI outage or force majeure event; an allowance that (40 CFR 63.9(k)), at the discretion of the delegated authority, submission to CEDRI can fulfill the obligation to report to the delegated authority; statement that the federal electronic reporting requirements cannot be exempted (40 CFR 63.12(c)); and acknowledgement that submission to CEDRI fulfills the obligation to submit to the regional office (40 CFR 63.13(a)).

Contact: Gerri Garwood, MPG, garwood.gerri@epa.gov, 919-541-2406, or Kevin McGinn, MPG, mcginn.kevin@epa.gov, 919-541-3796.

- **Electronic Reporting for Utilities** – EPA finalized revisions to the electronic reporting requirements for the Mercury and Air Toxics Standards (MATS) in July 2020 – see 85 FR 55,744 from September 9, 2020. Those revisions streamline reporting requirements, increase data transparency, and provide enhanced access to MATS data through the use of the acid rain program's existing Emissions Collection and Monitoring Plan System (ECMPS) Client Tool. While the ECMPS Client Tool is being revised and tested, report submission via portable document format (PDF) files will continue through December 31, 2023. These revisions are projected to reduce annual source burden by 11,000 hours and annual costs by over \$15 million. Contact: Barrett Parker, MPG, parker.barrett@epa.gov, 919-541-5635.

Data Systems

- **The Electronic Reporting Tool (ERT)** – In 2009, EPA made available a Microsoft Access® desktop application called the ERT (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>). This application creates an electronic alternative to paper reports for source emissions tests. To date, more than 5,900 reports have been submitted via CEDRI in the format generated through the use of the ERT.

Version 6 was released 8/28/2020 and included the following enhancements:

- Incorporation of the new Wood Heater module;
- Additional group pollutants, including total Dioxins and Furans, Semivolatile Metals (Pb and Cd), Low Volatile Metals (both As, Be, and Cr and As, Be, Cr, Sn, Co, Mn, and Ni



EPA Office of Air Quality Planning and Standards Updates
Source Evaluation Society – EPA Updates Webinar
April 21, 2021

groupings) and Total Condensable Particulate (Organic + Inorganic) added to the compound list;

- Point-to-point isokinetic calculations for Method 201A;
- Wet RATA calculations; and
- Performance Specification 12B and instrumental methods import sheet.

Version 6 was updated on 12/7/2020 to reflect the regulation update, on 3/24/2020 to address the Drupal 8 conversion and on 4/7/2020 to address calculation fixes. A complete list of updates to the ERT, as well as an update history, can be found on the ERT website.

To download the ERT, access the user's manual, find answers to frequently asked questions, or learn about training opportunities, please visit the ERT website. If you have any questions or issues with the ERT, please contact Theresa Lowe by email or phone.

Contact: Theresa Lowe, MPG, lowe.theresa@epa.gov, (919) 541-4786.

- **The Compliance and Emissions Data Reporting Interface (CEDRI)** – CEDRI is located on EPA's CDX. CDX is the EPA's node on the Exchange Network, a web-based platform for data sharing between EPA and state, local, and tribal agencies. CDX is the application used by EPA programs and various stakeholders to manage environmental data transmitted to EPA in order to meet EPA's reporting requirements. CEDRI is an application within the CDX that supports the electronic submittal of reports required by 40 CFR parts 60 (NSPS), 62 (Federal Plans), and 63 (NESHAP or MACT), *i.e.*, performance test reports (ERT file upload), performance evaluation reports (ERT file upload), notification of compliance status reports (generally PDF upload), and periodic reports (CEDRI fillable form or spreadsheet template). CEDRI supports aggregation of multiple reports into a single package for submission. Reports submitted via CEDRI are Cross-Media Electronic Reporting Regulation (CROMERR) compliant, meaning that the electronic signature is equal to a wet ink signature. Additional information can be found on the CEDRI website at <https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>. Questions can be sent to CEDRI@epa.gov.

In the past year, major enhancements to CEDRI include:

- Significantly improved user interface for Industry and Reviewer roles;
- Enhanced report search functions;
- Enabled manage reports functionality for EPA implement and manage reports and job aides thus reducing reliance on contractor support;
- Implementation of the Fenceline Monitoring Report, Site Management Plan, and Flare Management Plan uploads;
- Updated facility widget to allow users to provide sub-facility data during submission;
- Replaced notification email feature for Reviewer roles; and
- Added the ability to collect 40 CFR Part 49, 70, and 71 State Title V reports.

State, local, tribal, and EPA regional office personnel can sign up to review reports submitted to CEDRI by sending an email to CEDRI@epa.gov. The email should include the reviewer's name, phone number, organization information (name, address, phone number), and email address.

Contact: Eric Goehl, MPG, goehl.eric@epa.gov.



EPA Office of Air Quality Planning and Standards Updates
Source Evaluation Society – EPA Updates Webinar
April 21, 2021

- **WebFIRE** – We continue to implement our multi-part process to improve the air pollutant emissions factors program and to make the program self-sustaining. We are finalizing and intend to post *Recommended Procedures for Development of Emissions Factors and Use of the WebFIRE Database* by summer of 2021. The draft version of this document can be found at (<https://www.epa.gov/air-emissions-factors-and-quantification/procedures-development-emissions-factors-stationary-sources>). We recently completed programming WebFIRE with these updated procedures and incorporated existing AP-42 supporting documentation into our WebFIRE database so that electronically submitted test reports can be easily evaluated to determine if new or revised emissions factors should be proposed. Additionally, we have enhanced WebFIRE so that it stores and retrieves reports (*i.e.*, performance test reports, Notice of Compliance, air emission reports) received from CEDRI.

Users can search for reports and emissions factors on the WebFIRE website:
<https://cfpub.epa.gov/webfire/>.

Contact: Michael Ciolek, MPG, ciolek.michael@epa.gov or Casey Bray, MPG, bray.casey@epa.gov.

- **Emissions Factors Update**
 - The *Recommended Procedures for Development of Emissions Factors and Use of the WebFIRE Emissions Factor Database* will be posted on the CHIEF website by summer of 2021.
 - 4-6 new or revised existing emissions factors will be proposed and posted on the CHIEF website also during the summer of 2021. Please join the Chief listserv (<https://www.epa.gov/chief/chief-listserv>) to receive notifications on emissions factors development.

Revisions to AP-42 Section 7.1 – Organic Liquid Storage Tanks were finalized in March 2020. Information on the section is available on the EPA’s website (<https://www.epa.gov/air-emissions-factors-and-quantification/final-revisions-ap-42-chapter-7-section-71-organic-liquid>). The revisions to Section 7.1 include emissions estimating methodologies for the following types of events and situations:

- Landing a floating roof;
- Tank cleaning;
- Tanks containing unstable liquids, such as tanks that have air or other gases injected into the liquid (sparging), tanks storing liquids at or above their boiling point (boiling), or tanks storing liquids that contain gases with the potential to flash out of solution (flashing);
- Variable vapor space tanks;
- Pressure tanks designed as closed systems without emissions to the atmosphere;
- Time periods shorter than one year; and
- Internal floating roof tanks with closed vent systems.

Additionally, the revisions include the following guidance:

- Case-specific liquid surface temperature determination;
- Adapting equations for heating cycles in fixed roof tanks;



EPA Office of Air Quality Planning and Standards Updates
Source Evaluation Society – EPA Updates Webinar
April 21, 2021

- Applying Raoult’s Law to calculate the contribution of individual chemical species to the total emissions; and
- Worked examples (Section 7.1.5).

Contact: Casey Bray, MPG, bray.casey@epa.gov, or Michael Ciolek, MPG, ciolek.michael@epa.gov.

- **Source Classification Code (SCC) Revisions Project** – We are in the process of updating and improving the point source SCCs. EPA uses SCCs to classify different types of anthropogenic emission activities. Each SCC represents a unique process or function that emits an air pollutant. SCCs are used for multiple applications, such as NEI/EIS reporting, risk and technology review modeling, EPA’s WebFIRE database and the ERT. The SCCs are also used by many regional, state, local, and tribal agency emissions data systems. The objective of this project is to remove outdated and duplicate SCCs, identify missing SCCs, and fix inconsistencies in the level of detail the SCCs provide. A comprehensive list of SCCs can be found online (<https://www.epa.gov/scc>). Over the past year, we updated descriptions for 457 SCCs, created 11 SCCs, retired 13 SCCs, and revised 14 SCCs affecting the following sectors:
 - Asphalt Roofing and Processing
 - Hydrochloric Acid Production
 - Magnesium Production
 - Waste Disposal
 - Graphic Arts Printing
 - Pulp and Paper
 - Duplicative “MACT” SCCs.

Contact: Muntasir (Monty) Ali, ali.muntasir@epa.gov, (919) 541-0833.

Improving Emissions Monitoring through Rulemaking

- **Rule Reviews** – In March 2017, two court orders were issued for EPA to perform Residual Risk and Technology Reviews (RTRs) for 33 source categories. We received a court-ordered deadline to perform RTRs for an additional nine source categories in March 2018. The court-ordered deadlines for final signature dates for these rules range from December 31, 2018, to October 1, 2021. Thirty-three of the 42 deadline RTRs have already been promulgated, and two were removed from the suit. During RTRs, MPG and MTG staff work with the rule writers to assess the monitoring and testing requirements of the rules to determine if changes are needed or warranted. These reviews can include issuing a request for information under Section 114 of the Clean Air Act, which may include requirements for conducting testing. In 2019, EPA issued an extensive Section 114 request, including testing, for one facility associated with the MON rulemaking.

Additionally, MPG staff work with the rule writers to streamline recordkeeping and reporting requirements and incorporate electronic reporting as appropriate. MPG is now encouraging rule writers to propose electronic reporting templates as part of proposed rule packages in an effort to provide a better method of notification of availability of draft forms and additional time and means for stakeholders to comment on the draft form.



EPA Office of Air Quality Planning and Standards Updates
Source Evaluation Society – EPA Updates Webinar
April 21, 2021

In the latest batch of promulgated rules (listed above), in addition to the electronic reporting provisions, periodic performance testing was added to:

- Plywood and Composite Wood Products (40 CFR part 63, subpart DDDD)
- Miscellaneous Organic Chemical Manufacturing (MON) (40 CFR part 63, subpart FFFF)
- Auto and Light Duty Truck (40 CFR part 63, subpart IIII)
- Paper and Other Web Coatings (40 CFR part 63, subpart JJJJ)
- Large Appliances (40 CFR part 63, subpart NNNN)
- Fabric Printing (40 CFR part 63, subpart OOOO)
- Wood Building Products (40 CFR part 63, subpart QQQQ)
- Metal Furniture (40 CFR part 63, subpart RRRR)
- Metal Can (40 CFR part 63, subpart KKKK)
- Plastic Parts and Products (40 CFR part 63, subpart PPPP)
- Metal Coil (40 CFR part 63, subpart SSSS)
- Cellulose Products Manufacturing (40 CFR part 63, subpart UUUU)
- Integrated Iron and Steel Manufacturing (40 CFR part 63, subpart FFFFF)
- Miscellaneous Coating Manufacturing (40 CFR part 63, subpart HHHHH)
- Asphalt Processing and Roofing Manufacturing (40 CFR part 63, subpart LLLLL)
- Miscellaneous Metal Parts and Products (40 CFR part 63, subpart MMMM)

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- **Innovative Technology** - EPA continues implementation of new monitoring technologies in current rulemakings. We included new flare monitoring requirements in the RTRs for Ethylene Production, OLD, and MON. These requirements are similar to the requirements for refinery flares, but also include the use of mass spectrometers for heat content monitoring, where previously this was limited to gas chromatographs or calorimeters. These rules also include requirements for multi-point ground flares. These pressure-assisted flares are unable to comply with the maximum flare velocity requirements in the 40 CFR part 60 and 63 General Provisions, and as such, requirements more unique to this type of flare were needed.

EPA began receiving fenceline monitoring data from refineries in 2019. This data is submitted to CEDRI and is available to the public in WebFIRE. To date, 120 sites have reported benzene data from fenceline monitoring. Of these sites, the majority have been able to remain below the action level, with only 21 sites experiencing a sampling period above the action level.

Ethylene oxide has garnered a lot of interest recently because there are indications that it is more toxic than previously thought. To ensure that risk from ethylene oxide is at an acceptable level, it is necessary to reduce levels of emissions to very small amounts. These reductions generally require use of special scrubbing equipment to convert the ethylene oxide to ethylene glycol, which is then removed. EPA issued the first monitoring requirements for these type of scrubbers as part of the MON RTR last summer.

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