One Page Tip: July 2020
Part 75 Overview

Regulatory References:
Actual regulations such as: “Part 75, Continuous Emission Monitoring”, “Part 75 Emission Monitoring Policy Manual,” and “Plain English Guide to Part 75.”

A link to these and other related documents can be found here.

A StackVision User Guide can be found within the StackVision application (Main Menu > Help > StackVision Help).

CEMS operators should also consult the reporting instructions for Quality Assurance and Certification records. A link to the updated Monitoring Plan reporting instructions can be found here.

Background:
The purpose of these one-to-two-page summaries is to offer suggestions for how to perform these regulatory reviews, or offer key points to remember when conducting these activities. They are also intended as a starting point or a template for ESC | Spectrum customers to develop their own in-house and site-specific procedures, check lists, or other helpful tools for people to use. These summaries are not “all-encompassing” and do not contain every relevant piece of information on these topics.

This One Page Tip will address Part 75 and is expressly laid out for helping people wade through the various regulations and requirements.

One of the key elements to establishing clean and consistent emission datasets is the ability to operate the processes that are being monitored (the boilers, combustion turbines, reagent injection systems, Selective Catalytic Reactors (SCRs), Wet Flue Gas Desulfurization (WFGDs), etc.), and the associated CEM systems in a consistent manner.

Be aware that many facilities operate CEM systems that record emission readings to show or demonstrate compliance for several different reporting programs simultaneously.

The most common examples are SO2, NOx, and CO2/O2 monitors for both Part 60 and 75. Frequently, reporting systems have duplicate parameters within their CEMS configuration; one set for P60 reporting and the other for P75 reporting. Operators of diluent (CO2 or O2) and volumetric flow monitor systems also need to be aware that the data generated by these systems are frequently used in the derived calculations for Hg, PM, HF or HCl reporting for P63 (the EGU MATS)

Frequently, reporting systems have duplicate parameters within their CEMS configuration; one set for P60 reporting and the other for P75 reporting.

These overlapping regulations can lead to confusion and frustration, but this is where using checklists or having in-house procedures gives you a chance to keep a handle on these issues and allow you to address the overlapping regulations successfully.

For questions, suggestion, or for a general chat, do not hesitate to contact me.

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