



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

Ms. Tamera Thompson  
Virginia Department of Environmental Quality  
Air Division  
P.O. Box 10009  
629 East Main Street, 8th Floor  
Richmond, VA 23219

Re: Applicability of 40 CFR Section 63.8 to the Pulp and Paper MACT (40 CFR Part 63 Subpart S)

Dear Ms. Thompson:

On March 7, 2000, by electronic mail, you informally requested clarification on the applicability of 40 CFR Section 63.8 to a pulp and paper mill. Specifically, you asked if performance specifications had not been promulgated by the U. S. Environmental Protection Agency (EPA), would the continuous monitoring system (CMS) provisions of 40 CFR Section 63.8 apply to a pulp and paper mill subject to the Pulp and Paper MACT standard (40 CFR Subpart S)? You cited 40 CFR Section 63.8(a)(2) which states: "For the purposes of this part, all CMS required under relevant standards shall be subject to the provisions of this section upon promulgation of performance specifications for CMS as specified in the relevant standard or otherwise by the Administrator." EPA Region 3 has consulted with EPA's Office of Air Quality Planning and Standards (OAQPS) and Office of Enforcement and Compliance Assurance (OECA) on this issue. To date, EPA has not promulgated performance specifications for continuous parametric monitoring systems of the type applied in this rule. Therefore, at first glance, it would appear that 40 CFR Section 63.8 does not apply at this time to a pulp and paper mill subject to the MACT standard.

However, as required by 40 CFR Part 70.6(a)(3)(i)(B) and (C) and (ii), a Title V permit is required to include monitoring necessary to ensure compliance with the underlying regulation, including information on the use, maintenance and installation of monitoring equipment. The permitting authority is required to incorporate acceptable performance specifications for the CMS used to comply with the Pulp and Paper MACT standard into the Title V permit. The attached draft performance specifications developed by EPA should aid the Virginia Department of Environmental Quality (VADEQ) in developing acceptable protocol for installing, maintaining, calibrating and operating the CMS. In addition, 40 CFR Part 63.453 provides some performance specifications (e.g., location of a temperature CMS) and requires that the facility use the manufacturer's specifications in installing, calibrating, certifying, operating and maintaining the CMS. Where the manufacturer's specifications are lacking, EPA recommends using the attached draft performance specifications as guidance. VADEQ should also consider the appropriate subsections of 40 CFR Section 63.8 when developing the periodic monitoring required by 40 CFR Part 70.6(a).

EPA also believes it (and the delegated authority) has discretion under 40 CFR Section 63.8(a)(2), as indicated by the phrase “..or otherwise by the Administrator”, to develop any necessary protocols to ensure compliance with the standard prior to the promulgation of the performance specifications. As outlined in the April 20, 1998 delegation agreement between the VADEQ and EPA, VADEQ has the authority to approve of site-specific test and performance evaluation plans. Therefore, EPA recommends that VADEQ require the facility to submit a site-specific performance evaluation plan ,as outlined in 40 CFR Section 63.8(d), to ensure that the facility has developed an adequate quality control program.

If you have any additional questions regarding this issue, please do not hesitate to call me at 215-814-3297.

Sincerely,

(signed 5/30/01)  
Dianne J. McNally  
Air Toxics Coordinator

cc: Steve Shedd, OAQPS  
Peter Westlin, OAQPS  
Charlie Garlow, OECA

Enclosure

**Attachment - EPA Draft Performance Specifications (5/31/01)**

63.P Operating Parameter Performance Specifications

(1) Temperature can be measured using devices such as thermocouples, resistance temperature detectors (RTDs), and Infrared (IR) thermometers. Performance specifications for temperature measurements include:

- (i) collecting at least 4 evenly-spaced temperature readings per hour of process operation, not including periods of startup or shutdown, in order to have a valid hour of data;
- (ii) locating the temperature sensor in or as close as practical to a position that provides a representative temperature;

- (iii) using a temperature sensor with a minimum tolerance of 2.2 degrees Celsius or 0.75% of the temperature value, whichever is larger, for a noncryogenic temperature range or a temperature sensor with a minimum tolerance of 2.2 degrees Celsius or 2% of the temperature value, whichever is larger, for a cryogenic temperature range;
  - (iv) shielding the temperature sensor system from electromagnetic interference and chemical contaminants;
  - (v) having a chart recorder sensitivity in the minor division of at least twenty degrees Fahrenheit, if a chart recorder is used;
  - (vi) performing at least semiannually an electronic calibration according to the procedures in the manufacturer's owners manual and then conducting a temperature sensor validation check, in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 16.7 degrees Celsius of the process temperature sensor's reading;
  - (vii) conducting calibrations and validation checks more frequently than semiannually after prolonged excursions above the sensor's maximum operating temperature range;
  - (viii) performing at least monthly inspections of all components for integrity and of all electrical connections for continuity, oxidation, and galvanic corrosion;
  - (ix) recording the results of the inspection, calibration, and validation check in a log;
  - (x) recording at least one temperature reading every fifteen minutes while the process operates; and
  - (xi) determining the hourly average of all recorded temperature readings.
- (2) Pressure can be measured using devices such as manometers, gauges, and transducers (including strain gauges). Performance specifications for pressure measurement include:
- (i) collecting at least 4 evenly-spaced pressure readings per hour of process operation, not including periods of startup or shutdown, in order to have a valid hour of data;
  - (ii) locating the pressure sensor(s) so that a representative pressure is provided;
  - (iii) using a means to minimize or eliminate pulsating pressure, vibration, and internal and external corrosion;
  - (iv) using a gauge with a minimum tolerance of one-half inch of water or a transducer with a minimum tolerance of one percent of the pressure range;

- (v) conducting daily pressure tap pluggage checks and quarterly calibration checks with manometers for gauges or monthly calibration checks with manometers for transducers;
  - (vi) conducting calibrations more frequently after prolonged excursions above the sensor's maximum rated operating pressure range;
  - (vii) performing at least monthly inspections of all components for integrity, of all electrical connections for continuity, and of all mechanical connections for leakage;
  - (viii) recording the results of the inspections and checks in a log;
  - (ix) recording at least one pressure reading every fifteen minutes while the process operates; and
  - (x) determining the hourly average of all recorded pressure readings.
- (3) Flow can be measured using devices such as rotameters; differential pressure flow measurement devices including venturis, flow nozzles, orifice plates, rotameters; and various types of flow meters, including magnetic, mass, thermal, fluidic oscillating, vortex formation, turbine, and positive displacement. Performance specifications for flow rate measurement include:
- (i) collecting at least 4 evenly-spaced flow readings per hour of process operation, not including periods of startup or shutdown, in order to have a valid hour of data;
  - (ii) locating the flow sensor and other necessary equipment such as straightening vanes in or as close to a position that provides a representative flow;
  - (iii) using a flow sensor with a minimum tolerance of two percent of the flow rate;
  - (iv) reducing swirling flow or abnormal velocity distributions due to upstream and downstream disturbances;
  - (v) conducting at least semi-annually a flow sensor calibration check;
  - (vi) performing at least monthly inspections of all components for integrity, of all electrical connections for continuity, and of all mechanical connections for leakage;
  - (vii) recording the results of the inspection and flow sensor calibration in a log;
  - (viii) recording at least one flow reading every fifteen minutes while the process operates; and
  - (ix) determining the hourly average of all recorded flow readings.

- (4) Performance specifications for pH measurements include:
- (i) collecting at least 4 evenly-spaced pH readings per hour of process operation, not including periods of startup or shutdown, in order to have a valid hour of data;
  - (ii) locating the pH sensor so that a representative pH is provided;
  - (iii) ensuring the sample is properly mixed and representative of the fluid to be measured;
  - (iv) checking the pH meter's calibration on at least two points every 8 hours of process operation;
  - (v) performing at least monthly inspections of all components for integrity and of all electrical connections for continuity;
  - (vi) recording the results of the calibration and inspection in a log;
  - (vii) recording at least one pH reading every fifteen minutes while the process operates; and
  - (viii) determining the hourly average of all recorded pH readings.