

# CONSOLIDATED LIST OF CRITERIA

## MONITORING TECHNOLOGY

1. Proven technology (E)
2. Current technology must be used (D)
3. Appropriate for specific emissions unit and APCD (B)
4. Monitoring reliability — well documented (B)(E)
5. CEMS (D)

## CRITERIA (Continued)

### MONITORING APPROACH

6. Must be superior to required (D)
7. Greater frequency (F)
8. Average time (E)
9. Monitoring would reflect emissions of greater concern/more relevant data; (A)  
e.g., pollutant (VOC) instead of parameter (temperature)

## **CRITERIA (Continued)**

10. Monitor more parameters (F)
11. Require capture monitoring (B)
12. Monitor is accurate enough that enforcement is viable using the method (G)
13. Require SBA VSM (semi-best available VSM) (B)

## **CRITERIA (Continued)**

### **EMISSION CONTROLS/OPERATIONS**

14. Add-on controls with proven technology (A)
15. Manufacturer of control device (3rd party) concurrence that monitoring is superior (A)

## CRITERIA (Continued)

### QA/QC

16. To forgo stack testing, increase calibration (A)
17. Periodic verification that the monitor is capturing data (G)
18. Better QA/QC; Acceptable QA procedures (F)(D)
19. ISO requirements (C)

## **CRITERIA (Continued)**

20. VSM monitoring plan, including corrective action (C)(D)
  
21. Minimum standards for operator training/plan (A)(C)

## **CRITERIA (Continued)**

### **REGULATORY/POLICY**

- 22. Good compliance history; specific bad compliance history (A)(B)(C)
- 23. State approval (C)(G)
- 24. EPA approval / National consistency (B)(D)
- 25. Equal degree of protection for pollutant of concern (F)

## **CRITERIA (Continued)**

- 26. Emission limitation expressed in short term emission limits (A)
- 27. Must produce credible data (D)
- 28. Can't violate specific rule (B)
- 29. No double counting for voluntary or required monitoring (B)

## **CRITERIA (Continued)**

30. Enforceable & verifiable to receive incentives (C)(B)
31. Must establish accountability (D)
32. No grandfathered units or grandfathered units become subject to rule or limit (B)
33. Backsliding clause for life of permit (A)

## **CRITERIA (Continued)**

- 34. Termination of agreement provisions (C)
- 35. Attainment/nonattainment (B)
- 36. No reduction of NAAQS (D)
- 37. HAPs/Criteria pollutants (B)

## **CRITERIA (Continued)**

### **DEMONSTRATION**

38. Require demonstration that VSM provides good data — use test methods, engineering studies or models (G)
39. Historical data for monitor vs. emission test data (B)

## **CRITERIA (Continued)**

40. Direct, proven correlation with emission limit/standard and measured pollutant and VSM (A)
41. Reproducible results (E)
42. Approved testing procedures (C)
43. List of approved consultants (B)

## **CRITERIA (Continued)**

### **MISCELLANEOUS**

- 44. Cost effective (E)
- 45. Self-monitoring component (D)
- 46. Available & Accessible (E)