

DRAFT Responses to
 COMMENTS ON DRAFT MONITORING PLAN REPORTING INSTRUCTIONS
 (Instructions document dated June 1, 2006. Comments received August 16, 2006, **Correction made August 29, 2007**)

Complex Element	Comment	Response
Analyzer Range Data	<i>Dual-Range Indicator</i> (page 46). In the former RT 530, column 84, sources were instructed to indicate if a dual-range analyzer was required, but the default high-range value was used. How is this situation represented in the new field?	This information is still part of the span data (rather than the analyzer range data). Instead of an extra flag to indicate the use of a default high range, the reporting of a default high range value in the high scale monitor span record indicates this approach.
Component Data	<i>Serial Number</i> (p. 43). The old instruction to provide a serial number “that represents the control unit of the monitor” is good advice to retain in the new document.	Will add.
	Rotating Fuel Flowmeters (p. 44). It seems burdensome to the user to have to assign a new component ID for a rotating meter every time it’s placed into service, even though it may have existed previously in the monitoring plan. Why can’t the ID be unique to the serial number of the meter?	Because hourly fuel flow data is reported at the monitoring system level, under the current reporting rules it is difficult (and sometimes impossible) to be certain which fuel flowmeters are actually in use for a given hour. The “begin” and “end” dates/hours in the MONITORING SYSTEM COMPONENT DATA record in ECMPS will indicate when a component was an active part of a system. This will allow a more accurate assessment of that system’s QA status. Unfortunately, this does not support the fuel flowmeter rotation rules that are currently in use.
Monitoring Default Data	<i>Default Source Code</i> (page 92). Old codes “DCPD” for diluent cap defaults and “LME” for LME generic default emission factors have been removed. What codes are used to report these defaults?	Use Default Source Code “DEF” (Part 75 default value). CO2R G , NOXR G , CO2N and O2X will be added as appropriate parameters for the DEF source code.
	<i>Default Source Codes and Descriptions</i> (page 91-2). The source code for diluent cap has been removed from the table, however, the parameters associated with diluent capping (CO2N and O2X) do not appear in any other code. What should be entered in this field for diluent cap values?	

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Complex Element	Comment	Response
Monitoring Default Data (cont.)	It's not clear in Table 37 (p. 82) that the first category includes general missing data values – it looks like those missing data values are only for unmonitored bypass stacks. The missing data values situation should also be listed on page 81 where the reasons for having this record are summarized.	Will separate the two category titles to see if that makes it clear. Will also add more situations to the list on page 81.
	Add “Locations using a minimum fuel flow rate” to the list on page 81. The listing of situations requiring a Monitoring Default Data record includes #4 – Locations using a moisture default. However, this should be expanded to reflect sources that monitor moisture continuously and need a maximum or minimum potential moisture percentage for missing data purposes.	Will add.
Monitoring Formula Data	<i>Parameter Code</i> (page 64). Was parameter code NOXM intentionally removed? It seems confusing to replace it with “NOX,” (what does “mass rate” mean, anyways?) and require sources using old code “NOX” to change to new code “NOXR.” Is this the correct interpretation? If not, text explaining these codes is needed.	That is the correct interpretation. Mass rate means lb/hr. NOX is now parallel with SO2 (both indicating lb/hr).
	<i>Parameter Code</i> (page 64). When is code “CO2” used vs. “CO2C”? And it is presumed that “CO2D” is used only when formulas G-1, G-2, and G-3 are used? When is code “HIT” used – for multiple fuel meter systems only? It would be helpful to have these distinctions explained in the instructions.	CO2 indicates mass rate (i.e, tons/hr), whereas CO2C is concentration (i.e, percent). CO2D has been replaced with CO2M, since the daily record will report CO2 mass (tons) rather than a daily mass rate. (And CO2M is therefore appropriate for formulas G-1, G-2 and G-3.) HIT indicates total heat input (mmBtu) rather than heat input rate (mmBtu/hr). A table linking parameter codes and equation codes might clear this up.

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Complex Element	Comment	Response
Monitoring Formula Data (cont.)	<p>These old instructions are still appropriate and should be retained :</p> <ul style="list-style-type: none"> ➤ Default HI rate or default NO_x emissions rate are not required to be in formulas ➤ LME units do not have formulas ➤ The Appendix E NO_x correlation curve segments are not represented in formulas ➤ The examples illustrating when to reference other formulas ➤ The examples for using the alternate equations when using the diluent cap ➤ The example formulas at the end of the record description 	<p>Will add as appropriate (see next item regarding the diluent cap).</p> <p>Note that it is not necessary to complete the formula text field for standard formulas (for which the calculation is always the same).</p>
	<p>What happened to equations F-14D (for CO₂ wet using a diluent-capped O₂ measurement) and F-17D (for HI using a diluent-capped O₂ measurement)? Where is formula N-3?</p>	<p>The diluent cap can no longer be used for CO₂ or heat input calculations. Also, formula N-3 is unnecessary because the correct way to calculate NO_x mass emission rate is to first calculate the overall NO_x emission rate and then multiply that emission rate by heat input rate.</p>
Monitoring Load Data	<p><i>Maximum Load Value</i> (p. 112). We suggest that the distinction that this value is <u>gross</u> load should be retained. Previously, this record was required only for units, stacks, or pipes where load-based missing data procedures are applied. Is this element now required if load-based missing data is not performed?</p>	<p>Will re-add gross load language.</p> <p>Yes, this element is now required for all units (and also at all additional locations where load-based missing data is performed.)</p>
	<p><i>Lower Operation Boundary</i> and <i>Upper Operation Boundary</i> (p. 113). Previously, this information was reported only for units or stacks having CEMS, or if the optional fuel flow-to-load test is run. Is this information now required for all units? Should the text in these paragraphs also reflect the new load unit of measure (MMBtu/Hr)? [Minor quibble: The old sentence structure of first describing the situation, then the solution is preferable for ease of reading. I.e., “For a common stack, report” instead of “Report ... for a common stack.”]</p>	<p>Yes, this information is now required for all units. Yes, reference to mMBtu/hr of steam will be added. We agree with your comment about the sentence structure and will rewrite as needed.</p>

Complex Element	Comment	Response
Monitoring Load Data (cont.)	<i>Load Analysis Date</i> (p. 114). Previously, sources that were reporting the initial load analysis were to report the first day of the quarter rather than the actual date of the analysis. Now that the actual date is to be reported, must sources immediately update this record to replace the approximate (first day of quarter) date with the actual date, even though no new analysis has been done?	No, that should not be necessary.
Monitoring Location Data	How is this record different from the Unit Stack Configuration Data record? Both have a stack ID and a unit ID. Are both records always filled out?	This is the parent record for the unit data and the stack pipe data, so it is always required. The Unit Stack Configuration Data record is only necessary in a monitoring plan that involves a common stack, common pipe, or multiple stacks.
Monitoring Method	<i>Substitute Data Code</i> (page 34). In the former RT 585 instructions, sources were directed to leave the <i>Missing Data Approach</i> blank for LME sources. What is required in the new record?	Blank is still appropriate for LME methods. Will update.
	<i>Parameter Codes and Descriptions</i> (page 32). When is SO2M used?	Only for an LME method, since that method involves reporting SO2 mass (lbs) rather than SO2 mass rate (lbs/hr).
	<i>Monitoring Method Code</i> (page 33). Shouldn't the excepted method for CO ₂ be "Appendix D" and not "Appendix G"?	Not certain what the question is here. For use of formula G-4, although the methodology is defined in Appendix G, the "monitoring" is Appendix D fuel flow metering. For use of formula G-1 (and G-2 or G-3), it is fuel sampling and analysis as described in Appendix G.
	Previously, methodologies were associated with fuel codes, so that if the source was dual-fueled, two methodology records were reported. Should multiple records still be reported? What if there is a primary and a secondary methodology? And how will the methodologies be tied to the appropriate fuels?	Methodologies are not fuel specific and "secondary methods" are not allowed.

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Complex Element	Comment	Response
Monitoring Method (cont.)	When is parameter NOX, method CEM used versus parameter NOXR, method CEM?	Parameter NOX is for NO _x mass emission rate (lb/hr). So a method record for NOX indicates that the location is determining and reporting NO _x mass rate (which is either determined from NO _x concentration times flow rate, or by multiplying NO _x emission rate by heat input). Parameter NOXR is for NO _x emission rate (lb/mmBtu).
	The old instructions specified that where program requirements overlap, duplicative reporting was not required; is this still true?	Yes, this is still true.
	It is unclear from the opening paragraphs for this record that an entry is required for unmonitored bypass stacks until you read the <i>Bypass Approach Code</i> element. We recommend replicating the paragraphs in the old RT pertaining to unmonitored bypass stacks.	The “entry” for unmonitored bypass stacks is not a separate record, so the paragraph from the original instructions is not accurate. We will add a sentence referencing the need to indicate the bypass approach as part of the applicable method records, if appropriate.
	We recommend retaining the language in the old instructions telling ARP sources also subject to SUBH to include a record for NOXM when needed, assuming that this is still true.	The requirement has changed in that all units that are subject to SUBH must include the method record for parameter NOX (or NOXM, if LME) at the applicable monitoring location. (Previously, it was only required if the method being used to determine NO _x mass involved a NO _x concentration system.) We will edit.
Monitoring Plan	<i>Begin Date</i> (page 4). Is this the former <i>Date of First Commercial Operation</i> in RT 504? Or, should it reflect the date that the XML version of the monitoring plan was in effect, or, should sources use the date they first started reporting in the Acid Rain Program/NBP? Does this date change with every monitoring plan submittal to indicate that it has been updated? Same questions for <i>End Date</i> .	The Begin Date and End Date fields have been removed from the monitoring plan schema.
Monitoring Span Data	The old instruction that flow MPF is expressed in scfh, wet basis is still appropriate and should be retained.	Will add.
	<i>MPC Value</i> (page 101). The instructions indicate that an MPC for O ₂ should now be reported. What are the regulations for determining O ₂ MPC?	We will change this to say MPC should be left blank for O ₂ .

Complex Element	Comment	Response
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Monitoring System Data	<i>System Designation Code</i> (page 51). EDR v2.2 added code “PE” for PEMS; this is not in the new table. How will PEMS be indicated?	There is a new System Type Code “NOXP” to represent a NOx PEMS system (assumed at the moment to be a NOx emission rate system). This may require revision if other types of PEMS systems are possible.
Rectangular Duct WAF Data	The paragraph describing its dependencies is missing.	Will add.
Stack Pipe Data	And here’s yet another record wanting stack information; this only contains a stack ID. But this one does look like a CS/MS/CP record; maybe this is the old RT 503? Much better instruction is needed to untangle these records!	This is the parent record for all monitoring records that belong to a stack or pipe.
	<i>Active Date</i> and <i>Retire Date</i> (page 13.) How are these dates different from the start/end dates in Unit Stack Configuration Data, page 8? Is the <i>Active Date</i> no longer the “first commercial operation date”?	The dates in this record indicate when the Stack or Pipe was active (for monitoring purposes). The begin and end dates in the Unit Stack Configuration Data record indicate when the relationship between a unit and a stack or pipe was active (for monitoring purposes).
	Should the listing of dependencies to the Stack Pipe Data record include the Rectangular Duct WAF Data?	Yes, and it should also be listed as a dependency to the Unit Data record. Will add.
Unit Stack Configuration Data	<i>Stack Pipe ID</i> (page 7). More instruction is needed for this record. Is this record only required when it is a multiple stack/pipe or common stack/pipe configuration? I.e., do the old RT 503 requirements apply? The instructions seem to indicate that: “This is the alphanumeric code assigned by a source to identify a multiple or common stack or pipe at which emissions are determined.” However, the <i>Description of Data</i> instructions say to “submit a Unit Stack Configuration Data record for each unit-stack relationship defined in the monitoring plan.” Even a single unit-single stack source has a unit-stack relationship – should this one-to-one relationship be reported? And, we’re instructed to see the Stack Pipe Data record for more information about defining multiple and common stacks and pipes. This record is	This is the equivalent of the RT 503, which defines unit-to-stack or unit-to-pipe relationships. Only common or multiple stacks and pipes necessitate use of this record. A single unit configuration is assumed to have a stack, but since the stack is not separately defined, there is no need to have a record defining its relationship to the unit.

Complex Element	Comment	Response
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Miscellaneous	Comment	Response
	Will there be an equivalent record to the old RT 556 (Monitoring System Recertification, Maintenance, or Other Events)?	Yes. This is in the QA/Cert Schema and is called the QA CERTIFICATION EVENT DATA record.
	It seems awkward to design so many records that have just one element, or a single element plus a beginning/end date pair. The best example is the unit-level static information. Why can't this information be combined into a single unit record?	While those elements are static for most units, they can and do change under some circumstances.
	There needs to be a better organization to the instructions document. Perhaps just alphabetical by data element name?	We will consider this suggestion.
	When sources convert to this format, must historical records be converted? For example, if my source has several RT 536 records that have been deactivated, should those records be included in the first monitoring plan submittal, or will they already exist in the database prepared by CAMD?	CAMD will convert the necessary data from the existing monitoring plan (as stored in EPA's MDC database) and will populate the new ECMPS database with that information. Sources will retrieve that monitoring plan and will be able to make and submit any necessary changes or additions.

Minor Typographical Errors

Page	Description	Response
29	The description for "begin date" has the sentence: "If this is an updated ... record showing a change in one ore (sic) more attribute value (sic), this date should be...." A couple of typos in that one.	Will correct.
65	In Table 23 for F-factors, the factor names in the headings should use subscripts: F_c and F_w . This occurs also in formula codes F-7B, 19-14, and F-8. OK, there are a lot of places where subscripts need to be cleaned up. Also, equation D-1H should be represented as D-1h.	Will correct subscripts in the headings. Equation D-1H is thus represented to be consistent with the requirement for all uppercase when the code is reported in the monitoring plan.
68	Oops! What happened in formula D-12?	Will correct.
75	Expand the Code column in Table 32 a tiny bit so that D-8/F-19V doesn't get split up.	Will correct.

108	The <i>WAF Determination Date</i> element has a reference to the old EDR column number.	Will correct.
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