



The following comments were received on the draft rulemaking text for 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants.

Comment on 10 CSR 10-6.220 draft rulemaking text via email from a private citizen on November 8, 2014.

The proposed new paragraph 10 CSR 10-6.220(3)(E)2.

Owners and operators of emission units not required to install COMS shall conduct a visible emissions survey for all affected emission units subject to the opacity limits in (3)(A) of this rule...

is excessive for sources that allowed 20% or 40% opacity. EPA Method 22 is inappropriate for these situations. I suggest **monitoring** and **record keeping** below (this wording should be revised for rulemaking, what is provided has been used in Title V operating permits) since it follows the Region 7 Policy on Periodic Monitoring for Opacity, April 18, 1997. What I have provided is an actual procedure for the permittee to follow, not a reference.

Monitoring:

- 1) The permittee should note the visible emissions performance of the plant according to the schedule outlined in 2) below. Specifically, the source would first conduct a quick survey of the entire plant. The permittee must maintain a log noting whether any air emissions (except for water vapor) were visible from the plant, all emission points from which visible emissions occurred, and whether the visible emissions were normal for the process. If the permittee observes no visible or other significant emissions then no further observations would be required.

For those emission points with visible emissions perceived or believed to be above the normal opacity level, the permittee should record a formal Method 9 reading for the emission points of concern. Whether recording “qualitative” visible emission characteristics or taking Method 9 readings, the permittee should also document the total duration of any visible emission incident as part of the log.

Where the permittee opts to record “qualitative” visible emissions data, rather than record official Method 9 readings, it may be prudent for the source to bring in a certified Method 9 observer to periodically “quantify” visible emissions. These periodic Method 9 readings along with the survey results would give the responsible official some reasonable assurance that the source is meeting its opacity obligations.

In all cases, the permittee shall insure that all persons responsible for making visible emission observations acquire basic training in the general principles and practices of “reading” opacity. At a minimum, the observers should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water. EPA’s Reference Method 22, found at 40 CFR Part 60, Appendix A, suggests two references in Section 7 that may be helpful.

The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required at that time. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.

- 2) The permittee must maintain the following monitoring schedule
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - b) Should the permittee observe no violations of this regulation during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.
 - (2) If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

The permittee shall maintain records of all observation results using Attachments B (Opacity Emission Observations, page 88) or C (Method 9 Opacity Emissions Observations, page 89) [or their approved equivalent], noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;
- 3) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,

5) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

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In further support of my earlier comments regarding 10 CSR 10-6.220, , below is title, purpose, scope and application statements from EPA's Method 22 (from 40 CFR 60 App. A-7, emphasis has been added). Please note that this regulation applies to fugitive emissions or flares. These are sources NOT covered by 10 CSR 10-6.220.