

**SAN JOAQUIN VALLEY UNIFIED
AIR POLLUTION CONTROL DISTRICT
COMPLIANCE DEPARTMENT**

COM 2026

REVISED: _____ **SIGNED** _____ **DATE:** May 30, 2008
Jon Adams
Director of Compliance

TITLE: **RULE 1080 - CONTINUOUS EMISSION MONITOR (CEM)
POLLING POLICY**

OBJECTIVE:

This policy is to establish District policies to clarify the purpose, requirements, and data interpretation of CEM polling in the San Joaquin Valley Air Pollution Control District.

PURPOSE:

The Compliance Division has a responsibility to review CEM data to determine if facilities are correctly interpreting and reporting the compliance status from continuous emissions monitoring. CEM data can be reviewed in the field by reviewing strip charts and other data generated by CEMs. Because manual field review of these records is very time consuming the District has established a system to poll and electronically review CEM data. This system enables the District to review CEM data electronically, without going to the field.

POLICY STATEMENT:

Facilities that are required to operate CEMs to record emissions data shall install and operate a system that provides a means by which the District may poll the emissions data on a daily basis. This requirement is most easily accomplished by installing a modem, phone line, and a data logger that is supported by the District's CEM polling and data management system. Alternative data acquisition systems that utilize software to emulate a data logger may be developed and used but are not recommended because the District is unable to assist in the development of such software or provide technical support for such systems.

The authority for this requirement is described in California Health and Safety Code section 42303, which states that "An air pollution control officer, at any time, may require from an applicant for, or the holder of, any permit provided for by the regulations of the district board, such information, analyses, plans, or specifications which will disclose the nature, extent, quantity, or degree of air contaminants which are, or may be, discharged by the source for which the permit was issued or applied." District Rule 1080, section 7.1, further states that "A person operating or using a stack-monitoring system shall upon written notice from the APCO, provide a summary of the data obtained from such systems. This summary of data shall be in the form and the manner prescribed by the APCO."

DATA COLLECTION:

Data loggers or alternate data acquisition systems shall be programmed to record hourly averages of the emissions data from the CEMs. There are some instances, such as when a permit specifies a three-hour rolling average, when data from additional averaging periods will be required. Emissions data shall be expressed in the same units of measurement as the emission limits in the permit, corrected to the appropriate O₂ level. Calibration periods and other types of data exceptions shall also be recorded. The District must approve any deviations from these specifications in writing.

The District system will poll and retrieve the CEM data from the previous day during the early morning hours. This data will then be electronically compared with source specific emission set points established by the District. Whenever an emission set point is exceeded the inspector responsible for the facility will be notified via e-mail.

DATA ANALYSIS AND INTERPRETATION:

When an inspector is notified of a questionable emission value, the data collected for the day in question shall be reviewed and compared with the applicable emission limits. If the inspector suspects that an emission limit may have been exceeded, the facility operator shall be contacted and arrangements shall be made to review the validated CEM data that is maintained by the facility. If the facility's CEM data verifies that an emission limit has been exceeded, appropriate enforcement action shall be taken. If the facility's CEM data does not verify that an emission limit has been exceeded, no enforcement action shall be taken. The District shall investigate discrepancies between the polled data and the facility's CEM data.

DATA COLLECTION FAILURES:

When the facility's data logger, alternate data acquisition system, communication system, or the District polling system fails and the District is unable to poll the CEM data, the District shall notify the facility of the failure and both the District and the facility shall investigate the cause of the failure. If the District determines that the failure has been caused by a malfunction of the source's data logger or communication system the facility will be notified. The facility shall then take the appropriate steps to identify and correct the problem. Alternative methods of collecting and reviewing data will be arranged until the system is operational.

Up to 30 days of downtime per calendar year will be allowed for repairs or maintenance. If downtime for repairs will exceed 30 days per calendar year, the facility must obtain a variance or a NOV shall be issued for failing to provide the required data in the form and manner prescribed by the APCO.

If the District determines that the cause of the malfunction is failure of the District's polling system, the District shall make arrangements to review the CEM data using an alternative method until the system is operational.

Alternative methods of data collection and review may include but are not limited to delaying polling until repairs are completed, daily Fax reports, or field review of CEM data.

ENFORCEMENT ACTION:

Facilities that fail to install a system by which the District may electronically poll the emissions data by December 31, 2001, shall be in violation of District Rule 1080, Section 7.1 for failure to provide the required data in the form and manner prescribed by the APCO. Facilities required to install CEMs after November 1, 2001, shall have 60 days to comply with these requirements.