

AN OVERVIEW COMPARING RULE 218 AND PROPOSED RULE 218.2 REQUIREMENTS

Requirements	Rule 218	PR 218.2	Changes under PR 218.2 as compared with Rule 218
<b>Purpose</b>	None	(a)	Same purpose as for Rule 218, although it is not specified in Rule 218
<b>Applicability</b>	(b)	(b)	PR 218.2 retains the concept of the applicability under Rule 218 and provides further clarification
<b>Definitions</b>	(a)	(c)	<p>The following new definitions added to PR 218.2:</p> <ul style="list-style-type: none"> <li>• ACEMS</li> <li>• CALIBRATION ERROR TEST</li> <li>• CEMS FAILURE</li> <li>• CEMS FINAL CERTIFICATION LETTER</li> <li>• CEMS MODIFICATION</li> <li>• RECLAIM</li> <li>• RECLAIM FACILITY</li> <li>• FORMER RECLAIM FACILITY</li> <li>• UNIT</li> </ul> <p>Other changes:</p> <ul style="list-style-type: none"> <li>• Removed a list of existing definitions that are no longer used in Rule 218.2 or have been integrated in the rule language</li> <li>• Revised a list of existing definitions for clarity</li> </ul>
<b>Implementation schedule</b>	None	(d)	This new subdivision in PR 218.2 defines the timeline to transition facilities from complying with Rules 218 and 218.1 or Rule 2012 to PR 218.2 and 218.3
<b>Monitoring Requirements</b>			
Continuous measurement	None	(e)(1)	Same concept as Rule 218, although it is not clearly specified in Rule 218
CEMS failure (for up to 96 hours)	(f)(3)(B)	(e)(2)	<p>Revision</p> <ul style="list-style-type: none"> <li>• Allowing an additional 96 hours if the emission source is not operating</li> <li>• No longer requiring an interim variance for the additional hours</li> </ul>
CEMS shutdown at a unit long term shutdown	None	(e)(3)	<p>New provisions</p> <ul style="list-style-type: none"> <li>• Conditionally allowing CEMS shutdown at a unit shutdown that lasts for a minimum 168 consecutive hours</li> </ul>
Demonstrating unit non-operation	None	(e)(4)	<p>New provisions</p> <ul style="list-style-type: none"> <li>• Options to demonstrate unit non-operation</li> <li>• Referenced by (e)(2) and (e)(3)</li> </ul>
<b>Certification Requirements</b>			

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Application and approval requirements	(c)(1)(A)	(f)(1) (f)(2) (f)(3) (f)(4) (f)(5) (f)(6)	<ul style="list-style-type: none"> <li>No change in concept with Rule 218 application process</li> <li>Reorganized the rule language for clarity                             <ul style="list-style-type: none"> <li>✓ Establishing the “roadmap” - (f)(2)</li> <li>✓ Providing details - (f)(3) through (f)(6)</li> </ul> </li> </ul>
Alternative process for modification of CEMS Component Listed in Guidance Document R-002	None	(f)(7)	<ul style="list-style-type: none"> <li>Alternative process for a CEMS modification on a component that is:                             <ul style="list-style-type: none"> <li>✓ Not identified on the CEMS final certification letter</li> <li>✓ Listed on the South Coast AQMD Technical Guidance Document R-002</li> </ul> </li> <li>Incorporated current practices into the rule</li> </ul>
If an alternative CEMS recertification submitted pursuant to subparagraph PR218.2 (f)(7) is disapproved	None	(f)(8)	
Alternative process for modification of CEMS Component Listed in Quality Assurance/Quality Control Plan	None	(f)(9)	<ul style="list-style-type: none"> <li>Alternative process for a CEMS modification on a component that is:                             <ul style="list-style-type: none"> <li>✓ Not identified on the CEMS final certification letter</li> <li>✓ Not listed in the South Coast AQMD Technical Guidance Document R-002</li> <li>✓ Listed in the Quality Assurance/Quality Control Plan</li> </ul> </li> <li>Incorporated current practices into the rule</li> </ul>
Emission Data During CEMS Certification or Recertification	None	(f)(10)	<p>New provision</p> <ul style="list-style-type: none"> <li>Provisionally validating the data recorded during the certification or recertification process</li> </ul>
Operation of CEMS During Certification Testing	(c)(3)	(f)(11)	No change
SCEMS and ACEMS Certification and Recertification	(c)(2)	(f)(12)	<ul style="list-style-type: none"> <li>Clarified the criteria for certifying a SCEMS</li> <li>Added the criteria for certifying a time-shared CEMS (a type of SCEMS) and an ACEMS</li> <li>Moved the specification for different data acquisition and averaging interval to PR 218.3 (j)</li> </ul>
<b>Requirements for Existing CEMS and SCEMS</b>			

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Requirements for existing CEMS and SCEMS	(d)	None	Deleted provisions <ul style="list-style-type: none"> <li>Under Rule 218, a CEMS or SCEMS is considered as an existing CEMS or SCEMS if its certification application for initial approval was submitted before May 14, 1999, otherwise it is a new CEMS or SCEMS</li> <li>PR 218.2 does not differentiate between “new” or “existing” CEMS (or SCEMS) by application date for the requirements</li> </ul>
<b>Quality Assurance/Quality Control (QA/QC) Plan</b>			
What to include for a QA/QC plan	(a)(12)	(g)(1)	<ul style="list-style-type: none"> <li>No change to the approach</li> <li>Rule language revised for clarity</li> <li>Added the reference “Guidelines for Continuous Emission Monitoring System Quality Assurance and Quality Control Plan”</li> </ul>
Submittal timeline for a new QA/QC plan	(c)(4)(A)	(g)(2)	No change
Submittal timeline for a revised QA/QC plan	None	(g)(3)	New provision <ul style="list-style-type: none"> <li>Submit required revision for approval within 30 days</li> </ul>
Alternative quality assurance practices	(c)(4)(B)	(g)(4)	No change
<b>Recordkeeping Requirements</b>			
Records for CEMS data measured and calculated	(e)(2)	(h)(1)	<ul style="list-style-type: none"> <li>No change to the approach</li> <li>Rule language revised for clarity</li> </ul>
Records for the specified files	(e)(2)	(h)(2)	
The approach to maintain the records	(e)(1)	(h)(3)	
<b>Reporting Requirements</b>			
Semi-annual emission summary	(f)(1)	(i)(1)	<ul style="list-style-type: none"> <li>No change to the approach</li> <li>Rule language revised for clarity                             <ul style="list-style-type: none"> <li>✓ Reorganized the rule structure for clarification</li> <li>✓ Specified the reporting period</li> <li>✓ Moved the rule language related to recordkeeping to PR 218.2 subdivision (h)</li> </ul> </li> </ul>

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Excess emission	(f)(2)	(i)(2)	<ul style="list-style-type: none"> <li>No change to the approach</li> <li>Minor word changes for clarity</li> </ul>
CEMS non-operation due to maintenance or damage	(f)(3)	(i)(3)	<ul style="list-style-type: none"> <li>No change to the approach</li> <li>Added specification for the required information for the report</li> </ul>
Scheduled CEMS shutdown	None	(i)(4)	<p>New provision</p> <ul style="list-style-type: none"> <li>Contingent on PR 218.2 (e)(3) which allows a CEMS shutdown during a scheduled unit shutdown that lasts for a minimum 168 consecutive hours</li> <li>Requires the owner or operator of the CEMS to notify the Executive Officer and submit a written report for the incident</li> </ul>
Relative Accuracy Test Audit (RATA)	None	(i)(5)	<p>New provision</p> <ul style="list-style-type: none"> <li>Requires submitting the RATA report within 60 days upon completion of the test</li> <li>Aligns with Rule 2012 requirement</li> </ul>
<b>Posting CEMS Certification</b>			
Posting of written approval of CEMS certification	(g)	(j)	No change
<b>Exemption</b>	None	(k)	Implemented in practice