

CEMS NEWSLETTER

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REGULATIONS REVIEW FOR UPDATING A COMS

Do you have an aging Continuous Opacity Monitoring System (COMS) that needs major repair or replacement? If so, you should be aware that two years ago the EPA changed the 40 CFR Part 60 Appendix B specifications relating to COMS.

These changes to Performance Specification 1 (PS-1) can apply to your facility if you are required to:

1. Install a new COMS
2. Relocate an existing COMS
3. Replace an existing COMS
4. Recertify an existing COMS that has undergone substantial refurbishing
5. Recertify a COMS, as required in the Code of Federal Regulations

Background

The original COMS specifications and test procedures were published in October of 1975. Over the years, the EPA gained more experience and understanding of COMS performance and operation. Manufacturers also continued to improve the design and operation of opacity monitors.

In the early 90's the EPA decided to update PS-1 to meet current industry practices and to ensure continued

improvement in the quality of opacity data.

The new Revisions were proposed in 1994 with a year for comments. A year later at a Public Stakeholder meeting on the issue, an ASTM (American Society for Testing & Materials) subcommittee volunteered to undertake development of a Standard Practice for opacity monitors.

The result was ASTM D 6216-98: *Standard Practice for Opacity Monitor Manufacturers to Certify Conformance with Design and Performance Specifications*. In 1998 (two and a half years before its incorporation, the EPA published a proposal to incorporate, by reference, the entire ASTM D 6216-98 into the proposed revisions to PS-1.

The new opacity regulations took effect in February of 2001 and require a user to meet both 40 CFR 60 Appendix B, PS-1 and the ASTM D 6216-98 specifications.

Changes

The new requirements changed the technical specifications to which the COMS have to perform. With newer technology come higher expectations for performance. Some of the major design specs addressed include:

1. Reduction in Angle of View and Angle of Projection
2. Requirements for calibration drift checking

3. Requirements for visual and audible alarms
4. Automated zero compensations
5. Compensation for dirt accumulation
6. More defined cal filter audit requirements
7. More defined Path Length Correction Factor requirements
8. Response to voltage, temperature and light requirements.

What does it mean to me?

Many of the older opacity units in the field today will not meet these specifications. While existing installations are "grand-fathered", users must beware that if they have to move, replace, or recertify their units, they might have to meet these new specifications.

The other issue to beware of is sending your opacity unit in for a major "rebuild". This usually requires a new certification and then the older unit might not meet the new requirements.

A question to ask yourself: "Can this unit be maintained; are parts available or is this unit being discontinued or upgraded?"

If you are not sure how your unit fits into the new regulations, give us a call. We may be able to help supply the answers you're looking for.



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If there is someone else who should be, or would like to be on our CEMS Newsletter mailing list, please contact Jim Nowak at:

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IN THIS ISSUE:

Continuous Opacity Monitoring Regulations: Do you have an aging Continuous Opacity Monitoring System (COMS) that needs major repair or replacement? If so, you should be aware that two years ago the EPA changed the 40 CFR Part 60 Appendix B specifications relating to COMS...



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