

MATS Emission Testing and Monitoring Requirements-for Existing Coal-Fired EGUs

40 CFR 63, Subpart UUUUU

- [Continuous Compliance](#) – *monitor* and *report* to document compliance at all times (except S&S)

- Stack Tests Quarterly for PM or Metals (decide which), HCl or SO₂ (decide which)
- *or* Continuous Monitoring System (CMS) – (must use CMS for Hg) – requires Monitoring Plan
- CEMS for HCl or SO₂ - (SO₂ is often easier/less expensive to monitor)
- CEMS or Sorbent Traps for Hg (Traps often give best results, but CEMS can work, too)
 - Traps require annual RATA only, Hg CEMS requires Quarterly audits
- CEMS or CPMS for PM - (with annual Metals test if choose Metals instead of PM compliance)
 - PM CEMS requires Quarterly audits
 - PM CPMS requires only Annual audit, but establishment & compliance with Operating Limit (or limits at various loads)
- *or* Low Emitting EGU (LEE) – will you qualify with the criteria? Initial 30 day performance test required for Hg.
 - If so, there is less ongoing testing
 - Does not apply if you have FGD and a Bypass Stack
 - LEE for Hg – test just on annual basis using Method 30B test/ - LEE for non-Hg – test just once every 3 years.

- [Initial Compliance Performance Tests](#) ↑ must fit with how you plan to show Continuous Compliance ↑

- Initial Performance Tune-Up – as in 40 CFR 63.10021(e)
- Stack Tests at maximum normal load for PM or Metals, HCl or SO₂ - 3 one-hour runs
- Continuous Monitoring System (CMS) – 30 days of monitoring data – requires Monitoring Plan
 - must be certified before that 30-day period (for example, PM by PS-11 – a week of testing!)
- CEMS for HCl or SO₂ - (SO₂ is often easier/less expensive to monitor)
- CEMS or Sorbent Traps for Hg - (Traps often give best results, but CEMS can work, too)
 - Traps require annual RATA only, Hg CEMS requires full Certification, then Quarterly audits
- CEMS or CPMS for PM (with annual Metals test if choose Metals instead of PM compliance)
 - PM CEMS requires full Certification (PS-11), then Quarterly audits
 - PM CPMS requires compliance with Operating Limit (or limits at various loads), but only Annual audit
- *or* Low Emitting EGU (LEE) – will you qualify with the criteria? If so, there is less ongoing testing.

→→ Consider pre-compliance Engineering Tests to know that you will likely “pass” OK ←←

- [Performance Tune-Up](#) – every 36 months – as in 40 CFR 63.10021(e)
- [Reporting and Recordkeeping](#)

- **Emissions Averaging Plans** – Due 120 days *before* 4/16/2015 (*or 2016*)
- **Site-Specific Monitoring Plans** – Due 60 days *before* Initial Performance Test
- **Performance test Notification** – Due 60 days *before* performance test
 - Initial & Ongoing performance tests, Initial certification, RATAs, RCAs, RRAs
- **CEMS QA/QC Plans** - No specific dates – but *before* CEMS certification - PM CEMS, Hg CEMS, HCl CEMS
- **Notification of Compliance Status** – Due 60 days *after* completion of performance tests and/or compliance demonstration - Submitted via ERT/CEDRI – *this will take time!*
- **Semi-Annual Compliance Reports** – Due every 7/31 or 1/31 – First report 1/31/2016 (*or 2017 if granted an extension for compliance*) Submitted via ERT/CEDRI
- **Quarterly Reports** – Due 30 days after the end of each quarter, to include data from:
 - Stack testing or CMS data (PM/Metals & HCl/SO₂), CMS data (Hg)