



**Maricopa County Air Quality Department**  
**Substantive Policy Statement: SPS-2022-001**  
**Minimum Quality Assurance Requirements for**  
**Continuous Emission Monitoring Systems**  
**Issue Date: November 1, 2022**

Approved by:

DocuSigned by:

*Philip McNeely*

**Philip A. McNeely, Director**

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A substantive policy statement is advisory only. A substantive policy statement does not include internal procedural documents that only affect the internal procedures of the county and does not impose additional requirements or penalties on regulated parties or include confidential information or rules or ordinances adopted pursuant to Arizona Revised Statutes (A.R.S.) Title 49 (The Environment), Chapter 3 (Air Quality). [A.R.S. §§ 11-1601(8), 49-471(17)]

If you believe that this substantive policy statement does impose additional requirements or penalties on regulated parties, you may petition the agency under A.R.S. § 41-1033 for a review of the statement. [A.R.S. § 41-1033]

An applicant for a license subject to A.R.S. Title 11 (Counties), Chapter 11 (County Regulations), Article 1 (General Provisions) may request a county to clarify its interpretation or application of a statute, ordinance, regulation, delegation agreement, or authorized substantive policy statement affecting the procurement of that license by providing the county with a written request that satisfies the requirements of A.R.S. § 11-1609(A). [A.R.S. § 11-1609]

### **I. Purpose**

This substantive policy statement (SPS) provides minimum quality assurance (QA) requirements for sources required to install a continuous emission monitoring system (CEMS) for which there are no QA requirements specified in federal or county rules.

### **II. Applicability**

This SPS applies to any source required to install a CEMS for which there are no QA requirements specified in federal or county rules. This SPS does not apply to a source that has a CEMS which is subject to 40 Code of Federal Regulations (CFR) 75.

### **III. Statutory Authority**

- A.** A.R.S. § 11-251 [Title 11-Counties, Chapter 2-Board of Supervisors, Article 4-Powers and Duties, Section 251-Powers of Board]
- B.** A.R.S. § 49-112(B) [Title 49-The Environment, Chapter 1-General Provisions, Article 1-Department of Environmental Quality, Section 112(B)-County Regulation; Standards]
- C.** A.R.S. § 49-402(B) [Title 49-The Environment, Chapter 3-Air Quality, Article 1-General Provisions, Section 402(B)-State and County Control]
- D.** A.R.S. §§ 49-473(A) and (B) [Title 49-The Environment, Chapter 3-Air Quality, Article 3-County Air Pollution Control, Sections 49-473(A) and (B)-Board of Supervisor]

- E. A.R.S. § 49-474 [Title 49-The Environment, Chapter 3-Air Quality, Article 3-County Air Pollution Control, Section 474-County Control Boards]
- F. A.R.S. § 49-480 [Title 49-The Environment, Chapter 3-Air Quality, Article 3-County Air Pollution Control, Section 480-Permits; Fees]

**IV. Divisions Affected**

- A. Permitting

**V. Definitions**

For the purposes of this SPS, the following definitions apply. If the document referenced for these definitions is revised, the most recently revised document for these definitions applies.

- A. **Continuous Emission Monitoring System (CEMS)** - The total equipment required to sample, analyze, measure, and provide a permanent record of emissions by means of readings recorded at least once every 15 minutes using an automated data acquisition and handling system (DAHS).

[Maricopa County Air Pollution Control Regulations, Rule 322]

- B. **Drift** - The difference between the pre- and post-run system bias (or system calibration error) checks at a specific calibration gas concentration level (i.e. low-, mid- or high-).

[EPA Reference Method 7E]

- C. **Operating Day** - A 24-hour period between 12:00 a.m. and 11:59 p.m. during which any regulated air pollutants are emitted from an emissions unit.

**VI. Discussion**

Historically, QA requirements for certain sources required to have a CEMS have not been specified in federal and county rules. In cases when these requirements have not been specified, QA requirements have been incorporated into air quality permits using Maricopa County Air Pollution Control Regulations, Rule 210 (Title V Permit Provisions) and Rule 220 (Non-Title V Permit Provisions). These rules do not contain minimum QA requirements but establish the regulatory authority to write permit conditions for the operation of a CEMS. In this SPS, the department is standardizing minimum QA requirements to be included in permit conditions for sources required to install a CEMS for which there are no QA requirements specified in federal or county rules.

**VII. Procedures**

**A. General Procedures:**

1. The procedures established in Sections VII(B) through (F) of this SPS are minimum QA requirements incorporated from 40 CFR 60.13, which includes Procedure 1 of 40 CFR 60, Appendix F and the applicable performance specification(s) in 40 CFR 60, Appendix B.
2. Sources required to install a CEMS for which there are no QA requirements specified in federal or county rules will have as permit conditions the procedures of this SPS.

- B. All CEMS shall be installed and operational prior to conducting performance tests under Rule 270 (Performance Tests). Verification of operational status shall include, but is not limited to, completion of the manufacturer's written requirements or recommendations for installation, operation, and calibration of the device.
- C. Owners and operators of a CEMS must check the zero (or low-level value between 0 and 20% of span value) and span (50 to 100% of span value) calibration drifts at least once each operating day in accordance with a written procedure. The zero and span must, at a minimum, be adjusted whenever either the 24-hour zero drift or the 24-hour span drift exceeds two times the limit of the applicable performance specification in Appendix B of 40 CFR 60. The system must allow the amount of the excess zero and span drift to be recorded and quantified whenever specified.
- D. Except for system breakdowns, repairs, calibration checks, and zero and span adjustments required under Section VII(C) of this SPS, all CEMS referenced in Section VII(B) of this SPS for measuring emissions shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) at least once every 15 minutes.
- E. All CEMS shall be installed such that representative measurements of emissions from the permitted source are obtained. Additional procedures for location of a CEMS contained in the applicable Performance Specifications of Appendix B of 40 CFR 60 shall be used.
- F. Owners or operators of a CEMS shall maintain records of all QA procedures in accordance with the conditions in the air quality permit.

#### VIII. References

- A. 40 CFR 60.13
- B. 40 CFR 60, Appendices B and F
- C. Rule 270 (Performance Tests)

#### IX. Revision History

Version	Date	Description
1.	11-01-2022	Initial version