

Frequently Asked Questions (FAQs) Concerning the
Compliance Assurance Monitoring (CAM) Rule

The following questions and responses concerning implementation of the Compliance Assurance Monitoring (CAM) Rule are arranged in three groups. The first group contains general background information about the CAM package. The second group contains specific information related to the CAM rule, and the third group contains information related to the changes in operating permit program rules brought about by the CAM rule.

General Background Information

Question 1. When will the rule take effect?

Response 1. The rule is effective November 21, 1997, which is thirty days after the Federal Register publication date of October 22, 1997. This means that the changes to parts 70 and 71 are effective on November 21, 1997. See 62 FR 54900. Even though the effective date has occurred, **most owners and operators will not need to submit CAM plans until renewal of their initial permits.** However, owners or operators of existing or new large pollutant specific emission units (PSEUs) - those whose post-control emissions exceed or are equivalent to the major source threshold - that do not have complete permit applications by April 20, 1998 - which is 180 days after publication of the rule in the Federal Register - will need to include CAM plans as part of their permit applications. See section 64.5(a) and (b).

Chart I shown below contains the CAM plan due dates. Note that the term "other unit" means a unit whose post-control emissions are less than the major source threshold.

Chart I. CAM Plan Due Dates

Pollutant Specific Emission Unit (PSEU) Size	CAM Plan Due as Part of the Operating Permit INITIAL Application	CAM Plan Due as Part of the Operating Permit REVISION Application	CAM Plan Due as Part of the Operating Permit RENEWAL Application
Large	If permit application is not complete by 4/20/98 OR if PSEU part of a greenfield permit application after 4/20/98	If a significant permit revision at an existing title V source	If application is complete before 4/20/98
Other	Never	Never	Always

HANDOUT #3

POTENTIAL PRE-CONTROL DEVICE EMISSION ESTIMATES

Example # 1: Based on Potential to Emit & Control Efficiency	
Emission Unit	Flat glass melting furnace
Control Device	Venturi Scrubber
Pollutant	SOx
Potential to Emit	10.6 tons/yr (based on Title V application)
Control Efficiency	94% (based on AP-42, Table 11.15-1)

Calculate the Potential pre-control device emissions.

Example # 2: Based on Uncontrolled Emission Factor from AP-42	
Emission Unit	Hot mix asphalt dryer, drum mix process
Control Device	Fabric filter
Pollutant	PM10
Production Rate	210 tons/hr (based on application)
Operating Capacity	8,760 hr/yr
Uncontrolled Emission Factor	4.3 lb PM10/ton (based on AP-42, Table 11.1-5)

Calculate the Potential pre-control device emissions.