Site-Specific Monitoring Plans
Section 63.10000(d) requires the operator to develop (and submit if requested) a Site-Specific Monitoring Plan for CEMS at least sixty (60) days before the initial CEMS performance evaluation (i.e., initial certification). If the operator is using quarterly stack testing to determine ongoing compliance with the HCl and/or PM limits, then the plans must include information regarding the procedures that the unit will use to ensure that it is in compliance with the HCl and/or PM limits between tests. Hg CEMS have both electronic and hardcopy monitoring plan requirements under Appendix A of the MATS Rule.

Site-Specific Performance Evaluation Plans and Test Plans
A Site-specific Performance Evaluation Plan is required for any CEMS (e.g., PM, Hg or PM CEMS) certification or QA tests site-specific test plans are required for any MATS compliance stack testing (e.g., PM or HCl testing). The Site-Specific Performance Evaluation Plans and Test Plans must be submitted at least sixty (60) days prior to the first scheduled test.

Performance Evaluation Reports
A Performance Evaluation Report is required for the Hg, PM and/or HCl CEMS initial certification and the initial PM and/or HCl compliance testing, as applicable. The Performance Evaluation Report must be submitted no later than sixty (60) days after the last performance test. As the Rule is currently written, the Hg CEMS, Hg sorbent trap monitoring system and HCl CEMS certification results would be submitted electronically to EPA via the Emissions Collection and Monitoring Plan System (ECMPS) software. The stack compliance test results would be entered into the EPA's Electronic Reporting Tool (ERT) software and submitted electronically via EPA's Compliance and Emissions Data Reporting Interface (CEDRI).

Notification of Compliance Status
As specified in Section 63.10030(e) of Subpart UUUUU and 63.9(h), a Notification of Compliance Status must be submitted no later than the close of business after the 60th day following completion of the performance tests.

Quality Assurance/Quality Control Plans
RMB can prepare or review the required QA/QC Plan for a new MATS CEMS (including Hg sorbent trap systems). The QA/QC Plan can be developed as a standalone document or the QA/QC procedures can be incorporated into an existing QA/QC Plan. RMB can also develop reasonable and efficient QA/QC programs for process monitors.

Boiler Tune-up Procedures
Section 63.10005(e) requires the operator to conduct a boiler performance tune-up as part of the initial compliance demonstration. The boiler performance tune-up must comply with the requirements specified in Section 63.10021(e). While utilities often conduct many of the required activities, it is important to ensure that the boiler tune-up meets all of the MATS requirements and that sufficient documentation is maintained to demonstrate compliance.

Emission Averaging Plans
Section 63.10009(a) allows certain sources to use emission averaging in lieu of meeting the applicable MATS requirements on an EGU-specific basis. In this case, the owner or operator must develop an Emissions Averaging Plan that complies with Section 63.10009(j).

Hg CEMS Services
RMB has extensive expertise in the procurement, certification and operation of Hg CEMS. In 2006 - 2007, RMB managed EPRI's Hg CEMS field demonstration project which, at times, included a total of eight different Hg CEMS. RMB also served as EPRI's technical consultant in the development of a Hg calibrator traceability protocol. RMB has assisted numerous electric utilities with the installation of Hg CEMS to comply with Consent Decrees and in anticipation of the Clean Air Mercury Rule (CAMR) requirements. RMB's services include CEMS procurement, certification oversight, QA Plan preparation and regulatory interpretation. RMB is knowledgeable about the various Hg reference method procedures and has operated the sorbent trap Method 30B systems for conducting RATAs. RMB has assisted test contractors and utilities in analyzing sorbent trap samples using the Ohio Lumex analyzer. RMB also provides calibrator traceability certification services.

PM CEMS Services
As with Hg and standard pollutant CEMS, RMB has a wealth of expertise related to PM CEMS. Over the past several years, RMB has assisted utilities with the procurement, installation, certification and operation of PM CEMS and has managed PM CEMS field demonstration projects for EPRI. Services included, but were not limited to, technical specification development, installation and test plan preparation, correlation test management and QA Plan development.

HCl CEMS Services
Since 2013, RMB has managed EPRI's HCl CEMS field demonstration project which has included four HCl CEMS. RMB has also participated in the stakeholders conference calls and provided comments to EPA for the development of draft HCl Performance Specification 18.

CEMS Procurement Assistance
RMB offers turnkey CEMS procurement services including, but not limited to, bid specification preparation, vendor bid evaluation, test protocol preparation, installation and certification oversight and QA Plan and Monitoring Plan development. These services are founded on a wealth of expertise in CEMS technology and associated regulatory requirements. RMB will ensure that you are selecting the best monitoring approach and that the system is installed in accordance with the applicable regulations (e.g., 40 CFR Parts 60 and 75, Clean Air Interstate Rule and Utility MATS Rule).

MATS Training
RMB can provide customized onsite training on the Utility MATS Rule as well as other CEMS regulations. RMB provided a one-day MATS training course prior to the 2013 EPRI CEMS User Group Meeting.