

# AGORA ENVIRONMENTAL CONSULTING

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**Agora Environmental Consulting (Agora)** is a multi-disciplinary air quality consulting company providing services to electric utilities and a wide range of industrial sources. Since the early 1990's, Agora personnel have been working with utility and industrial companies to evaluate and comply with continuous emission monitoring system (CEMS) requirements established by EPA and State environmental agencies. For over twenty-five years, Agora has also served as the primary monitoring and testing consultant for the Electric Power Research Institute (EPRI) and the Utility Air Regulatory Group (UARG). Agora invites you to visit our website at [www.agoraenvironmental.com](http://www.agoraenvironmental.com) or contact one of our staff for more information.

## ***Mercury & Air Toxics Standards Services***

Agora is uniquely qualified to provide consulting services related to EPA's Mercury and Air Toxics Standards (MATS) for electric utility plants. Agora provided extensive assistance and data analysis to utilities during EPA's Information Collection Request. Agora assisted UARG in preparing technical comments during the rulemaking process and coordinated a utility workgroup to comment on EPA's floor analysis and the monitoring provisions in the MATS rule. Agora has also assisted utilities in developing strategies, CEMS replacement budgets and test programs to assess options for complying with the rule. Other MATS related services are discussed herein.

## ***Hg CEMS Services***

Agora has extensive expertise in the procurement, certification and operation of Hg CEMS. In 2006 - 2007, Agora managed EPRI's Hg CEMS field demonstration project which, at times, included a total of eight different Hg CEMS. Agora also served as EPRI's technical consultant in the development of a Hg calibrator traceability protocol.

Agora 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. Agora's services include CEMS procurement, certification oversight, QA Plan preparation and regulatory interpretation.

Agora is knowledgeable about the various Hg reference method procedures and has operated the sorbent trap Method 30B systems for conducting RATAs. Agora has assisted test contractors and utilities in analyzing sorbent

trap samples using the Ohio Lumex analyzer. Agora also provides calibrator traceability certification services.

## ***PM CEMS Services***

As with Hg and standard pollutant CEMS, Agora has a wealth of expertise related to PM CEMS. Over the past several years, Agora has assisted utilities with the procurement, installation, certification and operation of PM CEMS and has managed PM CEMS field demonstration projects for EPRI. Services include technical specification development, installation and test plan preparation, correlation test management and QA Plan development.

## ***CEMS Program Audits***

Agora's comprehensive audit services have proven to be a valuable tool for many clients to ensure that their CEMS program is in compliance with 40 CFR Part 75 as well as other applicable regulations and permit requirements. During a comprehensive audit, Agora will evaluate a source's QA Plan, Monitoring Plan, EDRs and recent QA test results. Agora also conducts a site visit to inspect the CEMS equipment, review onsite records, evaluate program management and interview plant personnel with CEM program responsibilities. In several instances, Agora has performed audits for legal counsel under attorney-client privilege.

## ***Quality Assurance Plans***

Agora prepares comprehensive CEMS QA Plans for compliance with 40 CFR Part 60, Part 63 and Part 75. Agora has also developed QA Plans for Hg sorbent trap systems. Agora notes that the QA Plan is an integral component of a regulatory audit. Agora has developed numerous comprehensive QA Plans that have successfully weathered audits by EPA and State agencies. A detailed QA Plan will also serve as a valuable internal training tool. Unfortunately, many QA Plans have not kept pace with either regulatory or internal program revisions.

## ***Litigation Support & Expert Testimony***

Agora's senior staff provides litigation support to the client's legal counsel. Agora continues to provide technical support to the utility industry commenting on proposed regulations and monitoring requirements. Agora's assistance includes: regulatory review and analysis, CEMS, COMS and stack test data review and analysis, and expert testimony.

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## ***EPA Petitions***

Agora's staff has also prepared numerous petitions addressing a variety of issues from approval of alternate monitoring approaches to resolving non-compliant issues. Founded on sound technical support, these petitions have successfully reduced potential monetary and allowance fines associated with noncompliance issues. In several cases, Agora has worked with legal counsel to resolve compliance issues.

## ***Electronic Data Report Assistance***

Agora offers consulting services for generating and/or reviewing quarterly EDRs. For several projects, Agora routinely accesses the CEMS data via modem or internet for data validation purposes. Agora also reviews copies of the maintenance logs to ensure that the source is complying with EPA's diagnostic and recertification test policy. At the end of each quarter, Agora conducts a final review and generates the EDR. Agora has experience with most of the commercially available DAHS software packages. Agora is well versed in the ECMPS Client Tool software and is serving as an "agent" for numerous clients.

## ***CEMS Procurement Assistance***

Agora 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. Agora 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, Cross-State Air Pollution Rule and MATS).

## ***CEMS & Regulatory Training***

Since 1996, Agora has presented a CEMS Users Training Course in Raleigh, North Carolina. This 3-day comprehensive course is typically offered on an annual or semi-annual basis, though Agora has presented this course on a semi-annual basis for the last several years. Topics include regulatory requirements and revisions, CEM technologies, CEM QA/QC, CEM program auditing, and CAM as well as current, applicable research projects. EPA representatives and CEM equipment vendors often join Agora staff members as instructors. In the past, the course has been attended by utility and industry personnel from the United States and

Canada, as well as federal and State agency representatives. Participation is limited to approximately forty (40) attendees. Agora also provides onsite training tailored to client-specific monitoring and regulatory requirements.

## ***New Unit Startup & Certification Assistance***

Similar to our CEMS procurement projects, Agora also provides turnkey consulting services to clients commissioning new units, stacks and/or pollution control equipment. Project support includes monitoring system evaluations, oversight of all required notifications, test protocols and test programs. Agora also revises or develops QA Plans and Monitoring Plans and prepares CEMS certification/recertification applications.

## ***Greenhouse Gas Rule Assistance***

Agora provides assistance in complying with EPA's Mandatory GHG Reporting Rule. Services include compliance assessments, Monitoring Plan development and annual reporting assistance.

## ***EDR-AUDIT***

Agora continues to offer EDR-AUDIT as an alternate tool for auditing the correctness and completeness of EDRs. EDR-AUDIT Version 8.0.79 is fully compatible with the XML EDR requirements. The software provides a complete check of all calculated emission values, EDR format and content, QA/QC results and substituted data values. Software features include: RATA optimizer, annual span evaluation, normal load analysis, QA certification event assistance and custom reports. EDR-AUDIT is an extremely cost effective product and is provided by Agora on a licensed basis.

## **AGORA STAFF**

For additional information concerning any of Agora's services, please do not hesitate to contact one of our staff members.

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For more information concerning current air quality issues, visit Agora's website at:

**[www.agoraenvironmental.com](http://www.agoraenvironmental.com)**