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File: EA05-09

Gioseph Anello, M.Eng., P.Eng., PMP
Manager of Waste Planning & Technical Services
The Region of Durham
605 Rossland Rd
Whitby, ON L1N 6A3

**RE: Durham York Energy from Waste
Revised Air Emissions Monitoring Plan**

Dear Mr. Anello,

The revisions to the Air Emissions Monitoring Plan sent January 21, 2013 have been reviewed and comments on Section 5.5 of the report are offered:

Section 5.5 states: “[Relative Accuracy Test Audit] RATAs are used to establish the ability of a [Continuous Emissions Monitors]CEMS to accurately measure and report a given pollutant concentration or emissions rate from an affected source and to determine any bias in those measurements. The RATA is required for initial CEMS certification and must be performed annually thereafter during routine operation of the source. These relative accuracy and bias tests will be conducted in accordance with the procedures in 40 CFR Appendix B or EPS 1/PG/7.”

The following language should be added to this paragraph: “These relative accuracy and bias tests will be conducted in accordance with the procedures in 40 CFR Appendix B or EPS 1/PG/7 ... **as appropriate, to validate that the CEM system meets the minimum performance specifications listed in Schedule “F” of the Environmental Compliance Approval (ECA).**”

Please note that the ECA normally deals with two aspects as it relates to CEM systems: daily calibration and RATA.

The intent of the RATA is to objectively gather and evaluate evidence (within a short period of time) on the performance capabilities of the CEM system. It is the approach used to make the output of the CEM system traceable to a known value; with this known value based on the CEM system operation and its response to a set of traceable gas concentrations and pre-established set of operating conditions.

Daily calibration is intended as a routine spot check to determine that the CEM system is maintaining its minimum performance (ECA listed) based on the comparison of its output to the gas being used to challenge the CEM system. This “daily calibration” is the procedure that establishes the ability of the CEM system to accurately measure and report a given pollutant concentration on a day-to-day basis.

Once these changes are made to the report, we will have no further comments on the Plan.

Please contact me if you have any questions with the above comments.

Yours sincerely,



Dorothy Moszynski
Environmental Resource Planner and EA Coordinator
Air, Pesticides and Environmental Planning

- c. Dan Panko, Supervisor APEP Unit, Central Region MOE
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Central Region EA File
A & P File