# Continuous Emissions Monitoring Systems (CEMS) Support



Trinity Consultants is a leading global environmental consulting firm that brings 50 years of experience providing services and solutions in the EHS Regulatory Compliance, Built Environment, Life Sciences, and Water & Ecology markets. Trinity has the technical expertise, industry depth, and specialized capabilities to help clients achieve their goals across the natural and built environments.

Industrial facilities subject to air permits and regulatory emissions limits must frequently implement sophisticated Continuous Emissions Monitoring Systems (CEMS) to demonstrate compliance. Without a good understanding of the federal regulatory requirements under 40 CFR Parts 60 and 75 (as well as state and local requirements) and the development of a good CEMS program, demonstrating compliance with applicable limits can prove challenging.

For over 50 years, Trinity Consultants has assisted facilities with air quality permitting and compliance including CEMS-related services. Trinity's CEMS support includes CEMS program audits, including data acquisition and handling system audits, customized training, developing, reviewing and updating Quality Assurance plans, assistance with monitoring equipment selection, CEMS and Continuous Opacity Monitoring System (COMS) trouble shooting and procedure development. Maintenance of CEMS is an integral part of any Quality Assurance and Quality Control (QA/QC) program and Trinity can assist in creating or updating facility maintenance programs to ensure maximum CEMS data availability. Trinity's experienced professionals have the expertise to help ensure your CEMS program complies with applicable regulatory requirements in an efficient and effective manner.

### **Auditing for Compliance**

Leveraging its extensive regulatory experience, Trinity is ideally suited to assist clients with performing compliance audits for applicable federal and local CEMS requirements under 40 CFR Parts 60 and 75 and state or local programs. In conducting a compliance audit, Trinity assists clients in navigating the complex requirements of federal/permit/local regulations and in assessing the effectiveness of a CEMS and associated Data Acquisition Handling System (DAHS) program. Trinity helps facilities in auditing the data created by CEMS to ensure emissions are being calculated accurately and reporting data is in compliance with applicable air quality regulations. Trinity also examines facilities CEMS QA/QC practices to ensure compliance with CEMS QA/QC requirements.



### **Ensuring Quality Control**

QA/QC programs are the backbone for CEMS compliance with regulatory and permit requirements. Setting up appropriate QA/QC procedures, establishing missing data substitution provisions during QA/QC periods, and specifying DAHS calculation procedures are just a few key elements of an effective QA/QC program. Trinity assists in developing and reviewing QA/QC programs and monitoring plans that will be used to identify and manage the compliance obligations associated with CEMS. Trinity can also execute a CEMS performance evaluation to identify opportunities to improve CEMS performance on issues related to downtime and availability, accuracy, and reliability of CEMS data.

#### Maintenance Program Review

An effective CEMS maintenance program is essential for any CEMS to provide accurate and reliable data for compliance with applicable air quality regulations. Trinity has significant experience in developing and implementing innovative, efficient, and cost effective CEMS maintenance programs for clients in a variety of industries across the nation. Trinity can develop a preventative maintenance schedule designed to identify and address problem areas with CEMS before they become a compliance issue. An effective preventative maintenance program prescribes and documents what checks are needed, at what frequency, the responsible party, and acceptable results. It also provides the necessary procedures to resolve many performance issues discovered during regular maintenance checks as well as breakdowns.

#### **Essential Training**

Proper operation of CEMS is critical for compliance. Trinity has unmatched expertise in training environmental managers and facility operators on air quality requirements including how to effectively and appropriately operate CEMS units. Trinity provides standardized training on CEMS requirements as well as customized training that addresses a facility's own requirements and program (applicable requirements, data handling, QA/QC programs, maintenance programs, reporting systems, etc.). Customized, on-site training enables operators to effectively interface with control systems, analyze test functions, and maintain settings that are essential for efficient operation of the CEMS.

#### Source Testing Oversight

Source tests are a key component in determining a facility's compliance with applicable air quality regulations. By reviewing test protocols and results, Trinity helps to ensure that the test methods are appropriate for the facility and that the results are presented in a format as required to demonstrate compliance with existing applicable regulations.

#### **CEMS Installation Oversight**

Selecting, purchasing, and installing a new CEMS unit is a daunting task for any environmental or facility manager. Trinity understands the applicable regulatory requirements for each program (Acid Rain, Greenhouse Reporting, AB-32, RECLAIM, permit-specific, etc.). Trinity can assist in this process of CEMS vendor/unit selection and installation by providing oversight which is backed by years of experience with diverse industrial clients. Trinity works with numerous CEMS manufacturers and integrators to ensure the process is as seamless as possible and well-matched to the facility's needs.

#### CEMS Certification and QA/QC Plan Development

Preparing a CEMS application and navigating the certification process is a challenging task. Trinity helps minimize the burden by streamlining the application and certification process and by working directly with the vendors of the CEMS equipment and hardware as well as source testing vendors. Preparing a comprehensive QA/QC plan is often required as part of the CEMS application submittal and Trinity is well-equipped to develop and submit QA/QC plans as part of CEMS applications. Trinity can review and assist in updating QA/QC plans to ensure compliance with regulatory requirements and developing a useful CEMS training tool.

## **Reporting Facilitation**

As reporting requirements increase and change frequently, Trinity can oversee a facility's ever-changing compliance obligations. Trinity has extensive experience in streamlining the preparation of semi-annual and quarterly compliance reports for CEMS, a time consuming and meticulous process. Trinity can collect the necessary data and assemble the compliance reports for submission to the appropriate federal, state or local agency. Trinity can also complete a CEMS validation study of all programming and emission calculation operations as needed to validate CEMS processes.

#### Why Choose Trinity

Trinity built its reputation for excellence in helping clients with their EHS regulatory challenges. Whatever your CEMS-related challenges may be, Trinity can partner with you to ensure an appropriate, streamlined program that meets your compliance obligations.

ISO 9001:2015 certified at our corporate office in Dallas, Texas

#### CONTACT OUR TEAM!

For more information about how we can help your organization, please contact us.

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