

From: [ROOT Jenny](#)
To: ["John Morrissey"](#)
Subject: RE: proposed updates to civil penalty rules
Date: Monday, August 19, 2013 9:08:49 AM

Hi John,

Yes, direct measurement by stack test or CEM. The AQ program provided the language so that we are not including surrogates or other parameter monitoring (like pressure drop, etc.) for the major magnitude.

From: John Morrissey [mailto:mojo@lrpa.org]
Sent: Friday, August 16, 2013 9:16 AM
To: ROOT Jenny
Subject: proposed updates to civil penalty rules

Jenny,

I was looking at the announcement about the proposed rules and have a question about the 340-012-0135 section about "directly measured hazardous air pollutant". I didn't see the definition in the OAR and was wondering if that means actual measurement via stack test only?

Thanks,
John

(d) Exceeding an emission limit established pursuant to federal National Emission Standards for Hazardous Air Pollutants (NESHAPs): Major – if exceeded the Maximum Achievable Control Technology (MACT) standard emission limit for a directly-measured hazardous air pollutant (HAP), otherwise apply OAR 340-012-0130.