

Fluorinated Gas Production (Subpart L)
Mandatory Reporting of Greenhouse Gases (40 CFR Part 98)
Optional Form For Requesting an Extension of Use of Best Available Monitoring Methods

OMB Control No. **XXXX-XXXX**

Approval expires **XX/XX/XXXX**

The public reporting and recordkeeping burden for this collection of information is estimated to average 30 minutes per response (the burden was already included in ICR 2060-new). This is an optional application form. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do NOT send the completed form to this address.

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General Information: If you are an owner or operator subject to Subpart L of 40 CFR Part 98, you may use best available monitoring methods (BAMM) to estimate emissions that occur through June 30, 2011 for any parameter for which it is not reasonably feasible to achieve the following by January 1, 2011:

1. Acquire, install, or operate a required piece of equipment.
2. Procure measurement services from necessary providers (e.g., contractors specializing in stack testing to support the development of emission factors).
3. Gain physical access to make required measurements (e.g., because a measurement requires the installation of a port and it is unsafe to install that port during process operation).

You do not need to submit a request to EPA to use BAMM unless you are planning to use BAMM to estimate emissions that occur beyond June 30, 2011. You may use this optional form to request to use BAMM to estimate emissions that occur from July 1, 2011 through December 31, 2011 for any parameter.

To obtain approval, the request must demonstrate to the EPA Administrator's satisfaction that it is not reasonably feasible to acquire, install, or operate the required piece of monitoring equipment, to procure necessary measurement services, or to gain physical access to make required measurements to comply with subpart L.

For parameters other than scoping speciations, emission factors, and emission characterizations, you must submit your request by **February 28, 2011**. For scoping speciations, emission factors, and emission characterizations, you must submit your request by **June 30, 2011**.

Note Regarding Scoping Speciations, Emission Factors, and Emission Characterizations

Even without BAMM, you have until February 29, 2012 to complete scoping speciations, emission factors, and emission characterizations. These parameters can then be applied to 2011 activity data to estimate 2011 emissions by the general March 31, 2012 reporting deadline. **Thus, you will not need to use BAMM for scoping speciations, emission factors, or emission characterizations unless you cannot complete testing and parameter development until after February 29, 2012.**

Requests to use BAMM to estimate emissions that occur beyond December 31, 2011 may be submitted for unique and extreme circumstances, which include safety, technical infeasibility, or inconsistency with local, State or Federal regulations. You must submit your request by **June 30, 2011**. You may also use this form if you find it necessary to submit a request for an extension of the use of BAMM past December 31, 2011, under subpart L of 40 CFR Part 98 (40 CFR 98.124(o)). Please see Part II of this form.

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The following table summarizes the important dates for subpart L BAMB requests:

Important Dates for Subpart L BAMB Requests

To use BAMB to estimate emissions that occur between July 1, 2011 and December 31, 2011 for the following parameters:	Demonstrate that it is not reasonably feasible to comply with the monitoring requirements of subpart L before:	Submit BAMB request no later than:
Parameters other than scoping speciations, emission factors, and emission characterizations	July 1, 2011	February 28, 2011
Scoping speciations, emission factors, and emission characterizations	March 1, 2012	June 30, 2011
To use BAMB to estimate emissions that occur after December 31, 2011 for the following parameters:	Demonstrate that, due to extreme and unique circumstances, it is not reasonably feasible to comply with the monitoring requirements of subpart L before:	Submit BAMB request no later than:
Parameters other than scoping speciations, emission factors, and emission characterizations	January 1, 2012	June 30, 2011
Scoping speciations, emission factors, and emission characterizations	March 1, 2013	June 30, 2011

Please see §98.124(o) for the full set of requirements regarding the use of Best Available Monitoring Methods for Subpart L.

This form can be submitted electronically (preferred) to MRRpetition@epa.gov. Please include "Subpart L BAMB Request" in the subject line.

As an alternative, the form can be printed and mailed. (Please do not send duplicative forms by multiple delivery modes, for example, by email, overnight mail, and fax.) For US mail use the following postal address:

Carole Cook,
Climate Change Division,
Office of Atmospheric Programs (MC- 6207J),
Environmental Protection Agency,
1200 Pennsylvania Ave., NW.,
Washington, DC 20460

For submissions using a private mail carrier (e.g., DHL, FEDEX) use the following address:

Carole Cook
U.S. EPA
1310 L Street NW (802E)

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Washington, DC 20005-4113
USA
Tel.: (202) 343-9334

Upon receipt, the request will be recorded in the EPA tracking system, and the requester will be notified that EPA has received the request and is evaluating the request. EPA will evaluate your request to confirm that it is consistent with §98.124(o). The agency will then notify you to confirm approval or denial of the application. As a general matter, EPA will base its decision on the information provided in the timely extension request and does not intend to negotiate on specific issues or necessarily follow-up with the requester regarding missing data. As time allows, EPA may follow up on extension requests with additional questions. The requester must discontinue using best available monitoring methods and begin following all applicable monitoring and QA/QC requirements of subpart L and part 98 no later than the applicable date (July 1, 2011, for parameters other than scoping speciations, emission factors, and emission characterizations; February 29, 2012, for scoping speciations, emission factors, and emission characterizations) unless EPA approves an extension request before that date.

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If you are interested in submitting a request for an extension of the use of BMM to estimate emissions that occur during 2011, please complete Part I of the form below. If you are interested in submitting a request for an extension of the use of BMM to estimate emissions that occur after 2011 under unique and extreme circumstances, as discussed in 40 CFR Part 98 (Section 98.124(o)(4)), please also complete Part II.

Part I

General Information	
1. Name of Person to Contact about the Request	
2. Contact Person Address (include street address, city, state and zip code)	
3. Contact Person Phone Number	
4. Contact Person E-mail Address	
5. Signature: <i>"I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."</i>	
5. Date Signed	
6. Date Submitted	
Facility Information	
7. Facility Name	
8. Facility Physical Address (include street address, city, state and zip code)	
Emissions Estimation Method	
9. Which method are you planning to use to estimate emissions from fluorinated gas production and transformation processes?	<input checked="" type="checkbox"/> A. The mass balance method <input checked="" type="checkbox"/> B. The emission factor method (or emission calculation factor method, if applicable)
10. Explain why it is not reasonably feasible to apply the method not chosen in question 9 to estimate emissions from the relevant process.	
Monitoring Equipment	
11. Monitoring equipment for which the request is being made (e.g. scales, flowmeters)	

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12. Locations where each piece of monitoring equipment will be installed	
13. Specific parameters for which request is being made (e.g., reactant feed rates)	
14. Rule Citations for Monitoring Requirements for which the Monitoring Equipment is needed (e.g., §98.124(b)(1)(ii))	
Measurement Services	
15. Measurement services for which the request is being made (e.g. contractors specializing in stack testing to support the development of emission factors)	
16. Locations where each measurement service is needed	
17. Specific parameters for which request is being made (e.g., scoping speciations, emission factors)	
18. Rule Citations for Monitoring Requirements for which the Measurement Services is needed (e.g., §§98.124(c))	
Reason for the Extension Request	
<p>19. Reason for the Extension Request*</p> <p>* Insert the appropriate date for BAMB extension requests as follows:</p> <ul style="list-style-type: none"> - To use BAMB to estimate emissions that occur between July 1, 2011 and December 31, 2011, for parameters other than scoping speciations, emission factors, and emission characterizations: <u>July 1, 2011</u>. - For scoping speciations, emission factors, and emission characterizations: <u>March 1, 2012</u>. - To use BAMB to estimate emissions that occur after 2011 for parameters other than scoping speciations, emission factors, and emission characterizations: <u>January 1, 2012</u>. - BAMB to estimate emissions that occur after 2011 for scoping speciations, emission factors, and emission characterizations: <u>March 1, 2013</u>. 	<p>☒ A. equipment cannot be purchased and delivered by ____*</p> <p>☒ B. service providers are unable to provide necessary measurement services by ____*</p> <p>☒ C. equipment cannot be installed by ____* without a process unit shutdown</p> <p>☒ D. access to process streams, emission streams, or destroyed streams, as applicable, could not be gained before ____* to install the device.</p>
20. If you selected A in question 19, then complete items 20a through 20e below, as appropriate, and include supporting documentation as attachments, identifying them in the responses to which they are relevant.	
a) Date Equipment ordered	
b) Information on alternative suppliers investigated	

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and their delivery dates	
c) Backorder notices or unexpected delays information from supplier	
d) Description of actions taken to expedite delivery/installation	
e) Current expected delivery/installation date	
21. If you selected B in question 19, then complete item 21a below, verifying that appropriate supporting documentation is attached.	
a) Is the appropriate supporting documentation attached, which demonstrates that these services could not be acquired before the relevant date identified in question 19? (This documentation must include written correspondence to and from at least two service providers stating that they will not be able to provide the necessary services before the relevant date identified in question 19.)	☒ Yes; see attachment(s) (please list):
22. If you selected C in question 19, then complete items 22a through 22e below.	
a) Is the appropriate supporting documentation attached, which demonstrates that it is not practicable to isolate the process equipment or unit and install the measurement device without a full shutdown or a hot tap, and that there is no opportunity before the relevant date identified in question 19 to install the device?	☒ Yes; see attachment(s) (please list):
b) Dates of the three most recent shutdowns for this process equipment or unit	
c) Frequency of shutdowns for this process equipment unit	
d) Date of the next planned shutdown for this process equipment or unit	
e) Was there a shutdown or is there a planned process unit shutdown between December 31, 2010 and the relevant date identified in question 19? If yes, explain why the equipment was not/cannot be obtained and installed during that shutdown.	
23. If you selected D in question 19, then complete item 23a below, verifying that appropriate supporting documentation is attached.	
a) Is the appropriate supporting documentation attached, which provides illustrative	☒ Yes; see attachment(s) (please list):

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demonstration such as photographs and engineering diagrams demonstrating that access could not be gained?	
Description of BAMM and Plans for Monitoring Requirement Compliance	
24. What are the specific best available monitoring methods that you will use in place of the required methods? Please provide a detailed description.	
25. Describe how the results from using the best available monitoring methods will be applied (i.e., which calculation method will be used) to develop the emission estimate.* * Where the proposed BAMM is the use of current monitoring data in the mass-balance approach, include the estimated relative and absolute errors of the mass-balance approach using the current monitoring data.	
26. What are the specific actions the facility will take to comply with the monitoring requirements by the date when the BAMM extension expires?	

Part II – Additional Questions for BAMM Extension Requests that occur after 2011

Requests for Extension of BAMM that occur after 2011	
1. Please provide a detailed outline of the unique circumstance necessitating an extension. (Include specific data collection issues that do not meet safety regulations, technical infeasibility, or specific laws or regulations that conflict with data collection.)	
2. Please provide a detailed explanation and supporting documentation of how and when you will receive the required data and/or services to comply with the reporting requirements of subpart L in the future.	