

# CAM

## Ten Years Later

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# Background

- Promulgated in October 1997
- 40 C.F.R. Part 64
- Requires sources to monitor the performance of their active control devices.
- Most Title V sources didn't have to submit a CAM Plan until permit renewal.

# Initial Challenges

- Getting sources to submit CAM plans
- Having CAM mentioned in Statements of Basis
- Having CAM properly implemented in Title V permits
- Understanding when CAM was applicable
- Limited CAM guidance for some source and control device types
- Legal challenges regarding enhanced monitoring and credible evidence

# Remaining Challenges

- Some sources still challenge CAM
- CAM nonapplicability statements sometimes not justified
- CAM applicability determinations still come up
- Further CAM guidance still needed

# CAM not so common

- Permitting authorities still behind in Title V renewals (partly because of CAM)
- Older units might lack active controls
- New requirements or control devices might fall under CAM exemptions

# Current CAM developments

- Changes to Part 64 being discussed
- State program reviews will allow more detail with regard to CAM issues