BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Compliance Advisory

June 9, 2022

Source Testing Advisory

This Compliance Advisory is provided to inform you about activities of the Air District which may affect your organization's operation. It will assist you in your effort to achieve and maintain compliance with applicable air pollutions rules and regulations.

ATTENTION: ***OWNERS AND OPERATORS OF PERMITTED AIR POLLUTION FACILITIES***

SUBJECT: ***REQUIREMENTS FOR SOURCE TEST REPORTING***

Recent Air District inspections at Bay Area facilities have documented situations of consistent and ongoing non-compliance with requirements for conducting and reporting results of source testing. This advisory serves as a reminder regarding the need to comply with certain source testing requirements.

1. For clarity and per Air District Manual of Procedures (MOP) Volume V, Field Accuracy Test (FAT) and Relative Accuracy Test Audit (RATA) tests shall include both mass emissions and stack flow relative accuracy results in addition to pollutant/diluent concentration relative accuracies. Relative accuracy results shall be reported in units consistent with established limits, where applicable. If there is no established limit, mass emissions shall be reported in units of "pounds per hour."

2. 40 CFR 60, Appendix A, Method 19 allows owner/operators to determine pollutant emissions using F-factors on a mass per unit of gaseous, liquid, or solid fuel input basis that are published in Table 19-2 of the test method. For emissions estimation accuracy purposes, it is recommended that Table 19-2 be used only for sources that combust exclusively California Public Utility Commission (CPUC) regulated natural gas.

   For all other fuel types contained in Table 19-2 other than CPUC-regulated natural gas, compositional analysis is the preferred F-factor determination method and, if performed, shall be conducted using Air District approved methodologies. Additionally, compliance tests conducted in triplicate should include one fuel sample per run and Relative Accuracy Test Audit (RATA) tests should include one fuel sample for every three RATA runs, unless an alternative sampling regimen is reviewed and recommended by the Air District's Source Test Section prior to sampling. F-Factor flow determinations shall be reported dry and stack emissions shall be reported in the test report in the units of the applicable standard. Documentation for the current valid fuel flow meter certification must be submitted with the test report.

3. All relevant process and operational data relating to unit load and device operating conditions during testing must be included in every test report submitted to the Air District. The default time increment for process data is 1-minute data for the entire duration of the test run(s). Alternative time increments and averaging periods must

be approved by the Air District's Source Test Section prior to testing. Failure to provide adequate operational data may result in rejection of the testing and/or retesting.

4. Source tests to show compliance with any federally enforceable or State Implementation Plan (SIP) adopted emission standards must be conducted according to promulgated Environmental Protection Agency (EPA) test methods, or EPA-approved alternative methods, and meet EPA regulatory and methodology requirements. Per MOP Volume IV Section 1.3, in cases where promulgated test methodologies do not exist or that the owner/operator desires approval for alternative methodologies, alternative source test method requests must be submitted to the Air District's Source Test Section at least 30 days prior to the test date, and approval must be granted prior to testing.

5. The Air District has found instances where owner/operators have not provided sufficient stratification test and/or cyclonic flow check documentation as required by EPA and/or Air District promulgated test methods. Stratification test results with supporting documentation are necessary for source tests to be considered valid.

6. All test reports submitted to determine compliance with Oxides of Nitrogen (NOx) concentrations or emission rates using instruments that quantify total NO_x using a Nitrogen Dioxide to Nitric Oxide (NO_2-to-NO) converter of any type must include an NO_2-to-NO converter efficiency test as outlined in EPA Method 7E. The owner/operator shall include the efficiency test results with the submission of the test report.

   To provide an indication of analyzer integrity, it is recommended that all NOx CEMS which utilize instruments with a NO2-to-NO converter conduct a converter efficiency test on a semiannual basis. If available, the most recent efficiency test results should be included in the monthly CEMS reports submitted to the Air District and maintained onsite according to the record retention policies in MOP Volume V. To ensure the tests are representative, it is also recommended that the concentration of the gas used to perform the converter efficiency test be within 10 to 95 percent of the analyzer span.

7. Source test reports must be submitted to the Air District's Source Test Section within the timeframes allowed by permit condition or rule to be considered sufficiently received. Per MOP Volume IV, reports submitted to other Air District departments will not be considered received until they have been routed to the Source Test Section, unless otherwise specified by applicable permit condition. Late submittals will be referred to the Air District's Compliance and Enforcement Division for violation assessment.

If you have any questions regarding this advisory, please contact Jerry Bovee at 415-793-6113 for technical assistance.

JG **Jeff Gove**
Director of Compliance and Enforcement
Bay Area Air Quality Management District