



Compliance Advisory

June 9, 2022

Source Testing and Emissions Monitoring 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 pollution rules and regulations.

ATTENTION: OWNERS AND OPERATORS OF PERMITTED AIR POLLUTION FACILITIES

SUBJECT: REQUIREMENTS FOR SOURCE TESTING AND CONTINUOUS EMISSIONS MONITORING SYSTEM CALIBRATIONS

Recent Air District inspections at Bay Area facilities have documented situations of consistent and ongoing non-compliance with requirements for source testing and/or operation of Continuous Emissions Monitoring Systems (CEMS). This advisory serves as reminder regarding the need to comply with certain source testing and CEMS requirements referenced in Air District Regulations 1-501, 1-601, and the Manual of Procedures (MOP) Volumes IV and V. This advisory also addresses additional source test performance and CEMS calibration requirements.

1. Air District Rule 1-501 requires the owner/operator of a facility that emits air contaminants for which emission limits have been established to provide suitable sampling facilities such that the nature and quantity of such air contaminants can be determined. Rule 1-601 specifies that the criteria for determining the acceptability of such sampling facilities is contained in the Air District's MOP. The relevant sampling facility criteria is contained in Volume IV of the MOP.

Volume IV of the MOP includes sample collection and conditioning guidance that ensures representative sampling of the source. In general, the MOP requires the sample line connecting the sample collection probe to the pollutant analyzers be leak tight, to be heated such that the sample does not condense, and otherwise be maintained in good condition.

The Air District has identified that permanently installed probes and/or ground taps have been sometimes used for stack sampling of gaseous pollutants when conducting source tests. In this context, ground taps refer to permanently installed tubing that is not adequately tested for leak tightness, is not heated to prevent sample condensation, and/or where the sample probe-to-sample line connection is inaccessible. Use of ground taps and/or permanently installed probes has been observed for source tests on units where access is limited, proper ports have not been installed, and/or sampling platforms do not exist. This practice has also been identified at sources where suitable sampling facilities are installed and accessible.

Use of such ground taps or permanently installed probes used for source testing is not consistent with MOP Volume IV guidance as it is expected that the sample integrity is poor in such scenarios. This is because leaks and sample condensation

are likely, which may dilute the sample. Source tests performed using permanently installed probes or ground taps are inconsistent with applicable Air District and federal requirements, and test results based on these methods will not be accepted to demonstrate compliance.

2. Further, and as per Rule 1-601, source tests conducted on sources that do not have acceptable sampling port facilities, that do not have suitable access to sampling ports, and/or that do not comply with promulgated methods and regulatory specifications are not acceptable unless prior written approval is granted from the Air District. Requests to the Air District must be submitted in writing to the Air District's Source Test Section at least 30 days prior to the test date and approval must be granted before testing.
3. MOP Volume V, Section 5.2 sets forth requirements for calibration of CEMS. These include the requirement to introduce calibration gases into the sampling system as close to the tip of the probe as possible, and therefore daily calibrations which do not introduce calibration gases as close to the tip of the probe as possible are not acceptable unless written approval is granted from the Air District.
4. Per MOP Volume V, all planned CEMS component, data acquisition, software, sampling location, conditioning, or other design modifications that could in any way alter or affect the measured or reported concentrations or emissions must be granted approval by the Air District's Source Test Section prior to implementation.

If you have any questions regarding this notification, please contact Ben Sehgal at 415-793-6113 for compliance assistance or Jerry Bovee at 415-749-4601 for technical assistance.

More Information can be obtained from the following sources:

- For Guidance on acceptable sampling facilities, refer to Air District document "Guidelines for Construction of Particulate Sampling and Testing Facilities" at the following web link:
https://www.baaqmd.gov/~media/files/technical-services/port_guidance_130318_ver01.pdf

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