

SEM's 2019 Intent to Test Forms & Guidelines

April 11, 2019

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SIPRAC



Connecticut Department of Energy and Environmental Protection

A New Form Refresher

1. Two New ITT Forms:
 - a) Compliance Emissions Testing;
 - b) CEMS RATA
2. Two Compliance Certification Forms;
 - a) Compliance Emissions Test Results;
 - b) RATA Results
3. Revised Test Guidelines – Version 2.0



Two Test Protocols – Same Forms

1. Standard Test Protocol – No longer requires submission of a protocol with the ITT Form

- 45-days advance notice prior to testing

2. Non-Standard Test Protocol - Requires attachments

- a) Test method deviation justification
- b) Protocol

- 60-days advance notice prior to testing



Standard Test Protocols - Revised

1. Subsequent periodic performance testing utilizing previously accepted EPA test methods
 - a. NSR – recurring (not initial performance)
 - b. NSPS – recurring
2. Annual RATAs
- ~~3. Destructing & Overall Efficiency for VOC Emissions from control devices (requires Non-Standard Protocol)~~



Non-Standard Test Protocol

1. Initial performance testing (NSR & Federal test drivers)
2. VOC emissions at VOC sources (e.g. coating lines, etc.) & Section 38 testing
3. Any test protocol that proposes a *change or deviation* from an EPA accepted test method;
4. Any variance from test guidelines including load unless otherwise allowed pursuant to the RCSA. Caution: NOx RACT testing with other pollutants;
5. All NESHAP/MACT tests (NESHAP require 60-days advance notice prior to testing)



Test Certification Forms

A separate Certification Form is required for compliance emissions testing and RATAs:

1. Requires upfront reporting of any violations of emissions limits, test requirements, etc. in a standard form
2. Standardizes reporting format
3. Will minimize time reviewing test reports; and
4. Will reduce test report review backlog



Accepted Alternatives

1. In Lieu of using the new ITT Forms and Test Certification Forms, SEM will accept protocols and test reports in **EPA's Electronic Reporting Tool**;
2. These can be uploaded to the SEM FTP site
3. SEM will incorporate the ERT to improve accuracy and standardization – within 2-3 years

SEM Test Guidelines v.2.0

1. Guidelines were revised based on EPA feedback
2. Notification (of testing) and reporting sections were expanded to clarify the different electronic/paper reporting requirements
3. Guidelines will be released on April 30
4. Responses to public comments submitted on forms and Guidelines will also be released on April 30

Gradual Phase In



Step by step:

1. New forms will be gradually phased in
 - a) Will expedite protocol approvals
 - b) New Forms will be available by April 30
 - c) 60-day grace period until June 30 whereas new forms will be required
2. Submittals of test reports will not be required to our FTP site; It is encouraged for large reports and for reports in EPA's ERT format.
3. FTP instructions will be provided via Ms. Knight, on the SIPRAC website, on the DEEP website, and will also be emailed.

Questions?

Please submit questions to:

Email: Cinda.Lautenschlegar@CT.gov
DEEP.StackTestQ@ct.gov

Subject Line: “New ITT Forms” or “FTP Report Submittals” “Delegation” “ Help”

Thank you!



Personnel Changes



1. Director of Air Enforcement

Richard A. Pirolli

2. Retirement - Timothy Marsh

3. New Employee – Khamani Harrison