



Connecticut Department of Energy and Environmental Protection



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

Intent to Test Application Form Revision (DEEP-AIR-ITT-002)

July 11, 2013

Cinda K. Lautenschlegar

Source Emissions Monitoring

SIPRAC



Connecticut Department of Energy and Environmental Protection

Why Make Changes?

- Slow processing time due to:
 - Incomplete/outdated Information
 - Issue with how MRC is specified
 - Proposed test date hard to locate
- Want to ensure applicants are test ready:
 - By bringing attention to modifications, loads, and changes in processes
 - By avoiding NOVs due to load issues, test due date, etc.



Part I - Reformatted

- Allows for up to 3 different sources or EUs (6 using front and back) on the same form
- Saves paper
- Common identifiers don't need to be re-entered for each separate unit.



Expanded Part 1 - License Information

- Registration No.
- New Source Review Permit No.
- Title V Permit No.
- Stack or Emissions Unit (EU) No.

Expanded Part 1 – License Information

Proposed Test
Date

Proposed test dates are required to be confirmed with SEM prior to initiating testing

Proposed Start
Time

Verify with the assigned SEM engineer prior to initiating testing.

Last Tested

Likely unique for each equipment – regardless if grouped or not

Current Test
Due by Date

It's hoped more attention will be paid to due date to avoid NOVs

Expanded Part 5 - Reason for Test Program

- NSR Permit Requirement? NO_x RACT Testing?
- New Source Performance Standard (e.g. 40 CFR Part 60 Subpart JJJJ for RICE)?
- National Emissions Standard for Hazardous Air Pollutants (e.g. 40 CFR Part 63 Subpart ZZZZ for RICE)
- Enforcement Order, etc.

Intent to Test Information – Part VI Expanded

Current Form

- Specify MRC (and units)

Revised Form

- Specify MRC or throughput as permitted or registered (or RCOSA Section 22a-174-3b); For fuel burning sources in:
 - ❖ MGHI in MMBTU/hour
 - ❖ Maximum Fuel Firing Rate
- Specify how the operating load/capacity will be demonstrated during testing

Intent to Test Information

- Has any maintenance or parts replacement been performed on the equipment or control unit within the past year or since last tested? If yes, briefly describe:
 - Some maintenance, such as installing a new filter in a baghouse, may disqualify the equipment from a performance test until sufficient time has elapsed.

Maximum Rated Capacity – Is it Achievable?

- Has facility scheduled production or throughput such that MRC can be achieved during stack testing?
- Is MRC as permitted achievable for periodic testing regardless of ambient conditions or production?
 - Is a permit modification necessary?

Caution with MRC During Testing

- ❑ If the emissions unit is not operated at 90% of maximum rated capacity, or as close as possible thereto, the emissions unit might be de-rated to the production capacity achieved during testing.
- ❑ If the EU can't achieve 90% of maximum rated capacity a Notice of Violation may be issued.
- ❑ If the emissions unit is operated at significantly greater than its MRC, there may be a compliance issue



Addendum to ITT Form Now Includes

- Required attachments for ITT protocol
- Process Operating Conditions
- Hyperlink to ITT Form Instructions
- SEM Stack Test Guidelines



Questions?

Cinda K Lautenschlegar
Air Pollution Control Engineer
Source Emissions Monitoring
Cinda.Lautenschlegar@CT.Go

