

# Source Emissions Monitoring – LEAN-ed New Procedures Review & Comment Period

September 14, 2017

Presented by Cinda Lautenschlegar

SIPRAC



Connecticut Department of Energy and Environmental Protection

# SEM's New Procedures

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



# How...Why All The Changes?

1. Test report review backlog;
2. Lack of accurate and usable information supplied on current ITT Forms;
3. Tests that do not adhere to CAA National Stack Test Guidance and SEM Test Guidelines;
4. Large volume of questions and inquiries regarding waivers of test requirements;
5. Declining resources that may continue to decline;
6. Increase in number of sources that are required to test



# Lean – Good Implementation Plan

1. Combine and enhance ITT form with protocol as one submittal;
2. Develop a Master List of the Universe with test due dates and requirements
3. Overhaul the Department's Emissions Test Guidelines;
4. Create standardized set of spreadsheets for emission calculations for each pollutant



# Lean – Good Implementation Plan

6. Establish SOPs for field auditing purposes;
7. Revise RCOSA 22a-174-4 & 5 to include more test methods;
8. Outreach and communicate with the regulated community about the overhaul of SEMS;
9. Send staff to training to become certified by QSTI, to be on par with the stack testing managers; and
10. SOP for Pre-Screening of Reports



# Two New ITT Forms

- New ITT Forms = Separate ITT Form for:
  - Compliance Emissions Testing;
  - Relative Accuracy Test Audits



# Two New Test Protocol Requirements

## 1. Standard Test Protocol

- Subsequent periodic performance testing utilizing previously accepted EPA test methods;
- Annual RATA

## 2. Non-Standard Test Protocol:

- Initial performance testing (NSR & Federal test drivers);
- All VOC sources & Section 38 testing;
- Any test protocol that proposes a *change or deviation* from an EPA accepted test method;
- Any variance from test guidelines including load



# Why Two Different Test Protocols?

1. Difficult to ensure all test requirements will be met with proposed test protocols especially with sources that have overlapping state & federal requirements;
2. Initial decision was to require 90-days advance notice for all ITT protocols;
3. Instead, we decided to differentiate test protocols:
  - a) one more streamlined; and
  - b) one requiring more documentation and details



# Standard Test Protocols

- Uses the same ITT Form as Non-Standard Test Protocols;
- SEM will not issue formal protocol approval or rejection letters;
- Applications are required 60-days in advance of a proposed test effort;
- Confirmation of the test date(s) by SEM will constitute acceptance of the protocol;
- No safety net of pre-approved protocols - more exposure to a rejected test results



# Non-Standard Test Protocols

- SEM will issue formal protocol approval or rejection letters;
- Applications are required 90-days in advance of a proposed test effort;
- Longer processing time required to ensure test requirements will be met for any proposed initial performance testing, proposed changes of test methods, etc.;
- Less risk of a rejected test report



# New Test Certification Forms

- A separate Certification Form is required for compliance emissions testing and RATAs;
- Requires upfront reporting of any violations of emissions limits, test requirements, etc. in a standard form;
- Will speed up the report evaluation process;
- Will minimize time spent pursuing omitted or buried information in test reports; and
- Will reduce test report review backlog



# Revised Emissions Test Guidelines

1. Outlines new procedures & forms;
2. Summarizes state/federal test deadlines and test report submittal deadlines;
3. Highlights acceptable and not acceptable procedures;
4. Emphasizes test stoppages (unsatisfactory initial runs) aren't accepted and data must be submitted for 1<sup>st</sup> run;
5. Disallows the use of method 25A to determine VOC on a mass basis



# Timeline

1. Release draft of new forms and Guidelines Sept 15, 2017 on SIPRAC website;
2. Comment Period = 30 days;
3. Comment Period closes October 16, 2017;
4. Final Forms released October 31, 2017 on DEEP Air Enforcement Forms website;
5. Submittal of ITT Forms dating November 16 or later need to be on the new forms.



# Questions??

Comments:

[Cinda.Lautenschlegar@CT.gov](mailto:Cinda.Lautenschlegar@CT.gov)

Subject Line: Lean SEM Forms

Thank you!

