

SEM's New Intent to Test Forms & Guidelines – January 2018 Update

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SIPRAC



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Draft New Forms & Guidelines - Sept 2017

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



Reasons for Updating

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; and
6. Increase in number of sources that are required to test



Comments Period – Closed October 12, 2017

1. ITT Forms Compliance Testing and CEMS RATA
 - a. No external comments received
 - b. Minor updates made based on internal comments
 - c. Final ITT Forms will be posted by 1/19/2018
 - d. New Forms required starting 2/2/2018
2. Emissions Test Guidelines v2.0

Updates still being made. There appears to be some misunderstandings.
3. Test Compliance Certification Forms – Still under review.



Draft ITT Forms Become Final

- Start using the New ITT Forms by Ground Hog Day (2/2/2018):

1. Compliance Emissions Testing;
2. CEMS Relative Accuracy Test Audits



Two Test Protocols: Refreshed

1. Standard Test Protocol
2. Non-Standard Test Protocol



Standard Test Protocols

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**



Non-Standard Test Protocol

1. Initial performance testing (NSR & Federal test drivers)
2. VOC emissions in **lb/hour** & 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.



Standard Test Protocol

1. SEM **will ~~not~~** issue formal protocol approval/rejection letters **for the first cycle only**;
 - **Formal approvals will subsequently be phased out**;
2. ITT Forms are required 60-days in advance of a proposed test effort;
 - **Incomplete Forms may be sent; once test contractors and dates determined can be revised and submitted later**
3. Confirmation of the test date(s) by SEM will constitute acceptance of the protocol;
4. No safety net of pre-approved protocols - helpful to adhere to timelines to give auditors opportunity to identify deficiencies prior to a test



Non-Standard Test Protocols

1. Same ITT Form as for Standard Test Protocol – requires additional detailed protocol;
2. SEM will issue formal protocol approval or rejection letters;
3. ITT Forms are required 90-days in advance of a proposed test effort; **No violation for submittals less than 90 days;**
4. Longer processing time required to ensure test requirements will be met for any proposed initial performance testing, proposed changes of test methods, etc.;
5. Less risk of a rejected test report



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 speed up the report evaluation process
4. Will minimize time spent pursuing omitted or buried information in test reports; and
5. Will reduce test report review backlog
6. **Still reviewing the signature requirement in Part VII. Certification Form is similar to the ERT tool required for Federal testing requirements**



Final Steps - SIPRAC 2/8/18

1. Final ITT Forms released [January 19, 2018](#) on DEEP Air Enforcement Forms & SIPRAC websites;
2. Submission of ITT forms (and protocols) will be required on new forms starting [February 2, 2018](#)
3. Compliance Certification Forms will be finalized by [2/2/18](#)
4. SEM Test Guidelines v2.0 will be finalized by [2/2/18](#)
5. Wrap-Up SIPRAC [February 8, 2018](#)



Future SEM Goals

1. CEMS RATA Guidelines will be developed
2. Revamp Quarterly Audits and Quality Control Reporting (QA/QC)



Questions?

When in doubt, or if you have any questions,
please contact:

Email: Cinda.Lautenschlegar@CT.gov

Subject Line: “[New ITT Forms](#)”

Thank you!

