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

September 14, 2017
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SIPRAC
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
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
6. Establish SOPs for field auditing purposes;
7. Revise RCSA 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 1st 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:

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Subject Line: Lean SEM Forms

Thank you!