

FEDERAL REQUIREMENTS FOR NEW EQUIPMENT STARTUP NOTIFICATIONS AND EMISSIONS TESTING

Source Emissions Monitoring Group

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New Equipment Notification

40 CFR §60.7(a)

Any O/O subject to the provisions of this part shall furnish the Administrator written **notification** of:

1. The date of construction (or reconstruction pursuant to §60.15) within 30 days;
2. The actual date of initial startup postmarked within 15 days after startup;
3. Any physical or operational change to an existing facility which may increase emissions rate...postmarked 60 days prior to such change;



New Equipment Notification

40 CFR §60.7(a), cont'd

4. The date upon which demonstration of the Continuous Monitoring System performance commences in accordance with §60.13(c) postmarked within 30 days;
5. The anticipated date for conducting opacity observations required by §60.11(e)(1) within 30 days; and
6. That Continuous Opacity Monitoring Systems data results will be used to determine compliance with the applicable opacity standard during a performance test required by §60.8 in lieu of Method 9 within 30 days.



Performance Tests - 40 CFR §60.8

1. Within 60 days after achieving the max. production rate, but not later than 180 days after initial startup, the O/O shall conduct performance test(s) and furnish a written report of the results of such performance test(s) to the Administrator.
2. The O/O shall provide the Administrator at least 30 days prior notice of any performance test. If there is a delay, notice shall be provided at least 7 days prior to rescheduled date or by arranging a rescheduled date with the Administrator.



Pre-Test Preparation

1. O/O should review all applicable permits, regulations, enforcement orders, and applicable federal standards prior to completing a test protocol.
2. A completed Intent-to-Test Transmittal (ITT) form is required with the test protocol.
3. Test protocol content should meet the requirements set forth in the “*SEM Test Guidelines*” on the DEP website.
4. Test protocols shall be received by SEM at least 30 days prior to the test or as specified by the applicable regulation, permit, or enforcement order (at least 90 days for testing conducted in accordance with RCSA §22a-174-38)



ITT Protocols – Common Deficiencies

1. Accurate and complete sketch of stack configuration including disturbances
2. Sketch of sampling port and point locations - do they meet EPA requirements?
3. Sketch showing the plan and elevation of all operations venting to each stack
4. Stack ID number and/or EU No. if O/O has a Title V permit
5. Permit Nos. – registration numbers are often included but not Title V permit numbers
6. Consistency (of EUs) with ITT transmittal forms and test protocols
7. Stratification/fuel analysis not addressed



Test Report Requirements - Submissions

Regulation	Report Submittal Deadline
40 CFR Part 60 NSPS	Within 180 days after initial startup or within 60 days of reaching max. prod. rate.
40 CFR Part 63 MACT	Within 60 days after test is completed unless otherwise specified.
RCSA §22a-174-22 NO _x RACT	Within 30 days after completion of test
RCSA §22a-174-38 MWC Regulations	Within 60 days after completion of test
CGS §22a-191a(b) SSI	Within 60 days after completion of test



Test Report Requirements - Submissions

Regulation	Report Submittal Deadline
RCSA §22a-174 NSR	Within 60 days after completion of test unless otherwise specified in the permit
Relative Accuracy Test Audit (RATA) Initial	As specified in applicable permit or regulation
RATA Annual	Within 30 days following the close of the calendar quarter in which the test was conducted
40 CFR 60 Subpart K K K K Initial	As specified in the permit typically within 45 days after completion of test
40 CFR 60 Subpart K K K K Subsequent	Within 60 days after completion of test (§60.4375)



Permit Requirements Do Not Subsume Federal Requirements

Example: Combustion Turbines subject to 40 CFR Part 60 Subpart KKKK

1. Permit may specify testing requirements but not frequency
2. Permits for new equipment startups may require initial multi-pollutant testing in addition to NO_x
3. Annual testing for NO_x is required after initial testing
4. Permit vs Subpart KKKK load requirements differ



40 CFR Part 60 Subpart KKKK Combustion Turbines

ITT Protocol Approval Language for **Initial**
Performance Testing:

1. *“...you are required to conduct initial NO_x testing and furnish the Dept with a written test report within 60 days after achieving the maximum production rate at which this equipment will be operated, but not later than 180 days after initial startup of the equipment (§60.8(a)). NO_x testing must be conducted in accordance with the requirements contained in §60.4400”;*



40 CFR Part 60 Subpart KKKK

ITT Protocol Approval Language for **Initial**
Performance Testing cont'd:

2. *“In addition, the equipment must also comply with the requirements contained in Permit No. XXX-XXXX, which requires testing for NO_x, CO and PM-10 at a minimum of 90% of MRC.*

A written report of these results must be submitted within 45 days of the completion of emissions testing at the 90% load level;”



40 CFR Part 60 Subpart KKKK

ITT Protocol Approval Language for **Initial**
Performance Testing cont'd:

3. *“The testing and reporting requirements contained in paragraphs 2 and 3 may be combined, provided that the specified timelines and load conditions are met for both the permit and 40 CFR 60 Subpart KKKK.”*



40 CFR Part 60 Subpart KKKK

ITT Protocol Approval Language for **Subsequent** Performance Testing

“NO_x performance testing in accordance with §60.4400 is required on an annual basis (no more than 14 calendar months following the previous performance test). If the NO_x emissions result from the performance test is less than or equal to 75% of the NO_x emissions limit for the subject turbine, the frequency of subsequent performance tests may be reduced to once every 2 years (no more than 26 calendar months following the previous performance test).”



Things to Remember

- Be informed and comply with the different federal/state notification requirements particularly in 40 CFR Part 60 Subpart A;
- Submit thorough and complete ITT protocols and ITT Transmittal forms to expedite scheduling – deficiencies can delay test start dates or worse result in rejected test reports, and
- By complying with the above, NOVs can be avoided for notification and test requirements.



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