

**San Joaquin Valley
Unified Air Pollution Control District
Permit Services**

Source Testing Frequency

Approved by: _____ Signed _____ Seyed Sadredin Director of Permit Services	Date: 10/9/97 _____
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Purpose: To establish guidelines for permit processing staff in determining adequate frequency of source testing that must be required as a condition of permit issuance for Authorities to Construct. The provisions of this policy apply to initial source tests and the routinely required source test thereafter. This policy does not limit the District's authority to require testing for compliance purposes when deemed necessary by the APCO.

I. Background

Prior to formation of the SJVUAPCD, each of the 8 county APCDs imposed differing emissions testing requirements. This policy is intended to standardize required testing frequency by providing guidance on the appropriate frequency of testing for most commonly permitted sources.

The following factors are important in determining the appropriate frequency of required emission testing:

A. Statutory Requirements for Testing

Source testing frequency for certain class and category of sources may be prescribed in federal, state, or local regulations that apply to the source. Generally, the permit terms and conditions must require a testing frequency that is at least as stringent as those required by the applicable requirements.

B. Nature of Basic or Control Equipment

The characteristics of the basic and control equipment must be carefully considered in determining an appropriate frequency of source testing. Specifically, the unit's performance over time must be examined and more

frequent source testing must be required if variation or performance deterioration over time can be expected.

C. Margin of Compliance

The degree of difficulty that a source may encounter in achieving and maintaining compliance must be taken into account in determining the appropriate source testing frequency. More frequent testing must be required if the expected emissions from the source are close to the applicable emissions limits.

D. Reliability of Emission Factors

Occasionally, permit applicants propose emission factors that are new or are different from those typically used for similar sources. In such circumstances, initial testing must be required to verify the emission factors.

E. Source Testing Feasibility

In establishing source testing requirements, it must be noted that certain types of equipment or operation do not lend themselves to source testing. Large sources (i.e. too big for total enclosure) of fugitive emissions without a stack are an example of such sources.

II. Source Testing Frequency

Except for units for which source testing is not possible as a practical matter, the source testing frequency shall be established as follows:

Step 1 - Establish the most stringent emissions limitation (including performance or work practice standard) that will be incorporated into the permit. The most stringent emissions limitations must be determined taking into account any applicable averaging time, test method, and transfer or collection efficiencies. (Refer to ST 2 policy for examples of how a test method can influence the stringency of an applicable emissions limit.) A written analysis documenting the comparison of multiple applicable requirements and the basis for selection of the most stringent emission limits must be included in evaluation.

Step 2 - Identify source testing requirements contained in each of the rules and regulations that apply to the proposed source. If the applicable requirements do not specify testing requirements, skip to step 4.

Step 3 - The testing requirement that is associated with the most stringent emission limitation is presumed to be appropriate and will be incorporated into the permit. If

more than one regulation with the same emissions limitation apply to the source (e.g., federal and local rules), then the most stringent source testing frequency must be incorporated into the permit.

Step 4 - If the most stringent emission limitation is associated with a rule or regulation that does not contain a source testing frequency (e.g., NSR), then a testing frequency that can assure compliance with the most stringent limit(s) as well as the less stringent permitted emission limitations must be developed as follows:

- Units equipped with a catalyst must be tested for NO_x, VOC, and CO (only pollutants controlled by the catalyst) upon initial start-up and annually thereafter.
- Combustion equipment served by a baghouse or electrostatic precipitator must be tested for PM₁₀ upon initial start-up and annually thereafter.
- Non-combustion equipment served by a baghouse with expected PM₁₀ emissions of 30 pounds per day or greater must be tested upon initial start-up. Units with PM₁₀ emissions in excess of 70 pounds per day should also be tested on annual basis.
- Units equipped with afterburner, thermal incinerator, or catalytic incinerator for controlling VOCs must be tested upon initial start-up and annually thereafter.
- Units equipped with carbon adsorption for control of VOCs must be tested upon initial start-up and annually thereafter.
- Asphaltic concrete plants must be tested for PM₁₀ and NO_x emissions upon initial start-up.
- Units served by a scrubber for PM₁₀ control with expected emissions in excess of 30 pounds per day must be tested upon initial start-up and annually thereafter.
- Cogeneration and resource recovery facilities utilizing external combustion boilers or turbines must be tested upon initial start-up and annually thereafter. NO_x, PM₁₀ and CO shall be tested for all units, SO_x for units fired on liquid or solid fuel, and VOC for units fired on waste gas which contains VOCs.
- Initial testing must be required for units served by a cyclone, with expected PM₁₀ emissions of 30 pounds per day or greater. Annual source testing should not be required for sources served by a cyclone for PM₁₀ control unless the nature and quantity of materials controlled by the cyclone can vary significantly.
- For emergency internal combustion engines, initial start-up and annual source testing should be required by the permit only if an underlying applicable rule or regulation requires such testing.
- Annual source testing must be considered if significant performance deterioration can be expected over time or if the margin of compliance is low.

- See section V of this policy for units covered by an approved Source Specific Permitting Policy (SSPP) or Guidelines for Expedited Application Review (GEAR).

III. Sources of Hazardous Air Pollutants

Notwithstanding the provisions of Section II of this policy, source testing frequency for hazardous air pollutants with potentially significant emissions must be determined on a case-by-case basis, taking into account the potential risk to the public health and the source's ability to readily comply.

IV. Small Sources

Notwithstanding the provisions of Section II of this policy, except when mandated by an applicable requirement, annual source testing for PM10, SOx, VOC, NOx, and CO emissions should not be required if the uncontrolled emissions from the unit is less than 30 pound per day for that pollutant.

V. Units with Source Specific Permitting Policy (SSPP) or Guidelines for Expedited Application Review (GEAR)

Notwithstanding the provisions of Section II of this policy, source testing frequency for units for which the District has established a SSPP/GEAR shall be that specified in the SSPP/GEAR.