

STANDARD OPERATING PROCEDURE FOR ELECTRONIC STACK TESTING REPORTING

1. APPLICABILITY. This Standard Operating Procedure (SOP) applies to stack testing materials received by the Bureau of Air Quality (BAQ). This standard operating procedure applies to all staff involved with the receipt, logging, reviewing and uploading of stack tests. This SOP does not apply to compliance tests performed on nonmetallic mineral processing plants (40 CFR part 60, subpart OOO).

2. PURPOSE. To establish standardized methods for managing the receipt, review and storage of stack test reports. Each stack test report is valuable to the BAQ as it contains emissions data about a licensee's air emissions units under specific operating conditions and is readily available to interested parties.

3. DEFINITIONS.

3.1 AIR EMISSIONS COMPLAINT TRACKING SYSTEM (AECTS) Database. AECTS Database means the internal BAQ database used to record and track activities at stationary sources regulated by the BAQ. It is used by Compliance, Enforcement and Stack Testing staff to record data about their activities which uploads to the AFS database. The emissions data contained in the AECTS database is used by licensing staff and others looking for emissions data information.

3.2 Emission. Emission means the release of regulated pollutants into the ambient air, or the regulated pollutants so released.

3.3 Emissions Unit. Emissions Unit means any equipment or pollutant-emitting activity of a source which emits or would have the potential to emit a regulated pollutant or hazardous air pollutant. This term is not meant to alter or affect the term 'unit' for purposes of Title IV of the CAA.

3.4 Facility. Facility, building, structure, or installation means all of the pollutant-emitting activities which belong to the same industrial grouping, are located on one or more contiguous or adjacent properties, and are under the control of the same person.

3.5 Fuel-burning Equipment. Fuel-burning Equipment means any furnace, boiler, apparatus, and all appurtenances thereto used in the process of burning fuel, for the primary purpose of producing heat and power, including stationary internal combustion engines. Due to the process nature of asphalt plants, these are not regulated as "fuel burning equipment"; see General process or general process equipment.

3.6 General Process Source or General Process Equipment. General Process Source or General Process Equipment means any emissions unit, except fuel-burning equipment, incinerators, and mobile sources. Included in this category are rock crushers and asphalt batch plants.

3.7 Licensee. Licensee means an owner or operator of a facility or piece of equipment where an Air Emissions License is required.

3.8 Owner or Operator. Owner or Operator means any person who owns, leases, operates, controls or supervises a regulated pollutant source.

3.9 Protocol. Protocol means a report describing what testing is going to take place, which reference testing method will be employed to perform the testing as well as a timeframe for the testing to occur.

3.10 Regional Inspector (RI). Regional Inspector means a person who is assigned to perform compliance inspections for the BAQ in one of the four regional offices within the State.

3.11 Stack. Stack means any point in a source designed to emit solids, liquids or gases into the air, including a pipe or duct, but not including flares

3.12 Stack Test. Stack Test means a compliance stack test is a stack emissions measurement performed following the procedures specified and developed by the US EPA or other methods approved by the Department. Such testing is required by DEP to be conducted by various stationary sources in the state to determine compliance with the applicable air emission limits and to evaluate the impacts on ambient Air Quality and made be used to determine emissions factors for the units tested.

3.13 Stack Test Engineer (STE). Stack Test Engineer means a person who is knowledgeable and responsible for the receipt, review and resolution of any issues that arise with protocols and stack testing. The STE is responsible for implementing SOP's for stack testing and records retention.

3.14 Stack Test Observation. Stack Test Observation means the activity where the STE or RI or both are present during a stack test to ensure that the testing is being performed in conformance with all applicable rules, regulations and the protocol submitted by the licensee. The determination of who observes the stack test is made by following the Stack Testing SOP.

4. TESTING PROGRAM REQUIREMENTS.

4.1 A protocol is received by the STE and the RI 30 days prior to any stack testing being performed.

4.2 A stack test is performed to determine if a facility is operating within the limits set by the facility's Air Emissions License or to gather emissions information, including but not limited to, the evaluation of impacts on Ambient Air Quality or to determine emissions factors.

4.3 A stack test is performed according to the protocol submitted by the licensee, unless amendments have been approved by the Department.

4.4 A completed stack test report must be submitted to the Department no later than 30 days after completion of the testing, unless otherwise stated in the EPA performance test method or waived by the Department.

5. PROTOCOLS REQUIREMENTS.

5.1 Every stack test requires that a protocol be received by both the STE and the RI 30 days prior to any testing being performed. The thirty day timeframe may be waived by the Department if there is a legitimate need to perform the testing sooner. The protocols shall be sent to the Department as a paper report and must be included in the final electronic report to the Department for completeness. Any protocols submitted to the Department must meet the requirements set in the Department's SOP for protocols.

5.2 Once a protocol is received by the Department, it is date stamped by either mail room staff or by the BAQ receptionist.

5.3 The protocol is then reviewed by both the STE and the RI. If it is determined to be complete, the stack test may be performed as scheduled. If there is information missing or the protocol is incomplete, the STE or the RI will request additional documentation. After the protocol has been reviewed by the STE and the RI, the STE will enter the date of the protocol into AECTS when found acceptable. The AECTS database will automatically generate a letter to the licensee that the protocol has been received and accepted

5.4 Once it is determined that the protocol is complete and the testing will be performed, the STE will place the test on the stack testing calendar. The stack testing calendar is located in Microsoft Outlook Mail Calendars. An Email will be sent to the RI who is responsible for the facility. If the stack test will be observed, it will be determined at this time and the initials of the observer placed on the stack test calendar. The stack testing SOP describes the steps that are taken to determine who is responsible for the observation of the stack test.

6. PERFORMANCE OF STACK TESTING.

6.1 The stack test must be performed according to the protocol approved by the Department. The stack test report must be submitted to the Department within 30 days of the end of testing unless otherwise stated in the EPA performance test methods or waived by the Department.

7. MANAGEMENT OF STACK TEST REPORTS.

7.1 Two copies of the stack test report will be submitted to the DEP either by Compact Disc (CD) or Digital Video Disc (DVD) in a PDF format with a cover letter signed by a responsible official certifying that the stack test report is true and accurate. When the test report is received by the STE it is logged into the database. The STE will ensure that a copy of the report is received by the RI for their review. The naming of the report is the responsibility of the STE.

7.2 Stack Testing Report Naming Convention. Each stack test uploaded onto the H: drive shall be named using the following convention. The name of the report will be determined and entered into the database after the initial receipt of the compliance stack test report by the STE. The data from the stack test reports will be entered into the database per the AECTS database manual. The stack test report name in AECTS will be hyperlinked to the actual downloaded stack test report on the H: drive.

7.2.1 The naming of a stack test report will be as follows:

- A. The first characters will be an A, followed by the three or four digit license number followed by an underscore (A1234_)
- B. The next eight characters will be the date that the testing was performed (year/month/day) (YYYY/MM/DD). If the testing took place on more than one day then it will be the starting date of all the testing.

7.3 Record Retention. Under this process, a stack test report will be submitted by CD or DVD in PDF form. If a report is submitted to the Department in a paper format, then the STE will have the report scanned or request an electronic copy from the licensee. If this is not possible, the report will be entered into the AECTS database and it will be noted that it was a paper copy and is filed with the stack test reports.

7.3.1 If the licensee is submitting CD or DVD, it will be uploaded onto the H: drive and the CD or DVD will be placed into a three ring binder. Each Licensed facility that tests on a regular basis will have its own binder named with the Air Emissions License Number.

7.3.2 If a stack test is performed on a source, such as an asphalt batch plant, which only has to perform a single, one time performance test, the report will be placed into a binder, labeled Miscellaneous Performance Tests with all of the supporting paperwork (protocol, letter of certification, test report, etc.) is punched and marked with the appropriate report number from the AECTS database. This is the responsibility of the STE.

7.3.3 Each CD or DVD that is placed in a binder shall have the report number written on it in permanent marker. Any supporting documentation that was submitted with the report shall be placed into the binder sleeve or be punched and placed into the binder adjacent to the sleeve holding the report, and must be marked with the report name. This is the responsibility of the STE.

7.3.4 The binders containing the CD's, DVD's and related paperwork are to be stored in the Enforcement and Stack Testing Section Chiefs office.

8. QUALITY CONTROL/QUALITY ASSURANCE.

8.1 At the end of each month the STE will QA/QC the data entered in the AECTS database is entered into the appropriate place and is complete.

8.2 On a monthly basis, the STE will prepare a stack test summary report that will contain the following;

- A. Which facilities were tested.
- B. Which units at each facility.
- C. The results of the stack tests
- D. The number of stack tests observed by the STE or the RI.
- E. The number of stack test reviewed by the STE and the RI's.
- F. The number of pass/fails.
- G. Any outstanding stack tests not reviewed or entered into the database and the reasons why it was not done.

8.3 This report shall be Emailed to the following;

- A. Director, Bureau of Air Quality.
- B. Division Director, Licensing and Enforcement.
- C. Division Director Field Services.
- D. Unit Section Chief Enforcement and Stack testing.
- E. Unit Section Chief Air Emissions Licensing.
- F. Unit Section Chief Air Compliance.
- G. Unit section Chief Air Emissions Inventory.