

## San Joaquin Valley Air Pollution Control District

### District Policy APR 1705 Source Testing Frequency

Approved By:  Brian Clements Director of Permit Services	Approval Date: October 9, 1997 Revision Date: April 2, 2025
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#### I. 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 Authority to Construct (ATC) permits. The provisions of this policy apply to initial and ongoing source tests. This policy does not limit the District's authority to require testing for compliance purposes when deemed necessary by the APCO. Nothing in this policy supersedes any applicable federal, state, or local rule or regulation.

#### II. Source Testing Applicability Determination Considerations

The following factors shall be utilized to determine the need for source 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 if initial and ongoing source testing is required. Specifically, the unit's performance over time must be examined and more frequent source testing may 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. Initial and ongoing testing may be required if the expected emissions from the source are close to the applicable emissions limits.

#### D. Reliability of Emission Factors

Occasionally, permit applicants proposing technologies or emission factors that are new or are different from those typically used for similar sources. In such circumstances, initial testing may be required to verify the emission factors. Representative source testing can be considered as appropriate (see Section VII below).

#### E. Source Testing Feasibility

In establishing source testing requirements, it must be noted that certain types of equipment or operations do not lend themselves to source testing. Certain sources, e.g. those that cannot accommodate a total enclosure, fugitive emissions, etc., are examples of such sources.

#### F. Sources of Hazardous Air Pollutants

The 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.

### **III. Procedure for Determining 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 - Based on the ATC permit Application Review, identify 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.

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

Step 3 - If more than one applicable rule or regulation with the same emissions limit apply to the source, 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 emissions limits should be established considering the factors identified in Section II of this policy. Standard determinations have been established in Section IV below.

#### **IV. Standard Source Testing Applicability Determinations**

- Units equipped with a catalyst must be tested for NO<sub>x</sub>, VOC, and CO (only pollutants controlled by the catalyst) upon initial start-up and annually thereafter.
- Units equipped with afterburner, thermal incinerator/oxidizer, or catalytic incinerator/oxidizer for controlling VOCs must be tested upon initial start-up and annually thereafter. Upon successfully demonstrating compliance on two consecutive annual source tests, the following annual source test may be deferred for up to 36 months. If the result of the 36-month source test fails to demonstrate compliance with the permit limit(s), the source testing frequency shall revert to annually.
- Non-combustion equipment served by a baghouse with expected PM<sub>10</sub> emissions of 30 pounds per day or greater must be tested upon initial start-up. Units with PM<sub>10</sub> emissions in excess of 70 pounds per day should also be tested on annual basis.
- Units equipped with carbon adsorption for control of VOCs must be tested upon initial start-up and annually thereafter.
- Units equipped with a scrubber for control of VOCs must be tested upon initial start-up and annually thereafter.
- Units served by a scrubber for PM<sub>10</sub> control with expected emissions in excess of 30 pounds per day must be tested upon initial start-up and annually thereafter.
- Asphaltic concrete plants must be tested for PM<sub>10</sub> and NO<sub>x</sub> emissions upon initial start-up.
- Cogeneration and resource recovery facilities utilizing external combustion boilers or turbines must be tested upon initial start-up and annually thereafter. NO<sub>x</sub>, PM<sub>10</sub> and CO shall be tested for all units, SO<sub>x</sub> for units fired on liquid or solid fuel, and VOC for units fired on waste gas which contains VOCs.
- Combustion equipment served by a baghouse or electrostatic precipitator must be tested for PM<sub>10</sub> upon initial start-up and annually thereafter.
- Initial testing must be required for units served by a cyclone, with expected PM<sub>10</sub> emissions of 30 pounds per day or greater. Annual source testing should not be required for sources served by a cyclone for PM<sub>10</sub> control unless the nature and quantity of materials controlled by the cyclone can vary significantly.

#### **V. Small Sources**

Source testing is not required if the uncontrolled emissions from the unit are less than 30 pound per day for that pollutant, except if required based on the aforementioned provisions of this policy.

#### **VI. Units with Source Specific Permitting Policy or Guidelines for Expedited Application Review (GEAR)**

Notwithstanding the aforementioned provisions of this policy, for units for which the District has established another Policy or GEAR, the source testing frequency shall be as specified in that Policy or GEAR.

## **VII. Certifications**

Except as required by applicable rule or regulation, source testing is not required for units that are EPA, CARB, or District certified to meet the required emissions standard. Initial and ongoing portable analyzer monitoring may be required to ensure proper installation and maintenance of the equipment.

## **VIII. Representative Source Testing**

All units in the representative source testing pool shall comply with all source testing requirements under any applicable federal, state, or local rule or regulation. If opting to utilize allowed representative/pooled source testing requirements from an applicable rule or regulation, the units shall follow those requirements and are prohibited from utilizing representative source testing under this policy. For example, units subject to District Rules 4306, 4320, and 4702 are prohibited from utilizing representative source testing under this policy.

Initial and ongoing representative source testing may be allowed for a pool of units provided all of the following are satisfied:

- Initial source testing of a group of at least 20% of the pool is required within 120 days after start-up,
- Ongoing source testing of at least 20% of the pool is required annually,
- The representative test groups shall rotate each year so that within five years all units in the pool have been tested at least once,
- The emissions from all test runs from units in the group are less than 90% of the permitted limit and do not vary greater than 25% from the average of all the test runs in the group,
- All the units are located at the same stationary source,
- All the units are identical, including make, model, control system, rated capacity, permitted emissions, and operating specifications,
- All the units are utilized under the same normal operating conditions (e.g. type of use, load, etc.),
- All the units are maintained in the same manner and frequency, and
- The District, based on documentation submitted by the stationary source:
  - Determines that the margin of compliance for the identical units tested is significant and can be maintained on an on-going basis; or
  - Determines based on a review of sufficient emissions data that, though the margin of compliance is not substantial, other factors allow for the determination that the variability of emissions for identical tested units is low enough for confidence that the untested unit(s) will be in compliance. These factors may include, but are not limited to, the following:
    - Historical records at the tested unit showing consistent invariant load,
    - Fuel characteristics yielding low variability and therefore assurance that emissions will be constant and below allowable levels,

- Statistical analysis of a robust emissions data set demonstrating sufficiently low variability to convey assurance that the margin of compliance, though small, is reliable.
- Should any of the representative units exceed the required emission limits, or if the District determines that the criteria above for representative testing have not been fulfilled, each of the units in the group shall individually perform source testing to determine compliance within 120 days of the failed source test or District notification that representative testing criteria has not been met. Representative source testing may resume after all units have tested and demonstrate compliance.

### **VIII. Revisions to this Policy**

#### 4/2/25 Revisions:

- Updated formatting and organization of policy
- Clarified various provisions of this policy
- Added Sections VII (Certifications) and VIII (Representative Source Testing)