



## **Response to Comments**

**3/26/08**

## **Source Test Guidance Manual**

The proposed Source Test Guidance Manual was made available for public comment from May 9, 2006 – July 7, 2006.

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## **Events**

May 4, 2006 - DEQ sent a notification letter to eleven source testing firms to let them know that the draft Guidance Manual was available for public comment and that DEQ would host an informational meeting on May 25.

May 9, 2006 - The proposed Source Test Guidance Manual was originally made available for public comment May 9, 2006 –June 7, 2006.

May 11, 2006 - DEQ sent a notification email to facilities that electronically submitted a 2005 air emissions inventory to DEQ to let them know that the draft Guidance Manual was available for public comment and that DEQ would host an informational meeting on May 25.

May 25, 2006 - The informational meeting was held at DEQ's state office at 3:00 p.m. and one representative from a source testing company attended.

Prior to June 7, DEQ received a request to extend the public comment period and DEQ extended the comment period through July 7, 2006.

September 2007 - DEQ notified EPA of impending changes to the Source Test Guidance Manual and questioned whether a revision to the State Implementation Plan (SIP) was necessary since DEQ was intending to replace Section I, *Source Test Methods*, of the September 1986 - Procedures Manual for Air Pollution Control (Procedures Manual).

March 27, 2008 - EPA notified DEQ that a SIP revision is not necessary since the revisions to guidance are limited only to Section I of the 1986 Procedures Manual for Air Pollution Control. Section II, *Evaluation of Visible Emissions Manual*, of the Procedures Manual is referenced in IDAPA 58.01.01.625.04.b and incorporated into Idaho's SIP.

## **Comments**

The comments received by DEQ regarding the Source Test Guidance Manual are presented below. General comments on the overall guidance document are provided first, with comments regarding specific sections of the Guidance Manual provided further on and separated by section.

### **General Comments**

1. Unfortunately, we believe the document increases the complexity of stack testing procedures and requirements—without meaningful environmental benefits. The guidance document includes several new recommended procedures and is more rigid than necessary.  
Our conclusions and recommendations are:
  - That the proposed Stack Testing Guidance Manual be withdrawn, and further work on guidance be postponed.
  - That DEQ first complete the air quality permit streamlining effort since source testing is a key component of that program.
  - That the agency considers adopting rules to include reasonable testing requirements.
  - That DEQ, industry and other stakeholders jointly participate in drafting a flexible and simplified guidance document.

*Response to comment 1: DEQ did postpone work on the Source Test Guidance Manual to focus resources on the air permit streamlining effort, which is why the response to comments was delayed. DEQ does not plan to adopt additional rules regarding source test requirements. The Source Test Guidance Manual is meant to explain the status quo of source test review and approval, define where options are available, and clarify some technical issues. It is not meant to add requirements or complexity for completing a source test. DEQ is revising the language of the guidance manual so that it is less rigid and makes it clear that not all items listed in the Guidance Manual are required to be in every source test report and protocol. After addressing comments, DEQ will again make the revised draft Source Test Guidance Manual available for comment.*

2. IACI members who operate in multiple states report that testing procedures in those states take a third or less time and cost significantly less. Some of these companies will provide detailed comments and more information on the comparison of the Idaho program and other states. The current provisions in the proposed manual would unnecessarily increase the cost of doing business in Idaho, especially compared to other states. We believe the proposed manual would also increase costs to DEQ.

*Response to comment 2: DEQ does not intend to require significantly more detail in test reports than other states require, unless DEQ is being compared to states that don't actively review source test reports and just accept the results. Most of the guidance provided in the manual comes from EPA guidance documents, so most states should have similar requirements. For example, see Emission Measurement Center Guideline Documents GD-042, Preparation and Review of Site-Specific Emission Test Plans and GD-043, Preparation and Review of Emission Test Reports. These documents can be found on EPA's Emission Measurement Center website at: <http://www.epa.gov/ttn/emc/guidlnd.html>. Some details also came from the State of Pennsylvania's Source Testing Manual, Revision 3.3, November 2000, which can be found at: <http://www.dep.state.pa.us/dep/deputate/airwaste/aq/source/source.htm>.*

3. The proposed guidance is overly restrictive to both industry and source testing consultants. The draft guidance document lists unnecessary and redundant information required for source test protocols and stack testing reports. In addition, the suggested frequency for collecting stack testing data, process data and pollution control equipment data is unnecessary. Stack testing methods, sampling times, and sampling volumes need to be reevaluated. The proposed criterion for approving source tests sets a standard for accepting data that is impossible to meet. The proposed guidance will increase the amount of time and effort required for both industry and DEQ.

*Response to comment 3: DEQ acknowledges these statements. More specific comments were received that are related to some of the statements provided in this comment and those comments and responses can be found further below in this comment document. Some of the information in the test protocols and reports is redundant because it should be in both documents to make them complete, understandable documents. DEQ does not intend to require additional effort and cost beyond the level we have been requiring the past 2-3 years.*

- 4.a I have managed several hundred emission test projects during my career. Based on my experience it appears that the Department currently expends an inordinate amount of time on test review and approval. During 2005 the IDEQ spent over 700 hours reviewing source tests from Potlatch Pulp and Paper, incurring expenses of over \$31,000 for this activity. I am concerned that the proposed guidance will add more red tape to this

process. The resources required to assemble and review the extraneous information requested will further add to the costs of conducting tests for industry and the Department and will provide no environmental benefit.

- 4.b A more appropriate and effective method of standardizing and streamlining the Department's testing oversight process would be to modify the Department's rules to include reasonable testing project requirements. I have attached sample test regulations that may be useful. (The commenter attached a 20 page rule section that appears to contain source test rules from the state of Minnesota, Chapter 7017. The rule attachment was not included with these comments but is available from DEQ upon request. Please reference Potlatch comments when making the request.)

*Response to comment 4. The Guidance Manual is meant to provide consistency and guidance in an effort to reduce the amount of time DEQ has to expend reviewing source tests. One of the primary goals of the Guidance Manual is to reduce the time spent reviewing reports by reducing the number of reports that include unapproved test method deviations, incorrect test methods, missing data, etc. When DEQ encounters these issues in test reports it takes many hours to resolve them.*

*DEQ is also working to reduce the number of hours spent reviewing protocols and test reports. We pay attention to the average hours spent reviewing documentation and try to find ways to reduce the time. We have developed standard spreadsheets that we use to check calculations and standard forms for assuring conformance with test method quality assurance requirements.*

*It should also be noted that hours billed to Title V sources include paid leave taken by employees which includes holidays, vacation, and sick leave. On average, paid leave accounts for about 15% of total time.*

*Average Potlatch test report review time for 2004, 2005 and 2006 was:*

<i>Year</i>	<i>Total time</i>	<i>Leave time</i>	<i>Actual time worked</i>	<i>Number of protocols and tests reviewed</i>	<i>Average hours worked per protocol and/or test reviewed</i>
<i>2004</i>	<i>474</i>	<i>85</i>	<i>389</i>	<i>22</i>	<i>17.5</i>
<i>2005</i>	<i>703</i>	<i>142</i>	<i>561</i>	<i>35</i>	<i>16</i>
<i>2006</i>	<i>222</i>	<i>27</i>	<i>195</i>	<i>15</i>	<i>13</i>

*The commenter has requested that much of the guidance be incorporated directly into the rules, such as the State of Minnesota has done (see Minnesota Pollution Control Agency rules, Chapter 7017). DEQ believes the guidance will be more flexible and easily updated by maintaining a separate guidance document, rather than incorporating all guidance into the rules, and DEQ plans to proceed with a separate guidance document.*

5. Amalgamated requests that IDEQ withdraw this document until IDEQ's air quality permit streamlining efforts are completed. Source testing is a key component of the streamlining effort. Eliminating unnecessary time and effort will be beneficial to both industry and IDEQ. A guidance manual jointly developed by IDEQ and industry will meet with greater success than a manual mandated solely by IDEQ.

*Response to comment 5. DEQ did postpone finishing the Source Test Guidance Manual until after the permit streamlining effort was implemented. The Source Test Guidance Manual*

*comment period ended July 7, 2006. DEQ then postponed responding to the comments received until now. DEQ held an air quality Kaizen event to initiate streamlining the permit to construct process on October 16-20, 2006. DEQ agrees that eliminating unnecessary time and effort is a goal of both the permit streamlining initiative and the Source Test Guidance Manual. At this time, DEQ does not plan to host joint negotiations for the Guidance Manual, but it will be made available for public comment a second time.*

## **Relationship Between Guidance and Rules**

6. While we generally prefer rules, we do recognize guidance can provide a resource for agency staff and can assist the regulated community by promoting consistency in enforcement of rules. However, guidance must not be substituted for rule and must not be mandatory—it must allow for options.

*Response to comment 6: DEQ concurs that guidance is not meant to substitute for rules. The Source Test Guidance Manual is meant to provide guidance on how DEQ implements the source test rules already in place and appearing in IDAPA 58.01.01.157. The language in the Guidance Manual was revised in several places to insure readers understand the guidance is not a law.*

7. A more appropriate and effective method of standardizing and streamlining the Department's testing oversight process would be to modify the Department's rules to include reasonable testing project requirements.

*Response to comment 7. The information in the Guidance Manual is meant to be guidance for implementing the existing rules, so DEQ feels expanding the rules is not necessary. The central purpose of the Guidance Manual is to provide some certainty and flexibility in source testing. The rule (IDAPA 58.01.01.157) acknowledges approved test methods, but then provides the Department with the authority to allow deviations from the approved test methods. It would be administratively difficult and time consuming to promulgate a rule for each proposed deviation from an accepted method.*

8. The proposed Guidance Manual opens with a disclaimer that implies that it “does not have the force and effect of a rule.”

**The guidance manual does not have the force and effect of a rule** and is not intended to supersede statutory or regulatory requirements or recommendations of the state of Idaho or the Environmental protection agency. [proposed Guidance Manual, page iv; emphasis added]

However, language in the proposed Guidance Manual is not consistent with the disclaimer.

Due to the complexity and variability of testing methods and results, **only source tests conducted in conformance with the methods detailed in or referenced by this manual will meet the requirements of the rules for the following approved procedures.** [proposed Guidance Manual, Chapter 1, page 1; emphasis added]

**Failing to test in accordance with the procedures outlined in this manual may result in the rejection of the test.** [proposed Guidance Manual, Chapter 1, page 1; emphasis added]

The language in the proposed Guidance Manual, as shown above, states that this “guidance” is not optional. This matter of “guidance vs. rule” as applies to the proposed Guidance Manual is further complicated by what the applicable rules for emission testing state:

04. Reporting Requirements. If the source test is performed to satisfy a performance test requirement...a written report shall be submitted to the Department within 30 days of the completion of the test. The written report shall:

- a. Meet **the format and content requirements specified by the Department in any applicable** rule, regulation, **guidance**, permit, order or consent decree. Any deviations from the format and contents specified require prior written approval from the Department. Failure to obtain such approval may result in the rejection of the test results. [IDAPA 58.01.01.157.04; emphasis added]

Thus, this proposed Guidance Manual, once finalized by the Department, does have the force and effect of a rule. What DEQ has proposed is essentially a 59 page addition to the rules. Therefore, it is even more important that the proposed Guidance Manual be carefully crafted to reflect the actual requirements for information submitted to the Department and that the format requirements are consistent with those requirements. This issue alone should be sufficient justification for DEQ to work with stakeholders about what is really needed in this Guidance Manual.

*Response to comment 8: DEQ has reviewed the language used in the Guidance Manual and made changes to make it clearer that the Guidance Manual itself is not a rule, but is guidance used to explain the application of the rules. DEQ acknowledges that the Section 157.04.a of Rules requires written reports to meet the format and contents specified in guidance, among other things. DEQ has attempted to write the guidance to provide options and only require content that is also required by state or federal rule and the test methods. Sections of the Guidance Manual that the commenter specifically refers to above were modified as follows:*

Prior language

*Due to the complexity and variability of testing methods and results, **only source tests conducted in conformance with the methods detailed in or referenced by this manual will meet the requirements of the rules for the following approved procedures.*** [proposed Guidance Manual, Chapter 1, page 1; emphasis added]

New language

*Due to the complexity and variability of testing methods, source tests conducted in conformance with the methods referenced by this manual will minimize the variability of test results.  
Source testing conducted in accordance with this guidance document will allow DEQ to accept the results with minimal or zero follow-up information requests to the facility or test contractor.*

Prior language

***Failing to test in accordance with the procedures outlined in this manual may result in the rejection of the test. [proposed Guidance Manual, Chapter 1, page 1; emphasis added]***

New language

*Failing to test in accordance with approved test methods may result in the rejection of the test.*

*It should be noted that IDAPA 58.01.01.157.01.b. specifically acknowledges a requirement to test in accordance with approved test methods as it states: “Without prior Department approval, any alternative testing is conducted solely at the owner’s or operator’s risk. If the owner or operator fails to obtain prior written approval by the Department for any testing deviations, the Department may determine the test does not satisfy the testing requirements.”*

9. The regulatory implications of the guidance are not clear. While the disclaimer indicates the guidance is not enforceable, IDAPA 58.01.157.04 a. requires the written report to “Meet the format and content requirements specified by the department in any applicable rule, regulation, guidance, permit, order or consent decree.”

*Response to comment 9: See response to comment 8.*

10. Simplot understands the need for DEQ to have guidance on various matters, such as source testing. Guidance provides a resource for agency staff as they implement the rules. Guidance can also assist the regulated community as they implement rules. However, for guidance to be “guidance” it needs to provide options on how the rules are to be implemented. After all, “guidance” implies that it is optional. The proposed Guidance Manual is a very detailed and prescriptive document on writing source testing protocols, requirements for sources and requirements for reports. These detailed and prescriptive requirements present a number of issues: relationship of guidance and rules, very broad information requirements, imposition of new requirements not required by rules or permit, and requirements without technical basis. Simplot recommends that this guidance be withdrawn and that the agency meet with stakeholders (regulated community, source testers, and other interested parties) to discuss the issues and problems that the agency is having with source test protocols and reports. Simplot believes a true discussion among all the parties would result in a better understanding of what the needs are for guidance and the development of such guidance.

*Response to comment 10: DEQ has reviewed the numerous comments received on the draft Source Test Guidance Manual and made some changes to the language to make it less prescriptive. The guidance is not meant as new rules, but to explain how DEQ has been and will continue to implement the existing rules. The guidance is also meant to provide consistency in reports between various source test companies. The Idaho Attorney General’s office was consulted regarding the relationship of rule versus guidance and the Attorney General’s office determined that the Guidance Manual was written as guidance.*

## Requirements are Broad and Excessive

11. Simplot's fundamental position on source test protocols and reports is that the protocol and report should reflect what is required by the source test method and the recordkeeping and monitoring specifically required for that source in a permit, consent order, consent decree, federal rule or state rule. The proposed Guidance Manual goes way beyond this and needs to be revised.

*Response to comment 11: DEQ agrees with Simplot's position that source test protocols and reports should reflect what is required by the source test method and the recordkeeping and monitoring required for the source. In addition, the Guidance Manual addresses other issues such as observation of tests by DEQ staff, identifies which test methods are presumptively approved and how to request approval for deviations from those test methods, identifies EPA's Electronic Reporting Tool is an acceptable format for report submittal, discusses the process and control device monitoring requirements that should be undertaken during a test, and discusses how to address a few technical issues that arise on occasion.*

12. This draft guidance document is very detailed and includes several new recommended procedures. Both industry and other stakeholders are concerned about the rigidity of the guidance procedures and methods. As a result, Amalgamated requests that IDEQ withdraw this document and invite industry and other stakeholders to participate with IDEQ in drafting a more flexible and simplified guidance document.

*Response to comment 12: After reviewing the comments received, DEQ has revised the language in the Guidance Manual to lesson the implied rigidity of the guidance. At this time DEQ does not plan to host participation in drafting the Guidance Manual beyond making the Guidance Manual available for public comment a second time.*

13. The proposed guidance is overly restrictive to both industry and source testing consultants. The draft guidance document lists unnecessary and redundant information to be included in the source test protocols and stack testing reports. In addition, the suggested frequency for collecting stack testing data, process data and pollution control equipment data is unnecessary. Stack testing methods, sampling times, and sampling volumes need to be reevaluated. IDEQ proposed criteria for approving source tests suggests that unless industry completes a "perfect" test then the data will be rejected. This is not possible. The proposed guidance will increase the amount of time and effort for both industry to complete and IDEQ to approve source tests.

*Response to comment 13: The purpose of a protocol is to define the purpose of a test and explain how the test will be conducted and how the data will be reported so that the test company, the facility, and DEQ can agree on the appropriate conduct of the test prior to expending the time and effort to complete the test. There will be redundancies between the protocol and test report because the report should include the information outlined in the protocol. There is monitoring of process data and pollution control data that needs to be done during a test to demonstrate how the source was operating, and the frequency of monitoring during a test often needs to be more frequent than is usually required by normal periodic monitoring included in a permit. That is, if a permit requires the liquid flowrate to a scrubber to be monitored once per week, that frequency will not be adequate during a source test to demonstrate how the source was operating during a three-hour test period. Because of this issue DEQ is including guidance in the source test manual regarding what an expected frequency of monitoring is during a test.*

*Overall DEQ does not want to significantly increase the amount of time and effort that industry, testers, and DEQ need to conduct and approve a source test. However, DEQ does receive some test reports that are lacking information and that causes DEQ to request the missing information from the test contractor or facility. Hopefully the Guidance Manual will reduce the amount of information that is missing or incorrect and help to reduce the overall amount of time and effort spent reviewing test reports.*

## **Requirements Imposed Without Regulatory Basis**

14. The proposed Guidance Manual contains requirements that have no regulatory basis. As such, they need to be stricken. Specifics include:
- Requirements for calibration, certification and recordkeeping for processes, process control equipment, monitors and other related equipment that are not required by existing permits, rules, Orders or Decrees. See comments to Chapter 5, Bullets #10, #11, and #14; Chapter 7.5; and Chapter 8.
  - The certifications required in Chapter 5, Bullet #16; Chapter 7.6; and Chapter 7.11.1 have no basis and should be deleted. As noted earlier in these comments, the rules already require a certification as to the accuracy, truth and completeness of any monitoring data submitted. Why does DEQ believe it needs these additional certifications?

*Response to comment 14: The requirements for calibration, certification, and recordkeeping for processes, process control equipment, monitors and other related equipment are included in the Guidance Manual because that information is needed to demonstrate that a source is operating at worst-case normal conditions. In addition, on-going emission compliance demonstrations are usually based on throughput limits and control device operating parameters. DEQ and the public needs to have some assurance that the production data and control device parameter data are reasonably accurate in order to assure continuing compliance.*

*DEQ did remove the certification request in the protocol by the test team leader and facility representative regarding the incorporation of all test requirements in the protocol. The additional certifications are used to provide assurance that the persons responsible for various portions of the test report (laboratory data, field sheets, protocol) have reviewed and approved the data and reports they are responsible for. These certifications are for the benefit of the facility owner/operator as well as DEQ. The facility responsible official is required to certify the truth, accuracy, and completeness of the overall report, so the certification of portions of the report by the persons responsible for creating them can give the responsible official additional assurance that the information they are certifying is accurate.*

### **Section 1 – General**

15. We believe the title of this document needs to be changed to more accurately reflect what it covers. This guidance has no direct impact on the conduct of a stack test. We suggest that the title should be “Source Test Protocol and Reporting Guidance”

*Response to comment 15: DEQ has decided to keep the title of document as it is, The Source Test Guidance Manual. While the manual doesn't explain how to physically conduct a stack test, it does provide guidance on various aspects of conducting tests in the State of Idaho, such as where to find the approved test methods, how to obtain approval for deviations from the test methods, and some technical issues related to test conduct and compliance determination, e.g., audit samples and detection limits.*

16. The comments provided are directed at keeping the proper focus on the purpose of source testing: accurate measurement of emissions. The proposed Guidance Manual goes way beyond this. The detailed, prescriptive requirements for the protocols and reports as found in this proposed Guidance are not needed for the purpose of "accurate measurement of emissions." The implementation of this proposed Guidance Manual will result in additional resources to be expended by both sources and DEQ with no real benefit to the environment or to the public. As an example, for a simple RM5 test we expect that meeting these requirements will increase analytical costs by 20% and source test costs by 20-25%. This is a substantial cost increase that we believe is not justified.

*Response to comment 16: DEQ does not intend for this document to require additional resources to complete source test reports and protocols beyond those that have been required the past few years. The Guidance Manual attempts to address nearly all of the documentation that could be required for various source test situations. Not all of the information outlined in the Guidance Manual is expected to be provided in every test protocol and test report. DEQ has revised the language in the Guidance Manual to make the overall tone of the guidance less rigid.*

17. Is this guidance only for source tests used to determine compliance?

*Response to comment 17. In general, yes, the Guidance Manual is meant for tests conducted to demonstrate compliance with an applicable rule or emissions limit. DEQ recognizes that facilities conduct "engineering tests" to learn more about their emissions units. DEQ does not expect that those test reports would have the same level of detail, especially when they are not submitted to DEQ. However, the Guidance Manual provides an outline of information that facility Environmental Managers may want to use when determining the level of detail they want in the "engineering test" reports.*

18. Is DEQ delegated as the Administrator for the purposes of 40 CFR 63.7(c)(2)(i), and, if so, is this guidance to be interpreted as a "request" for a test plan?

*Response to comment 18. Yes, DEQ is the delegated Administrator for the purposes of MACT (40 CFR 63) for Title V sources. Non-Title V sources remain the responsibility of EPA<sup>1</sup>. States are not delegated authority to approve major alternatives to test methods in accordance with 40 CFR 63.91(g)(2).*

*The Guidance Manual is not meant to be a broadly applicable "request" for a test plan for each MACT source. Specific requirements for submittal of a test plan will be found in each MACT Subpart or permit.*

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<sup>1</sup> See the June 14, 2007, letter to Ms. Toni Hardesty, DEQ Director, from EPA Region 10 titled, "Delegation of National Emission Standards for Hazardous Air Pollutants (NESHAPs) to the Idaho Department of Environmental Quality (IDEQ) as in effect July 1, 2006." As of December 3, 2007, this letter was available on DEQ's website at:

[http://www.deq.idaho.gov/air/prog\\_issues/toxics/epa\\_neshaps\\_ltr\\_0607.pdf](http://www.deq.idaho.gov/air/prog_issues/toxics/epa_neshaps_ltr_0607.pdf)

19. Suggest that testing should be done by an independent test company.

*Response to comment 19. DEQ has included a recommendation that testing is conducted by an independent test company. The following sentence was added to page 1 under Source Test Acceptance, General. "It is preferred, but not required, that source testing conducted to determine compliance with an emissions standard is conducted by an independent test company."*

## **Source Testing Defined**

20. It is confusing to insert "...or the accuracy of a monitor or gauge" in this guidance. This item appears to relate to CEM's and should be addressed separately.

*Response to comment 20: The Guidance Manual does include limited guidance related to continuous emissions monitors (CEMS). However, referring to the term "gauge" was confusing and not defined. The sentence was changed to state, "or the accuracy of an emissions monitor."*

21. Source Testing Defined (Chapter 1, page 1): Suggest putting "emissions" in front of the word "monitor" to clarify that we are talking about emissions monitors (CEMS or COMS). The proposed Guidance Manual also uses the word "gauge." Simplot is not sure what is meant by "gauge" in relation to the definition of source testing.<sup>2</sup>

*Response to comment 21: The proposed change was made to include the word "emissions" in front of the word monitor in the definition of source testing. The word gauge was also removed from the definition because, although emissions gauge could be another term for an emissions monitor, it is not commonly used in source testing vernacular.*

22. This definition should explain different types of tests and, for compliance purposes, be consistent with EPA's definition in the 2005 source test guidance. This would clarify what types of tests need to follow the proposed guidance.

*Response to comment 22: The definition of source test in the Guidance Manual is not the same as EPA's definition in the 2005 National Stack Testing Guidance because the definition of stack testing in EPA's guidance is limited to tests conducted for the purpose of demonstrating compliance with standards in 40 CFR 60, 61, or 63. DEQ often requires stack tests to demonstrate compliance with other emission limits which were imposed to maintain compliance with the national ambient air quality standards or some other purpose under the SIP. Therefore, DEQ's definition is purposely more broad. EPA's definition is as follows:*

*Any performance testing conducted for the purposes of determining and demonstrating compliance with the applicable standards of 40 CFR Parts 60, 61, and 63 using promulgated test methods, other test methods or procedures cited in the applicable subpart(s), or alternative test methods approved by the*

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<sup>2</sup> Source testing is a measurement of the emissions from a source. Such information is often then used for the following purposes: (a) shows emissions in relation to a limit, (b) determination of accuracy of a continuous emission monitor, or (c) as required in some NESHAP rules, establish operating ranges for control equipment.

*Administrator under §§ 60.8, 61.13, or 63.7. It does not include visible emission observation testing.*

*DEQ clarified which tests need to follow the guidance in the paragraph following the definition of stack testing on page 1, under Source Test Acceptance, General. The Guidance Manual now states, “All source testing conducted to satisfy a performance test requirement or to determine compliance with an applicable emissions standard imposed by state and/or federal rules or regulations (e.g., New Source Performance Standard), a permit, an order, or a consent decree should be conducted in accordance with the requirements of the rules/regulations.”*

23. Suggest specific types of tests be described as follows:

- **Data submittal engineering tests-** Are conducted voluntarily by the owner or operator of the emission facility for the purpose of submitting the results to support a permit application, emission inventory, or any other type of data submittal. Methods and procedures commensurate with the data quality objectives, including deviations from approved methods, will be accepted. Notification procedures are not required.
- **Performance Tests Initiated By the Company** – Are conducted to measure emissions at a higher operating rate where a limit was imposed after a previous test.
- **Performance Tests Conducted to Meet Permit or Rule Requirement-** Are conducted to measure emissions at a higher operating rate where a limit was imposed after a previous test.
- **True Engineering Tests-** Conducted solely for a Company’s own information with no intention to use the results as a data submittal. The test need not conform to the notification, procedures and submittal requirements, but if the test indicates noncompliance with a particular limit the Company must inform the agency if the results constitute a deviation. The Agency can request test results, if necessary.

*Response to comment 23: DEQ did not choose to define different types of tests within the manual. However, DEQ did acknowledge that not all tests need to have the same level of quality assurance, especially for engineering tests that a facility conducts for their own information. DEQ added some language in section 2 of the Guidance Manual, Determination of Test Acceptance, explaining that not all test reports have to meet the same level of quality assurance.*

## **Source Test Acceptance, General**

24. Source test acceptance- the requirement that only tests conducted in conformance with the methods detailed or reference in the manual is overly restrictive and may not be appropriate in all applications. Methods should be selected based on data quality objectives, good engineering judgment and the purpose of the test.

*Response to comment 24: In the first draft the language in this section was as follows: “Due to the complexity and variability of testing methods and results, only source tests conducted in conformance with the methods detailed in, or referenced by, this manual will meet the requirements of the rules for following approved procedures.” DEQ recognizes that there may*

*be reasons to use other test methods that are not currently referenced by the Guidance Manual. For example, there may be new methods developed in the future, and those test methods should not be excluded from use. The language has been changed to say, “Due to the complexity and variability of testing methods, source tests conducted in conformance with the methods referenced by this manual are approved test methods and the use of those methods will minimize the variability of test results.” DEQ acknowledges other methods may be approved on a case-by-case basis.*

## **Source Test Conditions, General**

25. In some cases such as “soot blows”, etc. it may be better to conduct 3 runs at normal conditions and 1 run during the other periodic worst-case conditions such as a soot blow. This is an example—there may be other cases in which worst-case may only occur once a day or once a week, in which case testing during a worst-case condition is not practical.

*Response to comment 25: Regarding normal operating conditions DEQ relies on the definition of worst-case normal operating conditions as provided in the rule (IDAPA 58.01.01.157.02.a) and EPA guidance on representative testing conditions as provided in the EPA’s Clean Air Act National Stack Testing Guidance found in Appendix E of the source test manual. EPA’s guidance states, “Since the CAA requires continuous compliance with emissions limits except where explicitly excused, EPA interprets applicable regulations to require that any stack test that is conducted within the scope of this guidance must demonstrate that a facility is capable of complying with the applicable emissions standards at all times.” EPA’s guidance addresses soot-blowing in Section 5, Representative Testing Conditions.*

26. Worse cast normal as it relates to production rates should be defined – i.e. 90% of the 95<sup>th</sup> percentile previous year’s average daily operating rates. This definition currently exists in Potlatch’s Pulp and Paper Tier 1 permit.

*Response to comment 26: DEQ did revise the manual to include examples of worst-case normal operation for various situations, one of which is 90% of the 95% percentile of average operating rate.*

## **Stack Configuration and Access**

- 27.a Stack configuration and access- this is covered in the source’s permit (if applicable)—and is confusing here. Items c, d, and e do not relate to stack testing.
- 27.b Not all facilities have instrumentation installed to monitor and record emissions data or ambient emissions data. This should only be required for sources with continuous emission monitoring requirements. Manual recording of process data at regular intervals during a source test is a reasonable request.

*Response to comment 27: The rules give DEQ the authority to require sources to provide sampling ports, safe access, and other sampling and testing facilities as may be deemed reasonably necessary. The information is provided in the Guidance Manual to let sources know what they may be responsible for providing. The paragraph was revised to convey that the items “may” be required. Item d was removed because it is specific to ambient monitoring requirements, which is not within the scope of the Guidance Manual. Item d stated that is was*

*the owner/operator's responsibility to provide: "Instrumentation for ambient monitoring to determine the effect emissions from the stationary source or facility may have, or are having, on the air quality in any area affected by the stationary source or facility."*

*DEQ also provided some additional guidance by adding that: "Sampling ports and associated sampling traverse points should meet the stack location requirements in EPA Method 1. Instrumentation to monitor and record emissions data may be provided by the owner/operator by contracting with an independent test company."*

## **Section 2 – Determination of Test Acceptance**

28. Top of page 4 – we believe 30 days is more than enough time for DEQ to evaluate a source test. Such an amount is consistent with the practices of other states that Simplot has operations.

*Response to comment 28: DEQ has revised the expected duration of time in which DEQ will make a determination of test acceptance to 30 days, with a qualifier that more time may be necessary depending on the complexity of the test and staff availability. DEQ tries to respond to source test reports as soon as possible, and we do feel a responsibility to respond within 30 days since our rules require test reports to be submitted within 30 days of completion of the test. When we don't make the 30 day goal it's usually because we don't have staff available to look at the report, not that we were spending 30 days reviewing it. The review time can easily extend beyond 30 days when DEQ has to request missing data from the facility or testing firm. On average, DEQ spent 12 hours reviewing a test, protocol, or RATA during calendar year 2006. (133 tests, 36 protocols, and 27 RATAs were reviewed during calendar year 2006 with 2,272 hours expended, which includes over 500 hours of nontechnical administrative assistant time or paid leave.)*

### **Section 3 – Observation of Tests by DEQ Staff**

29. Section 3 of the guidance requires the facility to notify the agency of any source test. The last section of the guidance also discusses informational tests for process changes, etc. These two sections appear to conflict each other.

*Response to comment 29: The language in Section 3 of the Guidance Manual was revised to make it clear that DEQ must be notified of tests required by a rule, permit, order, or consent decree. DEQ does not have to be notified of informational or engineering tests conducted by the company for their own information. However DEQ should be given the opportunity to observe engineering tests if the facility foresees using the data to request changes to a permit that might include using the test data as emission factors or for a compliance demonstration.*

30. Clarify that IDAPA 58.01.01.157.03 is only applicable to tests conducted to meet regulatory requirements.

*Response to comment 30: Section 3 of the Guidance Manual, Observation of Tests by DEQ, was revised to clarify that facilities must notify DEQ of the intent to test at least 15 days prior to the test for compliance tests that are required by a rule, permit, order, or consent decree.*

### **Section 4 – Approved Test Methods**

31. If an alternate method has been approved by another EPA region or by Headquarters, can that approval be used in Idaho?

*Response to comment 31: In general, yes. An alternate method that has been approved by another EPA region or EPA Headquarters will be accepted by DEQ if DEQ determines that the alternate is appropriate for the situation. DEQ revised the language in the Guidance Manual to state that DEQ will approve changes and deviations approved by EPA, rather than saying we will accept changes and deviations approved by the EPA Administrator.*

32. Is the DEQ delegated by the Regional Administrator to approve MINOR changes to test methods for NSPS or MACT? If so, please provide examples of a “minor” change.

*Response to comment 32: Idaho DEQ is delegated to approve minor and intermediate changes to test methods for NSPS and MACT<sup>3</sup>. Major changes to test methods are non-delegable authorities. The definitions of minor, intermediate, and major changes to test methods are found at 40 CFR 63.90 as provided below. Please be aware that as a condition of the delegation DEQ must maintain a record of all approved alternatives to all monitoring, testing, recordkeeping, and reporting requirements and provide this list of alternatives to its EPA Regional Office at least*

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<sup>3</sup> Idaho DEQ was provided authority to implement minor and intermediate changes to test methods as part of the overall NSPS and NESHAP delegations.

See the NSPS delegation letter dated July 11, 2007, addressed to Toni Hardesty, Director of the Idaho Department of Environmental Quality.

[http://www.deq.idaho.gov/air/permits\\_forms/permitting/epa\\_nsps\\_ltr\\_0907.pdf](http://www.deq.idaho.gov/air/permits_forms/permitting/epa_nsps_ltr_0907.pdf)

See the NESHAP delegation letter dated June 14, 2007, addressed to Ms. Toni Hardesty, Director of the Idaho Department of Environmental Quality.

[http://www.deq.idaho.gov/air/prog\\_issues/toxics/epa\\_neshaps\\_ltr\\_0607.pdf](http://www.deq.idaho.gov/air/prog_issues/toxics/epa_neshaps_ltr_0607.pdf) See the relevant MACT Subpart A delegable and non-delegable authorities at 40 CFR 63.91(g).

*semi-annually, or on a more frequent basis if requested by the Regional Office. The Regional Office may audit the State-approved alternatives and disapprove any that it determines are inappropriate, after discussion with the State. If changes are disapproved, the State must notify the source that it must revert to the original applicable monitoring, testing, recordkeeping, and/or reporting requirements (either those requirements of the original section 112 requirement, the alternative requirements approved under this subpart, or the previously approved site-specific alternative requirements). Also, in cases where the source does not maintain the conditions which prompted the approval of the alternatives to the monitoring, testing, recordkeeping, and/or reporting requirements, the State (or EPA Regional Office) must require the source to revert to the original monitoring, testing, recordkeeping, and reporting requirements, or more stringent requirements, if justified.*

***Minor change to test method means:***

*(1) A modification to a federally enforceable test method that:*

- (i) Does not decrease the stringency of the emission limitation or standard;*
- (ii) Has no national significance ( e.g., does not affect implementation of the applicable regulation for other affected sources, does not set a national precedent, and individually does not result in a revision to the test method); and*
- (iii) Is site-specific, made to reflect or accommodate the operational characteristics, physical constraints, or safety concerns of an affected source.*

*(2) Examples of minor changes to a test method include, but are not limited to:*

- (i) Field adjustments in a test method's sampling procedure, such as a modified sampling traverse or location to avoid interference from an obstruction in the stack, increasing the sampling time or volume, use of additional impingers for a high moisture situation, accepting particulate emission results for a test run that was conducted with a lower than specified temperature, substitution of a material in the sampling train that has been demonstrated to be more inert for the sample matrix; and*
- (ii) Changes in recovery and analytical techniques such as a change in quality control/quality assurance requirements needed to adjust for analysis of a certain sample matrix.*

***Intermediate change to test method means*** a within-method modification to a federally enforceable test method involving “proven technology” (generally accepted by the scientific community as equivalent or better) that is applied on a site-specific basis and that may have the potential to decrease the stringency of the associated emission limitation or standard. Though site-specific, an intermediate change may set a national precedent for a source category and may ultimately result in a revision to the federally enforceable test method. In order to be approved, an intermediate change must be validated according to EPA Method 301 (Part 63, Appendix A) to demonstrate that it provides equal or improved accuracy and precision. Examples of intermediate changes to a test method include, but are not limited to:

- (1) Modifications to a test method's sampling procedure including substitution of sampling equipment that has been demonstrated for a particular sample matrix, and use of a different impinger absorbing solution;*
- (2) Changes in sample recovery procedures and analytical techniques, such as changes to sample holding times and use of a different analytical finish with proven capability for the analyte of interest; and*
- (3) “Combining” a federally required method with another proven method for application to processes emitting multiple pollutants.*

**Major change to test method** means a modification to a federally enforceable test method that uses “unproven technology or procedures” (not generally accepted by the scientific community) or is an entirely new method (sometimes necessary when the required test method is unsuitable). A major change to a test method may be site-specific, or may apply to one or more sources or source categories, and will almost always set a national precedent. In order to be approved, a major change must be validated according to EPA Method 301 (Part 63, Appendix A). Examples of major changes to a test method include, but are not limited to:

- (1) Use of an unproven analytical finish;
- (2) Use of a method developed to fill a test method gap;
- (3) Use of a new test method developed to apply to a control technology not contemplated in the applicable regulation; and
- (4) Combining two or more sampling/analytical methods (at least one unproven) into one for application to processes emitting multiple pollutants.

## **Section 5 – Source Test Protocol Content and Format**

- 33.a. Chapter 5 in general needs substantial revision. Most of the information that is listed to be provided in the source test protocol is excessive as it is: (a) information not needed to evaluate the source test, (b) information that is provided and gone through during the PTC process, or (c) information that may not be required by the source to provide.
- 33.b. Some general comments—this section of the manual includes a lot of things to be included in the test protocol that testers have never been required to include before, many of which involve full participation by the source. The nature of the source testing does not always allow the luxury of having the time to prepare source test protocols of this scope. We hope that the DEQ will not be expecting this scope of protocol for every job. A simple 3-run Method 5 test should not require this type of protocol, but obviously a multi-source project with various test methods would benefit from this type of protocol. We would hope that this would not become a “checklist” of what is required in every protocol and will cause burdensome and costly pre-test planning processes.

*Response to comments 33.a and 33.b: A source test protocol isn't required to be submitted for every test, so in some cases a facility may choose to not submit a protocol at all. DEQ's rules currently say that submittal of pre-test information is “strongly encouraged”, but some permits and rules do require the submittal of a pre-test protocol. Of course DEQ certainly hopes information will be submitted prior to the test to avoid significant unapproved test deviations that may compel DEQ to reject the test after it has been conducted which would necessitate performing a second test and may be grounds for enforcement action if testing deadlines are missed.*

*The information listed in Section 5 of the Guidance Manual should be known prior to the test company arriving on site. Not all of the information is required to be submitted, but DEQ may request the information if it is not included in the protocol and DEQ determines that it is needed in order to approve the protocol for the specific test. Not all of the information may need to be submitted for every protocol, depending on the specific circumstances and requirements of the test. The language in the Guidance Manual says that “the information is typically submitted in a protocol.”*

*Item 12 was revised to remove the statement that “A detailed description of the proposed sample collection, recovery (including storage conditions and method of transport), and analytical procedures.” This was removed because item 5.7 already adequately addresses the issue.*

34. Bullets #1, 2, & 3: DEQ is reminded that the test contractor and analytical lab are contracting with the source not with DEQ. All communication with these contractors and DEQ will be in the presence of or thru the source operator. Providing names and phone numbers of these individuals is not necessary and should be removed from the list of required information.

*Response to comment 34: Items 1, 2, and 3 are in regard to contact information for the facility, test company, and laboratory. DEQ understands that the test contractor and the laboratory are usually contracting with the source owner/operator. However, DEQ occasionally contacts test contractors directly via email and telephone and sometimes the test contractors contact DEQ directly. This is often to clarify information in the protocol or test report or request additional QA information. Hopefully, by following the guidance in the proposed Guidance Manual, the occasions to contact the test contractors directly will be minimized.*

35. Bullet 2- a protocol could be prepared and submitted by the facility prior to selection of a testing company.

*Response to comment 35: Generally, protocols received by DEQ were prepared by the test company. It is possible that the source owner/operator could prepare the protocol, and in that case it would be acceptable to not include the contact information for the test company if they have not yet been chosen. The Guidance Manual does not require that all of the information listed in the section be included in the protocol. The Guidance Manual states, “The following information is typically included in a test protocol.”*

36. Bullet 3. The idea to enter a laboratory’s contact information is good housekeeping. Generally, a testing company will perform some of the laboratory analysis in-house and some analysis will be subcontracted. More than one laboratory may be utilized depending upon the type of analysis. For various reasons, the laboratory may or may not have been chosen at the time the protocol is written. Some of these reasons could be cost, a planned in-house analysis may be subcontracted, laboratory equipment problems and availability. Any laboratory where subcontracted analysis is performed should be acceptable as long as the laboratory that performed the analysis followed the prescribed procedures. It may be a good idea, or courtesy, to write in the protocol wording such as “IT is planned to use ABC laboratory...”, but I do not believe it should be a requirement.

*Response to comment 36: It is not a requirement to include the laboratory name and contact information in the protocol. Some test methods (particulate methods, gaseous analyzer test methods) don’t require a third party laboratory, so in those instances a laboratory would not be included. It may also be the case that the laboratory has not been chosen at the time the protocol is submitted, which is acceptable.*

37. Bullet #4: Sufficient information to describe the source to be tested is all that is needed to determine that the test methods are appropriate. Identification of any process equipment is entirely unnecessary and all reference to equipment manufacturer or model numbers should be removed from the list of required

information.<sup>4</sup> We agree that stating the proposed test date and pollutant to be measured by the test is appropriate. All else in bullet 4 should be removed.

*Response to comment 37: Some revisions to item 4 were made to make it less prescriptive. The protocol should have a description of the sources being tested that is detailed enough to identify specific emission units and control devices, the date of the test, and pollutants that will be measured.*

38. Bullet #5: We agree that the purpose of the testing should be clearly stated. Including copies for any standards, permit or consent order is not required or necessary. This should be deleted.

*Response to comment 38: This item was changed to say that, “The protocol may include copies of the specific rule, permit, or consent order requirements so that the source owner/operator, test contractor, and DEQ are aware of operating and monitoring requirements.” In some protocols it makes sense to include copies of the documents to avoid missing required monitoring. DEQ often sees protocols prepared by test contractors that just include a general statement that the owner/operator will monitor and record applicable operating parameters during the test without specifying what they are. If those specific parameters are required to be recorded by a permit or rule and they are not included in the test report it is grounds for rejection of the test.*

39. Bullet 5- this item (test objectives) should relate to test descriptions shown above

*Response to comment 39: DEQ occasionally receives protocols that do not explain the objective of the test. When that occurs we have to call the facility to determine why they are doing they test so we know what documents (permit, consent order, etc.) to look for in order to evaluate the protocol. For this reason DEQ believes the test objective is worthy of its own bullet item.*

40. Bullet #6: As stated for Bullet #4, most of the information requested here is not warranted. We agree that a brief description of the pollution control equipment and expected production rate or other indicator of normal system operation should be included (see later discussion in these comments on “worst-case normal”). Sometimes a block diagram is helpful for explaining a process, and if a source believes that such a diagram would be helpful, then they should provide it. But, providing a block diagram should not be required of everyone. Other information mentioned in this bullet, such as fan specifications, all raw material flows and all effluent flows should not be required. It is not clear at all why such information is necessary to validate a source test.

*Response to comment 40: DEQ reviewed this condition and removed fan rated capacities from the list because DEQ is more concerned with the actual measured flow rate than the expected flow rate. DEQ also revised the language to remove the word “all” that appeared in several places. Other information in this bullet item is relevant to determining potential*

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<sup>4</sup> This information is likely contained in the applicable permit or has been filed with the Department in a permit application document. The source test protocol is supposed to be focused on how the testing requirements in a rule or permit will be implemented. It is not the place to have to re-create a permit application document describing the process, detailed process material balances, detailed equipment information, etc.

*modifications to the test methods that may be needed to obtain a representative sample from the emissions unit.*

41. Bullet 6- Fan ratings appear irrelevant.

*Response to comment 41: The suggestion to include fan ratings in the protocol was removed.*

42. Bullet #7: We agree that deviations from the reference methods should be adequately explained. However, the additional criteria and information that DEQ is insisting on in this bullet may not always be feasible to collect. We suggest that DEQ evaluate any deviation on its technical merits and in such evaluation that the following be considered:

- What the specific deviation is.
- A detailed explanation of why the deviation is necessary.
- Any information on the comparison of the deviation methodology to the reference method.

*Response to comment 42: DEQ separated this item into two paragraphs to identify that this bullet item addresses both test deviations, which generally are “tweaks” to an existing method, and alternative test methods, which generally consist of significant changes in test methodology. Often test deviations can be approved without comparative testing and have been approved previously or used in other situations. Alternative test methods is where comparative testing becomes involved.*

43. Bullet 7- there are numerous method modifications commonly accepted—DEQ should describe them so the contractor does not need to repeatedly include this information. For example, demonstration of cyclonic flow should only be required once—not repeatedly.

*Response to comment 43: It is difficult for DEQ to identify test deviations that are acceptable in all situations. DEQ does not outright accept that a cyclonic flow check need not be repeated after it has been completed once. DEQ has encountered stacks that exhibit cyclonic flow sometimes and not others. There are some sources where repeating a cyclonic flow check would be warranted because the precursors to cyclonic flow such as tangential stack entry and inadequate distances to upstream and downstream flow disturbances are present.*

44. Bullet #8: Simplot recommends that non-dimensional (not to scale) sketches of this information be sufficient. What is needed is the information to determine how the sample locations relate to the criteria in RM 1 and any applicable RM criteria. Why is a dimensioned drawing necessary if the actual values are included in the sketch?

*Response to comment 44: The sketches do not have to be to scale, they just need to have the appropriate dimensions annotated, such as length and diameter. A “dimensional diagram” does not have to be to scale.*

45. Bullets #10 and #11: The information requested here should be consistent with: (a) information consistent with “worst-case normal” conditions and (b) information required to be monitored and recorded by the applicable permit, rule or order. Examples:

- The only process information that should be required is that consistent with monitoring requirements in the permit, etc. and those related to worst-case normal conditions.<sup>5</sup> Documentation on “capacity” or other process information not related to “worst case normal” or permit requirements is not needed in the protocol (or in the test report).
- It doesn’t make any sense to state what the operation conditions for the control equipment in the protocol. Simplot fails to understand why this is needed to evaluate the protocol?<sup>6</sup>

*Response to comment 45: DEQ concurs with the commenter on item 10. DEQ revised item 10 in an attempt to make it more understandable that an explanation of the worst case normal operating conditions should be included in the protocol along with the rated capacity of the source. Item 11 asks for an explanation of the parameters that will be monitored during the test. The explanation within item 11 was expanded to make the reasons for the information more comprehensible.*

46. Bullet 11- Worse case normal needs to be defined.

*Response to comment 46: An expanded explanation of worst-case normal operating conditions is included in the Guidance Manual on page 2 under Source Test Conditions, General. A footnote was added to direct the reader to this explanation of worst-case normal.*

47. Bullet 11- Refers to 5.10 (which is bullet 10) but not numbered.

*Response to comment 47: DEQ removed the reference to 5.10 because it wasn’t really needed since it was referring to the previous bullet.*

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<sup>5</sup> When discussing testing requirements it is helpful to review what the rules state on worst-case normal conditions”. The specific language is as follows: a. The test must be conducted under operational conditions specified in the applicable state or federal regulation, rule, permit order, consent decree or by Department approval. If the operational requirements are not specified, the source should test at worst-case normal operating conditions. Worst-case normal conditions are those **conditions** of fuel type, and moisture, process material makeup and moisture and process procedures, **which are changeable** or which could **reasonably be expected** to be encountered during the operation of the facility and which would result in the highest pollutant emissions from the facility. [Emphasis added] The key aspects of the “worst-case normal” are conditions that are “changeable” or which could “reasonably be expected to be encountered during the operation of the facility.”

<sup>6</sup> The purpose of the protocol is to provide the Department a chance to review the proposed source testing and ensure it is consistent with the monitoring and testing requirements in the permit, rule, Consent Order, Consent Decree, etc. It is not about operation of the pollution control equipment. Operation of the pollution control equipment may be governed by any O&M requirements for the control equipment that exist in the permit. Often to meet any O&M requirements, there is an Operations and Maintenance Manual that has been developed that describes the typical operating conditions. If such an O&M Manual exists as required by the permit, then the source should provide such operating condition information in the test report. The protocol can state that such info will be collected, but it is not apparent why the operation values need to be provided in the protocol.

48. Bullet #12: DEQ should be aware that ASTM documents are subject to copyright restrictions and are not in the public domain. Providing copies may be an infringement. Detailed descriptions sample handling, transport or analysis are only necessary in the unusual event of a deviation from the specified method.

*Response to comment 48: DEQ concurs that copies of copyrighted material should not be provided to DEQ, but the methods should be identified in enough detail that DEQ can easily identify the specific method. DEQ requests a copy of the non-EPA methods because they may not be easily attainable by DEQ. DEQ concurs that detailed descriptions of sampling handling, transport, or analyses do not need to be routinely included in a protocol and that statement was removed from the Guidance Manual.*

49. Bullet #12. Including copies of non-EPA analytical procedures in the protocol seems burdensome (see comments for 7.2 below).

*Response to comment 49: DEQ requests that copies of non-EPA analytical procedures be included in the protocol so the burden is not on DEQ to track them down.*

- 50.a Bullet #13: Sample calculations and formulas are usually included in the test report or in the method. This information does not need to be included in the sampling protocol.
- 50.b Bullet #13: Formulas should only be provided if they are not included in the method.
- 50.c Bullet #13: Including the formulas for calculations in the protocol seems burdensome. The example cited is a good example and would be appropriate to include, but including the formulas for everything seems excessive. These are always included in the final report.

*Response to comment 50: DEQ added language to item 13 to clarify that the formulas should be provided in the protocol only if they are not included in the test method.*

- 51.a Bullet 14: Including blank copies of field and laboratory sheets is ok, but I do not see the purpose; generally there are very few changes to these forms, but there are always slight modifications and upgrades. Including test equipment calibration is a good idea.
- 51.b Bullet 14: Including copies of all field data sheets and equipment calibrations in the protocol seems burdensome. Testers often don't know exactly which data sheets or equipment will be used on a project until it happens. Trying to determine this ahead of time is not realistic.
- 51.c Bullet 14: This is not necessary for DEQ to evaluate a protocol

*Response to comment 51: Item 14, regarding field data sheets and equipment calibrations, was revised to say that "Examples of field data sheets (including chain-of-custody) and field/laboratory equipment calibration sheets if available."*

- 52.a Bullet 14: Process monitoring device calibration information should not be required to be provided unless required by the permit, applicable rule, Consent Order, or Consent Decree.
- 52.b Process monitoring device calibration is already required to be in the test report, and including process monitoring device calibration in the test protocol is unnecessary duplication. Maybe IDEQ is trying to avoid equipment calibration documentation

problems “after-the-fact”, and I can understand why it is a good idea but do not think it should be a requirement.

- 52.c Including process monitoring device calibration information in the test protocol seems burdensome. If the source has a recordkeeping program for their equipment calibrations, it seems that requiring that information to be included in the test protocol is double reporting and not necessary. The inspector should already have access to that type of information. This type of information is difficult for the Source Testing firm to track down.

*Response to comment 52: Item 14, regarding process monitoring equipment calibrations, was revised to say “Also, include process monitoring device calibration information if available.”*

- 53.a Bullet 15: A written synopsis of all conversations with DEQ is grossly over prescriptive. We agree that some correspondence and conversations with DEQ are important and should be recorded. Making this a requirement for all communications as a requirement of the protocol is unwarranted and should be deleted.
- 53.b Bullet 15: This is not necessary for DEQ to evaluate a protocol—the requirement for a written synopsis of all conversations is overly prescriptive.
- 53.c Bullet 15: Including copies of all correspondence and written synopsis of all conversations with DEQ regarding the test program seems burdensome.

*Response to comment 53: DEQ revised item 15 to remove the word “all”. It is not a requirement to include copies of correspondence and a synopsis of conversations, but it can save time and effort to document the decisions that have already been made so the questions don’t get asked again.*

- 54.a Bullet 16: This needs to be removed. The rules (see IDAPA 58.01.01.123) and for Title V sources already require a certification statement to be submitted with the test protocol. DEQ has provided no legal or regulatory basis for this new certification statement.
- 54.b Bullet 16: This is not necessary for DEQ to evaluate a protocol. In some cases the “on-site supervisor” of the test team may not be selected until just prior to the test. A written certification of a test PLAN is overly prescriptive and has no regulatory basis.
- 54.c Bullet 16: A signed statement is already required in the test report. Requiring a signed statement in the protocol is unnecessary duplication.

*Response to comment 54: Item 16 was removed from the Guidance Manual. DEQ has determined that an additional certification is not necessary for the protocol. Item 16 had stated, “A statement signed by the on-site supervisor for the test team and a representative of the facility certifying that “to the best of their knowledge” the state and federal regulations, operating permits, or plan approvals applicable to each source or control device to be tested have been reviewed and that all testing requirements therein have been incorporated into the test plan.”*

55. Submitting the Protocol. The requirements described in the third paragraph of this section are too broad. And, as stated earlier in these comments, the Proposed Guidance Manual goes way beyond the information needed in a submitted protocol. As an example, any process change should not warrant the requirement to submit a new protocol. Obviously, if a process change or control equipment change requires permitting, then during that permitting process the appropriate source testing methods will be described in the permit. And if those testing methods have changed and/or

other related conditions have been added, then submittal of a new protocol is justified. Otherwise, submission of a new protocol is not likely justified and is nothing more than a waste of resources for both the source and DEQ.

*Response to comment 55: The paragraph referred to by the commenter was removed from the Guidance Manual. DEQ agreed the requirements were overly broad. The paragraph had stated, "If modifications are made to any process equipment or control device, or if an applicable section of this manual has been revised since approval, a new protocol must be submitted for approval. Each page of the protocol must be numbered sequentially. The source and the DEQ regional office will be notified each time additional information is required."*

## **Section 6 – Reporting Deadlines and Certifications**

56. My only comment is to give ample time to submit test reports. I see in the draft 30-days and 60-days. I'd suggest they all be 60-days to allow time for good report generation. Often lab analysis can take up to 20 or more days to get completed. And I'd figure 30 or 60 days is inconsequential to the project as long as it gets done correctly.

*Response to comment 56: DEQ is currently limited by the requirements of the Rules. IDAPA 58.01.01.157.04 requires that test reports be submitted to DEQ within 30 days of test completion. It will require a rule change to allow additional time. DEQ has been allowing sources 60 days to submit test reports after test completion where a federal rule specifically provides that amount of time.*

57. Many types of subcontracted laboratory analysis (e.g. dioxins, metals) should be allowed a longer timeframe (e.g. 45-60 days). What is the mechanism for requesting a longer reporting period? Would a different reporting period be specified in the test protocol?

*Response to comment 57: If a longer period is needed to submit the test report a written request for a time extension may be made to the appropriate DEQ regional office.*

## **Section 7 – Source Test Report Content and Format**

### **Required Information**

- 58.a Chapter 7.1, 7.2., and 7.3. Why wouldn't it be sufficient to refer to the protocol already submitted and then report the deviations from the protocol? What purpose is served by repeating the information already provided in the protocol? We agree that plan deviations compelled by field conditions and other circumstances should be adequately described and their impact explained.
- 58.b 7.1 – is redundant information

*Response to comment 58: Section 7.1 was significantly revised. It previously required "All information required by the protocol." Section 7.1 was revised to request a summary of the test program.*

- 59.a 7.2 Including copies of non-EPA sampling or analytical methods in the report is an unusual request. Requesting copies of alternate sampling methods seems reasonable, but requesting copies of analytical methods seems unreasonable. Many samples are

subcontracted to analytical laboratories. Source sampling firms do not always have copies of these methods in their library. The report from the subcontract laboratories typically references the methods used. In this internet era, it seems a web link would make more sense than including copies of the methods in the report.

59.b 7.2 – is included in 7.1 and redundant here

*Response to comment 59: Section 7.2 was revised and now asks for identification of the test methods and analytical procedures. It no longer requests that copies be submitted with each test report.*

60. 7.3 – planned deviations are included in 7.1 – only unplanned deviations should be included here

*Response to comment 60: Section 7.3 requests a list of “deviation from the approved pretest protocol”. Test deviations that were approved in the pretest protocol do not have to be discussed in detail, but it is helpful to have them noted in the test report.*

61.a 7.5: The comments provided to Chapter 5, Bullets 10, 11 and 14 apply here too. Only the process information required by the permit, rule, Order or Decree needs to be provided. Likewise, calibration information for process or pollution control equipment should only be required to be provided if a permit rule, Order or Decree requires such.

61.b 7.5: Unless required by permit or rule, process and control device monitoring equipment may not be calibrated.

61.c 7.5: Including process monitoring device calibration information in the report seems burdensome. If the source has a recordkeeping program for their equipment calibrations, it seems that requiring that information to be included in the report is double reporting and not necessary. The inspectors should already have access to that type of information.

*Response to comment 61: The language in Section 7.5 was changed to note that process monitoring calibration information “should” be provided, rather than “must” be provided. There is some level of uncertainty in all emission measurements and process monitoring data. The degree of uncertainty can be important, especially when test results show emissions at or near an emissions standard.*

62.b 7.6: The on-site supervisor of the test team is typically unavailable to sign the report because they are traveling, so it should be stated that a stamped signature is acceptable for all signatures. Waiting for original signatures could slow up issuing the report.

62.a 7.6: This needs to be deleted. See comment to Chapter 5, Bullet 16.

*Response to comment 62: Section 7.6 was renumbered to Section 7.7 and was revised to request a signature of a test team member, rather than requesting signature of the on-site test supervisor.*

63. 7.7: Does this statement indicate that a chain-of-custody is necessary for samples that are handled in-house? We feel that a chain-of-custody should only be necessary for any subcontracted laboratory analyses.

*Response to comment 63: Section 7.7 was renumbered to Section 7.8. It was also amended to note that a chain-of-custody record is not required for samples that are collected and analyzed by the test contractor.*

64. Chapter 7.11 needs major revisions.
- Chapter 7.11.1. The certification of the laboratory as to the quality of the data and any deviations is not necessary. See comments to Chapter 7.6 and Chapter 5, Bullet 16. This needs to be deleted.<sup>7</sup>
  - Chapter 7.11.2 through 7.11.5. Requiring this mass of data on a routine basis is hugely prescriptive and excessive.<sup>8</sup> The report should provide what analytical method was used and it is fine to note what instrumentation was used and type of detector, but the other data is clearly unreasonable. All of the items 7.11.2 thru 7.11.5 should be deleted.
  - Chapter 7.11.8.2 DEQ should note that the level of QC/QA measures vary with the number of samples, the analyte being measured, etc. For example, a “spike” is not possible for certain determinations (ex. is gravimetric). Also, breakthrough determinations are not usually needed for most chromatography analyses.

*Response to comment 64: Section 7.11 was renumbered to Section 7.12. Section 7.12.1 was revised to require a signature from a lab analyst or responsible official of the laboratory on the results. It no longer requires a certification statement from the laboratory. Sections 7.12.2 thru 7.12.5 remain in the Guidance Manual. They were revised to note that they should be included “when applicable” because not all test reports use analytical methods with associated calibration data. It has been common practice to include the type of gaseous analyzer instruments used and associated calibration gas certification sheets in test reports for many years, so these are not new requirements. Chromatographic data should be included in the test report if it was produced to determine emission concentrations.*

65. As a further point of explanation, the part of the certification statement found in 7.6 and 7.11.1 regarding “legible” is almost amusing. Is this really a problem? If DEQ can’t read some field notes – why not just ask the source to help with this matter? Is a certification statement on legibility really necessary? What is next – a penmanship demonstration requirement for the protocol by every potential member of the source testing team and every analyst/technician in the lab?

*Response to comment 65: The field data sheets and laboratory sheets need to be legible in order for DEQ to read them. The certification for laboratory analysts was removed from the Guidance Manual, but the certification from a test team member remains in Section 7.7, which was renumbered from 7.6.*

- 66.a 7.11.2, 7.11.4, 7.11.5 all seem to refer to samples that are sent out to a subcontract laboratory. These laboratories typically do not provide this type of information in their

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<sup>7</sup> This proposed Guidance Manual consistently repeats some type of certification. As already discussed, there is no legal basis for these additional certifications.

<sup>8</sup> Simplot could probably provide an additional page of comments on why Section 7.11.2 through 7.11.5 is excessive; we believe it is sufficient to say that under other environmental monitoring programs such level of detail is not required by agencies (example is NPDES monitoring). This type of level of detail is sometimes seen in a CERCLA type data package. Simplot is not aware that DEQ has any basis or rationale for requiring such level of information to be submitted with a source test.

report; however, this type of data would be available upon request if there were questions about the analysis. It seems unlikely that these laboratories would provide this type of data package without increasing their prices. If the analysis is done in-house, we would provide this type of information.

66.b 7.11 – this section appears overly prescriptive and detailed if a certified lab is used.

*Response to comment 66: Section 7.11 was renumbered to Section 7.12. This section was not meant to address only information sent to a contract laboratory, but DEQ understands how this inference could have been made because the first subsection dealt with certification requirements from the laboratory. The subsections requesting laboratory signatures and discussions of laboratory deviations were moved to the bottom of Section 7.12. Most of the requirements of Section 7.12 deal with calibration data for test contractor field analyzer equipment.*

67. 7.12 – If sample calculations are included in the method, this is unnecessary.

*Response to comment 67: Section 7.12 was renumbered to Section 7.13. A set of sample calculations should be included even if the equations are included in the test method to demonstrate that the results were calculated using the appropriate equations. This has been done by most test contractors for many years, so it is not a new requirement.*

68.a I believe the 30-day reporting requirement for some types of tests is too strict. The standard subcontracted analysis turn around time is 15 business days, or three weeks. If samples are shipped, this adds at least one more day. Shipping samples may take 2 to 3 days more if a sample is taken on a Thursday, shipped on a Friday, or taken on a Friday and shipped Monday. Subcontracted analysis may take 3 to 3 ½ weeks to receive the analysis, finish compiling the data, review the data and submit the report within the regular 30-day deadline. Requiring the 30-day deadline requires the analysis to be expedited as a standard procedure, and unnecessarily increases the subcontracted analysis costs by 50 percent for a two-week turn around, or 100 percent for one week turn around.

68.b As reference in the IDEQ draft “Source Test Guidance Manual”, 40 CFR 63.7(g) allows 60 days for the source test report to be submitted for those sources covered by that section. It appears that the authors of the CFR realize that some types of tests require more time for reporting purposes. Allowing 60 days for all test reports would be more standard and does not necessarily increase costs to the facility.

*Response to comment 68: DEQ concurs with the commenter that allowing more than 30 days would be reasonable. However, the Rules currently require that test reports must be submitted within 30 days, so changing the timeframe will require a rule revision. This revision is something that DEQ may undertake as resources allow.*

## **Electronic Reporting Tool**

*The electronic reporting tool (ERT) section was updated to include additional test methods that EPA has developed the capability to accept electronically since the first draft of the Guidance Manual was proposed. The test methods supported by ERT Version 3 include the following: Methods 1 through 4, 3A, 5, 6C, 7E, 10, 17, 25A, 26A, 29, 101A, 201A, and 202. Also included*

are Conditional Test Methods 39 and 40. The ERT replaces the: (1) time-intensive manual preparation and transcription of stationary source emissions test plans and reports currently performed by contractors, and (2) time-intensive manual quality assurance valuations and documentation performed by State agencies.

## **Section 8 – Process and Control Device Monitoring Requirements**

69.a Chapter 8. The comments provided for Chapter 5, Bullets # 10, #11 and #14 and Chapter 7.5 also apply here. Only the process information required by the permit, rule, Order or Decree needs to be provided. Likewise, calibration information for process or pollution control equipment should only be required to be provided if a permit, rule, Order or Decree requires such.

69.b Calibration only if required by permit or rule (i.e. MACT CMS)

*Response to comment 69: Some permits or consent orders do not specify the operating conditions and associated monitoring and recordkeeping that should be conducted during a test. DEQ concurs that where the test operating, monitoring, and recordkeeping is specified in a permit, order, or decree, that those parameters should be followed. Generally permits do not include calibration requirements for monitors. The uncertainty in the process monitors adds to the uncertainty of the test results, especially when the results are based on a throughput standard, such as pounds of emissions per ton of production. Also, it is helpful for DEQ to know the accuracy of monitors when setting or approving allowable ranges for parametric monitoring. For example, if DEQ plans to set a pressure drop range at 2.2 to 4.5 inches of pressure drop, it is useful for DEQ to know if the existing pressure drop monitor can be used to determine pressure at the level of tenths of an inch of water.*

70. Page 18 “Data Frequency”: In reality some production instrumentation does not have the resolution to record every 15 min and yield accurate or even relevant data. What would our options be then?

*Response to comment 70: This section of the guidance manual is included so that source owner/operators are aware that they need to put some thought and planning into the appropriate production monitoring before the test starts so that representative data will be obtained. DEQ recognizes that recording data points every 15 minutes may not be feasible or relevant for all processes. In those cases the source owner/operator should discuss alternatives with DEQ. The Guidance Manual was revised to include other options that have been used successfully, such as totalizing meters that would be used to record data at the beginning and end of each test run.*

## **Section 9 – Technical Issues**

### **Audit Samples**

71. Page 19 discusses audit samples. It has always been my understanding that it is the agencies responsibility to request an audit sample, not the source. This should be clarified in this section.

*Response to comment 71: It is the sources responsibility to request an audit sample where one is required. For example, 40 CFR 63.7(c)(4)(i) states, “The owner or operator must*

*request performance audit materials 30 days prior to the test date.” The source can make a request for an audit sample to DEQ and DEQ can request from EPA that an audit sample be sent to the source or test contractor. This section of the Guidance Manual was revised to make it more clear who should obtain audit samples and how they can be obtained.*

## **Detection limits**

- 72.a Chapter 9 has a number of technical deficiencies. Specific comments include: Detection Limits. It must be remembered that the purpose of source testing is often to demonstrate compliance (or noncompliance) with the standard. There is no justification for requiring ultra low concentration determinations or extending sampling times to collect additional material just to have a detectable amount of whatever substance is being measured. Often, such measures are deviations from the official method. DEQ’s statement of: “If appropriate steps are not taken, sample results less than the detection limit could be considered unacceptable” is completely without merit. If the method (protocol) as specified in the permit has been followed, what is the justification for such action by DEQ.<sup>9</sup>
- 72.b Detection limits—What is the purpose in requiring sample results greater than the detection limit if the detection limit indicates compliance with the standard?
- 72.c If the emission standard is greater than the detection limit, then a non-detect demonstrates compliance with the standard. It is important however, that it be determined prior to sampling that the detection limit is less than the emission limit.

*Response to comment 72:DEQ has revised the discussion of detection limits in the Guidance Manual to distinguish between the application of method detection limits when the test results are being used for compliance demonstration versus development of emission factors. The method detection limits come into play when developing emission factors so DEQ can be comfortable with the accuracy of the factors. If an emission limit already exists and the source is testing to demonstrate compliance with the limit, then sampling results that are below the method detection can be used to verify compliance with the limit if the sampling volume was reasonable.*

73. Detection Limits. Using the full detection limit as a substitute for reliable data is not done as commonly as using ½ the DT. Doing so most likely results in overly conservative estimates of emissions. Rather than a one-size fits all method to the matter of non-detects, Simplot recommends that DEQ evaluate each on a case-by-case basis when such a determination is needed for emission inventory purposes.

*Response to comment 73:This guidance is meant to minimize case-by-case determinations. In general DEQ would like to see the method detection limit used for emission calculations.*

74. Reagent Blanks. The requirement for all chemical reagents to be analyzed for contamination is unrealistic. Reagents come in different grades for different purposes. All reagents come with specified, not to exceed concentrations for contaminants that might be present. Rather than DEQ requiring that all reagents be

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<sup>9</sup> Once again, as comparison to the NPDES program, if the proper sampling and analysis is done, and the sample results are below the detection limit, that is what they are – NON DETECT. There is no need for special actions by the source to vary the method or sampling to collect a detectable amount.

analyzed for contamination, DEQ should rely on the analytical methodology being used for what “blanks” need to be run. That includes any blanks specified by a test method (including reference methods).

*Response to comment 74: DEQ modified the language in this section to remove the word “all” before chemical reagents and changed shall to should. The sentence previously read, “All chemical reagents shall be analyzed for contamination, preferably before use in the field”*

*The test methods do allow for minor correction of results to compensate for contamination and this is determined by analyzing blanks.*

## **Sample Times and Volumes**

75. Will DEQ accept the average of 2 valid runs to demonstrate compliance with a state standard in the event that there is a problem with one run?

*Response to comment 75: DEQ may accept the average of 2 valid runs if an unpredictable problem occurs with one of the runs that would cause the results to unacceptable. An example is breaking a sample bottle during shipping that would preclude analysis of the sample. Generally, if a problem is encountered with a run while the test company is still on site, an extra test run should be conducted so that three valid runs are available. There must be good reason to exclude a test run.*

76. Page 20 “Sampling Volumes” EPA 5 is to be sampled at 50 cuft/hr while all other at 36 cuft/hr. Is this correct or a typo?

*Response to comment 76: The table with recommended minimum sampling times and volumes was removed from the guidance manual. The sampling times and volumes should meet the requirements of the individual test methods and rule requirements.*

77. Page 20, Table 1 provides minimum sampling times and volumes per run. At least for Method 23, these are different than what is prescribed in 60 CFR Part 63.1349(b)(3)(i) (3 hours and 90 dscf instead of 4 hours and 144 dscf).

*Response to comment 77: Table 1 was removed from the Guidance Manual. Sampling times and volumes must meet the requirements of specific test methods and rule requirements.*

78. This section lists several test methods and suggested test run times and sample volumes. If a source is testing to prove compliance with a pollutant emission rate, several of these suggested times and volumes appear to be high. Some examples are as follows:

### **Example 1. Particulate Matter**

Source Limit: 0.02 grains per dry standard cubic foot limit (gr/dscf)  
Sample Volume: 30 dry standard cubic feet (dscf, ft<sup>3</sup>)

Using the following equation:

$$(0.02 \text{ gr/dscf})(1 \text{ lb}/7000 \text{ gr})(454000 \text{ mg/lb}) = 38.9 \text{ mg}$$

To prove compliance the target sample need only have less than 38.9 mg, which is more than 12 times the reported detection limit of 3.0 mg. TETCO proposes that a particulate matter test that captures less than 3 mg should be treated the same as other types of tests that capture less than the detection limit, i.e., if the catch is less than 3 mg, then calculate as if it was 3 mg, rather than rejecting the test for having less than 3 mg. Increasing the particulate matter test sample volume to 50 dscf is unnecessary.

Example 2. Dioxin/Furan (Method 23) for cement kiln:

Limit: 0.02 ng (TEQ) per dry standard cubic meter (ng/dscm, m<sup>3</sup>) at 7 percent oxygen (lower of two possible limits).

Sample Volume: 90 dry standard cubic feet (dscf) (federal requirement)

Using the following equation:

$$(0.02 \text{ ng/dscm})(0.0283 \text{ m}^3/\text{ft}^3)(90 \text{ ft}^3)(1000 \text{ pg/ng}) = 509 \text{ pg}$$

The laboratory limit for a dioxin/furan sample varies slightly from sample to sample but generally ranges from 5 to 10 pg (TEQ) in the entire sample. Using the federal requirement of a 90 dscf sample yields a result that is 50 times the required amount needed to prove compliance for the above source. Increasing the sample time to 240 minutes with a minimum sample volume of 120 dscf is unnecessary.

Example 3. Fluoride

Source Limit: 0.010 pounds per ton of equivalent P<sub>2</sub>O<sub>5</sub> feed (lb/ton)

Sample Volume: old requirement of 30 dry standard cubic feet (dscf, ft<sup>3</sup>)

Production Rate: 48.4 tons per hour (tph) P<sub>2</sub>O<sub>5</sub> feed

Source Flow Rate: 2090 dscf per minute (dscfm)

Using the following equation:

$$(0.010 \text{ lb/ton})(48.4 \text{ tons/hr})(30 \text{ dscf})(454,000 \text{ mg/lb})/[(2090 \text{ dscf/min})(60 \text{ min/hr})] = 52 \text{ mg}$$

For this particular example the laboratory detection limit was less than 0.2 mg in the sample. The calculated 52 mg result is more than 100 times the necessary amount needed to show compliance. Increasing the minimum sample volume to 36 dscf is unnecessary to show compliance.

This same approach could be shown for other pollutants, i.e. sulfuric acid mist, metals, etc. Most minimum sample volumes and test run times should be based upon detection limits and the size of the sample required to prove compliance.

*Response to comment 78: DEQ concurs with the commenter. The table with recommended sampling time and volumes was removed from the Guidance Manual. Sampling times and volumes must meet the requirements of specific test methods and rule requirements. If the sample catch shows compliance with the emissions limit, then compliance has been demonstrated. Sample times and/or volumes may need to be increased when sampling to develop an emission factor so that the sampling catch is greater than the method detection limit.*

## Minimum Particulate Matter Sample Catch

79. (1<sup>st</sup> paragraph) For very clean sources it is almost impossible to collect 50 milligrams of particulate matter. The testers do not typically have the capability to clean up and weigh the samples in the field using the necessary quality assurance procedures so they can't check to see if they have collected enough sample. Weighing samples properly can be a several day process. If the testers know that the source is very clean, the run time can certainly be increased, but it is difficult to guess how long is long enough, and the longer the sample time, the more costly it is for the source. If the source is wet, sampling longer may actually require stopping the run to empty the impinger liquid and restarting the run, which can jeopardize the sample and should be avoided.

*Response to comment 79: The first paragraph of this section is not stating that 50 milligrams of particulate matter must be collected during a sampling run. The paragraph says that many emission standards were set by EPA using that amount and that if a sampling run collects less than that amount compliance is reasonably assured.*

- 80.a Minimum Particulate Matter Sample Catch. The comments on this are the same as for Detection Limits. As stated earlier, what is the point? If the standard analysis time shows that the results are essentially non-detect and that is below the compliance limit, what is the benefit from additional testing? ***The purpose of the testing is not to collect a detectable amount of a contaminant; rather often the purpose is to determine compliance.*** If the amount collected of a contaminant is non-detect and the calculations show that any emission is way below the emission limit – that is sufficient.
- 80.b Minimum particulate matter sample catch – irrelevant if a catch <3 mg demonstrates compliance with the standard. The requirement for a 3 mg catch penalizes clean sources by requiring longer test times. Potlatch has permit requirements to test sources that have <1 mg catches. This requirement would triple test times and add significant cost to a project with no environmental benefit.
- 80.c Perhaps DEQ should consider back-calculating a sample volume that would be adequate for sources with low emissions units. This would be helpful to the source because they could provide that information to the source testers who are often competitively bidding to perform work.

*Response to comment 80: DEQ has revised this section of the Guidance Manual to distinguish between testing done to demonstrate compliance with an emission standard and testing done to develop an emission factor. DEQ agrees with the commenters that a test does not have to attain a minimum catch to demonstrate compliance. To demonstrate compliance, a test result only needs to show that results are less than the limit. This can be demonstrated by calculating a target catch that would be expected if sample results were equal to the standard. If the actual catch is below the target catch then compliance has been demonstrated. A minimum sample catch that is equal to or greater than the minimum detection limit should be attained when sampling to develop an emission factor because a sampling catch less than the detection limit has a high degree of uncertainty.*

81. This section only appears to be relevant for sources that are required to demonstrate compliance using Method 5I.

*Response to comment 81: The section regarding minimum particulate matter sample catch was divided into two subsections; one subsection regarding testing to demonstrate compliance, and one regarding testing to develop emission factors. See the response to comment 80 above and the revised section for further information.*

82. (2<sup>nd</sup> paragraph) This paragraph makes it sound like DEQ is suggesting performing more test runs on clean sources. Clean sources should not be “penalized” for being low emitters.

*Response to comment 82: DEQ concurs with the commenter. The section was revised to make it clear that clean sources do not have to conduct extended or additional test runs to demonstrate compliance. However, relatively clean sources may have to go to extra effort when developing emission factors to obtain samples that are above the method detection limit.*

83. (3<sup>rd</sup> paragraph) This paragraph seems reasonable and should take preference over paragraphs 1 and 2 in this section.

*Response to comment 83: Please see the response to comment 80 and the revised section.*

## **Testing Outside Permit Requirements**

84. Regarding testing outside permit requirements, does this mean that if a source operates outside of permitted operational requirements for testing purposes they are not in violation of their permit?

*Response to comment 84: This section does explain that sources can operate outside of permitted operating constraints when conducting source tests and DEQ may not pursue enforcement action. DEQ understands that sources need the flexibility to operate outside of permitted constraints to establish new operating ranges. Sources should only operate outside of the existing permitted constraints during the test and should return to compliance with the permit immediately following the test until the appropriate permit action is taken to change the permit constraints.*

## **General Comments**

85. I did not see the IDEQ altitude correction that was deleting pressure from the equation. Will it be used or is it gone?

*Response to comment 85: The altitude correction is still used for sources demonstrating compliance with the fuel burning equipment particulate matter standards found at IDAPA 58.01.01.675-681. The altitude correction is found at IDAPA 58.01.01.680. The altitude correction is only used for the fuel burning equipment particulate matter standards to calculate the concentration in grains per dry standard cubic feet. A discussion of the altitude correction was added the Guidance Manual in section 9, Technical Issues.*

## Appendices

86. Appendix B – To avoid confusion this Appendix should appear in the same form in which it was published by EPA (i.e. inserted PDF)

*Response to comment 86: The document (EMC Guideline Document GD-022R3) was included in same form as published by EPA. The PDF version of the document was copied from EPA's website and then converted to .png picture format so that it could be inserted in the Word format of the Guidance Manual.*

87. Appendix E – EPA National Stack Test Guidance – To avoid confusion this Appendix should appear in the same form in which it was published by EPA (i.e. inserted PDF). It would be useful to see the EPA documents referenced on Page 51.

*Response to comment 87: The EPA National stack testing guidance was inserted as it appears in PDF by copying the PDF document from EPA's website <http://www.epa.gov/compliance/resources/policies/monitoring/caa/stacktesting.pdf> and then converting it to .png picture format so that it could easily be inserted into the document. Generally, the documents referenced by EPA's National Stack Testing Guidance can be found on EPA's website.*

88. Appendix E – EPA National Stack Test Guidance, Page 58 “Rounding”, The spreadsheets we use do the round and 91.50 is round to 92.0. Secondly at what point is the number 91.50? For instance 91.499 can be reported as 91.50 which then can be rounded to 92.0. The computer will report 91.

*Response to comment 88: According to the guidance, intermediate calculations should maintain 5 significant figures. When the final number is rounded, it should be rounded to the same number of significant figures as the emissions limit or standard. So, if the emissions limit is 98, then 91.499 would be rounded to 91 (the first number to be discarded is less than five). However, if the emission limit were 98.0, then 91.499 would be rounded to 91.5.*