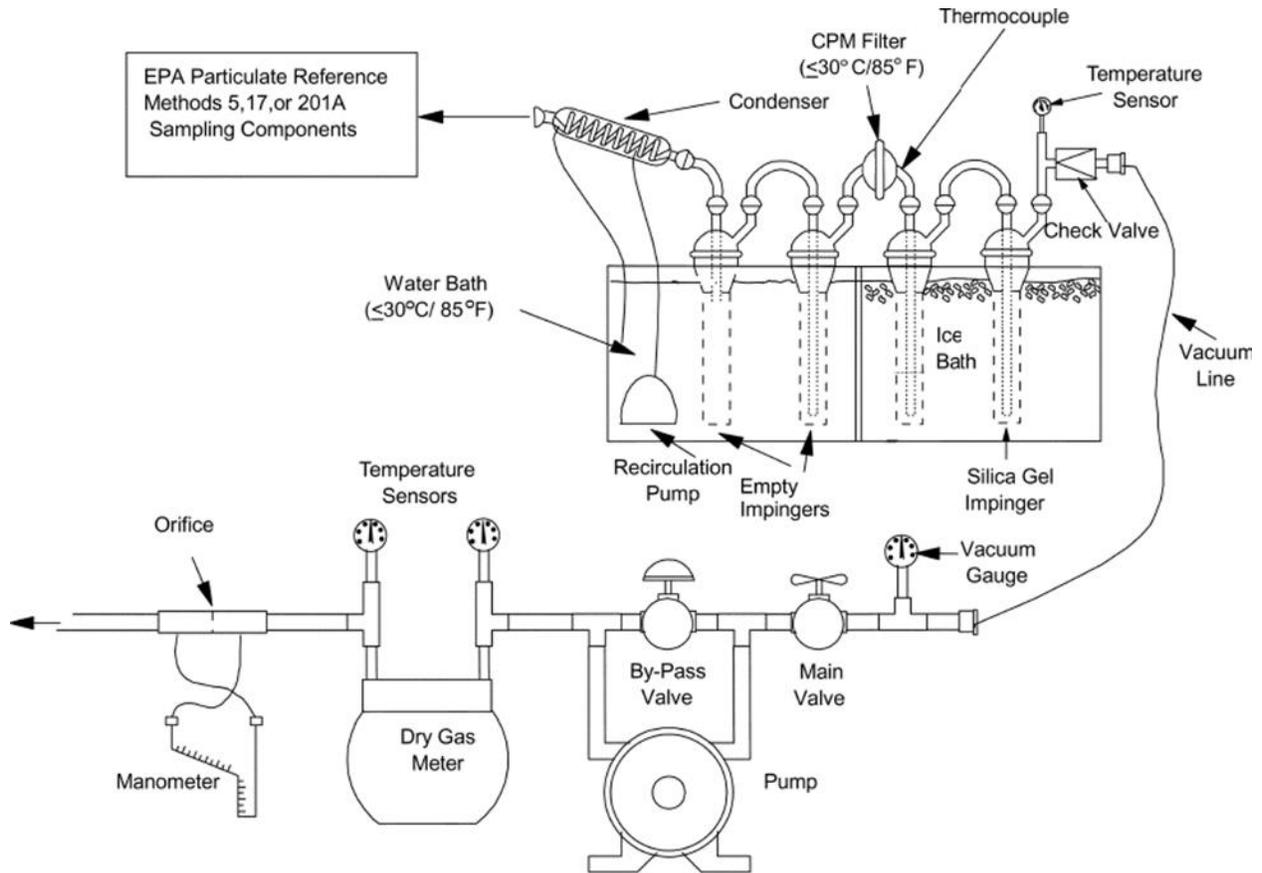


Source Test Guidance Manual



State of Idaho
Department of Environmental Quality

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Abbreviations, Acronyms, and Chemical Nomenclature

BH	back half
CAM	compliance assurance monitoring
CFR	Code of Federal Regulations
DEQ	Idaho Department of Environmental Quality
dscf	dry standard cubic feet
EMC	Emissions Measurement Center
EPA	US Environmental Protection Agency
ERT	electronic reporting tool
ft ³	cubic feet
FH	front half
Hg	mercury
gr	grain
IDAPA	Numbering designation for all Idaho administrative rules
lb	pound
MACT	Maximum achievable control technology
ml	milliliter
mg	milligram
NESHAP	National Emission Standards for Hazardous Air Pollutants
NCASI	National Council for Air and Stream Improvement
NSPS	New Source Performance Standards
PM	particulate matter
QA	quality assurance

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Preface

This document specifies the procedures and protocols suggested for sources of air pollution in Idaho subject to the “Rules for the Control of Air Pollution in Idaho” (IDAPA 58.01.01 *et seq.*); the Idaho Environmental Protection and Health Act (Idaho Code §39-100 *et seq.*); and applicable permits, orders, and decrees to determine compliance with Idaho’s air quality regulations.

This guidance replaces “Section I – Source Test Methods” of the Idaho Department of Environmental Quality’s (DEQ’s) 1986 *Procedures Manual for Air Pollution Control*.

This guidance is intended for use within the air quality program. For use with other DEQ programs, such as hazardous waste regulated by the Resource Conservation and Recovery Act, check with the appropriate program for guidance.

Questions regarding this document should be addressed to the following:

Air Division Administrator
Idaho Department of Environmental Quality
1410 North Hilton St.
Boise, Idaho 83706
(208) 373-0502

Disclaimer

This guidance manual is intended to help environmental managers, source test contractors, and others understand DEQ’s expectations for source test protocol and report content. This 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 US Environmental Protection Agency. It is provided as general guidance and does not alter the discretionary authority of DEQ to protect public health.

Any mention of brand names in this manual is only for illustration purposes and does not constitute an endorsement of the products nor of the acceptability of the products.

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1 Purpose

This manual is intended to clarify the Idaho Department of Environmental Quality's (DEQ's) existing regulatory requirements by providing guidance on how to prepare for stationary source testing and report the results. This manual identifies the information that DEQ recommends operators of air pollution sources and their contractors collect when conducting source tests (also known as performance, emissions, compliance, or stack tests) to show compliance with the test methods and procedures contained in the "Rules for the Control of Air Pollution in Idaho" (IDAPA 58.01.01.157). This manual also provides guidance about potentially applicable federal testing requirements, DEQ's preferred protocol and report content, parametric monitoring during tests, and various technical issues. This manual does not provide detailed systematic instructions related to sampling, recovery, or analysis, which is information that can be found in the promulgated reference methods.

1.1 Source Testing Defined

For this manual, source testing is defined as any standardized procedure of actions using calibrated tools to determine a rate or concentration to verify emissions from a source or the accuracy of an emissions monitor. Unless otherwise specified, a source test usually consists of three separate test runs using the applicable test method.

1.2 Source Test Acceptance

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 Standards [NSPS]), a permit, an order, or a consent decree) should be conducted according to the requirements of the rules and regulations. It is preferred, but not required, that source testing to determine compliance with an emissions standard is conducted by an independent test company. 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 according to this guidance document should allow DEQ to accept the results with minimal or zero follow-up information requests to the facility or test contractor.

1.3 Source Test Rejection

Failing to test in accordance with approved test methods may result in DEQ's rejection of the test. Rejection of a source test for any reason or failure of test results to document compliance with an applicable standard could result in a formal enforcement action by DEQ. A rejected source test or test results that fail to document compliance with an applicable standard will not satisfy the testing requirements imposed by state and/or federal rules or regulations, permits, orders, or consent decrees. Any deviations from the approved methods should have prior written approval from DEQ in order for the test to be accepted.

1.4 Source Test Conditions

The source test should be conducted under operational conditions (e.g., percent-rated capacity and type and moisture content of fuel and process materials) specified in the applicable permit, order, or consent decree. If the operational requirements are not specified, the source test shall be conducted at worst-case normal operating conditions. For DEQ to ensure continuous compliance, DEQ may impose operational limitations or require additional testing if the test is conducted under conditions other than worst-case normal operating conditions. Worst-case normal operating conditions are those conditions of fuel type(s) and moisture content, raw material composition used in the process, emissions control equipment parameters, and process operational procedures that are variable or could be expected to be encountered during process operation and would result in the highest pollutant emissions from the process. By pollutant, DEQ means the pollutant or pollutants that are the subject of the test. In general, if the operating requirements are not specified in a rule or permit, operating a source at greater than 80% of maximum capacity will satisfy the worst-case normal requirement. However, some emission sources do not operate near maximum capacity, and in those cases, operating near normal operating conditions is acceptable. As an example, one permit defined worst-case normal operating conditions for a source as 90% of the 95th percentile of the previous year's average operating conditions. DEQ may request historical operating data from the owner/operator to verify that the test was conducted at worst-case normal operating conditions.

In some instances, operating at a low production rate may be worst-case normal. This situation has occurred in kilns when measuring dioxin/furan emissions because a lower production rate causes the kiln temperature to rise into the range where dioxin/furan formation is more prevalent. Low production rates may also be applicable for worst-case normal conditions when attempting to demonstrate compliance with a destruction efficiency requirement.

1.5 Stack Configuration and Access

DEQ may require owner/operators to provide the following under permits to construct (IDAPA 58.01.01.211) and Tier II operating permits (IDAPA 58.01.01.405):

1. Sampling ports of a certain size, number, and location.
2. Safe access to each port.
3. Instrumentation to monitor and record emissions data.
4. Any other sampling and testing facilities as may be deemed reasonably necessary.

Sampling ports and associated sampling traverse points should meet the stack location requirements in the US Environmental Protection Agency's (EPA's) Method 1. Instrumentation to monitor and record emissions data may be provided by the owner/operator through a contract with an independent test company.

1.6 Related Rules

The "Rules for the Control of Air Pollution in Idaho" (IDAPA 58.01.01.157) state the following:

157. TEST METHODS AND PROCEDURES. The purpose of this Section is to establish procedures and requirements for test methods and results. Unless otherwise specified in these rules, permit, order, consent decree, or prior written approval by the Department: (4-5-00)

01. General Requirements. If a source test is performed to satisfy a performance test requirement or a compliance test requirement imposed by state or federal regulation, rule, permit, order or consent decree, then the test methods and procedures shall be conducted in accordance with the requirements of Section 157. (4-5-00)

02. Test Requirements. Tests shall be conducted in accordance with the following requirements. (4-5-00)

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. (4-5-00)

b. The Department may impose operational limitations or require additional testing in a permit, order or consent decree if the test is conducted under conditions other than worst-case normal. (4-5-00)

IDAPA 58.01.01.211.04 and IDAPA 58.01.01.405.02 also state:

a. Such test shall be at the expense of the owner or operator. (5-1-94)

b. The Department may monitor such test and may also conduct performance tests. (5-1-94)

c. The owner or operator of a stationary source or facility shall provide the Department fifteen days prior notice of the performance test to afford the Department the opportunity to have an observer present. (5-1-94)

2 Test Acceptance Determination

DEQ will review the final test results within a reasonable time and make a written acceptance or rejection determination for the test. DEQ considers a reasonable time for making an acceptance determination to be 60 days, although a longer time may be necessary depending on the complexity of the test and staff availability.

2.1 Additional Information Requests

DEQ may request additional information to determine whether the test results can be accepted. The final determination will be made after the complete test report and any additional information requested by DEQ are received. All tests do not have to meet the same level of stringency for quality assurance (QA). For example, an engineering test conducted by a facility to determine how emissions change under varying operating conditions does not have to document compliance with all of the QA guidelines in the source test report if the results will not be used for permitting purposes. Tests conducted to demonstrate compliance with an emissions standard or limit, or to develop emission factors that will be used for permitting purposes must meet a higher level of quality assurance.

2.2 Related Rules

IDAPA 58.01.01.157.05 states the following:

- 05. Test Results Review Criteria.** The Department will make every effort to review test results within a reasonable time. The Department may reject tests as invalid for: (4-5-00)
- a. Failure to adhere to the approved/required method; (4-5-00)
 - b. Using a method inappropriate for the source type or operating conditions; (4-5-00)
 - c. An incomplete written report; (4-5-00)
 - d. Computational or data entry errors; (4-5-00)
 - e. Clearly unreasonable results; (4-5-00)
 - f. Failure to comply with the certification requirements of Section 123 of these rules; or (4-5-00)
 - g. Failure of the source to conform to operational requirements in orders, permits, or consent decrees at the time of the test. (4-5-00)

3 DEQ Test Observation

DEQ may have an observer present at any source test conducted at any facility in Idaho, regardless of the reason for the test. DEQ may observe sample recovery, whether it is at the collection site or at a laboratory, as part of the overall source test observation.

3.1 Advance Notice Required

Notify the appropriate DEQ regional office, at least 15 days before a compliance test required by a rule, permit, order, or consent decree, is conducted. Appendix A provides regional office contact information. Longer advance notice is usually required for sources that are regulated under the New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), or maximum achievable control technology (MACT) programs. Unless specified otherwise in the subparts, both NSPS and NESHAP programs require at least 30-calendar days' notice of any stack test (40 CFR 60.8(d) and 40 CFR 61.13(a) and (c)), while the MACT program requires at least 60-calendar days' notice (40 CFR 63.7(b)).

Facilities do not have to notify DEQ in advance when engineering tests are conducted only for the purposes of gathering information. However, DEQ should be notified and given the opportunity to observe if the facility plans to use the information to develop emission factors, revise permit conditions, or demonstrate compliance. Any source test results that exceed any emission limit must be reported to DEQ according to the excess emissions procedures (IDAPA 58.01.01.131).

3.2 Observer Involvement

DEQ observers are present to note operational and testing procedures. The observer may be requested by facility personnel or the testing contractor to provide guidance on operation of the process and the monitoring of process and control equipment operational conditions during testing. The observer may, at their discretion, inform the testing contractor and facility personnel of noted departures from testing methodology and from the approved test protocol that may result in test rejection. The observer may also record information about testing or process operating conditions, take photographs, and/or initial any test-related documents such as field run sheets or process monitoring data that must be provided in the final test report. This information may be used during the review of the test report to validate portions of the test results. The facility maintains responsibility for test performance, reporting, and validity.

3.3 Related Rules

IDAPA 58.01.01.157.03 states the following:

03. Observation of Tests by Department Staff. The owner or operator shall provide notice of intent to test to the Department at least fifteen (15) days prior to the scheduled test, or shorter time period as provided in a permit, order, consent decree or by Department approval. The Department may, at its option, have an observer present at any emissions tests conducted on a source. (4-5-00)

4 Approved Test Methods

If a permit or rule does not specify the appropriate test method, DEQ will accept the test methods approved for the applicable pollutants, source types, and operating conditions found in 40 CFR 51, 60, 61, and 63. Copies of methods approved for use in Idaho can be obtained from the EPA's Emission Measurement Center (EMC) website at <http://www.epa.gov/ttn/emc/tmethods.html>. For questions about the correct test method to use, contact DEQ.

4.1 Prior Approval of Changes and Deviations

DEQ will accept changes and deviations in reference methods that have received written approval from EPA (for standards in 40 CFR 60, 61, and 63) or DEQ (for all other emissions standards or for permit requirements) as long as DEQ has determined that the reference method deviations are appropriate for the specific application. However, some subparts of the regulations in 40 CFR 63 specifically withhold state or local agency authority to approve test method deviations.

For information on obtaining EPA approval of test deviations and alternatives, see *EPA Handling of Requests for Approval of Minor/Major Modifications/Alternatives to Testing and Monitoring Methods or Procedures*.¹ Additional information regarding prior EPA-approved test method deviations and alternatives specific to NSPS and NESHAP sources is available on EPA's Applicability Determination Index website at <http://cfpub.epa.gov/adi/>.

4.2 Related Rules

IDAPA 58.01.01.157.02.c–f states the following:

- c. The Department will accept the methods approved for the applicable pollutants, source type and operating conditions found in 40 CFR Parts 51, 60, 61, and 63 in determining the appropriate test method for an emission limit where one is not otherwise specified. (4-5-00)
- d. The following requirements apply to owners or operators requesting minor changes in the test method. As stated in Subsection 157.01 above, without prior Department approval, other changes may result in rejection of the test results by the Department. (4-5-00)
 - i. For federal emission standards codified at 40 CFR Parts 60, 61, and 63, the Department will accept those minor changes which have received written approval of the U.S. EPA Administrator so long as the Department determines they are appropriate for the specific application. (4-5-00)
 - ii. For all other emission standards in these rules or for permit requirements, the Department will accept those minor changes that the Department determines are appropriate for the specific application. (4-5-00)
- e. An owner or operator proposing to use an alternative test method not considered a minor change in Subsection 157.02.d. above, must: (4-5-00)

¹ Emission Measurement Center Guideline Document, EMC GD-022R4, April 21, 2014, at <http://www.epa.gov/ttn/emc/guidlnd/gd22.pdf>.

- i. Demonstrate to the Department by comparative testing or sufficient analysis, that the alternative method is comparable and equivalent to the designated test method. (4-5-00)
- ii. Submit the request for approval to use an alternative test method to the Department at least thirty (30) days in advance of a scheduled test. (4-5-00)
- iii. Obtain, and submit to the Department, EPA approval for use of the alternative test method for emission standards in these rules (except for state only toxic air pollutant standards) or for federal emission standards codified at 40 CFR Parts 60, 61, and 63. (4-5-00)
- iv. Obtain verification that any prior approval of an alternative test method by the Department continues to be acceptable. Alternative methods may cease to be acceptable if new or different information indicates that the alternative test method is less accurate, less reliable, or not comparable with any current state or federal regulation, rule order, permit, or consent decree. (4-5-00)
- f. Prior approval by the Department may not constitute Department approval for subsequent tests if new or different information indicates that a previously Department approved test method is less accurate, less reliable or not comparable with any current state or federal regulation, rule, order, permit or consent decree. (4-5-00)

5 Source Test Protocol Content and Quality Assurance

The test protocol, also known as the quality assurance project plan (QAPP), is the main vehicle for obtaining quality data on a test-by-test basis.² Protocols can be used to define the purpose of a test, obtain DEQ's interpretation of the test requirements, and clarify process monitoring methods. Before conducting an emissions test, owners or operators are strongly encouraged to submit a test protocol to DEQ in writing, at least 30 days in advance. Source test protocols are only required to be submitted for approval when mandated by a permit, order, or consent decree. The following information is typically submitted in a test protocol:

1. Facility name, mailing address, current physical location (if a portable source), telephone number, contact person (including job title), and if applicable, the facility permit number and issuance date.
2. Testing company's name, mailing address, contact person (including job title), and telephone number.
3. Analytical laboratory's name, mailing address, contact person (including job title), and telephone number.
4. Description of each source to be tested, expected test date, pollutants to be measured, and any associated air pollution control devices. Include the name of the manufacturer or model to differentiate between similar equipment.
5. Specific objectives of the test program such as compliance with an operating permit limit or condition, emission factor development, rule applicability determination (e.g., MACT, CAM, or Title V), or periodic monitoring. Protocol approval will depend on the testing objectives. The test results may not be acceptable for all objectives. 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 specific operating and monitoring requirements.
6. Simple block diagram showing each source, any associated air pollution control devices, associated fans, raw material flows, and effluent flows. Do not include engineering drawings. Include any factors that might affect testing or the test results (e.g., batch operations, high moisture or temperature effluents, very high/low effluent flow rates, low emissions rates, and plant operating schedules).
7. Summary table for each source, indicating the pollutants, sampling and analytical procedures (including the method number and date of revision), and all planned deviations from the proposed methods. Unless a deviation to the method is proposed, DEQ will assume that the testing will precisely follow the reference method. If any deviations from a reference method are proposed, a detailed explanation of each deviation must be included. This explanation must state why the deviation is

² US Environmental Protection Agency. 1994. *Quality Assurance Handbook for Air Pollution Measurement Systems: Volume III, Stationary Source Specific Methods*. EPA/600/R-94/038c. Accessed July 2015. <http://www.epa.gov/ttn/emc/qahandbook3/qaiii%201994/qa%20vol%20iii%20-%20sept%201994%20pt1.pdf>. See a discussion of the most recent version of EPA's 1994 quality assurance handbook at <http://www.epa.gov/ttn/emc/email.html#qaqc>.

necessary, document prior approval from DEQ or EPA, or compare the proposed deviation to the reference method requirements.

In some cases, DEQ may approve alternative methods to those identified in Section 4, “Approved Test Methods.” Generally, the facility must prove by comparative testing or sufficient analysis that the alternative method is comparable and equivalent to the method specified in section 4. If additional information indicates that the alternative method may be less accurate, less reliable, or is not compatible with any state or federal regulation, permit, order, or consent decree, DEQ may not provide approval.

8. Dimensioned diagram showing each testing location, stack (or duct) dimensions and area, and distances to the nearest upstream and downstream flow disturbances.
9. Table for each sampling location indicating the number and configuration of sampling ports and the number of traverse points per port.
10. Explanation of the worst-case normal operating conditions (Section 1.4, “General Source Test Conditions”), rated capacity of the process, and conditions at which the process and any associated air pollution control devices will be operated during the testing.
11. List of all operating parameters that will be recorded during the test. The operating parameters to be monitored may already be required by a permit or rule. If operating parameters are not required by a permit or rule, parameters must be monitored to verify that each source is operating at worst-case normal conditions and that all associated air pollution control devices are operating within appropriate ranges as may be defined in an operation and maintenance manual. If the source will be operated outside of currently approved parameter ranges during the test in an effort to expand the acceptable range, this explanation should be included in the protocol.
12. If an EPA reference method will be used without deviation, a copy of the procedure need not be included. However, a copy of other sampling or analytical methods should be provided, even if no deviations are proposed, unless the method is copyrighted. If the method is copyrighted, the source of the method should be identified in enough detail that DEQ can obtain a copy of the method.
13. Formulas for calculations used in data reduction if not provided in the test method. In some cases, simply referring to the reference method may not be adequate. For instance, the reporting of volatile organic compound emissions is not adequately addressed by the reference methods.
14. Examples of field data sheets (including chain-of-custody) and field/laboratory equipment calibration sheets if available. Include process monitoring device calibration information if available.
15. Copies of correspondence and a written synopsis of relevant conversations with DEQ about the test program.

5.1 Submitting the Protocol

Submit the test protocol to the DEQ regional office with jurisdiction over the facility. The test protocol should be submitted at least 30 days in advance of the anticipated test date to give DEQ time to review the protocol and, when appropriate, allow time for an audit sample to be ordered

and shipped to the test site. The actual test date can be provided after the protocol is submitted. DEQ must be notified of the actual test schedule at least 15 days in advance of the start of testing so that DEQ can arrange for an observer to be present. Failure to provide adequate notification could lead to rejection of the test results.

When source testing is required on a recurring basis, a single source test protocol may be submitted for approval; thereafter, a letter referencing the previously approved protocol is sufficient, if that protocol is still considered acceptable. A facility owner/operator should obtain verification that a previously approved protocol is still acceptable.

5.2 Electronic Reporting Tool

Test protocols may be prepared and submitted electronically using EPA's electronic reporting tool (ERT).³ ERT provides a format that allows consistent criteria to quantitatively characterize the quality of data collected during an emissions test and highlights the need to document key information required by the test methods.

5.3 Related Rules

IDAPA 58.01.01.157.01.a states the following:

- a. Prior to conducting any emission test, owners or operators are strongly encouraged to submit to the Department in writing, at least thirty (30) days in advance, the following for approval:
 - i. The type of method to be used; (4-5-00)
 - ii. Any extenuating or unusual circumstances regarding the proposed test; and (4-5-00)
 - iii. The proposed schedule for conducting and reporting the test. (4-5-00)
- b. 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. (4-5-00)

IDAPA 58.01.01.157.03 states the following:

- 03. Observation of tests by Department Staff.** The owner or operator shall provide notice of intent to test to the Department at least 15 days prior to the scheduled test, or shorter time period as provided in a permit, order, consent decree or by Department approval. The Department may, at its option, have an observer present at any emissions tests conducted on a source. (4-5-00)

³ The Electronic Reporting Tool (ERT), a Microsoft Access desktop application, is an electronic alternative to paper source test reports documenting emissions measurements for stationary sources. Download at <http://www.epa.gov/ttn/chief/ert/index.html>.

6 Report Deadlines and Certifications

If a source test is performed to satisfy a test requirement imposed by state or federal regulation, rule, permit, order, or consent decree, a written report shall be submitted to DEQ within 60 days of test completion, unless a different reporting period is specified. If a longer period is needed to submit the test report, a written request may be made to the appropriate DEQ regional office.

For any source test performed to satisfy an NSPS (40 CFR 60) testing requirement, the test must be conducted *and the report submitted* within 60 days after achieving the maximum production rate at which the affected facility will be operated but not later than 180 days after initial startup (40 CFR 60.8). All NSPS-required test reports must be submitted to both DEQ and EPA. For any source test performed to satisfy NESHAP/MACT (40 CFR 63) testing requirements, the results must be submitted before the close of business on the 60th day after completion of field sample collection (40 CFR 63.7(g)). The NSPS and NESHAP/MACT source test general provisions can be viewed at the Electronic Code of Federal Regulations website: <http://www.ecfr.gov>.

All reports and notifications should be submitted to the local DEQ regional office (Appendix A). All reports must be certified by a responsible official of the company, and the certification must be submitted in hardcopy with an original signature. The certification must state that “based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.” Failure to include the required certification will delay DEQ’s review of the test results.

6.1 Requesting Source Test Deadline Extensions

DEQ has authority to approve some source testing deadline extensions, but certain other extensions must be approved by EPA. Possible responses to extension requests are explained below:

1. **For source tests to determine compliance with Part 60 NSPS requirements—** Currently, DEQ is not delegated authority to grant time extensions for any Part 60 NSPS program requirement. Delays and extensions in testing for NSPS requirements must be approved by EPA.
2. **For source tests to determine compliance with Part 61 NESHAP requirements—** Currently, DEQ is not delegated authority to grant time extensions for any Part 61 program requirement. Delays and extension in testing for these requirements must be approved by EPA.
3. **For source tests to determine compliance with Part 63 NESHAP requirements—** DEQ can only grant test deadline extensions for force majeure events in accordance with 40 CFR 63.7(a)(4), as a delegated Category I authority in 40 CFR 63.91(g)(1)(i), for those NESHAP standards that DEQ has been delegated authority by EPA.⁴ Delays and extensions in testing deadlines for subparts that DEQ does not have delegated authority for must be approved by EPA.

⁴ EPA’s NESHAPs delegation letter is available at deq.idaho.gov/air-quality/regulatory-programs/neshaps-for-hazardous-air-pollutants/.

4. **For other source tests with other purposes**—For source tests with other purposes, a request for a source test deadline extension must be submitted to DEQ in writing and must include the reason for the extension request and proposed test dates. The request must be submitted to the appropriate DEQ regional office (Appendix A). DEQ will review the request according to the *Clean Air Act National Stack Testing Guidance* (<http://www2.epa.gov/compliance/clean-air-act-national-stack-testing-guidance>) to determine if an extension to the test deadline is appropriate.

6.2 Related Rules

IDAPA 58.01.01.157.04 states the following:

04. Reporting Requirements. If the source test is performed to satisfy a performance test requirement imposed by state or federal regulation, rule, permit, order, or consent decree, a written report shall be submitted to the Department within sixty (60) days of the completion of the test. (4-11-15)

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. (4-5-00)

b. Include all data required to be noted or recorded in any referenced test method. (4-5-00)

IDAPA 58.01.01.123 states the following:

123. CERTIFICATION OF DOCUMENTS. All documents, including but not limited to, application forms for permits to construct, application forms for operating permits, progress reports, records, monitoring data, supporting information, requests for confidential treatment, testing reports or compliance certifications submitted to the Department shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (5-1-94)

7 Source Test Report Content and Format

Source test reports should contain the following information, as applicable. Missing data may result in DEQ requesting additional information. The source owner/operator, source test company, and/or the DEQ regional office may be notified each time additional information is requested. A report may be rejected if numerous errors and omissions are identified. Each page of the report should be numbered sequentially.

DEQ usually needs 60 days to review a source test report. Additional time may be required if the report is incomplete, poorly organized, contains numerous errors, if the testing program is complex, or if the backlog of reviews is substantial.

EPA's *Clean Air Act National Stack Testing Guidance*⁵ discusses test reports in the following:

The written test report should be sufficient to assess compliance with the underlying regulatory requirements, permit conditions, or enforcement order, and adherence to the test requirements. When reviewing the site-specific test plan, the delegated agency should identify for the facility any information that should be included in the test report. During the actual test program, there are usually modifications to the procedures specified in the site-specific test plan, and these modifications should be documented in the test report.

Similar to the site-specific test plan, certain basic elements should be addressed in a test report to document the testing conditions and results, and enable the delegated agency to determine whether a complete and representative stack test was performed. For a prototype of a sufficiently detailed test report, see Emission Measurement Center Guideline Document (GD-043), "Preparation and Review of Emission Test Reports," (December 1998) (www.epa.gov/ttn/emc/guidlnd.html). If the test report does not contain sufficient information with which to adequately review the testing process and data results, it is within the discretion of the delegated agency to request additional information, or require another test if appropriate.

The test report should include chain-of-custody information from sample collection through laboratory analysis including transport. It also should include sufficient raw data and cross correlations in the appendices such that a new set of calculations including statistics could be independently generated from the raw data if necessary.

7.1 Report Content

The following information should be included in source test reports, as applicable:

1. Summary of test program—Include a brief summary that identifies or states, as applicable, the following:
 - a. Overall purpose of the emission test
 - b. Participants (e.g., stack testers, facility personnel, and observers)
 - c. Regulations, if applicable
 - d. Name of plant
 - e. Plant location
 - f. Process description

⁵ US Environmental Protection Agency. 2009. *Clean Air Act National Stack Testing Guidance*. <http://www2.epa.gov/compliance/clean-air-act-national-stack-testing-guidance>.

- g. Air pollution control equipment, if applicable
 - h. Emission points and sampling locations
 - i. Pollutants measured
 - j. Dates of emission testing
2. Identification of the test methods, including sample collection, recovery (with storage conditions and method of transport) and analytical procedures.
 3. List of all deviations from the approved pretest protocol and problems associated with the sampling, recovery, analysis, or source/control device operation. An explanation of each deviation is required.
 4. Summary table that includes the run number, test date, volumetric flow rate, emissions concentration, emissions rate in the units of any applicable emissions standards, and all applicable emissions standards.
 5. Summary table of process parameters (including the units) recorded during the actual testing period to verify that each emission source was operating at worst-case normal operating conditions or at the levels specified in the applicable permit or any applicable NSPS, NESHAP, MACT, or approved source test protocol, and all associated air pollution control devices were operating normally. Calibration information pertaining to the process and control device monitoring equipment should also be provided.
 6. Schematic of each sampling location that includes the following:
 - a. Duct diameter
 - b. Direction of flow
 - c. Dimensions to nearest upstream and downstream disturbances (include number of duct diameters)
 - d. Location and configuration of the sampling ports
 - e. Port nipple length and diameter
 - f. Number and configuration of traverse points
 7. Certification signed by a test team member certifying that “to the best of their knowledge” the source test report has been checked for completeness, and the results presented therein are accurate, error-free, legible, and represent the actual emissions measured during testing.
 8. Chain-of-custody record verifying the integrity of the samples and field blanks. If samples were collected and analyzed by the test contractor, a chain-of-custody record is not required.
 9. Dates and results of the most recent calibrations for pitot tubes, thermocouples, dry gas meters, rotometers, orifices, and any other equipment used that requires periodic calibration. The test company must be able to supply the actual calibration procedures upon request.
 10. Results of each audit sample (if applicable), including the audit sample number, date of analysis, name of the analyst, and name of the analytical laboratory.
 11. All raw field data obtained during testing. This shall also include all process and control device monitoring and calibration data.

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12. All post-test analytical and calibration data.
 - a. Type of instruments and/or detectors used, including the manufacturer's name, model number, and range.
 - b. Calibration gas certification sheets including the name, range, type, vendor, and expiration date.
 - c. Instrument calibration curves with specific instrument ranges.
 - d. Chromatographic data (when applicable).
 - i. Chromatograms (must be scaled so that the largest target peak is full scale).
 - ii. Identity of all target peaks.
 - iii. Retention times and peak areas/heights.
 - iv. Amount of material introduced to the analyzer (for spiked compounds).
 - v. Attenuation.
 - vi. Integration time table.
 - e. Strip charts (when applicable)—All strip charts must be legible and clearly annotated and must clearly distinguish the concentration trace for each pollutant. Using colored copies or highlighters is strongly recommended. Strip charts should not be used for data reduction if the measured pollutant concentration is highly variable. Strip chart annotations should include the following:
 - i. Start/stop time of each run, test date, and run identifier.
 - ii. Introduction point of calibration gases.
 - iii. Calibration gas concentrations.
 - iv. "Zero" point concentration and concentration at full scale (span) for each pollutant.
 - v. Chart speed.
 - vi. Point(s) at which changes are made to the span or chart speed.
 - f. Data logger printouts.
 - g. QA summary for all field activities.
 - i. For instrumental analyzers, a table(s) similar to those provided in EPA Method 6C, Figures 6C-3, 6C-4, and 6C-5 must be provided.
 - ii. For laboratory instrumentation, a table of all QA checks, (i.e., spikes, recovery studies, and breakthrough determinations) should be included, when applicable.
 - h. Laboratory calculations and a summary of results.
 - i. Laboratory results should include a detailed summary of all deviations from the approved methods or problems with the analyses.
 - j. If a subcontracted laboratory is used, laboratory results should include a signature of the responsible official at the analytical laboratory or a laboratory analyst.
 13. Complete set of sample calculations for one run of each pollutant test. This sample should show all the formulas and input values used to calculate the emissions from the raw data.
 14. All other pertinent information used to calculate the emissions results.
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7.2 Electronic Reporting Tool

Test reports that use EPA reference methods may be prepared and submitted electronically using EPA's ERT⁶. Some EPA regulations require report preparation in the ERT format with the report submitted electronically through EPA's Central Data Exchange at <https://cdx.epa.gov>.

The pollutants quantified by these test methods include, but are not limited to, the following:

- Filterable particulate matter (PM)
- Condensable PM
- Filterable PM₁₀
- Filterable PM_{2.5}
- Carbon monoxide
- Fluoride
- Chlorine, chloride, hydrogen chloride, and total chloride
- Nitrogen oxides
- Sulfur dioxide
- Metals (antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, manganese, mercury, nickel, yellow or white phosphorus, selenium, silver, thallium, and zinc)
- Total organic compounds (as carbon, ethane, methane, or propane)

The ERT replaces the time-intensive manual preparation and transcription of stationary source emissions test plans and reports currently performed by contractors for emissions sources and the time-intensive manual QA evaluations and documentation performed by state agencies. The ERT provides a format that allows consistent criteria to quantitatively characterize the quality of data collected during an emissions test and highlights the need to document key information required by the test methods.

⁶ The Electronic Reporting Tool (ERT), a Microsoft Access desktop application, is an electronic alternative to paper source test reports documenting emissions measurements for stationary sources. Download at <http://www.epa.gov/ttn/chief/ert/index.html>.

8 Process and Control Device Monitoring Requirements

Where process and control device data are recorded during performance tests, accurate measurement of that data should be given nearly as much importance as the accurate measurement of emissions data. The process and control device data are necessary to verify that the source is operating at conditions specified in a permit, order, or consent decree, or at worst-case normal operating conditions.

8.1 Data Monitoring Frequency

Process and control device operational parameters (e.g., production rate, fuel input rate, pressure drop, and flow rate) should be monitored and recorded at least once every 15 minutes of sampling run time unless other frequencies would provide sufficient data, or different frequencies are specified in an applicable permit or consent order. When a totalizing meter is used, recording the value at the beginning and end of each test run is sufficient. In the case of sampling scrubber water for concentrations of constituents such as total dissolved solids and/or total suspended solids, one composite sample consisting of four grab samples taken at least 10 minutes apart should be taken over the course of each run.

8.2 Instrument Calibration

The calibration data of process and control device instrumentation should be included in the test report. Calibration data should include, at a minimum, the manufacturer's stated accuracy of the instrument.

9 Technical Issues

This section discusses some common technical issues related to source testing.

9.1 Correcting Field Data Errors

Field data and process and/or control device operation monitoring sheets should be completed in pen. DEQ recommends that field data corrections are made by putting a single line through the error, writing in the correct data, and initialing the correction. Using correction fluid or any other means of concealing errors is not acceptable.

9.2 Audit Samples

Audit samples are available for a number of pollutants and are required to be analyzed for test methods involving chemical analysis (40 CFR 60.8(g) and 40 CFR 63.7(c)). Audit samples are provided to the laboratory analyzing the test samples as a QA measure. The laboratory analyzes the audit samples along with the collected test samples to provide information on analytical method accuracy.

When an audit sample is required and available, the source owner or operator is responsible for acquiring an audit sample from an accredited audit sample provider. *If audit samples are available for the test method(s) the owner or operator plans to use, audit samples must be purchased from an accredited audit sample provider.* A list of accredited audit sample providers and test methods that have available audit samples can be obtained from EPA's EMC website at <http://www.epa.gov/ttn/emc/email.html#audit>.

9.3 Detection Limits

A reasonable attempt must be made to obtain sample results greater than the method detection limit when collecting data that will be used to develop emission factors. Conceptually, the "limit of detection" is the smallest amount of a substance that an analytical method can reliably distinguish from zero. Several ways to potentially increase the pollutant sample to greater than the detection limit include increasing the sample volume, concentrating the sample, and using high-sensitivity analytical techniques. If appropriate steps are not taken, sample results less than the detection limit could be considered unacceptable. If the result for a sample is less than the analytical detection limit, despite reasonable efforts to obtain detectable results, the detection limit should be used in the source emissions calculations, except for EPA Methods 23 and 29, as explained below. For reagent blank values less than the analytical detection limit, a value of zero shall be used.

If an emission limit already exists, sample results less than the detection limit can often be used to demonstrate compliance with the emission limit by using the method detection limit in the calculations. If the source would still be in compliance when using the method detection limit in the emission calculations, the emission test demonstrates compliance.

The procedures for polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans with values less than the detection limit are specified immediately after section 9.9 of EPA Method

23. These procedures may also be used for polycyclic aromatic hydrocarbons. For EPA Method 29 heavy metals, use the following guidelines:

- If all of the fractions are greater than the detection limit, use the reported values. For example, 10 milligrams (mg) mercury (Hg) front-half (FH) and 1 mg Hg back-half (BH) = 11 mg Hg (total).
- If one or more fractions, but not all, are less than the detection limits, use the detectable values only. For example, 10 mg Hg (FH) and <1 mg Hg (BH) = 10 mg Hg (total).
- If all fractions are less than the detection limit, use the detection limits. For example, <10 mg Hg (FH) and <1 mg Hg (BH) = <11 mg Hg (total).

9.4 Reagent Blanks

Chemical reagents should be analyzed for contamination, preferably before use in the field, to avoid gross contamination problems. The sample results may be corrected for minor contamination based on analyzing blanks. The maximum allowable blank correction is 0.001% of the reagent weight used, unless specified otherwise by the test method. EPA Method 5, for instance, limits the blank correction to 0.001% of the weight of acetone used for recovery of the sample train.

9.5 Sampling Times and Volumes

A test program shall consist of three test runs per pollutant with recommended minimum sampling times and volumes greater than or equal to those stipulated in state/federal requirements. The minimum sampling times do not apply for variable processes (e.g., batch operations). In these cases, sampling during an entire batch cycle may be necessary.

9.6 Minimum Particulate Matter Sample Catch

In some instances when sampling for PM, the mass of the sample catch is very small, which can cause problems with the analysis, such as negative sample weights. EPA uses a minimum catch of about 50 mg (front half) when calculating the minimum sample volume required to show compliance with new regulations. That is, EPA calculates how many cubic feet of sample are necessary to collect 50 mg on the probe and filter for a source emissions concentration at the level of the standard. Then, although the tester may collect much less than 50 mg during the compliance test, EPA and DEQ can be reasonably sure that the source is in compliance using a three-run average.

9.6.1 Demonstrating Compliance

When determining compliance with an emission limit, a tester does not always have to collect the target catch. Instead, DEQ suggests that the tester sample enough stack gas, based on a calculation that if the source was exactly at the level of the emission standard, the sample catch would equal the target catch. If, at the end of the test, the catch were smaller than the target,

DEQ could still conclude that the source is in compliance, although the exact emission level might be unknown.⁷

Example PM target catch:

Source limit: 0.02 grains per dry standard cubic foot limit (gr/dscf)

Sample volume: 30 dry standard cubic feet (dscf, ft³)

Target catch: 38.9 mg

Using the following equation:

$$(0.02 \text{ gr/dscf})(1 \text{ lb}/7,000 \text{ gr})(454,000 \text{ mg/lb})(30 \text{ dscf}) = 38.9 \text{ mg}$$

To prove compliance, the sample results need to have less than 38.9 mg.

9.6.2 Developing Emission Factors

Data indicate that very acceptable precision and repeatability (within about 0.1 mg) can be achieved for catches around 10 mg. In some cases, the source's emission rate could be established with sample catches at these levels with a minimized amount of uncertainty if the number of test runs were increased to six or nine. However, when process operation is very short, which dictates that the test runs also be very short, collecting even this small amount of sample can become a problem. Special testing schemes must be developed for these cases.

DEQ will accept a 3 mg PM catch if a reasonably large sample volume has been collected because that is the EPA Method 5 detection limit as described in section 2.3 of EPA Method 5I. A sample catch between 1 and 3 mg may be used for calculating emission rates, with the understanding that the resulting emission rates have a high degree of uncertainty. Results of less than 1 mg should not be used for calculating emission rates or pollutant concentrations. Testers should follow good practices when collecting and analyzing particulate samples. These practices include using low residue solvents, ensuring clean wash bottles and brushes, using low-tare plastic or Teflon beakers and petri dishes, and ensuring careful handling in the lab. Repeating sample brushing, rinsing, and collection procedures three and four times in the interest of thoroughness can only improve the results.

9.7 Fuel-Burning Equipment Particulate Matter Altitude Correction

The fuel-burning equipment particulate matter standards (IDAPA 58.01.01.675-681) require that an altitude correction be made. IDAPA 58.01.01.680 states "For purposes of Sections 675 through 680, standard conditions shall be adjusted for the altitude of the source by subtracting one-tenth (0.1) of an inch of mercury for 100 feet above sea level from the standard atmospheric pressure at sea level of 29.92 inches of mercury."

⁷ Based on minimum detection limit guidance for EPA Method 5 (Letter from Michael Ciolek, EPA, Office of Air Quality Planning and Standards, to Donald Wright, Raritan Depot, Minimum Detection Limit for EPA Method 5. January 31, 1997).

This correction must be made for all PM tests conducted to demonstrate compliance with the fuel-burning equipment PM standards. The correction should not be made for PM tests conducted on other sources. The correction for altitude also should not be used in calculating emissions from fuel-burning equipment in other units, such as pounds per hour.

9.8 Testing Outside Permit Requirements

Occasionally, facility owners/operators need to make changes to a process or control device due to economic or environmental concerns. These changes could include a production increase, fuel switch, feed material change, or control device operational change. These potential changes may need to be evaluated by a source test to determine new emission profiles or control device operational characteristics. *Facilities can operate outside of permitted operating constraints when conducting source tests.*

To afford facilities the flexibility to test outside permitted operating constraints, DEQ asks that facilities planning a test program to evaluate potential changes conduct the test(s) according to a DEQ-approved test protocol. After conducting the test, the facility should return to compliance with existing permit restrictions until the appropriate permit action is taken to change the operational restrictions. If the source test results demonstrate an exceedance of an existing emissions limit, an excess emissions report must be submitted to DEQ. An excess emissions report does not need to be submitted for operating outside of permitted operating constraints during the test period if the test results demonstrate compliance with existing emissions limits.

9.9 EPA Interim Guidance on the Treatment of Condensable Particulate Matter

Industry stakeholders have expressed concern that source-specific condensable particulate matter (CPM) test results obtained with EPA Method 202 can include positive bias that results in overestimation of emissions. Method 202 involves the use of variety of solvents and materials, implemented by individuals under various environmental conditions, all of which present the potential for contamination of emission samples. Upon review of industry's concerns, on April 8, 2014, EPA's Office of Air Quality Planning and Standards issued the memorandum, *Interim Guidance on the Treatment of Condensable Particulate Matter Test Results in the Prevention of Significant Deterioration and Nonattainment New Source Review Permitting Programs*.⁸ The guidance states in pertinent part the following:

...[I]t is appropriate on an interim basis to allow major source permit applicants to depart from one aspect of Method 202, specifically the current upper limit of 2.0 mg for the value of the field train recovery blank that can be used in the calculation of source CPM. During the prescribed interim period, air agencies may allow permit applicants to use field train proof blanks in lieu of field train recovery blanks and to allow blank values as high as 5.1 mg to be used in the calculation of CPM.

As recommended by the interim guidance, DEQ will accept using a field train proof blank in lieu of a field train recovery blank, and field train proof blanks as high as 5.1 mg, for EPA Method

⁸ The EPA guidance document is found at <http://www.epa.gov/ttn/emc/methods/method202.html>.

202 CPM tests conducted for major NSR projects in Idaho during the interim period identified in the guidance memorandum. Nevertheless, it is noted that high blank values indicate contamination of the sample results that affect the accuracy of the test results and DEQ strongly encourages the testers to use best practices to reduce blank values (such as using high purity solvents, and thoroughly cleaning the sample train glassware between tests).

For testing projects conducted at sources for purposes other than for major NSR (such as minor NSR and Title V tests not based on a major NSR project), if the sampling campaign is conducted to demonstrate compliance with an emission limit and the field train proof blank is >5.1 and ≤ 10.0 mg, DEQ will consider the margin of compliance when assessing the acceptability of the test results for compliance purposes and will reject test results that have a small margin of compliance (a change in sample mass equal to the blank value would cause a change in the compliance status). If a field train proof blank exceeds 10.0 mg the test results will be rejected.

If a sampling campaign is conducted to develop emissions factors at any source, DEQ will reject the results for use as emission factors if the field train proof blank exceeds 5.1 mg due to the potential inaccuracy of the test results resulting from the high blank contamination.

9.10 Quality Issues Associated with EPA Method 202, Measurement of Condensable Particulate Matter

EPA Method 202, as revised December 21, 2010, contains several (water, acetone, and hexane) reagent blank and sample train blank options. This section identifies how DEQ will interpret and implement the method blanks.

The method as promulgated by EPA contains optional laboratory reagent blanks and field reagent blanks. However, DEQ requires that either a laboratory reagent blank or a field reagent blank of water, hexane, and acetone be analyzed and reported for each sampling campaign to verify low reagent contamination. The reagent blanks must meet the acceptability criteria for allowable reagent blank residue as defined in EPA Method 202, Section 7.2, "Sample Recovery and Analytical Reagents," which states the following in part:

7.2.1 Acetone. Use acetone that is stored in a glass bottle. Do not use acetone from a metal container because it normally produces a high residual mass in the laboratory and field reagent blanks. You must use acetone that has a blank value less than 1.0 ppmw (0.1 mg/100 ml) residue.

7.2.2 Hexane, American Chemical Society grade. You must use hexane that has a blank residual mass value less than 1.0 ppmw (0.1 mg/100 ml) residue.

7.2.3 Water. Use deionized, ultra-filtered water that contains 1 ppmw (1 mg/L) residual mass or less to recover material caught in the impinger.

EPA Method 202 requires that the train glassware used to collect and analyze samples be baked at 300 °C for 6 hours before sampling at each source category at a facility. As an alternative to baking the glassware, a field train proof blank, as identified in section 8.5.4.10 of EPA Method 202, can be performed on the sampling train glassware. A field train proof blank is collected prior to conducting the test. The method, as promulgated by EPA, does not address what to do

with the field train proof blank results. If a field train proof blank is conducted, DEQ will allow subtracting the sum of the residual mass from the organic and inorganic rinses up to 5.1 mg from the field sample weight. If the field train proof blank residual weight is greater than 5.1 mg, DEQ will allow subtracting up to a maximum of 5.1 mg from the field sample weight, and the tester should consider assessing their sample recovery practices and materials used and retesting the source. (See Section 9.9 above for information regarding how DEQ will assess field train proof blank results at major NSR sources and other sources.) If the field train proof blank is greater than 10.0 mg at any source, DEQ will reject the sampling results due to poor data quality.

EPA Method 202 as promulgated by EPA contains a mandatory field train recovery blank. (EPA has since issued interim guidance that allows using a field train proof blank in lieu of a field train recovery blank. Section 9.9 of this manual discusses using the interim guidance.) The field train recovery blank must be collected after the first or second run of the test. The method states “From the field sample weight, you will subtract the condensable particulate mass you determine with this blank train or 0.002 g (2 mg), whichever is less.” The method does not address how to handle field train recovery blanks that exceed 2.0 mg. The field train recovery blank is intended to assess how well the tester recovered the sample from the train for the prior run. Therefore, if the field train recovery blank exceeds 2.0 mg, DEQ believes this indicates that the tester may have had a poor recovery of the sample, and any field train recovery blank mass that exceeds 2.0 mg, up to but not exceeding 10.0 mg, should be added to the field sample weight. If the field train recovery blank exceeds 10 mg, the condensable PM sampling campaign will not be accepted by DEQ due to poor data quality.

Example field reagent blank acceptability calculation:

Hexane blank volume = 150 milliliter (ml)

Measured residual mass from hexane blank = 0.12 mg

$0.12 \text{ mg}/150 \text{ ml} \times 100 \text{ ml} = 0.08 \text{ mg}/100 \text{ ml}$ (acceptable if $<0.1 \text{ mg}/100 \text{ ml}$)

Example sample mass calculation including a field train proof blank and field train recovery blank:

Field sample mass before blank correction = 19.3 mg

Field train proof blank = 6.0 mg (can subtract up 5.1 mg)

Field train recovery blank = 4.5 mg (can subtract up to 2.0 mg, and add any mass exceeding 2.0 mg)

Sample mass = $19.3 \text{ mg} - 5.1 \text{ mg}$ (proof blank maximum) $- 2.0 \text{ mg}$ (recovery blank maximum subtraction) $+ 2.5 \text{ mg}$ (recovery blank that exceeds 2.0 mg) = 14.7 mg

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Appendix A. DEQ Regional Office Contact Information

<p>Boise Regional Office 1445 N. Orchard St. Boise, ID 83706 (208) 373-0550 Toll-free: (888) 800-3480</p>	<p>Coeur d'Alene Regional Office 2110 Ironwood Parkway Coeur d'Alene, ID 83814 (208) 769-1422 Toll-free: (877) 370-0017</p>
<p>Idaho Falls Regional Office 900 N. Skyline Drive, Suite B Idaho Falls, ID 83402 (208) 528-2650 Toll-free: (800) 232-4635</p>	<p>Lewiston Regional Office 1118 "F" St. Lewiston, ID 83501 (208) 799-4370 Toll-free: (877) 541-3304</p>
<p>Pocatello Regional Office 444 Hospital Way, #300 Pocatello, ID 83201 (208) 236-6160 Toll-free: (888) 655-6160</p>	<p>Twin Falls Regional Office 650 Addison Ave West, Suite 110 Twin Falls, ID 83301 (208) 736-2190 Toll-free: (800) 270-1663</p>

Contact information and a map of regional offices are available at deq.idaho.gov/regional-offices-issues/.