



AIR POLLUTION CONTROL DISTRICT

POLICY: Approval, Observation, and Evaluation of Source Tests

EFFECTIVE: February 23, 2023

POLICY NUMBER: 16.A

GENERAL:

This District Policy provides guidance to Imperial County Air Pollution Control District (ICAPCD) Staff with their observation of source tests, and enforcement actions by Staff pertaining to source tests. Source tests are carried out by permittees for a variety of reasons, including but not limited to, demonstrating compliance with specific ICAPCD rules, state regulations, permit conditions, or compliance plan agreements. A permittee is generally required to administer an initial source test once their new/modified equipment, regulated under an Authority to Construct (ATC), is fully constructed and operable, in order to demonstrate compliance with applicable emissions limits. After the permitted equipment's initial test, the permittee is required to test the equipment on an annual basis, or based on the schedule per the equipment's Permit to Operate (PTO). The ICAPCD may also require the permittee to conduct a source test at any other time in order to demonstrate compliance or quantify emissions from the permitted equipment.

ICAPCD Staff reviews source test plans, observes source tests, and reviews source test results to ensure that the results are representative, accurate, and precise. ICAPCD must have confidence in the quality of the test results to determine compliance, and evaluate emission controls. The primary responsibilities of ICAPCD Staff, as described in this Policy, consists of the review and approval of source test plans, preparation for source test observations, observing source tests, reviewing source test report results, and compliance/enforcement assessments.

SOURCE TEST PLANS:

1. Prior to a permittee conducting any source test, the permittee shall submit a source test plan (STP) to the ICAPCD for review and approval. The permittee must fulfill this requirement for each required source test (initial start-up, annual, etc.). The STP must be developed by an independent third party tester (source tester), and the same independent third party tester shall administer the source test on the behalf of the permittee. If the ICAPCD does not approve a STP, the test results become invalid, and the permittee will need to re-do the source test upon receiving approval from the ICAPCD.
2. The permittee, or their independent third party tester, shall schedule all source tests to occur during daylight hours, Monday-Friday (excluding State and federal holidays), in order for ICAPCD Staff to observe the source test. If scheduling a source test during this timeframe results in compromising operational conditions or the safety of testing personnel, the permittee or third party tester shall present alternate

arrangements/scheduling to the ICAPCD, prior to testing, and preferably in the STP. During the test, ICAPCD Staff shall be granted access to:

- A. Real time data collected by testing contractors
 - B. Operational and/or process information from the source
 - C. Testing platforms and testing apparatus
 - D. Any other location District personnel deem necessary to validate testing operations
3. The permittee is required to submit the STP to the ICAPCD at least 30 days prior to the proposed test date. If the permit is specific in the required time of submittal and the STP is not submitted on time, the ICAPCD may require the permittee to postpone the source test. Additionally, enforcement action shall be taken by the ICAPCD with the issuance of a Notice to Comply (NTC), if it is a first-time offense by the permittee, or Notice of Violation (NOV), to the permittee. If the permit is not specific about the STP submittal, ICAPCD Staff (APC Engineer or Inspector) will determine if the submittal date allows sufficient time for review based upon current workload, complexity of the testing, urgency in obtaining emissions data, and other factors. If ICAPCD Staff determines that the STP cannot be reviewed on time, the test must be postponed. The STP must be reviewed for consistency with permit conditions (load requirements) and established source test methods (i.e. U.S. EPA or CARB Test Methods). ICAPCD Staff shall also verify the source tester's credentials, using CARB's Independent Contractor Program List, or other applicable tester resources/databases. In all cases, prior to the initiation of the test, ICAPCD must approve the STP in writing (via email or letter) to the permittee. Either an APC Engineer or APC Division Manager has the authorization to approve an STP.

OBSERVING SOURCE TESTS:

1. ICAPCD Staff must verify that the STP is correctly implemented. ICAPCD Staff must be familiar with the source permit, ICAPCD policy, applicable rules, the STP, the test methods to be used, and any other documentation that are relevant to the STP. The source shall contact the ICAPCD Staff member assigned to witness the source test at least five (5) days prior to the source test to confirm the test date and the specific start time of the test. ICAPCD Staff shall be present during the source test. If ICAPCD Staff is not present, ICAPCD shall classify the test as invalid, unless the permittee obtains prior ICAPCD approval. ICAPCD Staff is not required to be present during the entire source test for the test to be validated; however, it should be up to the Staff member to determine the period of time that he/she will be at the source test site. For all source tests, ICAPCD Staff shall witness a minimum of one complete source test run.
2. ICAPCD Staff must determine if each part of the source test program is consistent with the STP. If a procedure or piece of equipment is significantly different than that contained in the STP (different CARB/EPA test being administered, different make/model of the equipment, etc.), ICAPCD Staff shall inform the source operator and the third party tester. Of particular concern is the level of operation of the equipment (power rating) during the source test relative to the permitted level or the level required by permit conditions. Since tests are usually intended to be conducted at the maximum load allowed by permit conditions (unless ICAPCD has approved a lower load), ICAPCD Staff must verify that the equipment is operating at the proper level. The approved STP is the primary guideline to determine the validity of the test program. ICAPCD Staff observing the test, or an APC Division Manager, must approve all deviations from the STP or the referenced test methods prior to test implementation.

REVIEWING TEST REPORTS:

1. The ICAPCD Staff member reviewing the test report should be the same person who observed the source test. In the event somebody other than the ICAPCD Staff member who observed the test reviews the test report, ICAPCD Staff should get the test observation notes from the Staff member who attended the test. The reviewer should determine the date of test report submittal and verify that it complies with the source permit conditions. Generally, the permittee (or their third party tester) must submit the test report to the ICAPCD within 30 days of the date in which the source test was completed, per the equipment's permit conditions in its ATC or PTO. If the permittee submits the test report after the required permitted deadline, then ICAPCD Staff shall issue a NOV to the permittee.
2. The ICAPCD Staff reviewer must be familiar with the STP and the source permit. The reviewer shall verify that the test program has satisfied the requirements of the permit, specifically evaluating the test report to confirm that the source test fully satisfied the STP and followed all applicable test procedures per the cited ICAPCD Rule(s), U.S. EPA or CARB Test Procedure(s), CARB Executive Order(s) for Vapor Recovery Systems, etc. The reviewer shall check the raw data, data reduction procedures, data transformation, and calculations for at least one test run of each test type. For instrument testing, this will include checking that the strip charts were read correctly, the calibration drift is acceptable, the pollutant values are correctly calculated and averaged, and the mass emission values are correctly calculated.

COMPLIANCE DETERMINATIONS:

1. A source test generally includes three separate test runs, with each of the three test runs forty to sixty minutes in length. Compliance with permit limits or ICAPCD rules are determined by comparing the applicable emission limit with the average of the three source test runs, with this average rounded to the same number of significant figures as the emission limit. If one test run exceeds the emission limit, but the average of the three runs indicates compliance, then ICAPCD deems that the source is in compliance with the permit limit (for all test types). If the first test run indicates noncompliance, the permittee is not allowed to change operations to induce the average of the three runs to indicate compliance. Since a mid-test change in operations is not consistent with the STP, any such change not pre-approved by the ICAPCD invalidates any subsequent tests.
2. When a source fails a required annual source test, ICAPCD shall issue a NOV to the permittee. If the purpose of the source test is to verify emission limits in a new permit (Rule 213, Temporary Permit to Operate) or is the initial test to verify emission limits in a re-evaluated permit, the ICAPCD might not pursue enforcement action. An ICAPCD Division Manager will make this determination, on a case-by-case basis, after reviewing the test report and staff observations for the new/re-evaluated permit that required the source test. The permittee must follow up a failed source test with a repeat test to verify compliance, which follows the previously ICAPCD approved STP, on a separate future date after the original failed source test date. If the permittee believes they are or will be in violation, the permittee may seek variance protection from enforcement action.
3. For sources with continuous emission monitoring systems (CEMS), the annual source test of the emissions unit/source will generally take place on the same date(s) as source's

CEMS certification audit (required per 40 CFR Part 60, Appendix B). Due to the acceptable accuracy deviation allowed for CEMS, it is possible that the source test will indicate noncompliance while the CEMS for the same source simultaneously indicates compliance. If such a situation occurs, the test data of the emissions unit/source takes precedent over the CEMS certification audit data for determining compliance. Conversely, if the CEMS certification audit data indicates a violation while the test data of the emissions unit/source demonstrates compliance, an ICAPCD Division Manager will review the specific case to make a final compliance determination.


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