



Stack Testing Preparations – IDEM's Perspective

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Review your Draft Permit... Please

- Detailed review by qualified staff essential
- Check descriptions, capacities, Air Pollution Control Device parameters, etc.
- Consultants may be useful in some situations
- Correct problems while the permit is in draft form!



Draft Permit Review Areas of Concern

- Facility description/Maximum capacity of each unit not accurate or cannot be achieved
- Multiple units tied to common control or controls venting to common stack
- Control device permitted ranges
- Applicable timeframes/deadlines



The Stack Test Protocol, What is it?

- Detailed test plan that tells IDEM the following:
 - Who, what, when, where, why and how
- This is the document the Compliance Data Section assumes you will be following when testing!



The Stack Test Protocol, Where is it?

- Protocols located on the web at:
- http://www.in.gov/idem/files/air_compliancetestprotocol.pdf
- http://www.in.gov/idem/files/aircomp_rataform.pdf



Submittal Requirements

- For State sources 35 days in advance of the test date per 326 IAC 3-6-2 (if actual date has not been set or if test must be rescheduled, 14 day notice is required per 326 IAC 3-6-2(h))
- For 40 CFR Part 63 (NESHAP), 60 days unless a different timeline is contained in an individual rule.



Why These Timelines?

- Allows for technical review
 - Obtain additional information if needed
 - Work out any problem areas prior to the test
- Provides adequate time for test scheduling and observer assignment.



Protocol Review

- Two important reviews of the test protocol
- Internal review by the source
 - If a consultant is used the company must say they're involved with the protocol.
- Compliance Data Section review
 - Does the protocol contain all required elements and address all units to be tested?



Protocol Review, cont.

- Compliance Data Section will verify the following
 - Test date/submittal requirements met
 - Permitted capacity vs. proposed operating speed
 - Proposed sampling methodology correct
 - Sample location information
 - Reason for testing (NSPS, NESHAP, alternate emission factor development)



Common Protocol Problems

- Late submittal
- Proposed operating speed concerns
 - (Flag raisers! - max, 95%, as hard as possible, unknown, blank)
- Visible emissions
- No stack information (to be determined?)
- No rule applicability information



Miscellaneous Important Items

- Submit the protocol as soon as possible
- Don't wait until deadlines to conduct testing
- Don't change the protocol without contacting IDEM
- Involve the individuals who operate the unit(s) to be tested
- Ask questions if necessary



What to Expect During Stack Testing

- An agency representative may be on site to verify/assist with the following:
 - Production rates at agreed upon levels and are being recorded
 - Control device parametric monitoring being recorded
 - Contractor conducting the test acceptably
 - Provide assistance and technical interpretations of:
 - State or Federal regulations
 - Method changes or modification requests
 - Other testing questions as applicable



What to Expect During Stack Testing , cont.

- Delays – Plan for delays during the test
 - Make arrangements to operate at maximum capacity for as long as possible on test day
 - If timing is critical discuss this with your test consultant
 - Identify personnel or staffing issues and make arrangements prior to testing
 - Union breaks
 - Shift changes
 - Normal plant hours of work



What Are Your Responsibilities During Stack Testing?

- Perform testing within applicable timeframes
- Designate a company contact familiar with the unit and its operations
- Inform agency personnel of safety concerns and provide escort if necessary
- Perform all testing according to the submitted/approved plan
- Record production information and control device parameters as necessary
- Inform IDEM immediately if you suspect a problem or malfunction
- Ensure test reports submitted to IDEM within 45 days of testing



Contractor Expectations

- Punctual
- Have the proper equipment and be competent with the methods
- Follow the stack test protocol
- Regardless, the successful completion of the test is the source's responsibility!



Additional Items: The Big Three!

- Testing cannot be completed within permitted timeframes
- Source finds on test day they cannot achieve 95% of maximum capacity
- Source wishes to halt a compliance test



Final Thoughts

- The primary function of the Compliance Data Section is quality assurance!



Questions... Definitely
Answers... Hopefully