EPA Comments on CT's Source Emissions Monitoring (SEM) Test Guidelines
Dated April 13, 2018

EPA appreciates and recognizes that through the creation of the SEM guidance and forms, Connecticut DEEP has created a system that will assist both the regulated community and the regulators in reviewing stack test information efficiently.

1) In the SEM Guidelines Section 8, Test Report Contents, we recommend you note that several federal regulations require reports to be submitted electronically to EPA. The Part 75 regulations require sources to submit test reports to EPA's Electronic Collection and Monitoring Plan System (ECMPS). Part 63 Subpart UUUUU, the Mercury and Air Toxics Standards (MATS) for electric utilities, is temporarily allowing sources to submit test reports to ECMPS in PDF format until July 1, 2018. Many Part 60 and Part 63 regulations require sources to electronically create test reports using the Electronic Reporting Tool (ERT) and upload the report to the Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI).

2) We also recommend in Section 9, Helpful Source Testing Web Links, you add the following electronic reporting pages with hyperlinks.

- [Emissions Collection and Monitoring Plan System (ECMPS) (EPA)](#)
- [Electronic Reporting Tool (ERT) (EPA)](#)
- [Compliance and Emissions Data Reporting Interface (CEDRI) (EPA)](#)

3) Intent to Test Form, Part V – Section m and n appear to indicate that it is always necessary to operate at maximum capacity during testing. Stack test guidance suggests that testing be done at challenging loads. For a test of a VOC control system, that might be at a low load or low flow condition rather than high. Similarly, engine testing with a CO catalyst can be challenging when at low or high loads.

EPA suggests adding a footnote or sentence explaining that the regulatory agencies may require different loads during testing, depending on the representative operating conditions of the equipment.

4) ITT Form, Part X, box b – The text in the righthand column provides a useful definition of a "minor" change to a test method that appears to come from EPA's guidance and 40 C.F.R. 63.90. However, if the test is being done on a unit where both federal and state requirements apply but the federal standard is not delegated (e.g., a boiler subject to NESHAP Subpart JJJJJJ or an engine subject to NESHAP Subpart ZZZZ), an alternative test method proposal needs to be proposed to EPA as well, even if minor. So, CT might allow an alternative method for a state purpose that we would not allow for the federal standard.

EPA suggests a footnote citing the origin of the definition and alerting users to the need to consult with DEEP and EPA in situations where there is a question about delegation or the federal standard is not delegated.

5) ITT form for visible emissions – EPA suggests including a requirement to affirm that the observer is either a certified smoke reader for Method 9, or has met the requirements of Method 22 by taking the Method 9 training at least once.

Guidelines:

6) Page 3 - EPA understands that CT DEEP has decided to require notification 45 days prior to testing for facilities looking to use standard protocols. However, if the testing involves an emissions unit subject to both a CT and federal standard, a different notification requirement may apply. Particularly regarding sources subject to a NESHAP under 40 C.F.R. 63, EPA suggests a footnote that indicates that the NESHAP general provisions at 40 C.F.R. 63.7(b) requires NESHAP-subject sources to provide EPA with 60 days notice prior to testing.

7) Page 7 –Thank you for including EPA's compliance clerk's contact information. While it is useful to have an electronic copy of the test related documents, unfortunately, EPA cannot accept emailed compliance related documents as official documents. EPA's website regarding the cross media electronic reporting rule (CROMERR) https://www.epa.gov/cromerr/frequently-asked-questions-about-cromerr, says:

"Attaching reports to emails is not considered to be a CROMERR-compliant system as it fails meet numerous CROMERR requirements, namely:
- The document is not alterable without detection
- Alterations to the document are recorded by the system
- The document can only be submitted intentionally
- Submitters and signatories are provided with an opportunity to review and repudiate the COR

In addition, scanned signatures are not considered to be valid e-signatures. A valid electronic signature refers to an electronic document that has been signed using an electronic signature device. The identified signatory is uniquely entitled to use the signature device for signing that document provided that this device has not been compromised, and the signatory is an individual who is authorized to sign the document by virtue of his or her legal status and his or her relationship to the regulated entity on whose behalf the signature is executed."

However, if an entity is registered through the central data exchange (CDX), any type of compliance documents (air, water, etc.) may be submitted through the CEDRI system.

EPA suggests adding a footnote that EPA requires a paper version of any compliance related document unless it is submitted through a CROMERR compliance system, such as CEDRI.

8) Page 8 – In the table describing the deadlines for testing under various federal programs, the NESHAP box cites the general provisions. However, as is indicated in other places in the document, the facility must check the individual NESHAP which may have a shorter deadline (e.g., 150 days). EPA suggests adding, "unless another time frame is specified in the applicable subpart."

Also, although the general provisions do not discuss it, some NESHAPs have recurring testing requirements (e.g., after X number of operating hours, annually, triennially, etc.).

9) Page 8 – Please note that for SSIs, 40 CFR 62, Subpart LLL, and 40 CFR 60, Subpart LLLL, require initial and reoccurring emissions testing. EPA suggests that the table on page 8 include a footnote noting the reoccurring testing requirement.