



GUIDANCE DOCUMENT

Division of Air Pollution Control
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Engineering Guide #51: Number of Sampling Runs to be Witnessed by Agency Observers

Question:

For a source compliance demonstration and relative accuracy test audits (“RATAs”) how many sampling runs should be witnessed by agency observers to ensure that the source operation is representative of the specified testing requirements and that the appropriate sampling procedures are being utilized?

Answer:

The Ohio EPA prefers that all compliance demonstration testing and RATA runs be observed by Ohio EPA/LAA field office personnel. The observation of all compliance demonstration tests may not be possible, but at the very least 25 percent of all CEMS RATAs and 50 percent of all compliance tests conducted to demonstrate compliance must be witnessed. The personnel of the DO/LAAs are in the best position to know which of the scheduled compliance tests should be witnessed to ensure that compliance with permit limits or terms and conditions is being demonstrated and to ensure the best usage of agency resources. When scheduling which of the 25% of the CEMS RATA tests to observe, the DO/LAA should make sure to observe each CEMS RATA test at least once every 4 years.

The Ohio EPA requires that three sampling runs be performed (for most source categories) during a source compliance demonstration and at least nine runs for a RATA. For compliance demonstrations, since three runs are required, every reasonable effort should be made to observe all three runs. Observation of all three runs is mandatory if (1) the source operation is erratic, (2) an equivalent visible emissions limitation (EVEL) has been requested, (3) there are approved modifications to the testing methodology that need to be observed, (4) the compliance test is being conducted to resolve an enforcement case, or (5) the testing is the source's initial compliance demonstration. At least six runs of a RATA should be observed and if the RATA is passing after six runs the remainder of the runs may go unwitnessed.

Compliance tests and RATAs should be scheduled during normal working hours whenever possible. Test firms are required to submit an Intent to Test (ITT) notification form at least 30 days prior to the requested test date(s). If the test firms are complying with this requirement, pretest communications should enable all parties to arrive at a mutually agreed upon schedule for conducting the required tests. This coordination of schedules is especially important when more than three runs will be conducted as part of a compliance demonstration (i.e., an extra run including sootblowing, additional run(s) for determining emission rates under various load conditions, etc.). There may be situations when all three runs of a compliance test or the required RATA runs cannot be observed. These may be the result of unforeseen delays on the part of the owner/operator or test firm which may prohibit observers from witnessing all of the requisite runs. Approval to continue testing, or begin testing, after an observer has left the facility is at the sole discretion of the observer. There may be cases when the testing will need to be rescheduled on a mutually agreed upon date.

There can be other exceptions to the policy of observing all compliance test or RATA runs as specified above. If an observer has witnessed annual compliance tests or RATAs conducted by the same stack test firm on the same source and has confidence that the tests have been and will continue to be conducted in strict accordance with

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the appropriate sampling methods, the last compliance test run may go unobserved. For performance test with sampling runs that are longer than the typical one-hour duration, contact Central Office to discuss acceptable minimum observation requirements for these or other tests with unusual requirements.