

Engineering Guide #51: Number of Sampling Runs to be Witnessed by Agency Observers

Question:

For a source compliance demonstration how many sampling runs should be witnessed by agency observers in order 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 demonstrations be observed and that all three sampling runs be observed by Ohio EPA field office personnel. The observation of all compliance tests may not be possible, but at the very least 50 percent of all performance 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 is demonstrated and to ensure the best usage of agency resources.

The Ohio EPA requires that three sampling runs be performed (for most source categories) during a source compliance demonstration. 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.

Stack test 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 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 three 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 preferred policy of observing all three runs. If an observer has witnessed annual compliance tests, 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 the appropriate sampling methods, the third run may go unobserved. If the observers have been apprised of preliminary results of the first two runs and they show that the source is clearly out of compliance, the third run may go unobserved.