

Source Testing Section / Frequently Asked Questions (FAQs)

Acceptance of all testing is contingent upon the review of, and conformance to, the information in this document; otherwise, there may be adverse consequences, including the potential rejection of affected test data, which may result in enforcement action. This document is intended to provide clarification to eliminate confusion and to promote consistency, within the Pennsylvania Department of Environmental Protection (PA DEP) and the regulated community, and by testing contractors, for the benefit of all. This document applies to all counties within the Commonwealth of Pennsylvania, excluding Allegheny and Philadelphia. This document does not pertain to relative accuracy test audits (RATAs) or source testing related to continuous emission monitoring systems (CEMS) or their certification.

Question 1: What are the submittal requirements?

Answer:

The Department requires one paper copy <u>plus</u> one electronic copy of all source test submissions (notifications, protocols, reports, supplemental information, etc.) to be sent to both the AQ Program Manager for the pertinent regional office <u>and</u> the PSIMS Administrator in Central Office (mail and email addresses are provided below). Do not send submissions to anyone else, except the U.S. EPA, unless specifically directed to do so. To minimize the potential for rescheduling of the test, all protocols must be received at least <u>90</u> days prior to testing. Test reports must be received no later than 60 days after the completion of testing, unless a more stringent regulatory requirement applies. Any questions or concerns about source testing submissions can be sent to <u>RA-EPstacktesting@pa.gov</u> and the PSIMS Administrator will address them.

The following pertinent information shall be listed on the title page.

- 1. Test Date(s)
 - a. For protocols, provide the proposed date on which testing will commence or "TBD"
 - b. For reports, provide the first and last day of testing
- 2. Facility Identification Number (Facility ID)

 (For test programs that were conducted under a multi-site protocol, also include the PF Id under which the protocol was stored in PSIMS, as indicated in the protocol response letter.)
- 3. Source ID(s) for the applicable source(s) <u>and</u> air pollution control device(s) (The term Source ID is used in the permit but "Other Id" is used in DEP electronic systems. They are the same number and must also be listed for control equipment)
- 4. Testing Requirements (all that apply)
 - a. Plan approval number(s)
 - b. Operating permit number
 - c. Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ)
 - d. Special purpose(s) (Consent Order, RFD, RACT II, Tier II, etc.)

Paper Copies

Mail all papier submissions to both the PSIMS Administrator <u>and</u> the Air Quality Program Manager for the pertinent regional office. Mailing address are provided below.

Central Office

Pennsylvania Department of Environmental Protection

Attn: PSIMS Administrator

P.O. Box 8468

Harrisburg, PA 17105-8468

Southeast Region

(Bucks, Chester, Delaware, and Montgomery)

Pennsylvania Department of Environmental Protection

Attn: Air Quality Program Manager

2 East Main Street

Norristown, PA 19401

Northeast Region

(Carbon, Lackawanna, Lehigh, Luzerne, Monroe, Northampton, Pike, Schuylkill, Susquehanna, Wayne and Wyoming)

Pennsylvania Department of Environmental Protection

Attn: Air Quality Program Manager

2 Public Square

Wilkes-Barre, PA 18701-1915

Southcentral Region

(Adams, Bedford, Berks, Blair, Cumberland, Dauphin, Franklin, Fulton, Huntingdon, Juniata, Lancaster, Lebanon, Mifflin, Perry, and York)

Pennsylvania Department of Environmental Protection

Attn: Air Quality Program Manager

909 Elmerton Ave.

Harrisburg, PA 17110

Northcentral Region

(Bradford, Cameron, Centre, Clearfield, Clinton, Columbia, Lycoming, Montour, Northumberland, Potter, Snyder, Sullivan, Tioga and Union)

Pennsylvania Department of Environmental Protection

Attn: Air Quality Program Manager

208 West Third St.

Suite 101

Williamsport, PA 17701

Southwest Region

(Armstrong, Beaver, Cambria, Fayette, Greene, Indiana, Somerset, Washington, and Westmoreland)

Pennsylvania Department of Environmental Protection

Attn: Air Quality Program Manager

400 Waterfront Drive

Pittsburgh, PA 15222

Northwest Region

(Butler, Clarion, Crawford, Elk, Erie, Forest, Jefferson, Lawrence, McKean, Mercer, Venango, and Warren)

Pennsylvania Department of Environmental Protection

Attn: Air Quality Program Manager

230 Chestnut Street

Meadville, PA 16335

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Eliminate shading, color ink for data emphasis, small font size, and color saturation as the scanning to create an electronic file is done in black and white. Shading and color emphasis do not scan well and make the electronic copies difficult to read.

Electronic Copies

Email all electronic submissions to both the PSIMS Administrator in Central Office <u>and</u> the Air Quality Program Manager for the pertinent regional office. Email address are provided below.

Central Office

RA-EPstacktesting@pa.gov

Southeast Region

(Bucks, Chester, Delaware, and Montgomery)

RA-EPSEstacktesting@pa.gov

Northeast Region

(Carbon, Lackawanna, Lehigh, Luzerne, Monroe, Northampton, Pike, Schuylkill, Susquehanna, Wayne and Wyoming)

RA-EPNEstacktesting@pa.gov

Southcentral Region

(Adams, Bedford, Berks, Blair, Cumberland, Dauphin, Franklin, Fulton, Huntingdon, Juniata, Lancaster, Lebanon, Mifflin, Perry, and York)

RA-EPSCstacktesting@pa.gov

Northcentral Region

(Bradford, Cameron, Centre, Clearfield, Clinton, Columbia, Lycoming, Montour, Northumberland, Potter, Snyder, Sullivan, Tioga and Union)

RA-EPNCstacktesting@pa.gov

Southwest Region

(Armstrong, Beaver, Cambria, Fayette, Greene, Indiana, Somerset, Washington, and Westmoreland)

RA-EPSWstacktesting@pa.gov

Northwest Region

(Butler, Clarion, Crawford, Elk, Erie, Forest, Jefferson, Lawrence, McKean, Mercer, Venango, and Warren)

RA-EPNWstacktesting@pa.gov

The Department limits emails to 15 MB and PSIMS has a file size limitation of 100 MB for electronic files. Submit just **one** electronic file (convert any Microsoft Word or Excel files to an Adobe PDF format and combine them with the report or protocol), unless the submission contains CONFIDENTIAL information.

Confidential Information

If confidential information must be submitted, submit both a public copy, which has been <u>redacted</u>, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" <u>and</u> each page of the latter must be marked "CONFIDENTIAL".

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Question 2: Is Method 316 (M316) acceptable for the determination of formaldehyde (CH₂O)?

Answer:

Method 316 is only acceptable for testing of sources in the mineral wool and wool fiberglass industries. The method was developed by industry, not the US EPA, and because the latter does not provide technical support for M316, it is <u>unacceptable</u> for all other source categories. If the method is listed in a federal subpart, it may be acceptable (subject to approval by the Administrator) to determine compliance with emission standards in that specific subpart, but should be the promulgated method of last resort, if other options exist.

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