

## 8.5 What are the on-going QA test requirements for ozone season-only reporters ?

For a unit that is subject to the CAIR NO<sub>x</sub> ozone season program but is not in either the CAIR annual programs or the Acid Rain program (e.g., a non-EGU brought into CAIR by a State agency), emissions data may be reported on an ozone season-only basis rather than year-round, provided that this option is allowed by the State regulations.

If ozone season-only reporting is implemented, the QA requirements of §75.74 (c) in Subpart H of Part 75 must be met. These procedures require some pre-ozone season QA testing (between January 1<sup>st</sup> and April 30<sup>th</sup>), and additional QA testing inside the ozone season (May 1<sup>st</sup> through September 30<sup>th</sup>).

The QA test requirements for ozone season-only reporting are considerably different from, and quite a bit more complex than, the requirements for year-round reporters. For example:

- The required pre-season linearity check of a gas monitor must either be done in April or within a 168 operating hour period of “conditional data validation”<sup>60</sup> at the start of the ozone season.
- The 3<sup>rd</sup> quarter linearity check of a gas monitor must either be done in July or within a 168 operating hour period of conditional data validation, immediately after July 31<sup>st</sup>.
- RATAs must be done in the pre-season, between January 1<sup>st</sup> and April 30<sup>th</sup>, or within a 720 operating hour period of “conditional data validation” at the start of the ozone season.
- Daily calibrations must be performed from the date and hour of any pre-ozone season linearity check or RATA , through the remainder of the pre-season.

These are but a few of the QA provisions in §75.74(c). For a complete listing, see Table B-1 in Appendix B to this guide. In view of this, sources that qualify to use the ozone season-only reporting option should carefully weigh the perceived benefits of this option---i.e., reduced reporting frequency and less required maintenance of CEMS during the off-season--- against the potential invalidation of emissions data (and consequent loss of NO<sub>x</sub> allowances) that could result from a misunderstanding or misapplication of the rule requirements.

Year-round reporting offers many benefits that are not available to ozone season-only reporters, such as: (a) greater flexibility in scheduling linearity checks and RATAs; (b) certain test exemptions and test deadline extensions; (c) the ability to qualify for single-load flow RATAs; and (d) grace periods for linearity checks and RATAs that cannot be completed by the due date, due to unforeseen circumstances.