

Question 8.25

Topic: Linearity and RATA Deadline Extensions

Question: If a unit uses “non-QA operating quarters” to extend the deadline for a quarterly linearity check or RATA, does the unit have to start up just to do testing when the limit of allowable extensions is reached (i.e., a linearity is required at least every four calendar quarters and a RATA is required at least every eight calendar quarters)?

Answer: No. In addition to the quarterly linearity check exemptions and RATA deadline extensions that may be claimed on the basis of non-QA operating quarters, there are also grace periods for missed tests. Grace periods allow required tests to be completed within a certain number of unit or stack operating hours after the end of the quarter in which the QA test is due. The two cases are as follows:

(1) For linearity checks: Appendix B to Part 75 states in Section 2.2.3(f) that "If a linearity test has not been completed by the end of the fourth calendar quarter since the last linearity test, then the linearity test must be completed within a 168 unit operating hour or stack operating hour "grace period"...following the end of the fourth successive elapsed calendar quarter, or data from the CEMS (or range) will become invalid."

(2) For RATAs: Appendix B to Part 75 states in Section 2.3.1.1(a) that "If a RATA has not been completed by the end of the eighth quarter since the quarter of the last RATA, then the RATA must be completed within a 720 unit (or stack) operating hour grace period...following the end of the eighth successive elapsed calendar quarter or data from the CEMS will become invalid."

References: 40 CFR Part 72.2; 40 CFR Part 75, Appendix B, Sections 2.2.3 and 2.3.1.1

History: First published in October 1999 Revised Manual; revised in 2013 Manual calendar