

Question 15.4

Topic: Testing Timeline for Add-on SO₂ or NO_x Emissions Control Device Installations

Question: During the installation of an add-on SO₂ or NO_x emissions control device (where a new stack is not constructed), we intend to test auxiliary equipment of the new system, such as damper motors. Although emissions will be directed through the add-on controls during the testing, the controls will not be operating (i.e., no scrubbing agent (lime, ammonia, etc.) has yet been injected). Does the testing of auxiliary equipment trigger the timeline in §75.4(e) for completing the required tests of the CEMS?

Answer: No. All necessary CEMS testing must be completed within 90 operating days or 180 calendar days (whichever occurs first) after reagent (i.e., a scrubbing agent such as lime or ammonia) is first injected into the control device with the unit operating. This includes test injection of reagent to optimize the control device. Operations such as testing the damper motors, which may cause emissions to be temporarily routed through an idle control device, do not trigger the start of the testing timeline. However, if the affected source is operating (combusting fuel) during the auxiliary equipment testing, all emissions to the atmosphere must be accounted for, either by direct measurement with certified CEMS, with reference methods, or by using substitute data.

For common stack configurations, if emission controls are added to the individual units in stages (e.g., an SCR is added to Unit 1 this spring and a second SCR is added to Unit 2 next fall), each control device installation will have its own separate timeline.

(Note: Installation of add-on SO₂ or NO_x emission controls sometimes involves construction of a new stack. Section 75.4(e) provides 90 operating days or 180 calendar days (whichever occurs first) after emissions first exit to the atmosphere through the new stack to certify monitoring systems on the new stack. The case where both control device addition and new stack construction occur is addressed in Question 15.7).

References: § 75.4(e), § 75.20(b)

History: First Published in October 2003 Revised Manual; Revised 2013 Manual