

Question 24.11

Topic: Reporting of NO_x Emissions After Fuel Change

Question: For a unit that is converted from oil combustion to natural gas and oil, how do we report the NO_x emissions from natural gas from the time of the conversion until we are able to test and generate a NO_x curve? The quarter ended prior to the completion of NO_x testing required to establish the curve for natural gas.

Answer: In the absence of the NO_x emission rate curve required for Appendix E reporting, use the maximum NO_x emission rate (MER) for natural gas as determined from the maximum potential concentration values defined in Table 2-2 of Appendix A, Section 2.1.2.1 for your unit type. In the MER calculation, you may either:

- (1) use the minimum CO₂ concentration or maximum O₂ concentration (as applicable) under typical operating conditions;
- (2) use the appropriate diluent cap value; or
- (2) use quality-assured O₂ or CO₂ data recorded concurrently with the NO_x MPC, when the NO_x MPC is determined from emission test results or from historical CEM data.

References: Appendix A, Section 2.1.2.1

History: First published in October 1999 Revised Manual; revised in October 2003 Revised Manual; revised in 2013 Manual