Question 3.21

Topic: Stack Flow-to-load Test

Question: Please provide more details about the quarterly stack flow-to-load ratio test. A comparison of hourly flow-to-load assumes that they are related, but that is not always true.

Answer: During the rulemaking process, EPA had extensive discussions with utility representatives concerning the flow-to-load ratio test and incorporated many of their suggestions into the May 26, 1999 final rule. One concern raised by the utilities was whether a straight flow-to-load ratio is a sufficiently reliable indicator of flow monitor performance. To address this concern, the final rule allows an alternative to the straight flow-to-load comparison. The quarterly flow rate data may instead be analyzed using the gross heat rate (GHR), which includes a correction for the diluent gas concentration. In many instances, using the GHR appears to be a more satisfactory way of evaluating the data, especially for common stacks. Also note that the tolerance band for the flow-to-load ratio or GHR test is rather wide. For a further discussion of the rationale behind the flow-toload ratio test, see the preamble to the May 21, 1998 proposed revisions to Part 75 (63 FR 28061).

References: Appendix B, Section 2.2.5

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