Question 8.15

Topic: RATA Load Requirements for Common Stacks

Question: Our company has a plant with three units using a common stack. One of those units experienced an unscheduled outage during the last quarter in which we should perform an annual flow RATA at three load levels. Should we wait to perform the RATA for flow until all three units are operating again?

Answer: Every effort should be made to perform the relative accuracy test audit by the end of the required quarter. Section 6.5.2.1 of Appendix A defines the range of operation for a unit or common stack. For common stacks, the range of operation extends from the minimum safe, stable load of any unit using the stack to the highest sustainable load with all units in operation. Section 6.5.2.1 further defines the low, mid, and high load levels as 0 – 30%, 30 – 60%, and 60 – 100% of the range of operation, respectively.

Therefore, in the present example, if a load level of at least 60% of the range of operation could be attained with two units in operation, this would suffice for the high level flow RATA. The mid and low flow tests could then be done at 35% and 10% of the operating range, respectively (note that Section 6.5.2 of Appendix B requires a minimum separation of 25% of the operating range between adjacent load levels).

If, however, a true high level data point is not attainable with only two units in operation, then if it is expected that all three units will be back in service soon after the end of the quarter, perform the high-level flow RATA within the 720 unit operating hour grace period allowed under Section 2.3.3 of Appendix B. If it is expected that all three units will *not* be back in service within the 720 unit operating hour grace period, contact your EPA monitoring analyst.

References: Appendix A, Sections 6.5.2 and 6.5.2.1; Appendix B, Sections 2.3.1 and 2.3.3

History: First published in March 1995, Update #5; revised in October 1999 Revised Manual; revised in 2013 Manual