

## Question 21.1

### Topic: Bypass Stacks

**Question:** What are the RATA requirements for an SO<sub>2</sub> CEM system used for monitoring scrubber bypass conditions?

**Answer:** In accordance with the provisions of § 75.16(c) and § 75.17(d), bypass stacks are subject to the same monitor installation and initial certification deadlines as monitors on primary stacks. The rule, however, includes two provisions that reduce the amount of testing that must be performed on bypass stacks. According to Section 6.5.2(b) of Appendix A to Part 75, flow rate RATAs for bypass stacks have to be performed at only one load level instead of two or three. In addition, Section 2.3 and Figure 1 of Appendix B to Part 75 allow RATA deadline extensions for monitors installed on bypass stacks.

According to this section of the rule, only the quarters during which a bypass stack operates enough to meet the definition of a QA operating quarter are considered when determining RATA deadlines. For bypass stacks, the requirement that a RATA be completed semiannually or annually means that a RATA must be completed every two or four QA operating quarters, respectively (with an upper limit of eight calendar quarters between successive RATAs).

Note: As an alternative to monitoring the bypass stack, § 75.16(c) and § 75.17(d) allow an unmonitored bypass option which is strongly recommended for bypass stacks that are infrequently used.

**References:** § 75.16(c); § 75.17(d); Appendix A, Section 6.5.2(b); Appendix B, Section 2.3

**History:** First published in Original March 1993 Policy Manual as Question 2.1; revised May 1993, Update #1; revised and renumbered in October 1999 Revised Manual; revised in 2013 Manual