



# Sugar Mill Boiler Testing Policy

**Tim Bergeron**

**Engineering Support**

**Air Quality Assessment Division**

**Louisiana Department of Environmental Quality**



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- *Nothing in this policy shall nullify any specific requirements of a permit issued by the Department. If the air permit contains more stringent testing requirements than this policy, the requirements of the permit shall supersede this policy.*



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- Alternative testing locations may be allowed for NO<sub>x</sub> and CO testing with approval from the Department. A description of the alternative testing location, including a diagram of the testing location, must be submitted with the test protocol and approved by the Department prior to testing.
- Testing shall be performed using EPA Method 7E for NO<sub>x</sub>, Method 10 for CO, and Method 5 for PM, unless other methods are approved by the Department prior to testing. EPA reference method analyzers shall be used for Method 7E and Method 10.



# Boilers subject to NSPS:



- Boilers subject to NSPS will perform NO<sub>x</sub> and CO testing with every permit renewal (every 5 years). If the NO<sub>x</sub> PTE is less than 40 tons/yr, boilers subject to NSPS Dc may not be required to test for NO<sub>x</sub> and CO. To determine whether testing is required, please refer to the specific requirements in the facility's air permit.
- Boilers subject to NSPS will be allowed to have an approved maintenance and repair plan for all equipment that is part of the PM control. These boilers will be required to perform an initial test that shows compliance with the PM permit limit. Once the test shows compliance, the boiler will be maintained in that condition by following the maintenance and repair plan. The maintenance and repair plan will clearly outline what equipment will be inspected. Records of annual inspections and repairs must be kept onsite and made available to the Department for review.



# Boilers not subject to NSPS:



- If the NO<sub>x</sub> PTE is greater than 40 tons/yr, boilers not subject to NSPS will perform NO<sub>x</sub> and CO testing with every permit renewal (every 5 years).
- Boilers with PTE > 25tpy will not be required to test for PM if it can be shown that actual PM emissions are less than 25 tons/yr for the last 3 out of 5 years. Actual emissions shall be calculated in accordance with the application methodology for the most recent approved permit or with relevant stack test data.
- If actual PM emissions exceed 25 tons/yr and the boiler is not subject to NSPS, an approved maintenance and repair plan will be allowed instead of testing. The maintenance and repair plan will clearly outline what equipment will be inspected. Records of annual inspections and repairs must be kept onsite and made available to the Department for review.



# DEQ Performance Test Procedure for Stationary Sources



- 1. The facility shall notify Engineering Support with a proposed test plan at least 30 days in advance of the planned test.
- 2. If deemed necessary, Engineering Support will arrange and conduct a pre-test conference to review the test procedures to be used and the unit's operational mode during the test. The purpose of the pre-test conference is to ensure all parties are in agreement on testing procedures and how the process is to be operated during the test. The pretest meeting should include representation from LDEQ Engineering Support, the LDEQ Regional Office, the facility, and the testing contractor/consultant.
- 3. The pre-test meeting agenda shall include a discussion of methods to be used in testing, a description of the stack being tested, the number of runs that will be performed, length of the runs, operating conditions of the process during testing, and any other factors that might influence the test results. Normally, three one hour runs at maximum rates are conducted using EPA test methods or approved alternates.



# DEQ Performance Test Procedure for Stationary Sources



- 4. A pre-test meeting summary report shall be prepared by the facility or its representative and sent to attendees prior to the test. This report shall describe in detail the emission test procedures as agreed to in the pre-test meeting. The purpose of the report is to ensure in advance that LDEQ, the facility, and the test performer are in agreement on the conduct of the emission test.
- 5. The facility shall submit two copies of the test report to the Engineering Support Group of the Air Quality Assessment Division within 60 days of performing the test, unless a different frequency is specified by the facility's air permit. Engineering will evaluate the test report and send a letter to the facility with the results of the evaluation.
- \* **Note: If a test notification is sent to the LDEQ and no response is received by the facility, the facility must contact the LDEQ before testing can begin.**





# Reporting Deviations

- **40 CFR 70 General Condition R, LAC 33:III.535.A**
- The permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance. All such reports shall be certified by a *responsible official* as defined in LAC 33:III.502.A.
- 1. A written report shall be submitted within seven days of any emission in excess of permit requirements by an amount greater than the reportable quantity established for that pollutant in LAC 33.I.Chapter 39.
- 2. A written report shall be submitted for any emission in excess of permit emission limitations, regardless of the amount, where such emission occurs over a period of seven days or longer. The report shall be submitted no later than 14 days from the initial occurrence of the release event.







# Reporting Deviations

- **40 CFR 70 General Condition R (cont.), LAC 33:III.535.A**
- 3. A written report shall be submitted semiannually to address all permit deviations not included in Paragraph 1 or 2 of Part 70 General Condition R. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The semiannual deviation reports may be consolidated with the semiannual reports required by Part 70 General Condition K as long as the report clearly indicates this, and all required information is included and clearly delineated in the consolidated report. For previously-reported permit deviations (not reported in accordance with Paragraph 1 or 2 of Part 70 General Condition R), in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communications or correspondences constituting the prior report, including the date the prior report was submitted. The semiannual report shall be submitted by March 31, for the preceding period encompassing July through December, and by September 30, for the preceding period encompassing January through June.





# Reporting Deviations

- **40 CFR 70 General Condition R (cont.), LAC 33:III.535.A**
- 4. Any written report submitted in advance of the time frames specified in Paragraphs 1-3 of Part 70 General Condition R, in accordance with an applicable regulation, may serve to meet the reporting requirements of this Condition provided the report is certified in accordance with 40 CFR 70.5(d) and contains all information relevant to the permit deviation.  
Reporting under this Condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.





# Incorporating Test Results

- **LAC 33:III.523**
- A. Permit Amendments or Modifications. The owner or operator of any facility permitted under this Chapter shall request a permit amendment or modification to reflect the results of any testing required or approved by the permitting authority, if such testing demonstrates that the terms and conditions of the existing permit are inappropriate or inaccurate. The request, together with all information necessary to process such request, shall be submitted within 45 days of obtaining the relevant test results.
- 1. Administrative Amendments. Changes to incorporate test results may be incorporated into the permit as an administrative amendment if all of the following criteria are met:
  - a. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
  - b. increases in permitted emissions will not exceed 5 tons per year for any regulated pollutant;



# Incorporating Test Results

- **LAC 33:III.523**
- c. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III.Chapter 51 or under Section 112(g) of the Clean Air Act;
- d. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment, and would not trigger the applicability of any federally applicable requirement;
- e. changes in emissions would not qualify as a significant modification;
- f. the request is submitted no later than 12 months after commencing operation; and
- g. the permit contains a term which provides for the incorporation of test results by administrative amendment in accordance with this Paragraph A.1 of this Section.



# Incorporating Test Results

- **LAC 33:III.523**
- 2. Permit Modifications. Any change to incorporate test results which would not meet the criteria established in Paragraph A.1 of this Section shall be incorporated into the permit in accordance with the appropriate procedures for minor or significant modifications. **LAC 33:III.525 and 527**



# Questions?

## Speaker Contact Information:



Timothy Bergeron

Louisiana Department of Environmental Quality

Air Quality Assessment Division

Engineering Support

P.O. Box 4314

Baton Rouge, LA 70821-4314

Phone: 225-219-3410

Email: [timothy.bergeron@la.gov](mailto:timothy.bergeron@la.gov)

