



Alternative Test Method and Monitoring Approval

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Background

- Federal emissions standards typically specify performance test methods and monitoring
- Specific source, or other stakeholder group, may need or want to use alternative to required test method or monitoring



Discussion Topics

- Federal regulations and policies governing:
 - Authority for approval of alternatives
 - Delegation of that authority
- Approval process
 - Alternative test methods
 - Alternative monitoring
- Criteria for approval
 - Alternative test methods
 - Alternative monitoring
- Relevant Resources



Relevant Regulations

- Part 60 – NSPS
- Part 61 – NESHAP
- Part 63 – NESHAP for source categories of MACT



Relevant Regulations, cont.

- Administrator's authority to approve alternatives to test methods and monitoring requirements is codified in General Provisions to Parts 60, 61, & 63
 - Test Methods - §§60.8(b), 61.18(h), 63.7(f)
 - Monitoring - §§60.13(l), 61.14(g), 63.8(f)



Test Method vs. Monitoring

- Section 63.2 defines *test method* as a “validated procedure for sampling, preparing, and analyzing for an air pollutant specified in a relevant standard as the performance test procedure.”
- In actuality, the test procedure used to determine compliance could be a test method or a monitoring procedure
 - E.g., Subpart Da SO₂ and NO_x CEMS performance specifications and QA procedures



Delegation of Approval Authority for Alternative Test Methods & Monitoring

○ EPA Internal

- Delegations Manual – Delegations 7-119 and 7-121

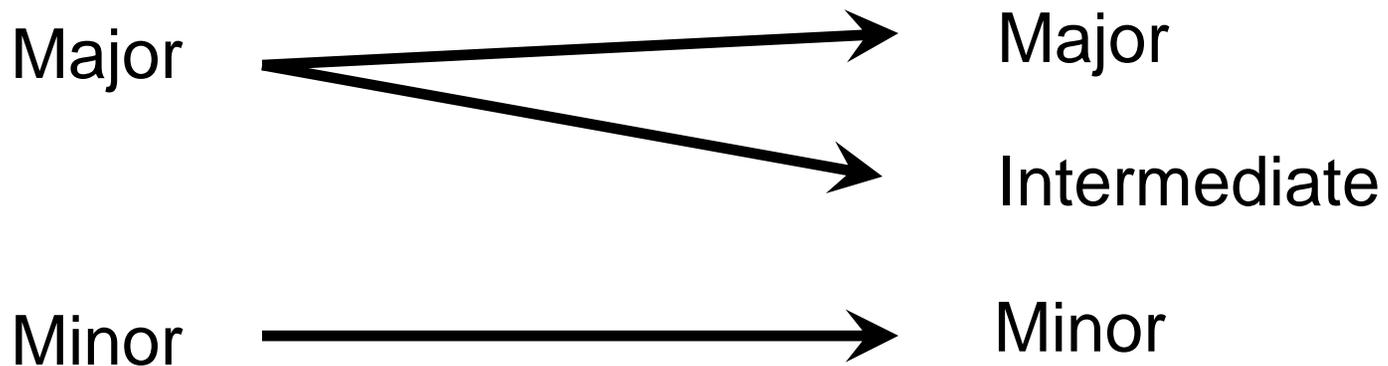
○ EPA External (States & Locals)

- 40 CFR 63, Subpart E
- EPA 305/B-99-004 – How to Review and Issue CAA Applicability Determinations and Alternative Monitoring
 - Explains that Parts 60 and 61 may follow Part 63 guidance



Categorization of Alternatives or Changes

- Definitions in Subpart E, §63.90(a)
 - Minor, intermediate, major change to test method
 - Minor, intermediate, major change to monitoring
- Affect level of delegation of approval authority





Definition:

Minor Change to Test Method

- Site-specific
- No national significance
- No effect on stringency of standard
- Made to accommodate site-specific constraints



Definition:

Intermediate Change to Test Method

- Modification involves proven technology
- Site-specific, but could have national significance
- Potential to decrease stringency of standard, but demonstrated that will not



Definition:

Major Change to Test Method

- Modification is an entirely new method and/or involves unproven technology
- May be site-specific, but will usually set a national precedent
- Broadly applicable



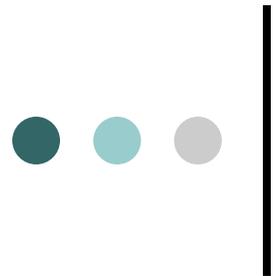
EPA Internal Delegations

	Test Methods	Monitoring
Major Changes	OAQPS	Regions
Intermediate Changes	OAQPS (Regions)	Regions
Minor Changes	Regions	Regions



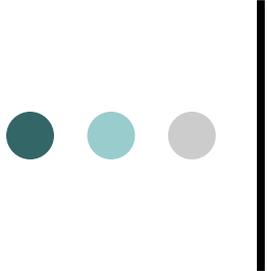
Delegation to States/Locals

- Policy codified in 40 CFR 63, Subpart E
 - Regions may delegate to S/L approval authority for:
 - Minor changes to test methods and monitoring - typically done
 - Intermediate changes to test methods and monitoring, where appropriate



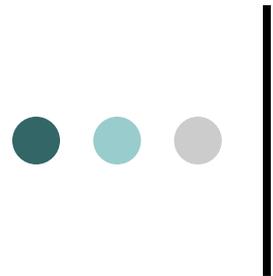
Approval Process for Major or Intermediate Changes to Test Methods

- Determine delegated authority
- Written request to delegated authority
 - Include supporting information
 - Appropriate cc:s
- Acknowledge request
- Review of request
 - Request additional info, if needed
- Issue official letter of approval/disapproval



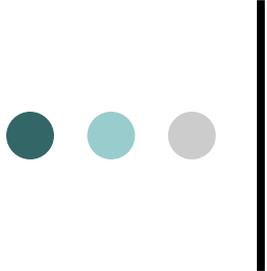
Approval Process for Minor Changes to Test Methods

- Determine delegated authority
 - State/Local or Region
- Request to delegated authority via site-specific test plan, letter, or verbally (during a test)
- Consideration of request
- Approval/disapproval via test plan approval or official letter, or test report if change approved during test program)



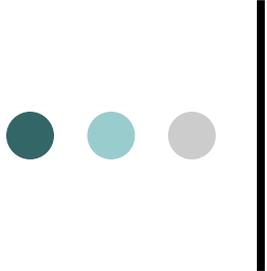
Approval Process for Major or Intermediate Changes to Monitoring

- Determine delegated authority
 - Typically Region
- Written request to delegated authority
 - Include supporting information/justification
 - Appropriate cc:s
- Review of request
 - Request additional info, if needed
- Issue official letter of approval/disapproval



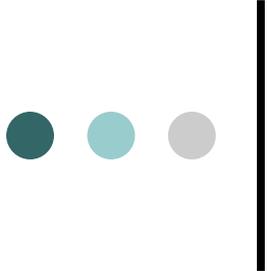
Approval Process for Minor Changes to Monitoring

- Determine delegated authority
 - State/Local or Region
- Request to delegated authority via letter or site-specific performance evaluation plan
- Consideration of request
- Approval/disapproval via performance evaluation plan approval or official letter



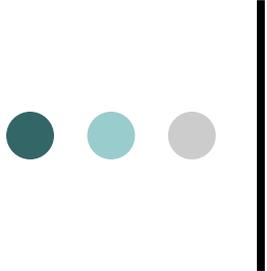
Criteria for Approval of Alternative Test Methods

- Must produce results adequate for the Administrator's determination of compliance
 - From definition of *alternative method* in General Provisions to 40 CFR Parts 60, 61, and 63
- That has been demonstrated to the Administrator's satisfaction using Method 301
 - From definition of *alternative test method* in General Provisions to 40 CFR Part 63
 - Applies to intermediate and major changes



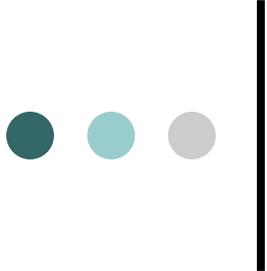
Criteria for Approval of Alternative Monitoring

- Like an alternative method, alternative monitoring must allow the Administrator to make adequate determination of compliance
- Examples of approvable alternative monitoring are included in §§60.13(l), 61.14(g), and 63.8(f)
- New approvals should be consistent with prior approvals
 - Applicability Determination index
 - Consultation with other Regions and OECA



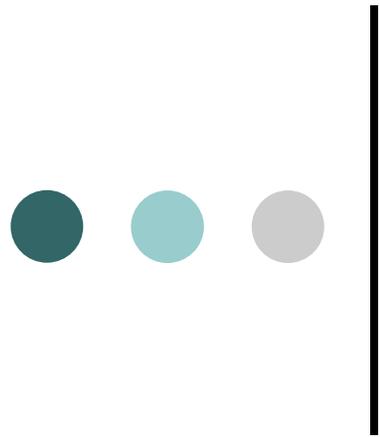
Resources on Alternative Test Methods

- Broad approvals on EMC website at www.epa.gov/ttn/emc/tmethods.html
- Federal Register Notices also at www.epa.gov/ttn/emc/approalt.html
 - Details on regulations (1/30/2007)
 - Yearly compilation of broad approvals
- Guideline on making requests at www.epa.gov/ttn/emc/guidInd.html
- 40 CFR 63, Subpart E



Resources on Alternative Monitoring

- Detailed guidance document:
 - How to Review and Issue Clean Air Act Applicability Determinations and Alternative Monitoring (EPA 305-B-99-004)
- Approved monitoring alternatives in Applicability Determination Index (ADI) on EPA/OECA website at www.epa.gov/compliance/monitoring/programs/caa/adi.html
- 40 CFR 63, Subpart E



Questions?