

Handling Alternative Test Method and Monitoring Requests and Approvals

Robin Segall

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Topics

- Background/Approval Authority
- Delegation of Authority
- Approval Processes
- Broad Approvals
- Resources

Alternative Test Method/Monitoring Approval Authority

- 40 CFR Parts 59, 60, 61, 63, and 65 all include authority for EPA Administrator to approve alternatives to test methods or monitoring procedures required under these parts
 - Test Methods - §§60.8(b), 61.18(h), 63.7(f), 59.104, 59.208, 59.208, 65.158(a)(2)
 - Monitoring - §§60.13(l), 61.14(g), 63.8(f)
- Alternative methods must be “.....adequate for... determination of compliance....”

Alternative Method Approval Authority

- Delegation

- Who can approve alternatives?
 - Administrator authority to approve major changes to test methods is delegated to OAQPS (MTG Group Leader)
 - Administrator authority to approve major changes to monitoring is delegated to EPA Regional Offices
 - Administrator authority to approve minor changes to test methods/monitoring is delegated to EPA Regional Offices
 - Most states delegated authority for approval of minor changes (and sometimes intermediate)

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 other words, the *test method* is how compliance is determined for a specific subpart. Performance test procedure could be a test method or a monitoring procedure:
 - Monitoring serving as test method (e.g., CEMS used to determine compliance such as SO₂ and NO_x CEMS under Subpart Da)
 - In this case, PS 2 and Procedure 1 would be test methods



Role of States

- First line of response for inquiries/requests from affected facilities
- Assess test method vs. monitoring and major vs. minor (or intermediate) changes
- Forward requests that are major
 - Test methods to OAQPS
 - Monitoring to Regional Office
- Decisionmaker on minor changes (if delegated)



Role of Regional Offices


- Response to questions or requests from affected facilities
- Assess test method vs. monitoring and major vs. minor (or intermediate) changes
- Forward requests for major changes to test method to OAQPS
- Decisionmaker on major changes to monitoring
- Decisionmaker on minor changes to test methods/monitoring where state not delegated

Approval Process for Major/ Intermediate Change to Test Method or Monitoring

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

Approval Process for Minor Change to Test Method or Monitoring

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



Criteria for Approval of Major/ Intermediate Changes to Test Methods

- 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
- Been demonstrated to the Administrator's satisfaction using Method 301 (40 CFR 63, App A)
 - From definition of *alternative test method* in General Provisions to 40 CFR Part 63



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](#)



Broadly Applicable Alternative Test Method Approvals

- All alternative monitoring approvals and most alternative method approvals are site-specific
- In 2007, EPA clarified process to issue test method approvals that are broadly applicable
- Federal Register Notice lays out authority and procedures for approval (72 FR 4257, 1/30/2007)
- Over 100 Broad Approval Decisions (over 80 new approvals since 2007)
- Only OAQPS can issue broad approvals



Withdrawal of Broadly Applicable Alternative Methods

- 2007 FRN provides public the opportunity to inform us of issues with broad approvals
- Recently occurred with ALT-061 and ALT-087
- Withdrawals will be posted at www.epa.gov/ttn/emc/approalt.html

Resources

- Definitions of major/intermediate/minor changes to test methods and monitoring §63.90(a)
- Delegation of approval authority to states §63.91(g)
- Delegation of approval authority to Regions Directive 7-121
<http://intranet.epa.gov/ohr/rmpolicy/ads/delegat.htm>
- Guideline for alternative test method requests on EMC website:
www.epa.gov/ttn/emc/guidlnd.html
- Broad approvals for test method changes on EMC website:
www.epa.gov/ttn/emc/tmethods.html
- Federal Register Notice on alternative test method process and broad approvals on EMC website: www.epa.gov/ttn/emc/approalt/FRNotc.pdf
- Yearly Federal Register Notices of broad approvals on EMC website:
www.epa.gov/ttn/emc/approalt.html
- Guidance document on approving alternative monitoring:
www.epa.gov/reg3artd/airregulations/delegate/appdet.pdf
- Approved monitoring alternatives in Applicability Determination Index (ADI) on EPA website at www.epa.gov/compliance/monitoring/programs/caa/adi.html



Technology Transfer Network Emission Measurement Center



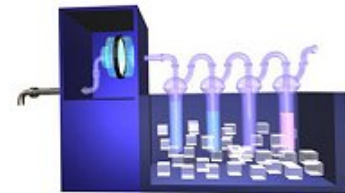
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Emissions Measurement Center

(EMC) provides information on test methods for measuring pollutants from smokestacks and other industrial sources. This site compiles the test methods available for emission measurement, and EMC staff provide technical assistance in the use and application of the methods. For information on a specific test method or performance specification (method text, relevant documents, and frequently asked questions), use the pull-down menus below. For other information available on this site, use the links in the left margin of this page.



Summary Pages for Test Methods and Performance Specifications

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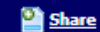
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Test Methods

Test methods can be divided into several categories:

- [Category A: Methods Proposed or Promulgated in the FR](#)
- [Category B: Source Category Approved Alternative Methods](#)
- [Category C: Other Methods](#)
- [Category D: Historic Conditional Methods](#)

Interim Policy on Posting Methods

A fundamental component of the EMC web site is to provide information regarding relevant methods and procedures for emission testing and monitoring. We have modified our presentation of these methods into four different categories. The categories are based on the legal status of the methods with regard to their application under federally enforceable regulations.

Each category is explained below and each includes stipulations for use of the methods included therein. Further provisions regarding the use of a specific method are contained within the applicability statement of the method. Please note that the guidance provided by these categories and methods is meant to supplement, not override the stationary source emission measurement requirements of Title 40 of the Codes of Federal Regulations (CFR) Parts 51, 60, 61, and 63.

Category A: Methods Proposed or Promulgated in the FR

These methods have been proposed or promulgated in the Federal Register and codified in the Code of Federal Regulations (CFR). They carry an xx, 1xx, 2xx, or 3 xx alphanumeric designation. The xx, 1xx, and 3xx numbered methods are directly cited by specific regulations for determining compliance under 40 CFR Parts 60, 61, and 63, and may be used by sources for application as cited by the regulations and the method itself without further EPA approval.



Questions?