

NJDEP Technical Services Emission Measurement Section

Our Mission:

The Technical Services Emission Measurement Section (EMS) is responsible for overseeing the quality assurance/quality control of air emissions measurements in New Jersey. The Section's two primary programs include:

- Oversight and review of all single event stack emission tests conducted by source facilities.
- Certification of the accuracy and reliability of continuous emissions monitoring (CEM) systems.









Stack Test Program

- Protocol Reviews
- Test Observations
- Stack Test Report Reviews
- Approximately 200 per year

CEMS Certification Program

- Equipment Protocol Reviews
- Certification Test Protocol Reviews
- Generally not observed
- Certification Test Report Reviews
- Approximately 30 per year





<u>Protocol Review</u> – Initial step. Ensures that not only the proper methods are selected, but that they are tailored to the source specific conditions.

<u>Test Observation</u> – The most critical step. Testing is complicated and often conducted in harsh conditions. Errors affecting the data quality could not be documented without direct observation.

<u>Report Review</u> – The final step. Includes calculation confirmation and review of laboratory data. Validated results can then be compared to Permit limits or other standards.



Technical Manual for Stack Testing

- Technical Manual 1004 (TM1004)
 - "Guidelines for Compliance Stack Emission Test Programs"
 - www.state.nj.us/dep/bts (Look under Consultant Services)
 - Revision approved September 2009.
 - New protocol templates.
 - Updated protocol templates.
 - Safety.
 - NJ Certified Labs required.
 - Basis and Operation during testing.



Plan to revise again to incorporate electronic submittals (and add more templates.)



Electronic Reporting to EMS

EPA's Electronic Reporting Tool (ERT)

- Software to Standardize Source Test Planning, Reporting and Assessment.
- http://www.epa.gov/ttnchie1/ert/
- Enhancements made to improve and simplify ERT use based on EMS requests. ERT used for electronic submittals of protocols, stack test reports and CEMS PST reports to improve efficiency.







Electronic Reporting to EMS

The Air Permitting Program began to include language in Permits approved on or after July 1, 2014 that required stack test protocols and stack test reports to be submitted to the Emission Measurement Section using ERT (unless otherwise approved by EMS.) This did not affect any tests where protocols were already submitted or approved, though ERT use is still encouraged for all tests.

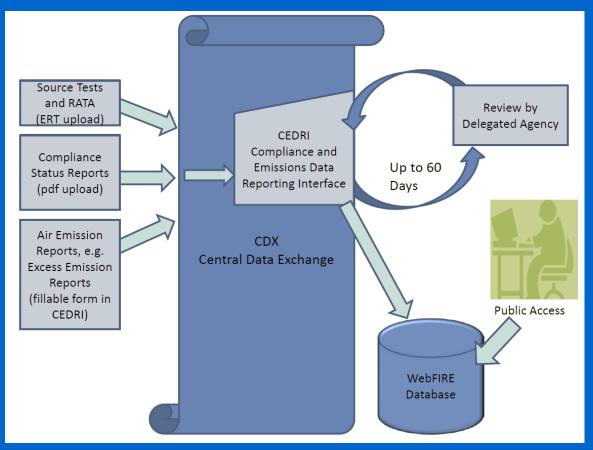
Background

EMS has been interested in moving towards electronic submittals of stack test protocols and reports. The USEPA released Version 1 of ERT in 2006. The ERT is used to electronically create and submit stationary source sampling test plans to regulatory agencies and, after approval, to calculate and submit the test results as an electronic report to the regulatory agency. Beginning in 2007, EMS began encouraging Testers to use the program so that both they and we could gain experience with it, and as a way to suggest refinements and improvements. Since that time, enhancements have been made to ERT (including those made at our request), and EMS sponsored two hands-on training sessions. Future enhancements are also in the works. Throughout this period, we have also repeatedly stated our intention to move towards requiring the use of ERT, including stating this in Technical Manual 1004.

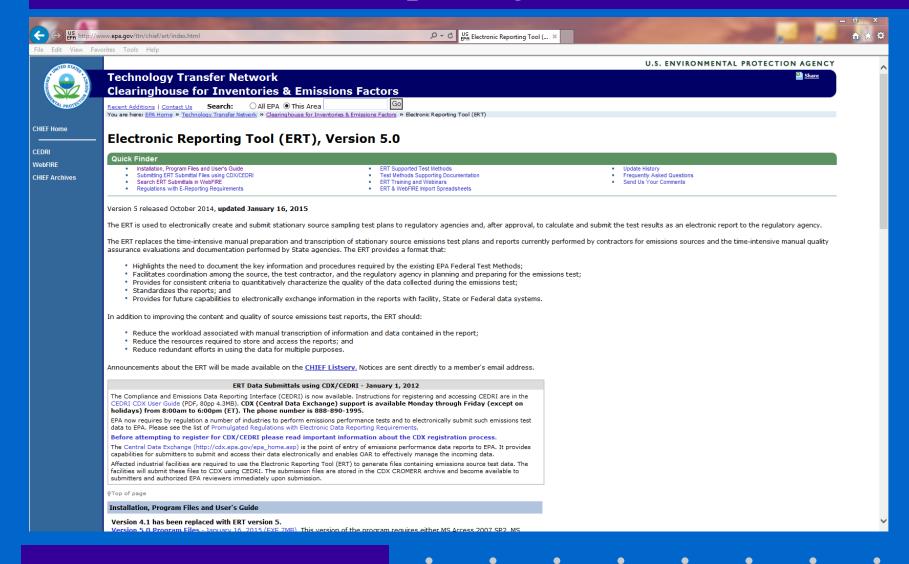


Proposed Rule – Electronic Reporting for NSPS

Proposal published March 20, 2015. Effective 90 days after promulgation. Requires use of ERT for nearly all NSPS test report submittals (amongst other things.)



Electronic Reporting Tool Website





ERT History

- Way to electronically receive source tests
- ERT v1 2006
- ERT v4 2011 (included EMS requested enhancements)
 - MS Access 2007; 2010; 2010 64bit
 - Data Entry Spreadsheets
 - Exports to Word
 - Custom Methods / Target Parameters
 - QA for Test Plan
 - Test Quality Questions
 - Performance Specification Tests
- Current version is ERT v5



ERT In Progress / Future Updates

• ERT Version 5 (released October 2014, updated January 2015) - Biggest change is adding a Submitter Completeness Checklist and Reviewer Checklist. Layout is also reorganized. Additional methods.

In the works:

- Lab Import
- New Methods
- Audit Sample / Blank Train Results
- Calculate Totals from Subcomponents
- Method Notes in Report
- Additional changes as requested during EMS training session



ERT Overview

- ERT Application
 - Microsoft Access 2007 / 2010 / 2010 64bit
- Project Data Set
 - Contains all data for one test report
- Workflow
 - Many methods supported. Custom method option for those not supported.
 - Test Plans (Protocol) can also include attachments
 - Review / Approve
 - Test Report can also include attachments
 - Review / Approve



ERT – Methods Supported

Methods 1 through 4 Method 3A Method 5 Method 5 @ 320°F Methods 5B, 5F, 5G Method 6C Method 7E Method 8 Method 10 Method 12 Methods 13A and 13B Method 104

Method 17

Method 23

Method 25A

Method 26 Method 26A Method 29 Method 30B Method 101 Method 101A Method 102 Method 103 Method 108 Method 201A Method 202

Method 0011 Method 0061 Methods 306, 306A Method 315 Method 316 **CARB 428 CARB 429** Performance Spec. 2 Performance Spec. 3 Performance Spec. 4 Custom test methods



ERT – Pollutants Quantified

- Filterable Particulate Matter
 - Condensable Particulate Matter
 - Filterable PM10
 - Filterable PM2.5
 - Acetaldehyde
 - Formaldehyde
 - Carbon Monoxide
 - Chlorine, Chloride, Hydrogen Chloride, Total Chloride
 - Nitrogen Oxides (NOx)
 - Sulfur Dioxide
 - Sulfuric Acid
 - Sulfur Trioxide
 - Metals including Antimony, Arsenic, Barium, Beryllium, Cadmium, Chromium, Cobalt, Copper, Hexavelant Chromium, Lead, Manganese, Mercury, Nickel, Phosphorus (yellow or white), Selenium, Silver, Thallium and Zinc

- Total Fluoride
- Hydrogen Fluoride
- Hydrogen Bromide
- Total organic compounds (TOC) (as Carbon, Ethane, Methane, Propane)
- Dioxin/Furan Cogeners
- Coplaner PCB's
- PAH Compounds
- Dioxins / Furans

The CEMS Relative Accuracy Test Audits which can be documented include:

- Carbon Monoxide
- Carbon Dioxide
- Nitrogen Oxides
- Sulfur Dioxide
- Oxygen

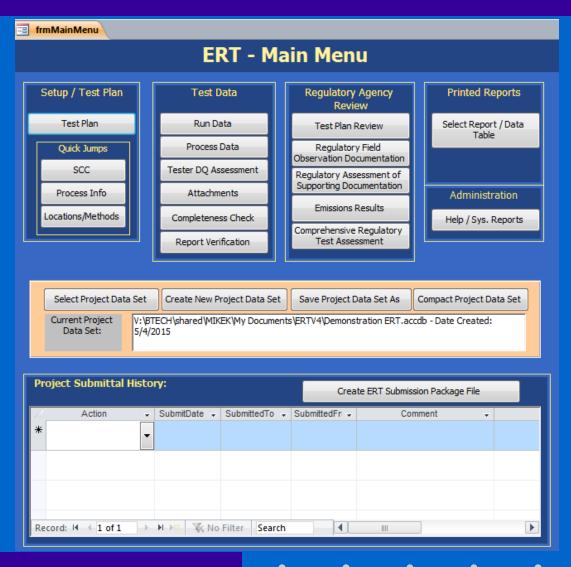


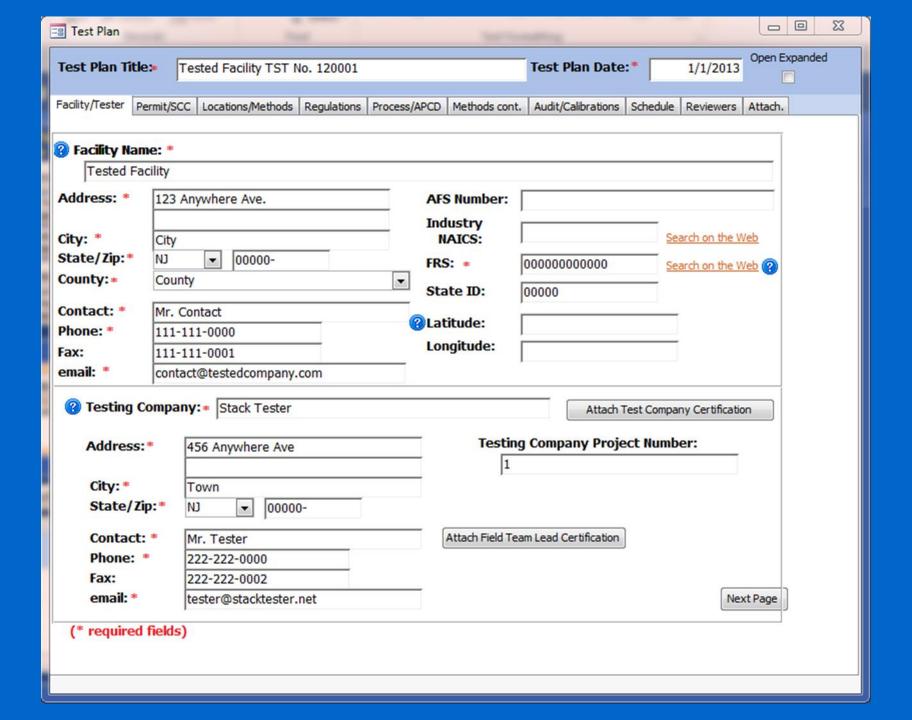
ERT Overview - Main Menu

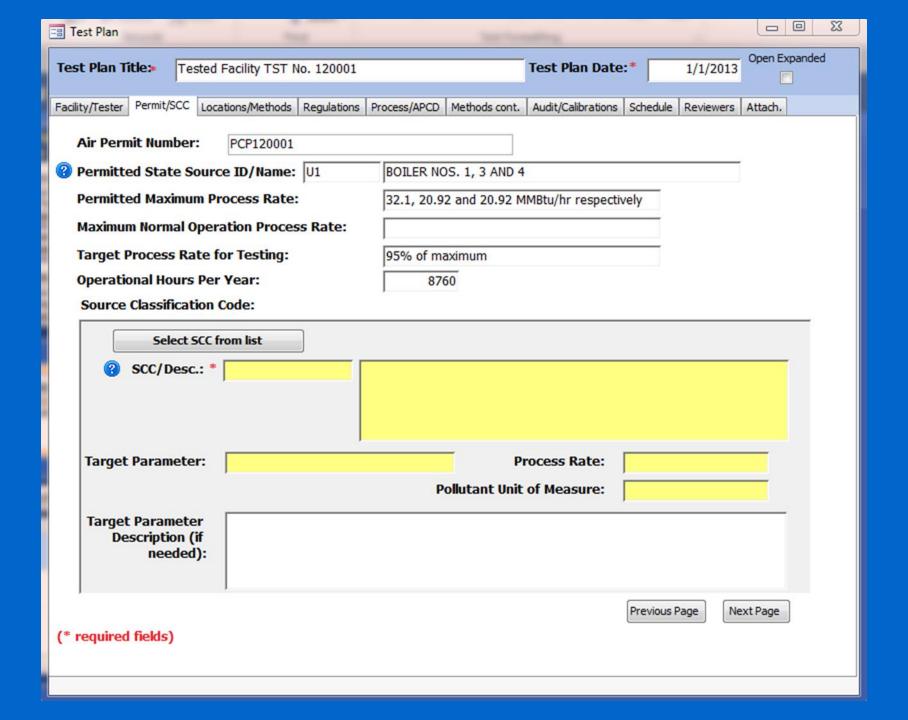
- Menu Items
 - Test Plan
 - Test Report
 - Review
 - Printing
- Project Data Set Selection
 - Select / Create / Save as / Compact
- Submittal History
 - Shows PDS history

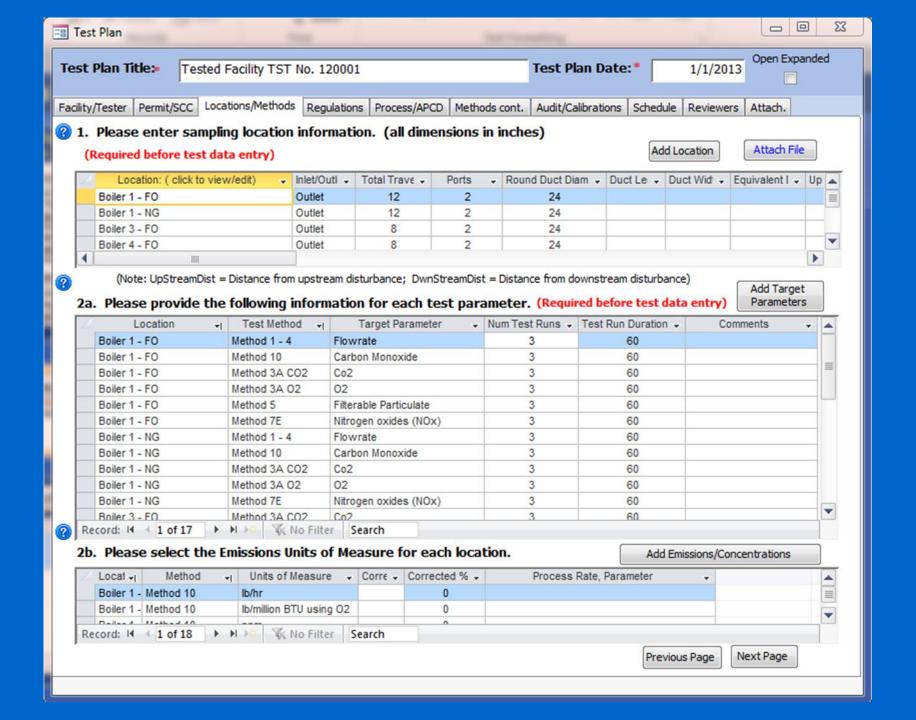


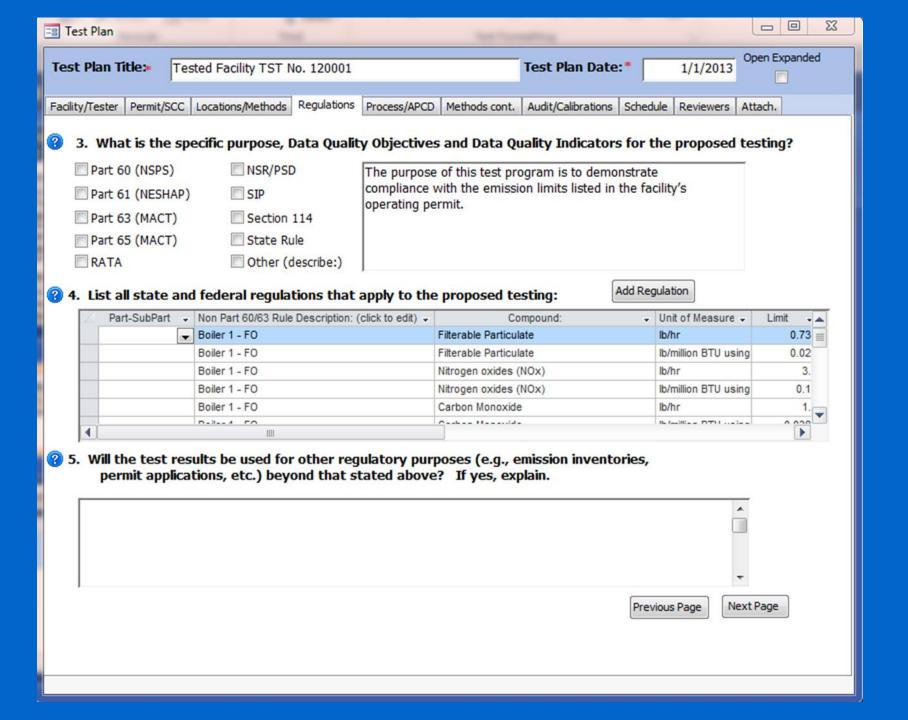
Let's Take a Look at ERT Screens

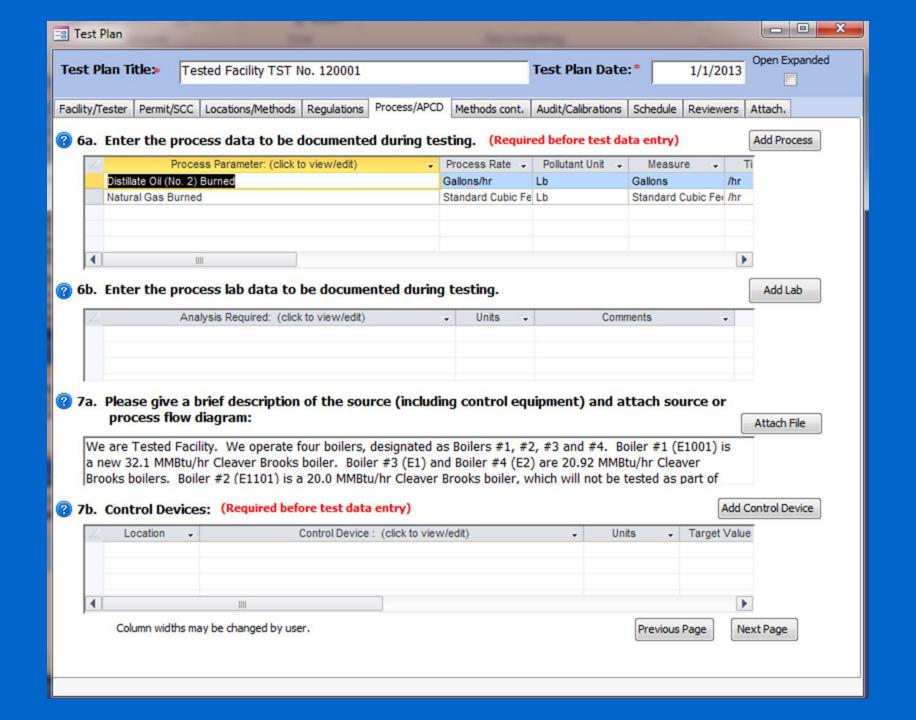


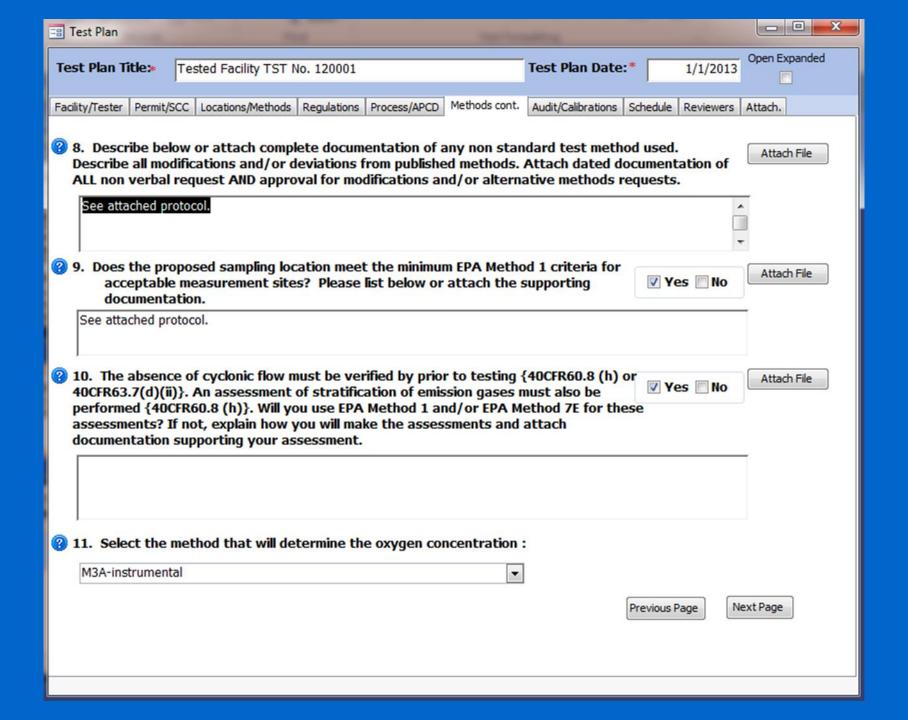


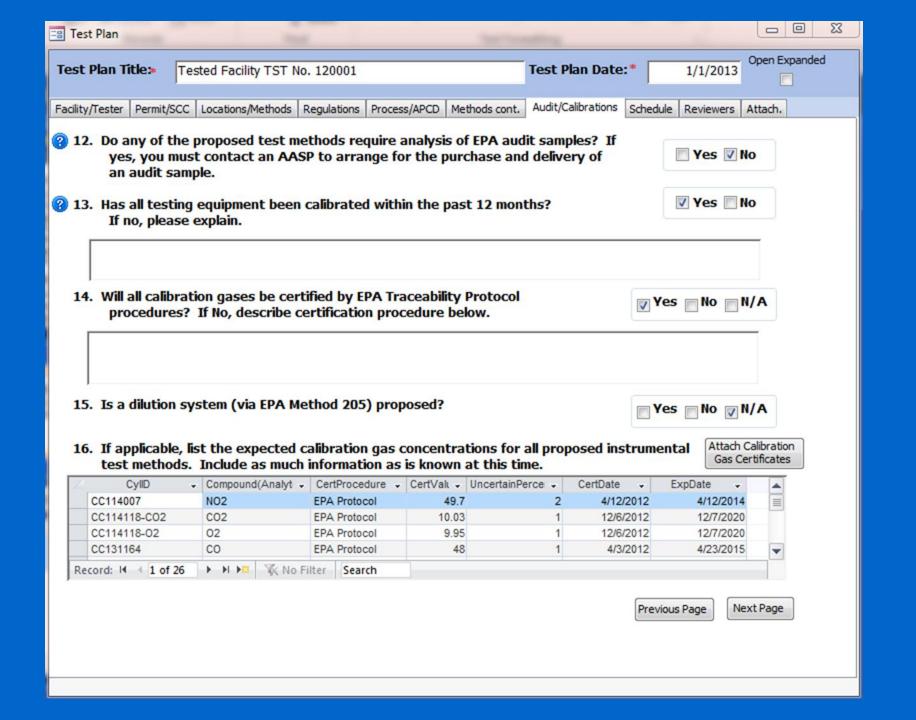




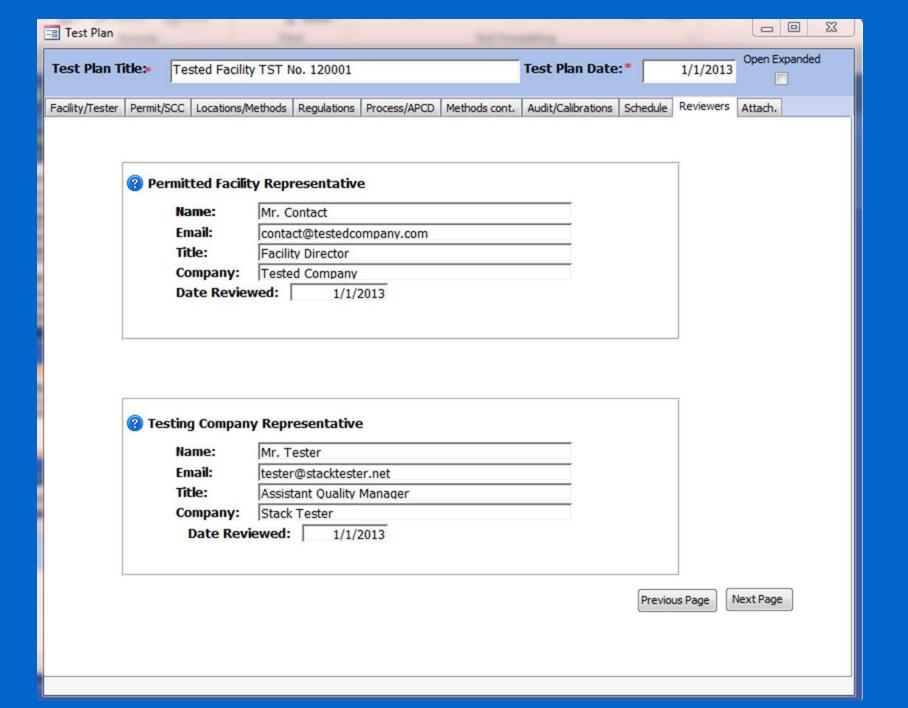


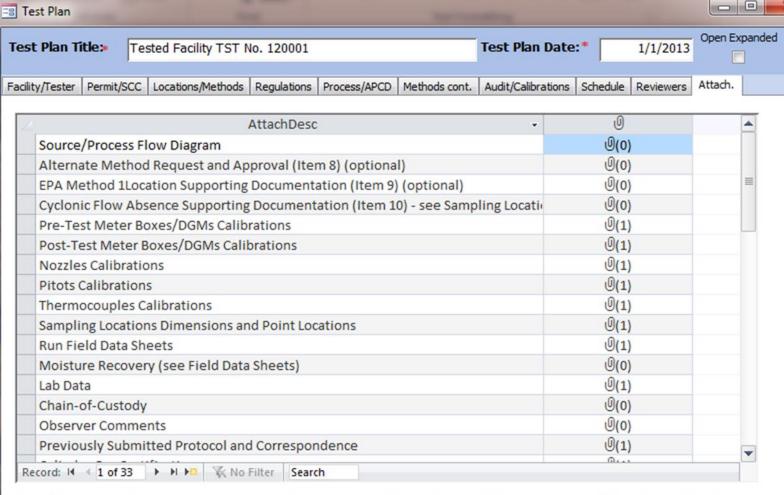






Test Plan		
Test Plan Title> Tested Facility TST No. 120001	Test Plan Date:* 1/1/2013	Open Expanded
Facility/Tester Permit/SCC Locations/Methods Regulations Process/APCD Methods cont	. Audit/Calibrations Schedule Reviewers	Attach.
② 17. What is the proposed test schedule?		
Testing has been scheduled with Mr. Michael Klein of the NJDEP for XXXXX between 8:00 am and 9:00 am.	. Testing is expected to start daily	
18. Additional comments:		_
② 19. Required Personal Protection Equipment:		
	Previous Page N	lext Page





To add or view an attachment:

- double click on the "paper clip" symbol
- select "add" to add a file
- select "view" to view a file

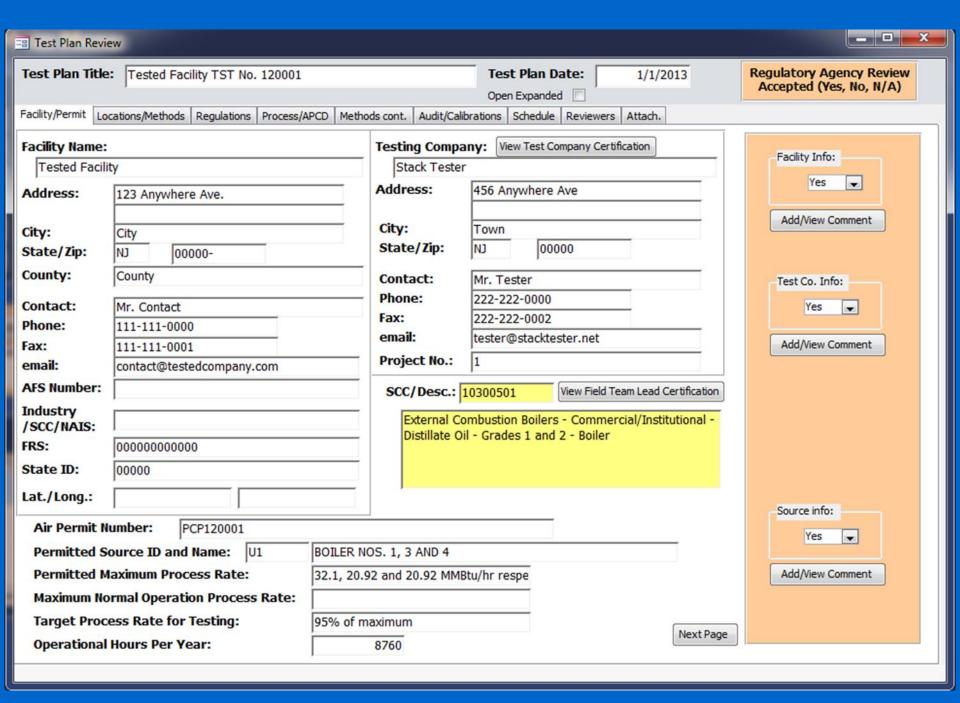
To add more attachment items, enter the description of the attachment in the bottom row of the attachdesc column. Then add your attachment.

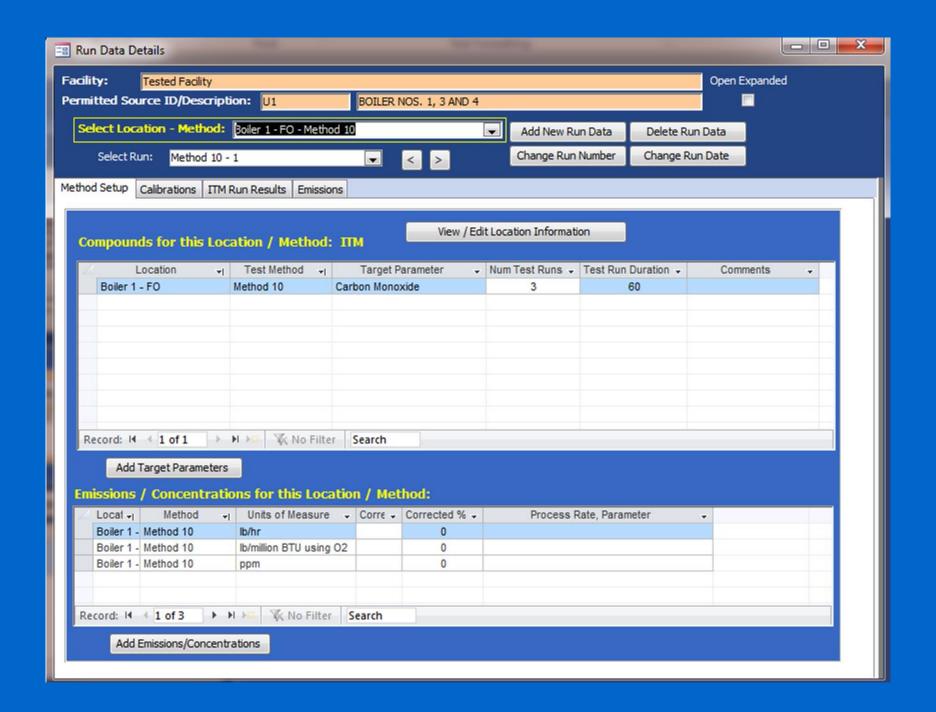
Tips to reduce the PDF file size:

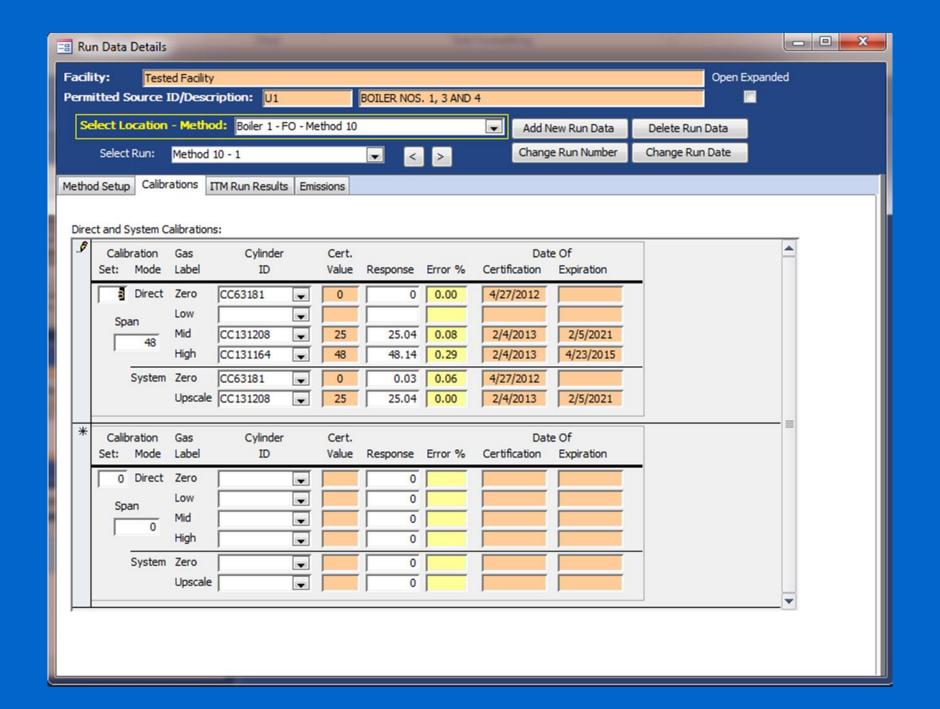
- Create PDF directly from application,
- Attach individual components not compiled material
- Use descriptive file names (i.e. M29-field-data_11-11-11.pdf)
- Attach compressed image files (JPG, GIF, PNG) or CGM
- Scan paper documents at 200 dpi

Previous Page

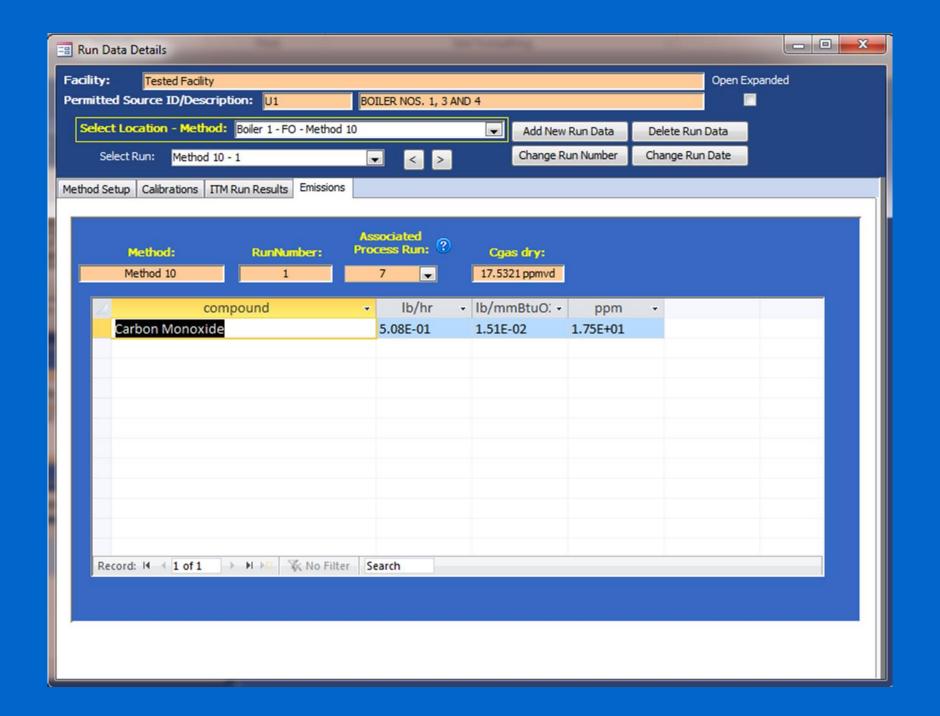
Finished

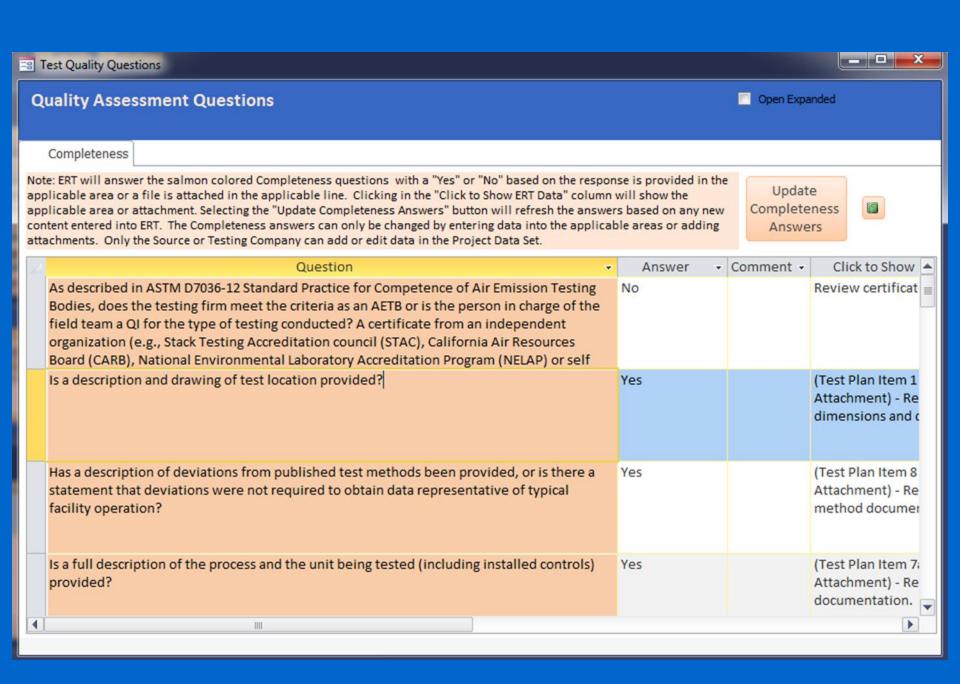


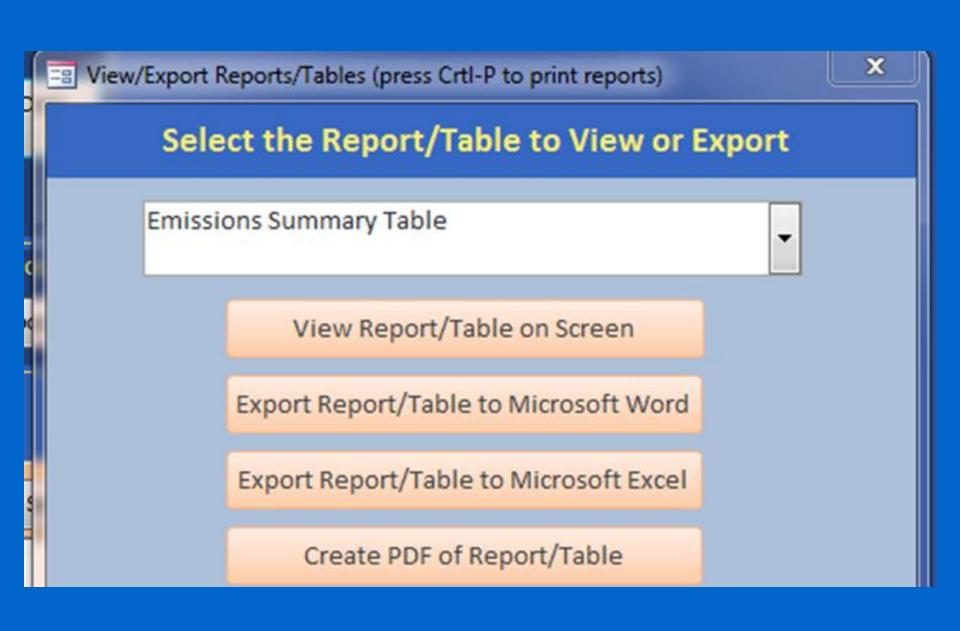














Protocol Templates

- Standardized procedures for commonly used methods developed by EMS. They have fill-ins and check boxes to make source-specific.
- Using Templates greatly reduces the EMS protocol review time.
- Currently have 17 Protocol Templates available for use.
- Developing an additional 10 Protocol Templates for incorporation into TM1004.
- Planning to require the use of Protocol Templates for any method that has one available.
- Protocol Templates will be incorporated into NJ ERT submittals as attachments.



Protocol Preparation Tool

	Ge	neral	Facili	ty Inf	ormat	<u>ion</u>		
Facility Name:						TST No.:		- 1
Program Interest No.:			PCP No.:			BOP No.:		- 1
Operating Scenerio:				DRE ?:		CE7:		Ψ
	NSPS7:		NESHAPS?:		MACT?:		Hours/Year:	
					Informa	tion_	Moisture % @ Saturation	DSCFM @ Saturation
Stack Diameter D	imensions	(inches)	Rectangular	Round				
Round (*)	Length (*)	Width (*)	Temp. ("F)	ACEM	SCFM 0	Assumed Moisture %	Assumed Stack O2%	DSCFM 0
	In	let Stack	and Flo	w Rate I	Informati	ion	ture % Ø Saturati	
Stack Diameter D			Rectangular			Pion	oure 16 gr Saturati	on
Round (*)	Length (*)	Width (*)	Temp. (°F)	ACEM	SCFM 0	Assumed Moisture %	DSCFM © Saturation	DSCFM 0
Outle	et Traverse	Details			Inlet	Traverse D	etails.	
Non-Particulate Traverse		Distance "B"	Distance "A"	□ Non-Particula	ate Traverse		Distance "B"	Distance "A"
Diameter or Equivalent	Inches	Downsteam From (*)	Manheum Frans (C)		r Equivalent	Inches	Downstream From (*)	Stockern From (*)
Diameters to Distru	bance				meters to Distrub	ance		
Required Traverse/Fio					Traverse/Flov			
Traverse Point Cald	culation			Traver	se Point Calc	ulation		
	<u>Par</u>		s of Int	erest (outlet o			
grains * 64.799 = mgs	Lb/Hr Limit	me/30cf			EPA Metho	d 25 vs 25A		
Particulate PM-10	_		Inlet VOC lbs	% Carbon	% Production 95	CE 100	DE 95	Outlet pom
PM-2.5	-			60	20	100	90	
Re	eportin	g Thre	shold A	Allowal	oles (o	utlet or	nly)	
Parameter	USE	Reporting lblyr	Lbs/hr	SOTA Ibulyr	Lbultr	Reporting Ib/hr	SOTA Tonsiye	Lbs.hr
-								
•								
•								
•								
	_	-						
Front Half Sample Volume (mls) Run Duration (Hrs) 1	300 ▼		etals (o				ack Half Sample V	
nur surasur (ris) 1	Lb/Hr Limit	uotrain	ICAP	AASICVAAS	<u>GFAAS</u>	ICPMS	Anal. us/ml	makisem 7% O
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-								
		Organi			Itlet onl	V) 0 Polar?	▼ Impinger Sta ~ ug/Train	rt Volume (mis)
Cample Volume (13 co		1000						
Sample Volume (L) 60		MW.	~ pom Limit	200240027200	Bolling Pt. (*C)	POIAT7	~ 000 Train	
		MW.	~ pom Limit	JOHN STREET	Bolling Pt. (*C)	Polarz	- 00/11mm	
		MW.	- pom Limit	and designating	Bolling Pt. (PC)	Polary	- OW I THE	
•		MW	~ com Limit	200200000000000000000000000000000000000	Bolling Pt. CC	POINT		
•		MW	~ com Limit	Interpolation .	Bosins Pt. PC	POMY	- Julian	

- Calculates many of the items needed for a protocol submittal.
- Currently available from EMS website:

http://www.state.nj.us/dep/bts/consult.html

- The functions of this spreadsheet have been incorporated into ERT.



Stack Test Quality Assurance Audits

- Audits (blind samples) formerly provided by EPA free of charge. Funding ended in 2010; audits stopped in May 2010.
- Regulation revisions approved in September 2010 to <u>require</u> purchase of audits from private Accredited Audit Sample Providers (AASP) from an approved audit program, if available.
- The NELAC Institute (TNI) developed consensus standards for a privatized audit program (http://www.nelac-institute.org/ssas) and is an EPA-approved audit program.
- Two AASPs must be available before purchase of audits is required by the regulation. Two (ERA and Sigma Aldrich) are now approved (but not for all methods) in the TNI program.

 <u>Audits were required starting on June 16, 2013</u>.



Stack Test Quality Assurance Audits

TNI Audit Process

- Facility (or Authorized Representative) provides Regulatory Agency sufficient information to determine type(s) and concentration(s) of needed audits, plus details on selected Provider (V1M3 §4.1.1.) In NJ, this information is in the Protocol.
- Facility orders audits from Provider.
- Provider contacts Regulatory Agency to allow for input.
- Regulatory Agency has 15 days to provide input.
- Provider ships audits to Facility/Tester to be on-site during test.
- Tester ships audits with stack samples to Laboratory.
- Laboratory reports audit results to Provider, <u>and</u> simultaneously reports audit and sample results to the Regulatory Agency.