Department of Environmental Protection

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DARM-OGG-04

SUBJECT: Guidance Regarding Compliance Testing And EPA Method 25

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The following applies to the use of EPA Method 25 in Florida:

Rule 62-297.310(1), F.A.C., (Florida Administrative Code) requires that three runs at least one hour in duration be conducted as a minimum for each test measuring mass emissions, except for specific situations which are covered in that section of the rule. To perform four runs for the purpose of being able to reject one of them is not acceptable. There must be a reason for rejection at the time of the run such as sample train failure, etc.

Rule 62-297.310(4)(a), F.A.C., requires each run to be from one-to-four hours in duration. The entire test (all three runs) must be done within a consecutive five-day period.

Pursuant to Rule 62-297.310(7), F.A.C., the owner must notify the Department at least 15 days before a compliance test is conducted. If that test (usually an annual compliance test) is completed and the results show a failure to meet the applicable standard or permit conditions, the Department shall initiate appropriate enforcement action.

If split samples are analyzed by more than one laboratory, the Department will normally consider the test inconclusive if one set of results indicate failure and another set of results obtained during the same compliance test indicate compliance. The Department will review conflicting test results on a case-by-case basis to determine compliance. For consistency, those tests should be reviewed by the Emissions Monitoring Section in the Bureau of Air Monitoring and Mobile Sources before final acceptance or rejection is determined.

If the compliance test results are inconclusive, the Department may require a retest within a short period of time, usually about 30 days. Pursuant to Rule 62-297.310(7)(b) F.A.C., the Department may require special compliance testing at other times when, after investigation, the Department has good reason to believe that any applicable emission standard contained in a permit or rule is being violated.

EPA Method 25 is adopted by reference in Chapter 62-297.401 F.A.C. EPA Method 25 requires the use of the audit gas. Audit cylinder gases for Method 25 are available to regulatory agencies by calling either the Emissions Monitoring Section at Suncom 278-0114 or EPA directly. Notification needs to be provided approximately 45 days prior to the compliance test in order to provide enough time to have the cylinder shipped to the district or county office.

EPA has instructed the Department that the audit gas concentration is not to be revealed to the source's test team. Rule 62-297.620, F.A.C., may be used on a source-by-source basis to obtain approval of alternate sampling methods. The Department will review and make a determination about any proposed deviations from the test method as adopted by rule. The applicant is responsible for demonstrating that such alternate procedures are adequate to demonstrate compliance. Such requests should be submitted to the Department at least three months before the desired test date since any major changes in the method may also require EPA review and approval.

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