



# Guidelines on the Use of Approved Source Test Results for Annual Emissions Reports



March 2020 ~~June 2021~~

These Guidelines are being issued to assist facilities with their reporting obligations under the Annual Emissions Reporting (AER) program. Facilities in the AER program must submit annual emissions reports for all emissions generated from both permitted and unpermitted sources.<sup>1</sup> When calculating emissions, the best available data should be used (e.g., continuous emissions monitoring systems (CEMS), source test results, material safety data sheets, rule or permitted limits, etc.). ~~It is imperative that the data sources used to calculate emissions should be certified/verified reviewed and approved prior to use. Use of an unverified data source will likely in order to avoid the use of data that may be deemed result in a determination that data it is invalid after it has been used the fact.~~ For example, CEMS data is not considered valid unless the CEMS is certified and compliance with required performance indicators such as relative accuracy and calibration error/drift can be demonstrated.

~~Generally, An approved verified-source test is one that has been reviewed submitted and approved by the South Coast AQMD Source Testing Evaluation (STE) unit. The source test should be Emissions data based on a source test can be considered valid if the source test was:~~

- ~~Approved Submitted for review and approval~~ prior to use in the annual emissions report;
- Conducted during or before the subject report year;
- Reflective of the equipment and its operation for the report year; and
- Tested at operating loads that demonstrate, at a minimum, normal operation (average emissions) for the reporting year.

There are some cases where source test results approved in other South Coast AQMD programs could be considered valid for use in an annual emissions report, even if the results were never submitted to the STE unit for review and approval. Source tests referenced in South Coast AQMD permit evaluations that resulted in the issuance of a Permit to Operate, used for a previously approved AB2588 health risk assessment, and those referenced in compliance verifications for the South Coast AQMD's RECLAIM Program or the EPA's Title V Compliance and Assurance Monitoring can be considered approved for use in an annual emissions report.

It is strongly recommended that all source test protocols be pre-approved before testing. Pre-approved protocols reduce the possibility of source test results being rejected for use under any South Coast AQMD programs. Testing protocols should be submitted to the South Coast AQMD STE unit.

If a facility submits an AER that relies, in whole or in part, upon a source test result that is not approved by the South Coast AQMD ~~STE units as listed above, the data is presumptively invalid.~~ The facility is put at risk of underreporting emissions and may be responsible for additional emissions fees, ~~and~~

<sup>1</sup> South Coast AQMD Rule 301(e) provides for annual reporting of emissions and the related payment of fees. Annual emissions reports "shall be made at the time and in the manner prescribed by the Executive Officer." [Rule 301(e)(8)(A)] The South Coast AQMD staff reserves the right to validate all information through audit, and acceptance of a fee payment does not constitute validation of emissions data. [Rule 301(e)(12)]

including any associated late fees. Reliance upon unapproved source test results~~invalid data~~ also creates a higher risk of audit.

Beginning with AERs for Calendar Year 2019, facilities submitting an annual emissions report that references source test results that have been submitted for review and approval prior to the reporting deadline will be exempt for specific associated late fees ~~of an annual emissions report that references those source test results will be considered approved and valid until notified that they have been disapproved~~. The facility will still be responsible for emissions fees on any underreported emissions due to any revisions resulting from review and approval of the source test results; however, pursuant to Rule 301 (e)(10)(E) no associated late fees will be applied.

Please note that these Guidelines are specific to source test results used for the AER program only. Please refer to other South Coast AQMD ~~Divisions~~ programs (e.g., Permitting, Compliance, AB 2588, etc.) regarding requirements on the use and approval of source tests for their respective programs.

### *Frequently Asked Questions*

1. How does a facility obtain South Coast AQMD approval of a source test?
  - Source test results requested for review and approval by the South Coast AQMD must be sent to the STE unit along with completed Forms ST-1 ~~and ST-2~~ which can be found at [https://www.aqmd.gov/docs/default-source/aqmd-forms/CEMS/request\\_evaluation\\_st1\\_st2.pdf?sfvrsn=19](https://www.aqmd.gov/docs/default-source/aqmd-forms/CEMS/request_evaluation_st1_st2.pdf?sfvrsn=19).

The request for review and approval must explicitly state the intended use of the source test at the time of submittal. Source test results for tested pollutants that have been approved for Compliance, Permitting, or AB2588 purposes are considered valid for use in an annual emissions report, however, Source test results that have been approved exclusively for AER purposes does may not necessarily not mean that they will be acceptable for other programs (e.g., Compliance, Permitting, AB2588, etc.). ~~For all submittals, the request for review and approval must explicitly state the intended use of the source test results at the time of submittal. Form ST-2 allows the applicant to request the review and approval of source test results for multiple purposes such as establishing a permit condition or demonstrating compliance with a rule limit.~~

The STE unit is currently developing an electronic source test receipt and tracking system. That system is expected to act as a central point for all source test submittals to the South Coast AQMD. Once developed, the South Coast AQMD will provide guidance on future source test submittals.

2. What if a source test report submitted for approval is based on a protocol that was not pre-approved?
  - The source test can still be reviewed by the STE unit for approval, but the risk of disapproval is increased because the test may have been performed using incorrect test methods such that the wrong type of data was captured or unqualified parameters were used. These problems can be avoided with pre-approval of a source test protocol.
3. What if a source test report was not submitted for approval, but the protocol prior to conducting the test was approved?

- The source test still needs to be reviewed and approved by the STE unit to ensure that it was completed according to the protocol and no other issues occurred that may require the results to be corrected or rejected (e.g., results are outside of span of measurement, averaging time was met, etc.).
4. What if the source test report was submitted to a member of the Compliance or Engineering Division and the facility did not hear otherwise that it was disapproved? Is it considered valid for AER?
- ~~No.~~—Submittal of a source test alone to South Coast AQMD staff does not constitute approval by the STE unit. Source test results requested for South Coast AQMD review and approval must be sent to the STE unit along with completed Forms ST-1 and ST-2 (see answer to FAQ #1). Results of the review and approval will ultimately determine how the data can be applied in an AER. Other cases where source test results can be considered valid for AER use are those referenced in South Coast AQMD permit evaluations that resulted in the issuance of a Permit to Operate, used for a previously approved AB2588 health risk assessment, and those referenced in compliance verifications for the South Coast AQMD's RECLAIM Program or the EPA's Title V Compliance and Assurance Monitoring.