

STACK TESTING AT ETHANOL PLANTS

FREQUENTLY ASKED QUESTIONS (FAQS)

These FAQs have been prepared by the Iowa Department of Natural Resources (DNR) to assist facilities in complying with the stack testing requirements found within their facilities construction permits and/or Title V permit. This document is intended solely as guidance and cannot be used to bind the DNR and is not a substitute for reading applicable statutes, rules, and permits.

1) Do I have to provide the exact date testing will be conducted or can I provide the week in which it will take place?

Yes, for each source you must provide the exact date or dates compliance testing will occur. DNR use these dates to plan which tests they will observe. Simply providing the week of the testing is not acceptable.

2) Can I do engineering tests prior to the compliance test? What if engineering tests show we are out of compliance?

Engineering tests must be completed prior to the day of the compliance test. If engineering tests indicate an exceedance of a permitted emission limit you are required to report the exceedance as outlined in 567 IAC 21.7. Testing is required to take place as outlined in the testing protocol barring a force majeure event has taken place. Delaying testing to avoid a documented violation is not acceptable as outlined by EPA's April 27, 2009 Stacktest Guidance document and also CFR 60.11 and 60.12. Test events that are cancelled or delayed due to high emission rates will be evaluated to determine if the source would have been in compliance with applicable requirements had the compliance test been performed.

3) Can I adjust my scrubber flow rates and injection rates between runs of the compliance testing if testing data shows we are close to our permitted emission rate? Or if we are passing by a large margin?

No, once a compliance test has started you are not allowed to adjust the scrubber flow rates or injection rates in an effort to avoid a violation. Any adjustments to the control equipment must be done prior to the date of the compliance test.

4) How long is the compliance testing and what testing methods are required for VOC and HAP testing?

Compliance testing consists of three consecutive one hour runs. You are not allowed to delay testing between runs in an effort to wait for emissions to decrease. VOC and HAP testing will be conducted using EPA Method 18 or 320. Method 25A may only be used for the testing of the destruction efficiency for an inlet/outlet test. Any proposed changes to these Methods or Alternate Methods must be included in the protocol and discussed with the DNR prior to the day of testing.

5) Am I required to catch a ferm drop during the Fermentation process compliance testing?

Yes, one of the three consecutive runs must catch the ferm drop. You will need to coordinate the start of your testing to ensure you catch a ferm drop over the course of the three consecutive one hour runs.

6) What type of production data do I need to include with the report?

You are required to provide the historical maximum production rate with each compliance test. This information is critical for determining if the compliance testing is a valid test. Not providing this information could result in the testing not being accepted as a compliance demonstration. It is critical to have accurate production data during the compliance test. This is typically reported in beer feed for the fermentation process but different units being testing can and will have different production data.

7) If a compound is a non-detect how should this be reported?

This compound needs to be reported at the detection level.

For Any questions regarding stack testing please contact Mark Fields at 515-343-6589 or Mark.Fields@dnr.iowa.gov