

Stack Testing Guidelines (May 2012)

This document outlines the Air Permit Division’s stack testing guidelines.¹ Stack testing provisions should only be established where performance test requirements or a continuous monitoring method (e.g., Continuous Emission Monitoring System (CEMS), Continuous Parameter Monitoring System (CPMS), Predictive Emission Monitoring System (PEMS)) have not been established by applicable federal or state regulations (e.g., Compliance Assurance Monitoring (CAM)) or permit terms or conditions. When applicable, these requirements should be cited as LAC 33:III.501.C.6 unless used to satisfy periodic monitoring requirements under 40 CFR 70, in which case they should be cited as LAC 33:III.507.H.1.a. See the “Notes” section following the chart for additional details.

Facility Category	Emissions Unit Category	Primary Fuel ²	Pollutant	Appropriate Testing Requirements If Potential Emissions from the Emissions Unit Are:						Test Method	Modifications for Applicable Federal or State Requirements and Other Comments
				< PSD Significance Level		≥ PSD Significance Level & < Major Source Threshold		≥ Major Source Threshold			
				Initial	Ongoing	Initial	Ongoing	Initial	Ongoing		
All Facility Categories	Internal Combustion Engines ≥ 500 HP and Operating > 720 Hours Per Semiannual Period	Natural Gas and Other Gaseous Fuels	SO ₂	EF	EF	I	F	I	F	EPA Method 6C	NO _x testing not required if 40 CFR 60, Subpart JJJJ or LAC 33:III.2201 is applicable. CO testing not required if 40 CFR 60, Subpart JJJJ; 40 CFR 63, Subpart ZZZZ; or LAC 33:III.2201 is applicable.
			NO _x	I	A or S ³	I	A or S ³	I	A or S ³	I = EPA Method 7E A or S = Portable Analyzer	
			CO	I	A or S			I	A or S ³	I = EPA Method 10 A or S = Portable Analyzer	
		Fuel Oil	PM _{2.5}	EF	EF	I	–	I	F	EPA Method 5 or 201A ⁴ EPA Method 202	PM ₁₀ and NO _x testing not required if 40 CFR 60, Subpart IIII is applicable. CO testing not required if 40 CFR 63, Subpart ZZZZ is applicable.
			PM ₁₀	EF	EF	I	–	I	F	EPA Method 5 or 201A EPA Method 202	
			SO ₂	EF	EF	I	F	I	F	EPA Method 6C	
			NO _x	I	A or S ³	I	A or S ³	I	A or S ³	I = EPA Method 7E A or S = Portable Analyzer	
			CO	I	A or S ³			I	A or S ³	I = EPA Method 10 A or S = Portable Analyzer	

¹ This document is intended solely as guidance for employees of the Air Permits Division. APD may take action at variance with this document when site-specific circumstances warrant.

² Stack testing provisions should generally be based on the primary fuel of the emissions unit. However, if a secondary fuel is combusted for significant periods (e.g., several months or more each year), additional stack testing may be appropriate.

³ Annual testing applies if the ICE is equipped with a catalytic converter.

⁴ See the “Notes” section for a discussion of Method 5 versus Method 201A.

EF = Emission Factor or Better

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Facility Category	Emissions Unit Category	Primary Fuel	Pollutant	Appropriate Testing Requirements If Potential Emissions from the Emissions Unit Are:						Test Method	Modifications for Applicable Federal or State Requirements and Other Comments
				< PSD Significance Level		≥ PSD Significance Level & < Major Source Threshold		≥ Major Source Threshold			
				Initial	Ongoing	Initial	Ongoing	Initial	Ongoing		
All Facility Categories (cont.)	Combustion Turbines	Natural Gas and Other Gaseous Fuels	PM _{2.5}	EF	EF	I	–	I	F	EPA Method 5 or 201A EPA Method 202	SO ₂ testing not required if 40 CFR 60, Subpart GG or KKKK is applicable. NO _x testing not required if 40 CFR 60, Subpart GG or KKKK or LAC 33:III.2201 is applicable. CO testing not required if LAC 33:III.2201 is applicable.
			PM ₁₀	EF	EF	I	–	I	F	EPA Method 5 or 201A EPA Method 202	
			SO ₂	EF	EF	I	F	I	F	EPA Method 6C	
			NO _x	EF	EF	I	F	I	F	I = EPA Method 7E F = Portable Analyzer	
			CO ⁵	EF	EF			I	F	I = EPA Method 10 F = Portable Analyzer	
	Fuel Oil	Fuel Oil	PM _{2.5}	EF	EF	I	–	I	F	EPA Method 5 or 201A EPA Method 202	SO ₂ testing not required if 40 CFR 60, Subpart GG or KKKK is applicable. NO _x testing not required if 40 CFR 60, Subpart GG or KKKK or LAC 33:III.2201 is applicable. CO testing not required if LAC 33:III.2201 is applicable.
			PM ₁₀	EF	EF	I	–	I	F	EPA Method 5 or 201A EPA Method 202	
			SO ₂	EF	EF	I	F	I	F	EPA Method 6C	
			NO _x	EF	EF	I	F	I	F	I = EPA Method 7E F = Portable Analyzer	
			CO	EF	EF			I	F	I = EPA Method 10 F = Portable Analyzer	

⁵ See the “Notes” section for an important discussion regarding testing of CO emissions from all emissions units.

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Facility Category	Emissions Unit Category	Primary Fuel	Pollutant	Appropriate Testing Requirements If Potential Emissions from the Emissions Unit Are:						Test Method	Modifications for Applicable Federal or State Requirements and Other Comments
				< PSD Significance Level		≥ PSD Significance Level & < Major Source Threshold		≥ Major Source Threshold			
				Initial	Ongoing	Initial	Ongoing	Initial	Ongoing		
All Facility Categories (cont.)	Boilers, Process Heaters, Industrial Furnaces, and Other Miscellaneous Fuel-Burning Equipment (Excluding Air Pollution Control Devices)	Natural Gas and Other Gaseous Fuels	PM _{2.5}	EF	EF	I	–	I	F	EPA Method 5 or 201A EPA Method 202	PM ₁₀ , SO ₂ , and NO _x testing not required if emissions unit is subject to a limitation set forth in 40 CFR 60, Subpart Da or Db. ⁶ PM ₁₀ and NO _x testing not required if emissions unit is subject to a limitation set forth in 40 CFR 60, Subpart D. NO _x and CO testing not required if LAC 33:III.2201 is applicable.
			PM ₁₀	EF	EF	I	–	I	F	EPA Method 5 or 201A EPA Method 202	
			SO ₂	EF	EF	I	F	I	F	EPA Method 6C	
			NO _x	EF	EF	I	F ⁷	I	F ⁷	EPA Method 7E	
			CO	EF	EF			I	F ⁷	EPA Method 10	
		Fuel Oil	PM _{2.5}	EF	EF	I	–	I	F	EPA Method 5 or 201A EPA Method 202	PM ₁₀ , SO ₂ , and NO _x testing not required if emissions unit is subject to a limitation set forth in 40 CFR 60, Subpart D, Da, or Db. PM ₁₀ and SO ₂ testing not required if emissions unit is subject to a limitation set forth in 40 CFR 60, Subpart Dc. ⁸ NO _x and CO testing not required if LAC 33:III.2201 is applicable.
			PM ₁₀	EF	EF	I	–	I	F	EPA Method 5 or 201A EPA Method 202	
			SO ₂	EF	EF	I	F	I	F	EPA Method 6C	
			NO _x	EF	EF	I	F	I	F	EPA Method 7E	
			CO	EF	EF			I	F	EPA Method 10	

⁶ In the case of Subpart Db, PM and SO₂ limits apply only if the emissions unit commenced construction, reconstruction, or modification on or after February 28, 2005.

⁷ See the “Notes” section following the chart for acceptable alternatives.

⁸ PM limits apply only if the emissions unit commenced construction, reconstruction, or modification on or after February 28, 2005.

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Facility Category	Emissions Unit Category	Primary Fuel	Pollutant	Appropriate Testing Requirements If Potential Emissions from the Emissions Unit Are:						Test Method	Modifications for Applicable Federal or State Requirements and Other Comments
				< PSD Significance Level		≥ PSD Significance Level & < Major Source Threshold		≥ Major Source Threshold			
				Initial	Ongoing	Initial	Ongoing	Initial	Ongoing		
All Facility Categories (cont.)	Boilers, Process Heaters, Industrial Furnaces, and Other Miscellaneous Fuel-Burning Equipment (Excluding Air Pollution Control Devices) (cont.)	Coal / Pet Coke	PM _{2.5}	EF	EF	I	F	I	F	EPA Method 5 or 201A EPA Method 202	PM ₁₀ , SO ₂ , and NO _x testing not required if emissions unit is subject to a limitation set forth in 40 CFR 60, Subpart D, Da, or Db. PM ₁₀ and SO ₂ testing not required if emissions unit is subject to a limitation set forth in 40 CFR 60, Subpart Dc. NO _x and CO testing not required if LAC 33:III.2201 is applicable.
			PM ₁₀	EF	EF	I	F	I	F	EPA Method 5 or 201A EPA Method 202	
			SO ₂	EF	EF	I	F	I	F	EPA Method 6C	
			NO _x	EF	EF	I	F	I	F	EPA Method 7E	
			CO	EF	EF			I	F	EPA Method 10	
			VOC	EF	EF	I	F	I	F	EPA Method 25A	
		Wood Waste / Bark / Biomass	PM _{2.5}	EF	EF	I	F	I	F	EPA Method 5 or 201A EPA Method 202	PM ₁₀ and NO _x testing not required if emissions unit is subject to a limitation set forth in 40 CFR 60, Subpart D. PM ₁₀ testing not required if emissions unit is subject to a limitation set forth in 40 CFR 60, Subpart Db or Dc. NO _x and CO testing not required if LAC 33:III.2201 is applicable.
			PM ₁₀	EF	EF	I	F	I	F	EPA Method 5 or 201A EPA Method 202	
			NO _x	EF	EF	I	F	I	F	EPA Method 7E	
			CO	EF	EF			I	F	EPA Method 10	
			VOC	EF	EF	EF	EF	I	F	EPA Method 25A	

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Facility Category	Emissions Unit Category	Pollutant	Appropriate Testing Requirements If Potential Emissions from the Emissions Unit Are:						Test Method	Modifications for Applicable Federal or State Requirements and Other Comments
			< PSD Significance Level		≥ PSD Significance Level & < Major Source Threshold		≥ Major Source Threshold			
			Initial	Ongoing	Initial	Ongoing	Initial	Ongoing		
Sugar Mills	NSPS Boilers	PM _{2.5}	EF ⁹ or I	Approved Plan	I	Approved Plan	I	Approved Plan	EPA Method 5 or 201A EPA Method 202	See APD's "Sugar Mill Testing Policy" on their "Emission Testing Program" webpage. ¹⁰
		PM ₁₀	EF ⁹ or I	Approved Plan	I	Approved Plan	I	Approved Plan	EPA Method 5 or 201A EPA Method 202	
		NO _x	EF	EF	I	F	I	F	EPA Method 7E	
		CO	EF	EF			I	F	EPA Method 10	
	Non-NSPS Boilers	PM _{2.5}	Approved Plan	Approved Plan	Approved Plan	Approved Plan	Approved Plan	Approved Plan	N/A	See APD's "Sugar Mill Testing Policy" on their "Emission Testing Program" webpage. ¹⁰
		PM ₁₀	Approved Plan	Approved Plan	Approved Plan	Approved Plan	Approved Plan	Approved Plan	N/A	
		NO _x	EF	EF	EF ¹¹ or I	EF ¹¹ or F	I	F	EPA Method 7E	
		CO	EF	EF			I	F	EPA Method 10	
Pulp and Paper Mills	Smelt Dissolving Tanks	PM _{2.5}	EF	EF	-	F	-	F	EPA Method 5 or 201A EPA Method 202	PM ₁₀ : "I" satisfied by 40 CFR 63, Subpart MM; "F" not required if PM is controlled by a wet scrubber. TRS testing not required if 40 CFR 60, Subpart BB is applicable <i>and</i> TRS is controlled with a scrubber.
		PM ₁₀	EF	EF	-	F	-	F	EPA Method 5 or 201A EPA Method 202	
		TRS	EF	EF	I	F	I	F	EPA Method 16, 16A, or 16B	

⁹ Applies if boiler has the potential to emit less than 25 TPY or if it can be shown that actual emissions were less than 25 TPY during any 3 of the last 5 years.

¹⁰ <http://www.deq.louisiana.gov/portal/tabid/2286/Default.aspx>

¹¹ Applies if unit is a backup, limited use (i.e., ≤ 500 hours per year), or emergency boiler.

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Facility Category	Emissions Unit Category	Pollutant	Appropriate Testing Requirements If Potential Emissions from the Emissions Unit Are:						Test Method	Modifications for Applicable Federal or State Requirements and Other Comments
			< PSD Significance Level		≥ PSD Significance Level & < Major Source Threshold		≥ Major Source Threshold			
			Initial	Ongoing	Initial	Ongoing	Initial	Ongoing		
Pulp and Paper Mills (cont.)	Recovery Furnaces	PM _{2.5}	–	F	–	F	–	F	EPA Method 5 or 201A EPA Method 202	PM ₁₀ : “I” satisfied by 40 CFR 63, Subpart MM; “F” not required if PM is controlled by an ESP or wet scrubber. TRS testing not required if 40 CFR 60, Subpart BB is applicable.
		PM ₁₀	–	A ¹²	–	A ¹²	–	A ¹²	EPA Method 5 or 201A EPA Method 202	
		SO ₂	EF	EF	I	F	I	F	EPA Method 6	
		NO _x	EF	EF	I	F	I	F	EPA Method 7E	
		CO	EF	EF			I	F	EPA Method 10	
		VOC	EF	EF	I	F	I	F	EPA Method 25A	
		TRS	EF	EF	I	F	I	F	EPA Method 16, 16A, or 16B	
	Lime Kilns	PM _{2.5}	EF	EF	–	F	–	F	EPA Method 5 or 201A EPA Method 202	PM ₁₀ : “I” satisfied by 40 CFR 63, Subpart MM; “F” not required if PM is controlled by an ESP or wet scrubber. TRS testing not required if 40 CFR 60, Subpart BB is applicable.
		PM ₁₀	EF	EF	–	F	–	F	EPA Method 5 or 201A EPA Method 202	
		SO ₂	EF	EF	I	F	I	F	EPA Method 6	
		NO _x	EF	EF	I	F	I	F	EPA Method 7E	
		CO	EF	EF			I	F	EPA Method 10	
		VOC	EF	EF	I	F	I	F	EPA Method 25A	
		TRS	EF	EF	I	F	I	F	EPA Method 16	

¹² Annual testing is required by LAC 33:III.2301.D.4.b.ii.

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			< PSD Significance Level		≥ PSD Significance Level & < Major Source Threshold		≥ Major Source Threshold			
			Initial	Ongoing	Initial	Ongoing	Initial	Ongoing		
Incinerators ¹³	Biomedical Waste	PM _{2.5}	EF	EF	I	F	I	F	EPA Method 5 or 201A EPA Method 202	PM ₁₀ : "I" not required if design charging rate greater than 250 pounds per hour. HCl: "I" not required if design charging rate greater than 250 pounds per hour; "F" not required if CEMS installed per LAC 33:III.2511.E.2.a.i. SO ₂ and NO _x : "I" not required if design charging rate greater than 500 pounds per hour. CO: "I" and "F" not required if CEMS installed per LAC 33:III.2511.E.3.
		PM ₁₀	EF	EF	I	F	I	F	EPA Method 5 or 201A EPA Method 202	
		SO ₂	EF	EF	I	F	I	F	EPA Method 6	
		NO _x	EF	EF	I	F	I	F	EPA Method 7	
		CO	EF	EF			I	F	EPA Method 10	
		VOC	I	-	I	-	I	-	EPA Method 25A	
		HCl	I	F	I	F	I	F	EPA Method 26	
	Crematories	PM _{2.5}	EF	EF	I	F	I	F	EPA Method 5 or 201A EPA Method 202	PM ₁₀ and CO: Initial test not required if design charge rate is greater than 500 pounds per hour.
		PM ₁₀	EF	EF	I	F	I	F	EPA Method 5 or 201A EPA Method 202	
		NO _x	EF	EF	I	F	I	F	EPA Method 7E	
CO		EF	EF			I	F	EPA Method 10		

¹³ Includes thermal oxidizers and regenerative thermal/catalytic oxidizers (RTOs/RCOs). In lieu of ongoing stack tests for VOC, continuous temperature monitoring and monitoring of additional parameters (as appropriate) will be required.

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			< PSD Significance Level		≥ PSD Significance Level & < Major Source Threshold		≥ Major Source Threshold			
			Initial	Ongoing	Initial	Ongoing	Initial	Ongoing		
Incinerators (cont.)	Refuse	PM _{2.5}	EF	EF	I	F	I	F	EPA Method 5 or 201A EPA Method 202	PM ₁₀ : "I" not required if design charging rate greater than 250 pounds per hour. HCl: "I" not required if design charging rate greater than 250 pounds per hour; "F" not required if CEMS installed per LAC 33:III.2521.F.8.a. SO ₂ and NO _x : "I" not required if design charging rate greater than 500 pounds per hour. CO: "I" and "F" not required if CEMS installed per LAC 33:III.2521.F.6 or 7.
		PM ₁₀	EF	EF	I	F	I	F	EPA Method 5 or 201A EPA Method 202	
		SO ₂	EF	EF	I	F	I	F	EPA Method 6	
		NO _x	EF	EF	I	F	I	F	EPA Method 7	
		CO	EF	EF			I	F	EPA Method 10	
		VOC	I	-	I	-	I	-	EPA Method 25A	
		HCl	I	F	I	F	I	F	EPA Method 26	
	Other Waste Gas Streams	PM _{2.5}	EF	EF	I	F	I	F	EPA Method 5 or 201A EPA Method 202	
		PM ₁₀	EF	EF	I	F	I	F	EPA Method 5 or 201A EPA Method 202	
		SO ₂	EF	EF	I	F	I	F	EPA Method 6	
		NO _x	EF	EF	I	F	I	F	EPA Method 7E	
		CO	EF	EF			I	F	EPA Method 10	
	VOC	I	-	I	-	I	-	EPA Method 25A		

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Notes

Timing

- Initial performance tests shall be conducted within 180 days of startup, re-start after modification, of issuance of the permit (in the event an initial performance test has never been conducted).
- Annual performance tests shall be within 10 - 14 months of the initial performance test or previous annual performance test.
- Semiannual performance tests shall be conducted within 5 - 7 months of initial performance test or previous semiannual performance test.
- Where required, performance tests shall be conducted within five years, plus or minus 6 months, of previous performance test.

Gaseous Fuels

Gaseous fuels include any gaseous substance that can be used as a fuel to create heat and/or mechanical energy, including synthetically produced gas from coal or oil, gaseous substances from the decomposition of organic matter, and gas streams that are by-products of a manufacturing process.

Backup Units

Any backup unit permitted to operate 1500 hours per year or less does not require stack testing, regardless of potential emissions.

Emissions Caps

For units in an emissions cap, stack testing provisions for each individual unit should be based on that unit's potential to emit (PTE). If the PTE of an individual unit exceeds the cap, stack testing provisions for that unit should be based on the limits established by the cap.

Identical Units

In cases where there are several engines or turbines of the exact make and model at a facility, a representative subset may be tested in lieu of testing all identical units. A representative subset must contain at least 50% of the affected units. This exception applies to engines and turbines only and does not extend to the other emissions unit categories addressed herein.

Particulate Testing

PM₁₀ and PM_{2.5} thresholds account for *both* filterable and condensable particulate.

For determining filterable PM₁₀ and PM_{2.5}, Method 5 may be used if all particulate matter collected is assumed to be PM₁₀/PM_{2.5}.

Method 201A should not be required on any stack with:

- a diameter less than or equal to 18 inches (25.7 inches when the combined PM₁₀/PM_{2.5} cyclone is used);
- entrained moisture droplets (e.g., from a wet scrubber); or
- a temperature of greater than 1000°F.

For existing, unmodified units, the initial stack test for PM_{2.5} (where Method 5 is not employed as discussed above) and condensable particulate matter should not be required within 180 days after the permit is issued unless testing for other pollutants will also be required. Instead, it should be conducted during the next required stack test (e.g., "A" or "F"). If ongoing testing is not required by these guidelines, the initial stack test may be conducted within 12 months after the permit is issued.

Carbon Monoxide Testing

Notwithstanding the thresholds set forth in these guidelines, testing of CO emissions shall generally be required whenever stack testing is required for NO_x.

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Recent Stack Tests

Stack testing conducted in the three years prior to submittal of the permit application may be used to fulfill initial stack testing requirements provided the test method prescribed by these guidelines was employed. In this event, the period to conduct the next performance test shall be based on the issuance date of the permit. For example, if the ongoing requirement is “A,” the subsequent test must be conducted within one year after issuance of the permit. Likewise, if the ongoing requirement is “F,” the subsequent test must be conducted within five years after issuance of the permit (not within 5 years of the previous test).

Low Emitters

Where permit limits are based on an underlying federal or state standard (e.g., 0.10 lb NO_x/MM Btu per 40 CFR 60.44b(a)(1)(i)) and initial stack testing reveals that potential emissions are less than 50% of that standard (based on the nameplate capacity of the emissions unit, not the observed capacity during the testing event), ongoing testing may be extended to once every two years where “A” is required and once every 10 years where “F” is required. This exception is pollutant-specific. This exception does not apply when permit limits, in tons per year, are based on a factor less than the applicable standard.

Gas-Fired Boilers and Process Heaters

As an alternative to “F” for gas-fired boilers and process heaters, the permittee may conduct a tune-up of the boiler or process heater annually. The annual tune-up shall entail the following measures:

1. Inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 36 months);
2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer’s specifications, if available;
3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly;
4. Optimize total emissions of carbon monoxide (CO). This optimization should be consistent with the manufacturer’s specifications, if available;
5. Measure the concentrations in the effluent stream of CO in parts per million, by volume (ppmv), and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made); and
6. Maintain on-site and submit, if requested by the department, an annual report containing the following information:
 - The concentrations of CO in the effluent stream in ppmv, and oxygen in volume percent, measured before and after the adjustments of the boiler;
 - A description of any corrective actions taken as a part of the combustion adjustment; and
 - The type and amount of fuel used over the 12 months prior to the annual adjustment (only if the unit was physically and legally capable of using more than one type of fuel during that period). Units sharing a fuel meter may estimate the fuel use by each unit.

Concerning “Modifications for Applicable Federal or State Requirements and Other Comments”

- 40 CFR 60 Subpart D does not contain SO₂ standards for gas-fired steam generating units.
- 40 CFR 60 Subpart Db does not contain PM and SO₂ standards for natural gas-fired steam generating units that commenced construction, reconstruction, or modification before February 28, 2005; or SO₂ and NO_x standards for wood-fired steam generating units.
- 40 CFR 60 Subpart Dc does not contain PM standards for oil-fired steam generating units that commenced construction, reconstruction, or modification before February 28, 2005; SO₂ standards for wood-fired steam generating units; PM and SO₂ standards for gas-fired steam generating units; or NO_x standards for any steam generating units.

Specific Requirements

Permit conditions will be developed after finalization of the guidelines. These conditions will address, among other things:

- operating rates (i.e., percent capacity) during the test period, and
- procedures should a unit not be operational when the stack testing is due.