

STAPPA/ALAPCO STACK TESTING
AND COMPLIANCE CERTIFICATION
SURVEY
April 2, 2002

STAPPA and ALAPCO request your assistance in determining the status of state and local air agencies' stack testing and compliance certification efforts. Accordingly, we urge you to print out this questionnaire, complete all questions and fax, (202) 624-7863, your completed copy to Geri O'Sullivan of STAPPA/ALAPCO AS SOON AS POSSIBLE, but no later than **Friday, April 26, 2002**. Please note that the results will be shared with all STAPPA and ALAPCO members, as well as EPA. Please contact Geri O'Sullivan with any questions at gosulliv@sso.org or (202) 624-7864.

YOUR NAME/TITLE:

YOUR AGENCY:

(Please include city/state)

YOUR PHONE#:

YOUR FAX#:

YOUR E-MAIL:

STACK TESTING QUESTIONS:

1. Does local or state law provide your agency with the general authority to require stack testing?

Yes _____

No _____

2. Does your agency have written guidance regarding the frequency and type of sources* to be tested for emissions compliance?

Yes _____ No _____

** The term "source" is synonymous with facility and for the purpose of this survey means the entire facility.*

3. If you answered yes to question #2, does your guidance pertain to Title V sources only, or to all sources regardless of size?

Title V sources only _____ All sources _____

4. How many Title V sources are located in your jurisdiction? _____

How many non-Title V sources are located in your jurisdiction? (please count facilities only; do not include individual emissions units*) _____

** For the purpose of this survey, the term "emissions unit" means each separate piece of equipment/air pollution activity (i.e., boiler, spray booth, printing operation, etc).*

5. Does your agency require the submission of written pre-test notification and test protocol?

Yes _____ No _____

6. How many stack tests* (not counting opacity tests) were conducted by sources in your jurisdiction during CY2001?

<50 _____ >50 _____ >100 _____ >250 _____

** For purposes of this survey, each emissions unit that is tested constitutes a separate test, and each pollutant measured constitutes a separate test.*

7. What is the percentage of stack tests observed by your agency personnel?

<50 _____ >50 _____ >90 _____

8. What is the percentage of stack test results reports reviewed by your agency personnel?

<50 _____ >50 _____ >90 _____

9. Are stack test frequency requirements typically specified in air permits to install and/or permits to operate?

Yes _____

No _____

10. If 'no' to question #9, are test frequency requirements specified in some other document, such as enforcement orders or rules?

Yes _____

No _____

If yes, please specify:

11. Please specify the minimum test frequency for emissions units at Title V sources in your agency:

Never

Once in lifetime of emissions unit
(example: NSPS unit)

Annually

Once during Title V permit cycle

Twice during Title V permit cycle

Other (specify frequency)

12. What factors affect emissions units test frequency in your agency? (please check as many as are applicable):

- _____ Compliance history of the emissions unit
- _____ Lack of agency authority
- _____ Lack of agency guidance
- _____ Actual-to-allowable emission ratio by the emissions unit
- _____ Presence of COM/CEM emission data for emissions unit
- _____ Recent physical modifications or production rate increases to the emissions unit that result in actual emission increases
- _____ Reference Method 9 data that indicate violations by the unit
- _____ Compliance demonstrations by units subject to new rule promulgations
- _____ Type of emissions unit (give specific examples):

- _____ Size of emissions unit (define 'large' vs. 'small'):

13. If your agency has written stack testing guidance, please attach a copy to your survey response and check here _____.

COMPLIANCE CERTIFICATION QUESTIONS:

1. What year did the Title V program become effective in your jurisdiction?

2. What year did the requirement for sources* to submit yearly compliance certifications become effective in your jurisdiction? _____

**The term source is synonymous with facility and for the purpose of this survey means the entire facility.*

3. How many Title V sources are under your jurisdiction? _____
4. How many final Title V permits has your agency issued to date? _____

5. Number of compliance certifications submitted by sources with final Title V permits:

CY1999 _____ CY 2000 _____

6. Is the required date for submittal of yearly compliance certifications:

fixed _____ staggered _____

If fixed, state the date the certifications are due _____

7. Is your procedure for certifying compliance:

_____ general, overall certification for the entire Title V permit; or

_____ requires compliance statements specific to each term/condition of the permit

8. With respect to question #7, are you satisfied with your agency's compliance certification procedure?

Yes _____ No _____

Why or why not?

9. Are yearly compliance certifications submitted to you on time?

Always _____ Usually _____ Sometimes _____ Never _____

10. Who is responsible for the submission and substantive review of yearly compliance certification reports?

_____ Permit staff
_____ Facility inspection staff
_____ Enforcement staff
_____ Combination of above (please specify):

_____ Other (please specify):

11. Do yearly compliance certifications contain the necessary information to verify compliance?

Always _____ Usually _____ Sometimes _____ Never _____

12. How would you characterize your yearly compliance certification process?

_____ It is a central part of the compliance verification effort; or

_____ It supplements other procedures used by your agency, and is duplicative of information received via compliance reports, inspection reports and stack test reports.

13. Are enforcement actions initiated on the basis of yearly compliance certification data that indicate non-compliance status?

Yes _____ No _____ (If 'no', why not?)

14. Are enforcement actions initiated for yearly compliance certifications that are not complete?

Yes _____ No _____ (If 'no', why not?)

15. Are enforcement actions initiated for yearly compliance certifications that are not submitted within 60 days of the due date?

Yes _____ No _____ (If 'no', why not?)

16. Are attempts made by agency staff to compare data submitted in yearly compliance certification forms to data submitted via other required compliance reports, inspection reports and stack test reports?

Yes _____ No _____ (If 'no', why not?)

17. How many sources did your agency determine to be out of compliance based upon yearly compliance certification data in

CY 1999 _____ CY 2000 _____

18. How many staff hours per year are devoted to the yearly compliance certification program in your state or local agency (e.g., reviewing forms, verifying compliance status, follow-up enforcement actions)?

19. Does your agency have written guidance for use by agency staff and industry as to what constitutes 'intermittent' versus 'continuous' compliance?

Yes _____ No _____

If 'yes', please attach a copy of your guidance to your survey response and check here _____

20. Other comments/suggestions pertaining to the yearly compliance certification program _____

4/02/02

