

## **Questions and Answers:**

Below are answers to some of the questions concerning Method 303 certification, Method 303 application, and the coke oven rule. This is provided as an informational bulletin. For further clarification of the rule, Method 303, or the Method 303 certification course, contact Roy Huntley at (919) 541-1060 or Amanda Agnew at (919) 541-5268.

### **D OBSERVERS BEGIN?**

Method 303 inspections for compliance with the new regulation (i.e., daily inspections) for coke batteries who choose the LAER track begin November 15, 1993. For batteries that choose the MACT track, inspections must begin on December 31, 1995.

#### **2. WHO MUST BE CERTIFIED?**

Anyone who inspects a coke battery to comply with the new coke oven NESHAP must be a certified Method 303 observer. Under the new rule, coke plants are not allowed to self-inspect, so observations by employees of the coke plant will not be used to determine compliance.

#### **3. HOW DOES ONE CERTIFY?**

One must attend and pass a Method 303 certification course. To register, call Beth Butler at (919) 515-4659.

#### **4. HOW MUCH EXPERIENCE IS REQUIRED PRIOR TO ATTENDING THE CERTIFICATION TRAINING COURSE?**

Trainees shall have completed at least 12 hours of field observations and shall have attended at least once the lecture portion of the EPA Method 9 certification (Method 9 of Appendix A, 40 CFR Part 60). The trainee should, but is not, required to, complete the field observation requirement at a coke oven battery that they will be inspecting after becoming certified.

During the 12 hours, the trainee shall observe the operations of a coke oven battery as it pertains to Method 303 and shall also practice inspecting the battery using Method 303 or a method similar to Method 303. For people with no experience with coke battery operations or coke oven inspection procedures, the 12 hours of field observation must contain instruction from an experienced coke oven observer, familiar with Method 303 or similar methods and the operation of the coke oven batteries. For people who are already familiar with coking operations (because they work on coke batteries, for example) and the coke oven *inspection procedure* (because they have inspected batteries, for example), it is acceptable for them to use previous experience to satisfy this requirement, providing their previous inspection experience includes inspecting coke batteries for door, lid, and offtake leaks, and timing charging emissions. If not, then they will have to obtain that experience. The general idea is for everyone to be familiar with coke battery operations and the general concepts of *counting door*, lid, and offtake leaks and timing charging emissions so that during the course, the student can concentrate on learning Method 303.

#### **5. HOW DOES ONE ARRANGE TO RECEIVE THE 12 HOUR FIELD OBSERVATION?**

Cooperation with the particular coke battery and the State or Local Agency will, of course, be needed. Contact the applicable State or Local agency for guidance.

#### **6. HOW MUCH SAFETY TRAINING DO I NEED?**

Prior to attending the Method 303 certification course, all trainees shall have completed the 24 hour basic health and safety training, or equivalent, and be fit-tested for a respirator. Anybody who has not completed the necessary safety training will not be certified. Any questions about how to obtain the proper training, call Kirk Foster at (919) 541-4571.

## **7. WHAT DO I NEED TO BRING TO THE COURSE?**

It is the responsibility of the trainees to supply their own hard hat, steel-toed safety shoes, safety glasses with side shields, and a fit-tested respirator. Also, trainees should bring a clipboard, a stopwatch, and a scientific calculator or a laptop computer with Lotus 123, version 2.1 or better (to run the Method 303 spreadsheet).

## **8. WHAT IS THE CERTIFICATION COURSE GOING TO BE LIKE AND HOW LONG DOES IT LAST?**

An agenda will be mailed to each trainee upon registration. In general, the course is four or five days long and starts on a Monday with a classroom lecture/workshop. This will either be held at a hotel conference room or at the plant. During the classroom portion of the certification course, the instructors go over the method in detail. The Method 303 video will illustrate the various procedures for *inspecting a battery* and a computer program to calculate the results will be demonstrated. A test will be given.

On Tuesday, the trainees go to the battery and groups of 5 - 8 will receive instruction from a panel member. After lunch, the groups will go back to the batteries with the entire panel for more practice. During Tuesday afternoon, the practice runs, if acceptable to the panel, can be used to satisfy the requirement in the rule for a practice run.

On Wednesday, the trainees return to the battery and begin the certification runs with the panel. Trainees will be certified when 1 practice run and 3 certifying runs have been completed to the satisfaction of the panel. For many people, certification will not be complete until Thursday. Friday should be considered as an extra day to be used in the event of bad weather.

## **9. HOW LONG DOES CERTIFICATION LAST AND HOW DOES ONE RECERTIFY?**

Certification lasts for one year. Observers re-certify twice by viewing the Method 303 video and correctly answering all of the questions on the Method 303 test. Every 3 years, an observer must demonstrate proficiency to the Method 303 panel again.

## **10. WHO PAYS FOR CERTIFICATION?**

Each trainee, except employees of the US EPA and state and local agencies, will have to pay a fee. Currently, the fee is set at \$1200. The rule provides for each owner or operator of a coke oven battery to pay an inspection fee to defray the costs of the *inspection program*. The formula for computing the inspection fee uses the average hourly rate for private visible emissions inspectors in the relevant market as one of its terms. Since the overhead *component of* this average hourly rate will include the costs of getting certified, the Inspection fees will reimburse state and local agencies and their contractors for costs incurred in getting a sufficient *number of* certified inspectors to administer the program.

## **11. HOW DOES A BATTERY STRADDLE THE TRACKS?**

There are two sets of emission limits; the MACT limits and the extension track (the extension track is also called the LAER extension track). Each battery must comply with one of the tracks, but may, if so desired, straddle both tracks until January *1998*, at which time a selection is necessary. If a battery wants to straddle both tracks, in other words, not commit to either track, that battery will be subject to the more stringent limits of the two tracks. The straddling ends on January *1, 1998*, when battery operators must declare which track they intend to follow.

**12. WHEN IS AN INCOMPLETE CHARGE ACCEPTABLE AND WHEN IS TIMING LESS THAN 5 CHARGES A DAY ACCEPTABLE?**

Section 3.8 of the Method reads as follows:

"Five charging observations (runs) obtained in accordance with this method shall be considered a valid set of observations for that day. No observation of an incomplete charge shall be included in a daily set of observations that is lower than the lowest reading for a complete charge. If both complete and incomplete charges have been observed, the daily set of observations shall include the five highest values observed. Four or three charging observations (runs) obtained in accordance with this method shall be considered a valid set of charging observations only where it is not possible to obtain five charging observations, because of visual interferences (see Section 3.5) or inclement weather prevent a clear view of the charging system during charging. However, observations from three or four charges that satisfy these requirements shall not be considered a valid set of charging observations if use of such set of observations in a calculation under Section 3.9 would cause the value of A to be less than 145."

In plain language, the observer must time 5 complete consecutive charges each day. If the observer's view of the charging system becomes obstructed during the charge to the extent that he thinks the charge has been compromised, the observer stops the stopwatch, records the accumulated time, and labels the charge an "incomplete charge". The observer then times the next charge to replace the incomplete charge. If five complete charges could not be obtained for that day, the incomplete charge can be used as one of the five charges for that day if at least one of the complete charges has a lower emission time than the incomplete charge.

**13. THERE ARE PROVISIONS IN THE RULE THAT ALLOW BATTERIES WITH SHEDS TO APPLY FOR AN ALTERNATIVE STANDARD. WHAT DOES THE OBSERVER DO WITH BATTERIES THAT APPLY AND RECEIVE AN ALTERNATIVE STANDARD?**

The response to this question is best shown in an example. In this example, Battery 1 has a coke-side shed and a baghouse to control emissions. The owner applies for an alternative standard, using the procedures in the regulation. After testing, the battery receives an alternative standard of 11.0 PLD. The coke-side doors under the shed of Battery 1 are now inspected (from the yard if possible, from the bench if not, per Method 303) once a week instead of once a day. The new PLD is not averaged with any other reading. Instead, it is a never-to-exceed leaking door limit. If the PLD for the coke-side with the shed do not exceed 11.0 PLD for 12 consecutive weeks, then the doors are inspected once a month. If any exceedance is recorded during the monthly inspection, the frequency of inspection returns to once a week.

In addition to the PLD limit, the observer must conduct a weekly inspection of the shed for collection efficiency and may have to read opacity, using Method 9, of the emissions at the outlet of the baghouse. The word "may" is applicable because the battery operator has the option of installing and maintaining a continuous opacity monitor at the baghouse outlet.

Inspecting the shed for collection efficiency means walking around the shed and looking for emissions escaping capture. Pushing emissions are exempt.

**14. IS THE OBSERVER REQUIRED TO INSPECT THE COLLECTING MAIN?**

Procedures for conducting collecting main inspections are in Method 303, but the observer is not required to inspect the collecting main every day. The permitting authority will determine the frequency of collecting main inspections by the observer. However, the regulation requires the owner or operator to inspect the collecting main daily.

**15. CAN BATTERIES BE COMBINED FOR THE PURPOSE OF CONDUCTING INSPECTIONS (E.G., TO OBTAIN FIVE OBSERVATIONS TOTAL FOR CHARGING INSTEAD OF TWO SETS OF FIVE OBSERVATIONS FOR TWO BATTERIES)?**

Batteries are defined in Appendix A of the rule, and as with other parts of the rule, this list was negotiated in good faith by all of the parties. If there is a demonstrable problem with the way that batteries are defined in the appendix, a facility may apply for an alternative method. However, combining of batteries will be determined on a case-by-case basis by the delegated enforcement agency. To be considered for an alternative method, the following criteria will apply:

There must be a substantive need or reason for the alternative method.

The alternative method must apply to charging observations only.

Batteries that are to be combined to conduct a single set of charging observations must be charged by a single larry car operated by the same crew for both batteries.

**16. IF TWO OR MORE BATTERIES ARE CONNECTED BY COMMON WALLS, DOES THIS CONSTITUTE ONE BATTERY?**

Not necessarily. The easiest way to determine whether something is considered one battery or two is to consult the list of batteries that is in the regulation.

**17. ARE VE FROM BYPASS STACKS OR OTHER SOURCES NOTED?**

Any "event" can be noted in the comment portion of the inspection form, "but VE from bypass stacks are not covered under the regulation.

**18. THE GUIDANCE IN THE METHOD IS TO VARY THE TIME OF DAY OF THE INSPECTIONS. DOES THIS MEAN NO NIGHT INSPECTIONS?**

There is nothing in the method or rule that prevents someone from conducting a Method 303 traverse at night.

**19. PRE-HEATERS DRIVE OFF EXCESS MOISTURE. IS THIS CONSIDERED COKE OVEN EMISSIONS?**

Pre-heater emissions are not covered under this-regulation.

**20. WHEN DOES THE CHARGING PERIOD END FOR BATTERIES THAT USE JUMPER PIPES OR ASSIST OVENS?**

The charging period begins when coal begins to flow into the oven and ends when the last charging port is recapped. If an oven uses a movable jumper pipe and an assist oven during charging, then emissions from the jumper pipe and the port of the assist oven count as charging emissions. The charging period ends when the last lid on the oven being charged is replaced.

**21. IS A BATTERY EXEMPT FROM NOV'S DURING THE TRAINING OF THE OBSERVERS?**

It is not the policy of the EPA to exempt a source from being cited for violations during a visit.

**22. SHOULD FLAMES SEEN COMING FROM AN OVEN DOOR JAMB DURING A DOOR TRAVERSE COUNT AS A DOOR LEAK?**

The procedures in Method 303 determine the presence of visible emissions. Flames are not counted as VE. However, any plume from the flame that is visible during a proper traverse can be counted as VE.

**23. DOES THE NEW COKE OVEN RULE SUPERSEDE OTHER STATE RULES?**

No. The coke battery is still obligated to comply with all state or county rules that are currently in place.