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DATE: July 18, 2019

TO: GCP Oil & Gas Permit Holders and AQB Staff

SUBJECT: GCP Oil & Gas (GCP O & G) Permit Condition B 111.A FAQ

Background: The GCP-O&G, General Condition B111.A, Paragraph 4 states the unit being tested must be operating at 90%-100% of the maximum operating rate "allowed by the permit." Paragraph 5 goes on to say if this capacity cannot be achieved, the emission unit is restricted to operate at 110% of the tested capacity.

Q1: Does the Department intend that this requirement applies for all compliance testing?

A1: Yes. This requirement applies to all compliance testing. Compliance testing of all emission units should be conducted at 90%-100% of the "permitted capacity" represented in the *registration form*. If operating restrictions do not allow testing at this level, testing should be performed at the maximum achievable level under prevailing operating conditions [B111.A, Paragraph 5 & B108.E].

Q2: My current operating conditions limit my load capacity to 60% during my normal testing schedule. If I test my unit at this capacity, will I be limited to operating at 110% of the tested capacity (66% of the load capacity) until operational load increases and I can perform a test at the higher capacity?

A2: Yes, the unit will be limited to the 66% load capacity unless the unit has previously been tested at a higher capacity. For example, if you have a previous test conducted on the unit at greater than or equal to 90% of the maximum operating rate allowed by the permit, the allowable operating rate for this unit will be your permitted operating rate because you have previously satisfied General Condition B111.A, Paragraph 4. Another example is if the unit was previously tested at 70% capacity and the most recent test is at 60% (current max capacity) the unit is limited to 77% load capacity, based upon the unit's previous highest tested capacity.

Important note: Condition B108.E requires **all** testing to be performed at the "maximum achievable load." Thus, the load shall not be reduced during any testing. If testing is not performed at greater than or equal to 90% of the unit's capacity allowed by the permit, B108.E requires documentation and reporting of the operating conditions, which must include adequate documentation of why any load falls below 90%.