Notice

This Engineering Guide was recently converted to a PC format and it has not been proof read by our engineering staff. Therefore, it is subject to change at a later date.
Question:

If a facility is required to conduct particulate emission tests on a boiler which is subject to OAC rule 3745-17-10, should sootblowing operations be performed during the emission tests? (This question was submitted by Michael Groves of RAPCA on September 13, 1982).

Answer:

The decision to include or exclude sootblowing as part of a compliance demonstration should be based upon the type of control equipment utilized for the boiler.

Boilers which are controlled with fabric filters, scrubbers or electrostatic precipitators are not exempt from complying with the visible emission limitations during sootblowing and, therefore, should include normal sootblowing cycles during all compliance demonstrations. (When establishing a test protocol, the source-specific sootblowing schedule may need to be modified to accommodate the test period). These controls adequately handle the additional emissions generated by a continuous, continual or intermittent sootblowing cycle, thereby allowing compliance with the mass emission limitation. If the owners of such boilers believe that they can't comply with the visible or mass emission limitations during sootblowing, they will need to change the sootblowing frequency so that the control equipment is not overloaded during the sootblowing process.

Boilers which are uncontrolled or controlled solely by mechanical collectors (including side stream separators) should not include sootblowing emissions as part of a compliance demonstration. The Ohio EPA recognizes that this type of control equipment is not always capable of adequately handling intermittent sootblowing emissions; therefore, we have exempted those sources from complying with the visible emission limitations during sootblowing operations. Since we take this approach with respect to the visible emission limitations, it follows that we should not expect the mass emission limitation to be met during intermittent sootblowing operations. Whenever possible, adjustments should be made to the sootblowing frequency to
minimize the impact of these emissions on the efficiency of
the control equipment.

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