

Guidance for Performing Opacity Observations using NJATM2 when a 10-Consecutive Second Standard Applies

Below is guidance on how observations are to be performed when Permits require opacity observations with a limit not to exceed for "more than 10-consecutive seconds."

EPA9 is not appropriate for performing these types of tests. EPA9 is for a "time average" standard. However, this is a "time exception" standard. Opacity readings must be taken using NJ Air Test Method 2 (NJATM2). The observation for this standard falls under NJATM 2, Section 2.4(e), which requires readings every 15-seconds, "except where consecutive second standards are prescribed." Since the allowable period is 10-consecutive seconds, taking readings at 15-second intervals is not appropriate.

These observations are performed by taking observations at 5-second intervals. Three consecutive readings above the limit would be an exceedance. You do not average readings with this method. Each reading represents the opacity for the time period between it and the next reading. A total of 10 minutes observation time is required at a minimum. This would result in 120 readings, the same as one would do for the usual 30-minute opacity observation using 15-second intervals under NJATM2. The analogous EPA method for a "time exception" standard would be EPA203B.

For periodic monitoring events, one 10-minute reading will suffice to demonstrate compliance, unless otherwise specified in the Permit (or regulation), or approved by BTS. If the Permit requires opacity compliance by stack testing, one 10-minute reading during each of the three particulate runs will be required, unless otherwise specified in the Permit (or regulation), or approved by BTS.