

# NO<sub>2</sub>/NOx In-Stack Ratio (ISR)

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# Why Start Collecting Data?

- Why did the District start collecting NO<sub>2</sub> data?
  - In 2010 the NO<sub>2</sub> NAAQS was lowered to below the state standard (188 vs. 339 µg/m<sup>3</sup>)
  - Performs ~80 permit modeling runs / month
    - ~5-15% required NAAQS/CAAQS determinations
      - non-PSD sources
    - Projects above NAAQS/CAAQS
      - Need for new option in modeling
        - » Required NO<sub>2</sub> ratio data

# Challenges – Data Collection

- No data was readily available
- Assume data provided by agencies was acceptable
- Use data from literature searches
- Use of hand held sampler data
- Limited in house source test data
  - Not required to report NO or NO<sub>2</sub> separate from NOx

# Challenges – Data Processing

- How do you combine data collected
  - By source type
  - By fuel type
  - By control type
  - By regional location
- How do you average the data
  - When you have multiple test
  - Different averaging periods
    - Minute / Hourly / Average Over Test Period

# Understanding Limitations

- Quality of the data
- Sources covered by the data
- How to apply it to modeled sources

# How Do We Move Forward

- Plans for collecting NO/ NO<sub>2</sub> data and supporting EPA's ISR efforts
  - Require all new PSD sources to report NO, NO<sub>2</sub>, and NOx separately.
  - Require all new non-PSD sources to report NO, NO<sub>2</sub>, and NOx separately.
    - For sources which are required to perform stack testing and
    - Test equipment provides for speciation.

# Contact Information

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