

## LEHDER Environmental Services

## Revised Procedures for Submission of Source Testing Information to MOE

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August 2009

### Introduction

The Ontario Ministry of the Environment (MOE) Technology Standards Section (TSS) has issued revised procedures for submitting source testing information to TSS source assessment specialists for review and/or approval. The revised procedures include the following elements:

- All source testing documents, including pre-test plans, testing schedule notifications, requests for information and source testing reports are to be submitted electronically
- Submissions are to be made to a common email address rather than to specific TSS personnel
- Compliance test scheduling and notification must follow the MOE-specified timelines.

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### Background

Prior to fall 2008, the MOE TSS had a single source assessment specialist responsible for the review and approval of all compliance source testing programs. Common practice was to correspond directly with the specialist regarding pre-test plan approvals, compliance test scheduling, or for information or guidance on sampling methods.

With the addition of a second MOE source assessment specialist in fall 2008, source testing programs are now being allocated to one of the two specialists on an as-received basis with the expectation that the assigned specialist will be responsible for all aspects of the source testing program (i.e., test protocol review and approval, scheduling and witnessing field work, and final report review and approval).

In 2008 the MOE TSS also began requiring that all source testing information be submitted in electronic format only (no hardcopies), except where hardcopy submissions were explicitly required (in the text of Certificates of Approval, Officer's Orders, etc.).

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### Who is Impacted?

The new procedures apply to all source testing programs (either compliance testing programs or voluntary testing programs) submitted to the MOE TSS after June 1, 2009.

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### Electronic Submissions

Source testing information submitted to the MOE TSS must be forwarded electronically to the following email address:

[source.testing@ontario.ca](mailto:source.testing@ontario.ca)

From this common email account, the information will be allocated to the appropriate source assessment specialist. Pre-test plans received to this address will be allocated on a first-come first-served basis to the specialists for their review/approval.

Electronic submissions must resemble properly prepared hardcopy reports, and must include: the consultant's or company's logo or letterhead; a cover letter (preferably issued from the holder of the CofA); the document issue date (day/month/year); and the name and signature of the person who prepared / released the document.

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### Submitting Large Documents

The email address [source.testing@ontario.ca](mailto:source.testing@ontario.ca) is limited to receive files **less than 10 MB** in size. If documents to be submitted exceed this size, the following options are available:

- document(s) can be uploaded to an FTP server by the submitter and access information for the FTP site forwarded by email to [source.testing@ontario.ca](mailto:source.testing@ontario.ca); or
- an email can be sent to the MOE prior to document submission requesting access to the MOE secure email server <https://attachmail.ontario.ca>, to which large documents can be uploaded.

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### Hardcopy Requirements

In some instances, the text of a Certificate of Approval (CofA), Provincial Officer's Order or other MOE correspondence may specify that hardcopies of pre-test plans or source testing reports **must** be submitted to another office or offices within the MOE.

The requirement to submit electronic documents to the TSS **does not supercede** these requirements. However, only electronic copies of the documents should be forwarded to TSS source assessment specialists, regardless of other requirements.

In general, if there is no specific requirement to submit hardcopies, it can be assumed that electronic submissions are acceptable to all MOE offices. It is suggested that a hardcopy be submitted to District Managers (local offices) unless otherwise instructed.

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## MOE Review Timeline and Field Work Scheduling

The MOE TSS has targeted a review period of **15 business days** for pre-test plan submissions. Pre-test plans will be reviewed on a first-come first-served basis.

The MOE TSS requires that source testing programs be scheduled for **no sooner than 10 business days after the date the pre-test plan was approved** and requires that formal source testing notification be provided **no less than 5 business days prior to the commencement of field testing**.

The MOE TSS reserves the right to require test programs to be re-scheduled if it is deemed important for the source assessment specialist to witness the field testing program and the schedule conflicts with a previously scheduled test program.

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## How can LEHDER Assist?

LEHDER Emissions Testing Group personnel can prepare and submit all required documentation (either electronically or in hardcopy) on behalf of our clients to satisfy MOE requirements. We also act as a liaison between our clients and the MOE source assessment specialists to facilitate field work scheduling to meet the needs of our client and to satisfy MOE requirements.

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## Questions

For further information or questions regarding these revised procedures please contact:

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## About LEHDER

LEHDER is one of the largest Air Quality Management consulting companies in Canada. Our team of consulting professionals is built around our core strength in industrial environmental, health and safety management. LEHDER recognizes our client's need to make decisions that provide for operational flexibility while meeting regulatory, economic and social requirements.

Visit our web pages at: [www.lehder.com](http://www.lehder.com)

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