

FIGURE 100-7



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

MEMORANDUM

SUBJECT: EPA Approval of San Diego APCD Test Method 100

FROM: William Grimley *WJG*
Source Characterization Group B (MD-19)

TO: Duane James
Rulemaking Section, Region IX (A-5-3)

At your request, members of the Emission Measurement Center have reviewed the February 1995 draft of the subject test method entitled, "Test Procedures for the Determination of Nitrogen Oxides, Carbon Monoxide and Diluent Gases by Continuous Emission Monitoring." This method encompasses EPA Test Methods 3A, 7E, 10, and 20, in 40 CFR Part 60, Appendix A [except for SO₂]. A procedure for determination of stack gas stratification was also included in the draft method. As no test data that compares the candidate method with any of the corresponding EPA methods was submitted, the method has only been reviewed from the standpoint of comparison with the technical procedures and performance specifications contained in the individual EPA methods.

The principles of sample extraction and analytical detection in candidate Method 100 are essentially the same as those in the corresponding EPA Methods. No interference response tests are specified; however it would be reasonable to exclude them as long as the method is only applied to combustion sources, and the discrimination ratios for potential interferents for the particular instruments used are known to be good.

The technical performance specifications in Method 100 are at least as rigorous as those contained in the EPA Methods, and more requirements have been added in Method 100 in respect to the determination of sample system bias and NO_x converter efficiency. Based on these findings, we believe it would be reasonable to approve this method for application to combustion sources.

Should there be any further questions, please feel free to contact me at (919) 541-1065.