



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

December 4, 2002

Mr. John Higuchi  
Manager, Source Testing  
South Coast Air Quality Management District  
21865 E. Copley Drive  
Diamond Bar, CA 91765-4182

Subject: Approval of Protocol for the Measurement of Nitrogen Oxides, Carbon Monoxide, and Oxygen and Request for Future Rule Language Change to Rule 1146

Dear Mr. Higuchi:

South Coast Air Quality Management District (SCAQMD) provided the following protocol to EPA Region 9 for review and approval.

Protocol for the Measurement of Nitrogen Oxides, Carbon Monoxide, and Oxygen from Sources Subject to South Coast Air Quality Management District Rule 1146 (September 21, 2001)

EPA Region 9 and the Emission Measurement Center reviewed the protocol and have no comments on it. EPA approves the above protocol for use in SIP approved rules in California.

However, the language in Rule 1146 needs to be modified as EPA has a specific definition for "alternative method" and "equivalent method" and we want to ensure that our approval of the protocol is not interpreted as it being "equivalent" to an EPA reference method. 40 CFR 60.2 provides the following definitions for alternative and equivalent test methods.

*Alternative method* means any method of sampling and analyzing for an air pollutant which is not a reference or equivalent method but which has been demonstrated to the Administrator's satisfaction to, in specific cases, produce results adequate for his determination of compliance.

*Equivalent method* means any method of sampling and analyzing for an air pollutant which has been demonstrated to the Administrator's satisfaction to have a consistent and quantitatively known relationship to the reference method, under specified conditions.

The following are suggested changes to Rule 1146 Section (d)(4) the next time the rule is changed.

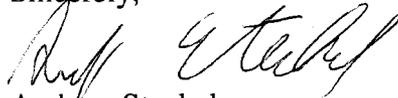
(4) Compliance with the NO<sub>x</sub> and CO emission requirements of paragraphs (c)(1), (c)(2), (c)(3), (c)(4), and (c)(5) and the stack-gas oxygen concentration requirement of paragraph (c)(6)(A) shall be determined according to procedures in District Source Test Method 100.1 - Instrumental Analyzer Procedures for Continuous Gaseous Emission Sampling (March 1989), or Method 7.1 - Determination of Nitrogen Oxide Emissions from Stationary Sources

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(March 1989) and Method 10.1 - Carbon Monoxide and Carbon Dioxide by Gas Chromatograph/Non-Dispersive Infrared Detector (GC/NDIR) - Oxygen by Gas Chromatograph-Thermal Conductivity (GC/TCD) (March 1989), or any other **alternative** test method, such as methods that allow the use of hand-held portable monitors, **determined to be equivalent and** approved before the test in writing by the Executive Officers of the District and the California Air Resources Board and the **Regional Administrator of the** United States Environmental Protection Agency, Region IX. ...

If you have any questions on this approval, please do not hesitate to have your staff contact Stanley Tong at (415) 947-4122.

Sincerely,



Andrew Steckel  
Chief, Rulemaking Office

cc: Conniesue Oldham, EMC  
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