



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

**75 Hawthorne Street
San Francisco, CA 94105-3901**

22 October 1998

**OFFICE OF THE
REGIONAL ADMINISTRATOR**

Mr. Rudy V. Zerrudo
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, California 94109

Dear Mr. Zerrudo:

I am writing in response to your letter of April 9, 1998, in which the Bay Area requested approval of several test methods for inclusion into the State Implementation Plan (SIP). The four Bay Area methods are:

Method 10 - Determination of Sulfur in Fuel Oil
Method 15A - Standardization and Analysis of Permanent Gases and Methane
Method 17 - Standardization of Hydrocarbon Calibration Gases
Method 44 - Determination of Reduced Sulfur Gases and Sulfur Dioxide in Effluent Samples by Gas Chromatographic Method.

Bay Area Method 10 is approved for use in the SIP when no ASTM methods are applicable, which in this case means when water is present in the fuel oil.

Bay Area Methods 15A and 17 are procedures to verify the concentration of certified calibration gases required by various EPA instrumental methods. Sources using these test methods are required to purchase gases certified by the manufacturer according to the "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards" as revised September 1993 (Protocol). The Protocol has stringent requirements for traceability and certification, and its requirements may not be replaced by other procedures. Sources which are not satisfied with the certification of their calibration gases should ship the gases back to the manufacturer for certification according to Protocol procedures. Therefore, these two methods are not approved for use as alternatives to the Protocol.

Bay Area Method 44 was submitted as an alternative to EPA Test Method 16, 40 CFR Part 60, Appendix A. Based on our review of this method, and per conversations with Gary McAlister of EPA's Emission Measurement Center, the difference between EPA Method 16 and Bay Area Method 44 is that the Bay Area Method allows the use of Tedlar Bags or "SilcoCan" canisters for storage of the samples before analysis, while the EPA method is an on-line method. The stability data that you submitted was conducted using ambient air; this study does not

address the reactivity or stability of the canisters in a source matrix (which would likely have much higher moisture, acid gases, etc.). In order to approve this method, a recovery study during the source test (similar to the recovery study described in Test Method 18, Section 7.6.3, 40 CFR Part 60, Appendix A) must be carried out in order to evaluate the alternative procedure.

Please contact Rima Dishakjian at (415) 744-2336 if you have further concerns on this matter.

Yours,



Felicia Marcus
Regional Administrator

bc: Rima Dishakjian (Region 9, Air Division, Air-4)
Terry Harrison (OAQPS, EMC, MD-19)
Bill Lamason (OAQPS, EMC, MD-19)
Gary McAlister (OAQPS, EMC, MD-19)
Andrew Steckel (Region 9, Air Division, Air-4)
Stan Tong (Region 9, Air Division, Air-4)