



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

JUL 6 1999

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

MEMORANDUM

SUBJECT: Review of CARB Method 100 "Procedures for Continuous Gaseous Emission Stack Sampling"

FROM: William Grimley *Bill Grimley*
Source Measurement Analysis Group (MD-19)

TO: Stanley Tong
Region 9 (AIR-4)

This is a follow-up confirmation of my e-mail to you dated April 26, 1999 in response to your request to William Lamason regarding our review of CARB Method 100, "Procedures for Continuous Gaseous Emission Stack Sampling", dated July 28, 1997. In your letter, you asked for our evaluation whether the method can be referenced in permits (Title V) and SIP approved rules only - not for compliance determinations under federal standards. I have reviewed the method and discussed it with others here and would offer the following comments:

No systematic sources of errors were noted. Only minor differences in comparison with EPA Methods 3A, 6C, 7E, and 10 were noted in technical and performance specifications, as well as in most procedural details. The one potentially contentious difference I noted that would be a problem if you had asked for approval as an alternative method under federal regulations is that while there are interference specifications, there are no actual procedures for measuring and documenting the amount of bias created due to interferant gases that could be present for a particular analyzer, as there are in EPA Methods 3A, 6C, 7E, and 10. In other words, there is no confirmation that the interference specification has been met. If the Region decides to approve this CARB method for reference in permits and/or use in SIP, then the Region should give notice that no approval is given for compliance determination with the federal New Source Performance Standard (NSPS) or the National Emission Standard for Hazardous Air Pollutants (NESHAP). Please call me at (919) 541-1065 if there are any questions.

cc: Bill Lamason (MD-19)
Conniesue Oldham (MD-19)
Robin Segall (MD-19)
Andrew Steckel (AIR-4)
Fred Thompson (MD-19)