



TED SCHWINDEN  
GOVERNOR

State of Montana  
Office of the Governor  
Helena 59620

*Comments*  
*1981*

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September 21, 1981

Mr. Steven J. Durham  
Regional Administrator  
Region VIII  
1860 Lincoln Street  
Suite 103  
Denver, Colorado 80295

Dear Mr. *SD* Durham:

Enclosed is an itemization of the source test procedures used by the Montana Air Quality Bureau in administering the State Implementation Plan.

This submission is in response to the Environmental Protection Agency's September 23, 1980 conditional approval of Montana's source test procedures (Sec. 52.386 Source Surveillance 45FR 62985). It includes a list of the required procedures and sets forth the section of the Montana Air Quality Rules which provides for enforcement of the test procedures (ARM 16-2.14(1)-S14050 TESTING REQUIRED, FACILITIES, recodified in August, 1980 to ARM 16.8.704 TESTING REQUIREMENTS). The section cited requires persons performing tests to use methods approved by the director, which are those that have been promulgated by EPA. Since the primary purpose of source testing is to demonstrate compliance with the state's regulations, it is unlikely that an individual would submit the results of a test conducted with unapproved methods. Furthermore, if a test is conducted using methods not approved by the director, the results of the test would not be accepted by the Montana Air Quality Bureau.

If you or your staff have questions related to the contents of the enclosed material, please direct them to the Air Quality Bureau, Cogswell Building, Helena, Montana, 59620, phone: 406-449-3454.

Sincerely,

TED SCHWINDEN  
Governor

Enclosure

cc: Dr. John Drynan

*orig: 85 - Appropriate Action*

*cy: 8MO*

MONTANA SDHES-AQB

Sampling & Analytical Procedures

All sampling and analytical procedures recommended for use by Montana are those generally recommended by the United States Environmental Protection Agency. Complete details of equipment and procedures are described in the Federal Register, August 18, 1977.

The Bureau can in specific cases, recommend the use of a different sampling or analytical procedure to facilitate minor changes in methodology, to incorporate the usage of equivalent methods, or to facilitate usage of alternate proven methods.

The only specific variation to EPA methods which Montana recommends or requires is:

EPA Method 5 - Particulate Sampling, etc.

- for non-NSPS sources, impinger weights or "back half" is required as part of total particulate catch in compliance determination. Use of a heated teflon flex-tube between probe and sample box is recommended in sampling areas where physical movement of sample box and probe is sufficiently difficult to jeopardize sampling procedure.

The means for enforcing the use of the required test procedures are found in ARM 16.8.704 TESTING REQUIREMENTS, and are as follows:

Any person or persons responsible for the emission of air contaminants into the outdoor atmosphere shall upon written request of the director provide the facilities and necessary equipment including instruments and sensing devices and shall conduct tests using methods approved by the director. Such tests shall include, but not be limited to, a determination of the nature, extent, quantity and degree of air contaminants which are or may be emitted as a result of such operation at all sampling points designated by the director and the data shall be recorded in a permanent log at least once each hour, if applicable. These data shall be maintained for a period of not less than one year and shall be available for review by the department. Such testing and sampling facilities may be either permanent or temporary at the discretion of the person responsible for their provision, and shall conform to all applicable laws and regulations concerning safe construction or safe practice. (History: Sec. 69.3913, R.C.M. 1947; Order MAC 16-1; Adp. 12/31/72; Eff. 12/31/71).