

Monday, May 15, 2006

Part II

#### Environmental Protection Agency

40 CFR Part 60

Update of Continuous Instrumental Test Methods; Final Rule

- $\square Method 3A O2 \& CO2$
- $\square Method 6C SO2$
- $\square Method 7E NOx$
- $\square Method 10 CO$
- □ Method 20 NOx/SO2/Diluent

May 15, 2006 Final Rule

- □ A Discussion of
  - Selected Amendments to the Test Methods
  - Technical Corrections & Clarifications

Update of Continuous Instrumental Test Methods - History

- $\square$  1<sup>st</sup> Proposed August 27, 1997
  - Reproposal Requested
- □ Reproposed October 10, 2003
  - Original Updates plus Others
- □ Final Rule May 15, 2006
- □ Updates Effective August 15, 2006
- Technical Amendment of Corrections/Clarifications Soon

## Rule Clarifications on Website

#### www.epa.gov/ttn/emc



- □ Purpose
  - Harmonize
  - Simplify
  - Update

- □ Harmonize
  - General Requirements in Method 7E
  - Consistent Equipment Requirements
  - Consistent Performance Tests
  - Calibration Gases & Ranges

- □ Simplify & Make Flexible
  - Incorporate Method 20 into Method 7E
  - Make Equipment Performance-Based Instead of Technology-Based
  - Some Tests Can Be Performed by Manufacturer

- □ Update
  - Relax Outdated Requirements
  - Incorporate Recently Accepted Options & New Techniques
  - Address Dilution Sampling Systems
  - Address Low Measurements Needs

## Sampling Traverse Points

- Number Determined by Stratification Test
  - 12- Point (per Method 1) *or*
  - 3-Point @ 16.7, 50.0, 83.3%
  - Methods 6C, 7E, 10 Pollutant Stratification Test
  - Method 20 Diluent-Corrected Pollutant Stratification Test
  - Rake Probes OK Except for \*CAMD Tests
- □ Clarification
  - Perform Stratification Test at Each Site

## Sampling Traverse Points

- □ >10%: 12-Point Sampling
- □ >5% but ≤ 10%: 3-Points @ 16.7, 50.0, & 83.3%
- $\Box \leq 5\%$ : Single-Point Sampling
- □ "Clarification:
  - Min. Test Run Time = 21 Min.
  - Single-Point OK for IC Engines or Stacks < 4"</p>

## **Dilution Sampling Systems**

- 3-Point System Calibration Error in Place of Analyzer Calibration Error Test
- 2-Point System Calibration Error in Place of Bias Test Between Runs
- 3-Point System Calibration Error Test Serves As Initial 2-Point Calibration Error Test for a Run

## **General Equipment Specifications**

- Performance Based OK If Can Pass Interference Check, CE, System Bias Tests
- Components Maintained Above Gas Dew Point Before Sample Conditioning
- Components Not In System Bias Check Must Be SS, Teflon, or Glass

# Zero Gas Quality

- Traceability Protocol Not Applicable
- □ Part 72.2 Provisions for Zero Air Material
  - SOx/NOx/VOC < 0.1 ppm
  - CO < 1 ppm
  - CO2 < 400 ppm

## Instrumental Test Methods

- □ Calibration Span (CS)
- Equal to High Calibration Gas Value
- □ Chosen Such That 20% ≥ Emissions ≤ 100% of Calibration Span, as Practicable
- □ Mid-Level Gas: 40-60% of CS
- □ Low-Level Gas: 0-20% of CS
- Method 205 Allowed (Special Approval for CAMD)

## Interference Test - Clarifications

- □ Table 7E-3 Lists Example Test Gases
- Address All Potential Interferences
- □ May Be Performed by Manufacturer
- Test Gases Manufacturer-Certified
- □ One Initial Test Per Make & Model
- □ Repeat for Non-model Replacement Parts
- Current Analyzers Grandfathered

Potential Interferent Gas <sup>1</sup>	Concentrations <sup>2</sup> Sample Conditioning Typ	
	Hot Wet	Dried
CO2	5 and 15%	5 and 15%
H <sub>2</sub> O	25%	1%
NO	15 ppmv	15 ppmv
NO <sub>2</sub>	15 ppmv	15 ppmv
N <sub>2</sub> O	10 ppmv	10 ppmv
со	50 ppmv	50 ppmv
NH <sub>3</sub>	10 ppmv	10 ppmv
CH <sub>4</sub>	50 ppmv	50 ppmv
SO2	20 ppmv	20 ppmv
H <sub>2</sub>	50 ppmv	50 ppmv
HCl	10 ppmv	10 ppmv

Table 7E-3. Example Interference Check Gas Concentrations

- Any applicable gas may be eliminated or tested at a reduced level if the manufacturer has provided reliable means for limiting or scrubbing that gas to a specified level.
- As Practicable, gas concentrations should be the highest expected at test sites.

## Method 7E NO<sub>2</sub> Converter Check

- 3 Options
  - 1. Conversion of  $NO_2$
  - 2. Old Method 20 NO + O2 in Bag
  - 3. Procedure in 40 CFR 86.123-78

Clarification

Can Be Performed Before or After a Test

Converter Efficiency Check Conversion of NO<sub>2</sub> Gas

- Traceability Protocol Gas
  - Unstable Over Long Periods
  - Reference Material May Contain HNO<sub>3</sub>
- □ Amending
  - Changing to Require Manuf-Certified Gas
  - Use Mid- to High-Concentration Range Gas
    Instead of 40-60 ppm Gas

Converter Efficiency Check Old Method 20 Bag Procedure

- Procedure Amendment
  - Secondary Steps For Determining Conversion
    Efficiency Were Confusing Dropped
  - Acceptance Criterion: 2% Drop from NOx peak
  - Requirement to Introduce Test Gas Upstream of Dilution Assembly For Sample Dilution Systems Dropped

### Manufacturer Stability Test

- Stability Against Test Site Variations in
  - Temperature
  - Line Voltage
- □ For Routine Analyses Below 20 ppm
- □ Clarification/Correction
  - Performed by Tester or Manufacturer
  - Use Procedures Similar to 40 CFR 53.23, not
    53.55 or 53.56

#### Low-Measurements Relief

#### Alternative Criteria

#### **Stratification Test Points**

- $\leq 0.5 \text{ ppm} \text{Single-Point Sampling}$
- $\leq 1.0 \text{ ppm} 3$ -Point Sampling
- **Calibration Error** Pass if  $\leq 0.5$  ppm
- **Calibration Drift** Pass if  $\leq 0.5$  ppm
- **Bias or System Calibration Test** Pass if  $\leq 0.5$  ppm
- □ Interference Test Pass if  $\leq 0.5$  ppm for CS of 5-10 ppm Or  $\leq 0.2$  ppm for CS < 5 ppm
- **Dynamic Spiking** Pass if  $\leq 0.2$  ppm

# Alternative Dynamic Spike Check

- □ Optional in place of:
  - Bias Test
  - Interference Check
- □ 2-Level Spike
  - Approx 50% above & 50% below Emissions
  - Spike Before & After Test
- Best on Steady-State Process
- Approval Required for CAMD Tests

#### Converter Eff. Calculation Corrections Old Method 20 Converter Check Calculation

**Current** Equation

$$EffNO2 = \frac{NOxfinal - NOfinal}{NOxpeak - NOxfinal} x 100$$

□ Amended Equation

% Decrease = 
$$\frac{NOxpeak - NOxfinal}{NOxpeak} x 100$$

Calculation Corrections/Revisions System Calibration Error Calculation

Missing DF in Eq. 7E-3

$$SCE = \frac{(Cs - Cv) \times DF}{CS} \times 100 \quad Eq.7E - 3$$

#### Calculations Corrections/Revisions Dynamic Spike Recovery Calculation

□ Current Equation

$$R = \frac{Css - Cavg}{Ccalc} \times 100 \quad Eq.7E - 12$$

□ Correct Equation

$$R = \frac{DF(Css - Cnative) + Cnative}{Cspike} x100$$

#### Calculations Corrections/Revisions

Missing Sample Concentration Calculation When Using a Zero Gas

#### Current Equation for Non-Zero Gas

$$Cgas = (Cavg - Cm) \frac{Cma - Coa}{Cm - Co} + Cma \quad Eq. \, 7E - 5a$$

#### □ New Equation For Zero Gas

$$Cgas = (Cavg - Co) \frac{Cma}{Cm - Co} \qquad Eq. 7E - 5b$$

## Upcoming Amendments Rule

#### Projected by End of April '07

DRAFT

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Part 60

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OAR-2002-0071; FRL-

#### RIN 2060-AK61

Update of Continuous Instrumental Test Methods: Technical Amendments

AGENCY: Environmental Protection Agency (EPA).

ACTION: Direct final rule.

SUMMARY: This action makes technical amendments to the

final rule to update five instrumental test methods that

was published on May 15, 2006. It was brought to our

attention by applicable parties that several of the updates

need adjustment to make them usable and more clearly

understood. We do not anticipate these amendments to raise

issues beyond those already addressed in the public comment

period. These amendments address unanticipated cases that

the final rule created but did not address.

DATES: This direct final rule will be effective on [INSERT DATE 60 DAYS AFTER DATE OF FUELICATION IN THE FEDERAL

Questions or Suggestions