

solicit comments on the availability of instruments capable of meeting the changes they recommend to our performance specifications for CO CEMS.

Today's proposal specifies the use of Method 10 as the reference method to certify the performance of the CO CEMS. We also believe Method 10 is capable of measuring CO concentrations as low as those experienced in the exhaust of a stationary combustion turbine following an oxidation catalyst emission control device. However, the performance criteria in addenda A of Method 10 have not been revised recently and are not suitable for certifying the performance of a CO CEMS at these low CO concentrations. Specifically, we believe the range and minimum detectable sensitivity should be changed to reflect target concentrations as low as 0.1 parts per million (ppm) CO in some cases. We also expect that dual range instruments will be necessary to measure CO concentrations at the inlet and at the outlet of an oxidation catalyst emission control device.

As a result, we solicit comments with specific recommendations on the changes we should make to Method 10 and the performance criteria in addenda A. We also solicit comments on the availability of instruments capable of meeting the changes they recommend to Method 10 and the performance criteria in addenda A, while also meeting the remaining addenda A performance criteria.

With regard to formaldehyde, we believe systems meeting the requirements of Method 320, a self-validating FTIR method, can be used to attain detection limits for formaldehyde concentrations below 43 ppbv. We expect path lengths in the range of 100 to 125 meters and state-of-the-art digital signal processing (to reduce signal to noise ratio) would be needed. Method 320 also includes formaldehyde spike recovery criteria, which require spike recoveries of 70 to 130 percent.

While we believe FTIR systems can meet Method 320 and measure formaldehyde concentrations at these low levels, we have limited experience with their use. As a result, we solicit comments on the ability and use of FTIR systems to meet the validation and quality assurance requirements of Method 320 for the purpose of determining compliance with the emission limitation for formaldehyde emissions.

As an alternative to Method 320, we are proposing Method 323 for natural gas-fired sources. Method 323 uses the acetyl acetone colorimetric method to

measure formaldehyde emissions in the exhaust of natural gas-fired, stationary combustion sources. We believe the proposed method can measure low concentrations of formaldehyde at a cost which is less than or equal to the cost of testing using Method 320; therefore, we solicit comments on the use of Method 323 by natural gas-fired sources to demonstrate compliance with the formaldehyde emission limitation.

We also believe CARB Method 430 and EPA SW-846 Method 0011 are capable of measuring formaldehyde concentrations at these low levels. Accordingly, we solicit comments on the use of CARB 430 and EPA SW-846 Method 0011 to determine compliance with the emission limitations for formaldehyde.

Based on the comments we receive on CO CEMS, we anticipate revising Method 10 and our performance specifications (PS4 and PS4A) for CO CEMS to ensure the installation and use of CEMS suitable for determining compliance with the emission limitation for CO emission reduction. If we should promulgate today's proposed rule for stationary combustion turbines before completing these revisions, however, we may require all new and reconstructed stationary combustion turbines subject to the final rule to demonstrate compliance with the formaldehyde emission limitation, or a formaldehyde percent reduction limitation similar to the CO percent reduction emission limitation, until we have adopted final revisions to Method 10 and our performance specifications for CO CEMS.

On the other hand, if the comments we receive lead us to conclude that CO CEMS are not capable of being used to determine compliance with the emission limitation for CO emission reduction, there are several alternatives we may consider. One alternative would be to delete the proposed percent reduction emission limitation for CO and require compliance with a comparable formaldehyde percent reduction limitation. This alternative would require periodic stack emission testing before and after the control device and would also require owners and operators to petition the Administrator for additional operating limitations, as proposed today for those choosing to comply with the emission limitation for formaldehyde. Another alternative would be to delete the proposed emission limitation for CO emission reduction and require compliance with the proposed emission limitation for formaldehyde. This alternative could require more frequent emission testing and could also require

owners and operators to petition the Administrator for additional operating limitations.

Another alternative would be to require the use of Method 320 (*i.e.*, FTIR systems) to determine compliance with the emission limitation for CO emission reduction. This alternative could also require more frequent emission testing and require owners and operators to petition the Administrator for additional operating limitations, as proposed today for those choosing to comply with the emission limitation for formaldehyde.

Based on the comments we receive on FTIR systems and Method 320, we may develop additional or revised criteria for the use of FTIR systems and/or Method 320 to determine compliance with the emission limitation for formaldehyde.

If we should conclude that neither CO CEMS or FTIR systems are capable of being used to determine compliance with the emission limitations for CO or formaldehyde emissions, then we may delete the emission limitations for CO and formaldehyde emissions and adopt an emission limitation consisting of an equipment and work practice requirement. This alternative would require the use of oxidation catalyst emission control devices which meet specific and narrow design and operating criteria.

We believe the emission limitations we are proposing for CO emission reduction and formaldehyde emission concentration are superior to these alternatives for a number of reasons. We believe that the CO emission limitation is better because it is easier and cheaper to continuously monitor CO, and it has been shown to be a good surrogate for HAP. Also, we prefer to have an emission limitation rather than an equipment or work practice standard. An emission limitation is superior because it ensures that emissions are below a certain level, as demonstrated by a CEMS or performance testing. However, we solicit comments on these alternatives, should we conclude that the proposed emission limitations for CO emission reduction and formaldehyde emission concentration are inappropriate because of difficulties in monitoring or measuring CO emission reduction or formaldehyde emission concentration to determine compliance. We also solicit suggestions and recommendations for other alternatives, should we conclude the proposed emission limitations are inappropriate because of monitoring or measurement difficulties.