

E. What Should I Consider as I Prepare My Comments for EPA?

You may find the following suggestions helpful for preparing your comments:

1. Explain your views as clearly as possible.
2. Describe any assumptions that you used.
3. Provide any technical information and/or data you used that support your views.
4. If you estimate potential burden or costs, explain how you arrived at your estimate.
5. Provide specific examples to illustrate your concerns.
6. Offer alternatives.
7. Make sure to submit your comments by the comment period deadline identified.
8. To ensure proper receipt by EPA, identify the appropriate docket identification number in the subject line on the first page of your response. It would also be helpful if you provided the name, date, and **Federal Register** citation related to your comments.

Background

Methods 3A, 6C, 7E, 10, and 20 are instrumental test methods for determining diluent (oxygen and carbon dioxide), sulfur dioxide, nitrogen oxides, and carbon monoxide emissions from stationary sources. The methods were developed for boilers, electric utility plants, refinery catalytic cracking catalyst regenerators, and gas turbines covered under the New Source Performance Standards (NSPS) in 40 CFR part 60. They were later adopted into the Acid Rain regulations and State and regional programs. The test methods were not developed at the same time and do not contain consistent equipment and performance requirements. Currently, some methods require more up-to-date equipment than others and some have more stringent performance requirements than others. These dissimilarities have hampered the current trend of using the methods together in the field. We are proposing to make collective changes that would render the methods easier to use by harmonizing their requirements. This would also update obsolete requirements and add flexibility by allowing alternatives to various equipment and performance specifications. The revisions we are proposing to the data reduction procedures would increase the certainty of the generated data.

On August 27, 1997 (62 FR 45369), many of the updates of this action were proposed with a larger action that

amended the stationary source testing and monitoring rules in 40 CFR parts 60, 61, and 63. In that proposal, minor revisions and updates were made and all test methods and performance specifications were revised into the new Environmental Monitoring Management Council (EMMC) format. Several commenters asserted that the preamble gave inadequate notice of the changes we were making to the instrumental methods. They argued that the proposal provided an inadequate basis and purpose statement and that it misled readers into thinking that no substantive changes were being made to the methods. Due to the large number of changes we were making in the regulations at that time, and in light of the section 307(d) requirements, the commenters requested that we address the instrumental method revisions through a separate proposal and not promulgate them with the rest of that package.

We agreed with these commenters concerns and stated our intention in the final rule [65 FR 61744] to repropose the revisions to the instrumental methods as a separate rule. In today's notice, we are proposing to revise equipment and procedures in the instrumental methods where appropriate to make their requirements consistent. We are also rewriting the methods in EMMC format. We have considered the comments we received pertinent to these methods in the August 27 proposal and are summarizing the major ones in this preamble. We will formally address all significant relevant comments from the first proposal in the final notice of these amendments.

Outline. The information presented in this preamble is organized as follows:

- I. Why Are These Amendments Being Made to the Instrumental Methods?
- II. What Changes Are Being Proposed to the Methods?
- III. What Major Comments From the Previous Proposal are Pertinent to This Reproposal?
- IV. What Statutory and Executive Orders Apply to This Rule?

I. Why Are These Amendments Being Proposed?

Amendments to Methods 3A, 6C, 7E, 10, and 20 are needed to update their performance requirements to state-of-the-art levels, remove obsolete specifications, harmonize similar requirements, and simplify to enhance their utility and reduce the costs of testing.

II. What Changes Are Being Proposed to the Methods?

We are proposing that Methods 3A, 6C, 7E, 10, and 20 in appendix A of 40 CFR 60 be revised to: (1) Make their equipment specifications and procedures as similar as possible to make them easier to use together in the field, (2) remove obsolete procedures and equipment listings, (3) add alternative performance tests, and (4) change their outline to conform with the standard EMMC format. We are proposing to base the analyzer calibration error on a percentage of the manufacturer certified gas value and the sampling system bias on a percentage of the applicable emission standard (except in Method 3A) instead of the span. For Method 3A, we are basing the tests on a percentage of the analyzer range. For the current bias test, the span may be chosen over a range of values instead of being a prescribed value. Under this allowance, the higher the span chosen for a test, the easier the performance criterion is met. We are proposing to base the bias test on a fixed value (the emission standard) to eliminate nonuniformity in stringency based on the tester's choice of a span. The calibration drift test that is currently required before and after each run would be dropped. We feel the bias test is a good enough indicator of analytical drift. We are also proposing to redefine the span as the highest concentration of the calibration curve (equivalent to the high-level calibration gas value).

The requirements of Method 10 would be modernized by upgrading many of its requirements to the current level of Methods 3A, 6C, and 7E. The analyzer calibration error test, sampling system bias test, and the calibration gases now required in Methods 3A, 6C, and 7E are being proposed for Method 10.

Methods 3A, 6C, and 10 are being proposed as abbreviated methods that reference Method 7E for much of the detail. Method 7E is being proposed as the full-length descriptive method. To remove the testing duplication between Method 20 and other methods, Method 20 would reference Methods 3A and 6C for diluent and sulfur dioxide measurements. The equations in Method 20 for concentration correction, fuel factor, and emission rate would be moved to Method 7E. Method 20 would exist as a placeholder in order to maintain references to it in State regulation and permit citations.

We are proposing the following specific changes to Methods 3A, 6C, 7E, 10 and 20: