

1. Method 10 would incorporate the calibration error test and between-run sampling system bias tests.

2. The performance criteria for bias test would be based on the concentration of the emission standard rather than the span. The requirement to correct the sample concentration for sampling system bias is replaced by a calculation of the run uncertainty.

3. Initial interference tests may be analyzer type-certified by manufacturers. Thereafter, an interference test of major potential interferences would be required at least annually. An alternative interference test would be allowed for Method 6C.

4. Three calibration gases would be required for each test method (Method 10 now requires four gases). The calibration gases would have to be of EPA traceability protocol quality and be in the same concentration ranges as now prescribed in Method 6C.

5. The Method 20 calculations would be moved to Method 7E. Methods 3A and 6C would be referenced for diluent and sulfur dioxide measurements.

6. Method 7E would require an NO₂ to NO converter efficiency test before each test for systems that convert NO₂ to NO before analysis.

7. Chemiluminescence analyzers would not be the only allowed technology for Method 7E.

8. In Method 10, alternatives to the ascarite and silica gel interference traps would be allowed.

9. A table summarizing quality control measures, performance requirements, and acceptable alternatives would be added.

10. Specific requirements for sampling point selection would be added.

11. Provisions for manufacturer certification of interference and stability would be added.

12. The methods would be reformatted in the EMMC format.

III. What Major Comments From the Previous Proposal Are Pertinent to This Reproposal?

The public comments received from the previous proposal have been evaluated and will be addressed comprehensively in the Comments and Responses Document that supplements the final rule following from this proposal. A number of revisions have been made to the proposed methods based on these comments. In this preamble, we discuss the comments that have resulted in significant revisions. Other minor revisions have been made based on specific comments, but these will be addressed later in the Summary of Comments and Responses Document.

Several commenters expressed concern that the proposed calculation of the bias test relative to the applicable emission standard added confusion for tests conducted at facilities not subject to an emission standard. The commenters argued that this new approach would upset market-based program tests and tests where the emission standard is in units other than concentration.

We consider these concerns valid and are now proposing to allow market-based programs to continue to base the acceptance tests on the span. For cases where the emission standard is in units other than concentration, we are proposing a conversion table to help determine a concentration equivalent to the emission standard.

Commenters were both for and against eliminating the calibration drift test. Since the sampling system bias check includes a measurement of analytical drift, we believe the calibration drift test is not necessary. Additionally, the proposed requirements for manufacturer's certification of stability for low-concentration analyzers and the yearly recheck of the analyzer for interferences promotes the use of better and more stable analytical technology.

One commenter noted that there is no carbon dioxide or oxygen emission standard for any source. For this reason, the commenter felt that sampling system bias limits should not be tied to emission limits. We agree with the commenter and are proposing to base the bias test limits in Method 3A on a percentage of the analyzer range instead of a percentage of the emission standard.

One commenter suggested that EPA specify a minimum number of sampling points when there is no applicable regulation. We are adding the Method 1 sampling point specifications in this proposal and allowing the option to conduct a stratification test if fewer sampling points are believed adequate.

Several commenters preferred we replace the requirement to use the high-level gas in the bias test with the option to use either the mid- or high-level gas, depending upon which gas is closer to the stack gas concentration. This proposal has incorporated this recommendation.

One commenter suggested that developing interference data was the responsibility of the instrument supplier, not the tester. The commenter thought the current interference test was excessive, could lead to sloppy work or even falsification of interference data, and limits the range of sources where the method could be used. We have added an allowance for manufacturer

certification of instruments, and we are requiring this certification where instruments will be used routinely to measure low (<15 ppm) concentrations. However, we feel that an ongoing program to ensure the instrument is properly maintained and is appropriate for the test facility is still needed. In this proposal we are adding an abbreviated check for major potential interferences, performed after the initial test and at least on a yearly basis, to show that the analyzer remains interference-free. We feel that maintaining the instrument in this way will increase data quality and promote instrument reliability.

Other commenters asked that the interference test be clarified. It was not clear whether the test must be performed with the first sampling event in a State or region, or the first sampling event of the calendar year. Was the test to be repeated if an analyzer undergoes significant maintenance? Would gas, oil, or coal boilers be considered different source types and require separate interference tests? One commenter recommended we consider modifying the requirement by stating that once an interference check is performed on a certain make or model of analyzer, additional checks on that company's same model need not be performed.

This proposal clearly states that the interference test is required for each different source category you test. This is irrespective of the regulatory jurisdiction or calendar year. The test must be repeated at each source category when a major instrument component (e.g., detector) is replaced. Gas-, oil-, and coal-fired boilers would be considered the same source category if the test gas interference check is performed. This procedure challenges the analyzer with a number of potential interference gases. If the Method 6C/Method 6 comparison interference check is used for sulfur dioxide, we feel the potential interference differences among the three boiler types warrants three separate interference tests. However, we are proposing to allow the test gas interference check as an alternative to the Method 6C/Method 6 comparison interference test in Method 6C. We are proposing to allow the instrument manufacturers to type-certify analyzers to fulfill the initial interference test requirement.

Many commenters objected to the proposed bias correction equation and argued it was too complicated. We are proposing to drop the bias correction requirement in favor of calculating the level of uncertainty for a run.