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SUMMARY OF 2022 PROPOSED REVISIONS RULE

REVISION CATEGORIES

- To Correct Errors
- To Add Clarity
- To Update References to Changed Materials
- To Update/Correct Formatting
- To Provide Consistency with other Monitoring Requirements
- To Add QA/QC and Best Laboratory Practices
- To Specify Requirement

REVISIONS TO CORRECT ERRORS

- Method 201A – Equation 25 would be corrected.
- 40 CFR Part 60, subpart QQQQ – Standards of Performance for New Residential Wood Heaters, New Residential Hydronic Heaters, and Forced-Air Furnaces –
 - The erroneous PM emission limits in g/MJ in §§60.5474(b)(2), (b)(3) and (b)(6) would be corrected.
 - In Method 28WHH, in section 13.8, the erroneous CO calculation instructions for equation 23 would be corrected to include the summation of CO emissions over four instead of three test categories.

REVISIONS TO CORRECT ERRORS (CONTINUED)

- Method 1 – Table 1-2, 99.9 percent of stack diameter from inside wall to traverse point would be corrected to 98.9 percent.
- Method 19 – Equation 19-5 would be corrected.
- Method 25 – Figure 25-6 would be corrected.
- Method 26 – Equations 26-4 and 26-5 would be corrected.

REVISIONS TO CORRECT ERRORS (CONTINUED)

- PS – 16:
 - In section 1.1, language would be corrected to ensure that if a predictive emission monitoring system (PEMS) contains a diluent component, then the diluent component must also be tested.
 - In section 1.1, language referring to PS-17 would be removed since PS-17 was not promulgated.
 - In section 3.12, language would be corrected to indicate that the relative accuracy test audit (RATA) is to be conducted as specified in section 8.2.
 - In section 9.1, the QA/QC summary chart would be corrected to reflect the language in section 2.2 and to align the criteria for a RAA with criteria in section 13.5.

REVISIONS TO CORRECT ERRORS (CONTINUED)

- PS -16 (Continued):
 - In section 9.4, the language indicating that a RATA is to be conducted at the normal operating level would be corrected to indicate as specified in section 8.2 and to remove the statement that the statistical tests in section 8.3 are not required for the yearly RATA.
 - In section 12.3.2, the alternative criteria language would be removed because it does not apply to F-factor determinations.
 - In sections 13.1 and 13.5, the language would be modified to add the corresponding alternative criteria in units of lb/mmBtu.

REVISIONS TO CORRECT ERRORS (CONTINUED)

- 40 CFR Part 63, subpart S – NESHAP From the Pulp and Paper Industry
 - The reference in 40 CFR 63.457 (c)(4) to Method 405.1 of part 136 of chapter 40 for the measurement of biochemical oxygen demand would be replaced with Method 5210B because Method 405.1 was withdrawn in 2007.
- 40 CFR Part 63, subpart EEE – NESHAP From Hazardous Waste Combustors
 - In the appendix, erroneous language regarding an Interference Response Test in the introductory paragraph of section 5 and section 5.3 in its entirety would be removed.

REVISIONS TO CORRECT ERRORS (CONTINUED)

- 40 CFR Part 63, subpart P PPPP – NESHAP: Engine Test Cells/Stands Residual Risk and Technology Review
 - The existing erroneous statement in 63.9306(d)(2)(iv) would be corrected to read, “Using a pressure sensor with measurement sensitivity of 0.002 inches water, check gauge calibration quarterly and transducer calibration monthly.”
 - The existing erroneous statement in 63.9322(a)(1) would be corrected to read, “The capture system meets the criteria in Method 204 of appendix M to 40 CFR part 51 for a permanent total enclosure (PE) and directs all the exhaust gases from the enclosure to an add-on control device.”
- Method 315 – The mislabeled section 6.2 would be corrected to 16.2.

REVISIONS TO ADD CLARITY

- In Method 1, the following changes were proposed:
 - The heading in section 11.5.1 would be moved to 11.5, and the word “procedure” would be moved to the first sentence in section 11.5.1.
 - Section 11.5.2 would be revised to clearly specify the number of traverse points to be used for sampling and velocity measurements once a directional flow-sensing probe procedure has been used to demonstrate that an alternative measurement site is acceptable.

REVISIONS TO ADD CLARITY (CONTINUED)

- In Method 25C, the nomenclature in section 12.1 for C_{N_2} and C_{mN_2} would be revised.
- In PS-1, section 8.1 (2) (iii) would be revised by removing the next to the last sentence, which reads, “The opacities of the two locations or paths may be measured at different times but must represent the same process operating conditions,” because the statement is confusing and unclear, and it is unlikely that one would achieve the same conditions at two different times.
- In PS-2, in section 8.3.3, a sentence would be added to clarify that during a calibration, the reference gas is to be introduced into the sampling system prior to any sample conditioning or filtration equipment and must pass through as much of the probe as is practical.

REVISIONS TO ADD CLARITY (CONTINUED)

- In Performance Specification 6, section 13.2 would be revised to specifically state the relative accuracy criteria including significant figures.
- In Procedure 1, the following revisions were proposed:
 - In section 4.1, a sentence would be added to clarify that during a calibration, the reference gas is to be introduced into the sampling system prior to any sample conditioning or filtration equipment and must pass through as much of the probe as is practical.
 - Section 5.2.3 (2) would be modified to refine the alternative cylinder gas audit (CGA) criteria in response to the use of analyzers with lower span values.
 - In section 6.2, the language referring to the relevant performance specification would be removed, and the language referring to the use of Equation 1-1 would be inserted.

REVISIONS TO ADD CLARITY (CONTINUED)

- In Procedure 5, the following revisions were proposed:
 - In section 2.5, we would clarify that ongoing daily calibration of the Hg CEMS must be conducted using elemental mercury reference gas.
 - We would revise the title of section 4.0 and add section 4.4 to explain more explicitly the procedure for conducting the system integrity check as well as to provide the criteria for passing the check.
 - In section 5.1.3, we would insert language referring to Equation 1-1 of Procedure 1 for calculating relative accuracy.

REVISIONS TO ADD CLARITY (CONTINUED)

- In Part 63, subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines
 - We would add language to all three sections of Table 4 stating that that the moisture measurement is only necessary when needed to correct the CO, formaldehyde, THC and/or O₂ measurements to a dry basis.

REVISIONS TO UPDATE REFERENCES

- PS-1 – ASTM D6216-12 would be updated to D6216-20.
- PS-12-A – Numerous sections would be updated to ASTM D6784.
- Part 63, subpart UUUUU – NESHAP: Coal- and Oil-Fired Electric Utility Steam Generating Units – References in Sections 4.1.1.5 and 4.1.1.5.1 in Appendix A would be updated from the 2002 to the 2016 version of ASTM D6784; table 5 would be revised to include ASTM D6784.
- Parts 60 and 63 General Provisions would be revised to include the updated ASTMs cited above.

REVISIONS TO UPDATE/CORRECT FORMATTING

- Method 4 – Table 4-3 would be formatted correctly.
- PS-4B – The entire performance specification would be updated to the Environmental Monitoring Management Council (EMMC) methods format.

REVISIONS TO PROVIDE CONSISTENCY WITH OTHER MONITORING REQUIREMENTS

- PS-12A – In section 13.3, the alternative relative accuracy criterion would be revised such that:
 - (1) it would apply only at mercury concentrations less than $2.5 \mu\text{g}/\text{scm}$ and
 - (2) the difference between the average reference method and CEMS values added to the confidence coefficient would be $0.5 \mu\text{g}/\text{scm}$

to be consistent with the mercury monitoring requirements in Part 63, subpart UUUUU.

- Part 63, subpart JJJJ - §63.3360(e)(1)(vi) would be revised by removing the term “non-methane” to be consistent with §63.3360(e)(1)(viii).

REVISIONS TO ADD QA/QC AND BEST LABORATORY PRACTICES

- 40 CFR Part 60, subpart AAA – Standards of Performance for New Residential Wood Heaters –
 - We would revise §60.534(d) to require measuring the first hour of particulate matter emissions for each test run by sampling with a third sampling train.

REVISIONS TO ADD QA/QC AND BEST LABORATORY PRACTICES (CONTINUED)

- Method 25 - A record and report section (section 12.9) would be added to confirm that the quality control (QC) was successfully performed.
- Method 323 –
 - Sections 10.1 and 10.3 would be revised to require best laboratory practices.
 - The nomenclature in section 12.1 would be revised to include “b,” which is the intercept of the calibration curve at zero concentration and revise K_c ; these additions are necessary because equation 323-5 in section 12.6 would be revised to reflect changes in calibration procedures for calculating the mass of formaldehyde.

REVISION TO SPECIFY REQUIREMENT

- Method 7 - Section 10.1.3 would be revised to change the word “should” to “shall” in the last sentence because the difference between the calculated concentration values and the actual concentrations are required to be less than 7 percent for all standards.