APPENDIX F TO PART 60 - QUALITY ASSURANCE PROCEDURES

PROCEDURE 1. QUALITY ASSURANCE REQUIREMENTS FOR GAS CONTINUOUS EMISSION MONITORING SYSTEMS USED FOR COMPLIANCE DETERMINATION

1. Applicability and Principle

1.1 Applicability. Procedure 1 is used to evaluate the effectiveness of quality control (QC) and quality assurance (QA) procedures and the quality of data produced by any continuous emission monitoring system (CEMS) that is used for determining compliance with the emission standards on a continuous basis as specified in the applicable regulation. The CEMS may include pollutant (e.g., $S0_2$ and $N0_x$) and diluent (e.g., 0_2 or $C0_2$) monitors. This procedure specifies the minimum QA requirements necessary for the control and assessment of the quality of CEMS data submitted to the Environmental Protection Agency (EPA). Source owners and operators responsible for one or more CEMS's used for compliance monitoring must meet these minimum requirements and
are encouraged to develop and implement a more extensive QA program or to continue such programs where they already exist. Data collected as a result of QA and QC measures required in this procedure are to be submitted to the Agency. These data are to be used by both the Agency and the CEMS operator in assessing the effectiveness of the CEMS QC and QA procedures in the maintenance of acceptable CEMS operation and valid emission data. Appendix F, Procedure 1 is applicable December 4, 1987. The first CEMS accuracy assessment shall be a relative accuracy test audit (RATA) (see section 5) and shall be completed by March 4, 1988 or the date of the initial performance test required by the applicable regulation, whichever is later.

1.2 Principle. The QA procedures consist of two distinct and equally important functions. One function is the assessment of the quality of the CEMS data by estimating accuracy. The other function is the control and improvement of the quality of the CEMS data by implementing QC policies and corrective actions. These two functions form a control loop: When the assessment function indicates that the data quality is inadequate, the control effort must be increased until the data quality is acceptable. In order to provide uniformity in the assessment and reporting of data quality, this procedure explicitly specifies the assessment methods for response drift and accuracy. The methods are based on procedures included in the applicable performance specifications (PS's) in appendix B of 40 CFR part 60. Procedure 1 also requires the analysis of the EPA audit samples concurrent with certain reference method (RM) analyses as specified in the applicable RM's.
Because the control and corrective action function encompasses a variety of policies, specifications, standards, and corrective measures, this procedure treats QC requirements in general terms to allow each source owner or operator to develop a QC system that is most effective and efficient for the circumstances.

2. Definitions

2.1 Continuous Emission Monitoring System. The total equipment required for the determination of a gas concentration or emission rate.
2.2 Diluent Gas. A major gaseous constituent in a gaseous pollutant mixture. For combustion sources, CO_2 and O_2 are the major gaseous constituents of interest.
2.3 Span Value. The upper limit of a gas concentration measurement range that is specified for affected source categories in the applicable subpart of the regulation.

2.4 Zero, Low-Level, and High-Level Values. The CEMS response values related to the source specific span value. Determination of zero, low-level, and high-level values is defined in the appropriate PS in appendix B of this part.
2.5 Calibration Drift (CD). The difference in the CEMS output reading from a reference value after a period of operation during which no unscheduled maintenance, repair or adjustment took place. The reference value may be supplied by a cylinder gas, gas cell, or optical filter and need not be certified.
2.6 Relative Accuracy (RA). The absolute mean difference between the gas concentration or emission rate determined by the CEMS and the value determined by the RM's plus the 2.5 percent error confidence coefficient of a series of tests divided by the mean of the RM tests or the applicable emission limit.

3. QC Requirements

Each source owner or operator must develop and implement a QC program. As a minimum, each QC program must include written procedures which should describe in detail, complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. CD determination and adjustment of CEMS.
3. Preventive maintenance of CEMS (including spare parts inventory).
4. Data recording, calculations, and reporting.
5. Accuracy audit procedures including sampling and analysis methods.
6. Program of corrective action for malfunctioning CEMS.

As described in Section 5.2, whenever excessive inaccuracies occur for two consecutive quarters, the source owner or operator must revise the current written procedures or modify or replace the CEMS to correct the deficiency causing the excessive inaccuracies. These written procedures must be kept on record and available for inspection by the enforcement agency.

4. CD Assessment

4.1 CD Requirement. As described in 40 CFR 60.13(d), source owners and operators of CEMS must check, record, and quantify the CD at two concentration values at least once daily (approximately 24 hours) in accordance with the method prescribed by the manufacturer.
The CEMS calibration must, as minimum, be adjusted whenever the daily zero (or low-level) CD or the daily high-level CD exceeds two times the limits of the applicable PS's in appendix B of this regulation.
4.2 Recording Requirement for Automatic CD Adjusting Monitors. Monitors that automatically adjust the data to the corrected calibration values (e.g., microprocessor control) must be programmed to record the unadjusted concentration measured in the CD prior to resetting the calibration, if performed, or record the amount of adjustment.
4.3 Criteria for Excessive CD. If either the zero (or low-level) or high-level CD result exceeds twice the applicable drift specification in appendix B for five, consecutive, daily periods, the CEMS is out-of-control. If either the zero (or low-level) or high-level CD result exceeds four times the applicable drift specification in appendix B during any CD check, the CEMS is out-of-control. If the CEMS is out-of-control, take necessary corrective action. Following corrective action, repeat the CD 4.3.1 Out-Of-Control Period Definition. The beginning of the out-of-control period is the time corresponding the completion of the fifth, consecutive, daily CD check with a CD in excess of two times the allowable limit, or the time corresponding to the completion of the

daily CD check preceding the daily CD check that results a CD in excess of four times the allowable limit. The end of the out-of-control period is the time corresponding the completion of the CD check following corrective action that results in the CD's at both the zero (or low-level) and high-level measurement points being within the corresponding allowable CD limit (i.e., either two times or four times the allowable limit in appendix B).

4.3.2 CEMS Data Status During Out-of-Control Period. During the period the CEMS is out-of-control, the CEMS data may not be used in calculating emission compliance be counted towards meeting minimum data availability as required and described in the applicable subpart [e.g., § 60.47a(f)].

4.4 Data Recording and Reporting. As required in 60.7(d) of this regulation (40 CFR part 60), all measurements from the CEMS must be retained on file by the source owner for at least 2 years. However, emission data obtained on each successive day while the CEMS is out-of-control may not be included as part of the minimum daily data requirement of the applicable subpart [e.g., § 60.47a(f)] nor be used in the calculation of reported emissions for that period.

5. Data Accuracy Assessment

5.1 Auditing Requirements. Each CEMS must be audited at least once each calendar quarter. Successive quarterly shall occur no closer than 2 months. The audits shall be conducted as follows:

5.1.1 Relative Accuracy Test Audit (RATA). The RATA must be conducted at least once every four calendar quarters. Conduct the RATA as described for the RA test procedure in the applicable PS in appendix B (e.g., PS 2 for SO_2 and NO_X). In addition, analyze the appropriate performance audit samples received from EPA as described in the applicable sampling methods (e.g., Methods 6 and 7).

5.1.2. Cylinder Gas Audit (CGA). If applicable, a CGA may be conducted in three of four calendar quarters, but in no more than three quarters in succession. To conduct a CGA:

(1) Challenge the CEMS (both pollutant and diluent portions of the CEMS, if applicable) with an audit gas of known concentration at two points within the following ranges:

Audit point	Audit range: Pollutant monitors	Audit range: Diluent monitors for CO_2	Audit range: Diluent monitors for O_2
1	20 to 30% of span value	5 to 8% by volume.	4 to 6% by volume.
2	50 to 60% of span value	10 to 14% by volume.	8 to 12% by volume.

Challenge the CEMS three times at each audit point, and use the average of the three responses in determining accuracy.

Use of separate audit gas cylinder for audit points 1 and 2. Do not dilute gas from audit cylinder when challenging the CEMS.

The monitor should be challenged at each audit point for a sufficient period of time to assure adsorption-desorption of the CEMS sample transport surfaces has stabilized.

(2) Operate each monitor in its normal sampling mode, i.e., pass the audit gas through all filters, scrubbers, conditioners, and other monitor components used during normal sampling, and as much of the sampling probe as is practical. At a minimum, the audit gas should be introduced at the connection between the probe and the sample line.

(3) Use audit gases that have been certified by comparison to National Bureau of Standards (NBS) gaseous Standard Reference Materials (SRM's) or NBS/EPA approved gas manufacturer's Certified Reference Materials (CRM's) (See Citation 1) following EPA

Traceability Protocol No. 1 (See Citation 2). As an alternative to Protocol No. 1 audit gases, CRM's may be used directly as audit gases. A list of gas manufacturers that have prepared approved CRM's is available from EPA at the address shown in Citation 1. Procedures for preparation of CRM's are described in Citation 1. Procedures for preparation of EPA Traceability Protocol 1 materials are described in Citation 2.

The difference between the actual concentration of the audit gas and the concentration indicated by the monitor is used to assess the accuracy of the CEMS.

5.1.3 Relative Accuracy Audit (RAA). The RAA may be conducted three of four calendar quarters, but in no more than three quarters in succession. To conduct a RAA, follow the procedure described in the applicable PS in appendix B for the relative accuracy test, except that only three sets of measurement data are required. Analyses of EPA performance audit samples are also required.

The relative difference between the mean of the RM values and the mean of the CEMS responses will be used to assess the accuracy of the CEMS.

5.1.4 Other Alternative Audits. Other alternative audit procedures may be used as approved by the Administrator for three of four calendar quarters. One RATA is required at least once every four calendar quarters.

5.2 Excessive Audit Inaccuracy. If the RA, using the RATA, CGA, or RAA exceeds the criteria in section 5.2.3, the CEMS is out-of-control. If the CEMS is out-of-control, take necessary corrective action to eliminate the problem. Following corrective action, the source owner or operator must audit the CEMS with a RATA, CGA, or RAA to determine if the CEMS is operating within the specifications. A RATA must always be used following an out-of-control period resulting from a
RATA. The audit following corrective action does not require analysis of EPA performance audit samples. If audit results show the CEMS to be out-of-control, the CEMS operator shall report both the audit showing the CEMS to be out-of-control and the results of the audit following corrective action showing the CEMS to be operating within specifications.

5.2.1 Out-Of-Control Period Definition. The beginning of the out-of-control period is the time corresponding to the completion of the sampling for the RATA, RAA, or CGA. The end of the out-of-control period is the time corresponding to the completion of the sampling of the subsequent successful audit.

5.2.2 CEMS Data Status During Out-Of-Control Period. During the period the monitor is out-of-control, the CEMS data may not be used in calculating emission compliance nor be counted towards meeting minimum data availability as required and described in the applicable subpart [e.g., § 60.47a(f)].

5.2.3 Criteria for Excessive Audit Inaccuracy. Unless specified otherwise in the applicable subpart, the criteria for excessive inaccuracy are:

(1) For the RATA, the allowable RA in the applicable PS in appendix B.

(2) For the CGA, ±15 percent of the average audit value or ±5 ppm, whichever is greater.

(3) For the RAA, ±15 percent of the three run average or ±7.5 percent of the applicable standard, whichever is greater.

5.3 Criteria for Acceptable QC Procedure. Repeated excessive inaccuracies (i.e., out-of-control conditions resulting from the quarterly audits) indicates the QC procedures are inadequate or that the CEMS is incapable of providing quality data. Therefore, whenever excessive inaccuracies occur for two consecutive quarters, the source owner or operator must revise the QC procedures (see Section 3) or modify or replace the CEMS.

6. *Calculations for CEMS Data Accuracy*

6.1 RATA RA Calculation. Follow the equations described in Section 8 of appendix B, PS 2 to calculate the RA for the RATA. The RATA must be calculated in units of the applicable emission standard (e.g., ng/J).
6.2 RAA Accuracy Calculation. Use Equation 1–1 to calculate the accuracy for the RAA. The RAA must be calculated in units of the applicable emission standard (e.g., ng/J).
6.3 CGA Accuracy Calculation. Use Equation 1–1 to calculate the accuracy for the CGA, which is calculated in units of the appropriate concentration (e.g., ppm SO_2 or percent O_2). Each component of the CEMS must meet the acceptable accuracy requirement.

$$A = \frac{C_m - C_a}{C_a} \times 100 \qquad \text{Eq. 1–1}$$

where:
A = Accuracy of the CEMS, percent.
C_m = Average CEMS response during audit in units of applicable standard or appropriate concentration.
C_a = Average audit value (CGA certified value or three-run average for RAA) in units of applicable standard or appropriate concentration.

6.4 Example Accuracy Calculations. Example calculations for the RATA, RAA, and CGA are available in Citation 3.

7. *Reporting Requirements*

At the reporting interval specified in the applicable regulation, report for each CEMS the accuracy results from Section 6 and the CD assessment results from Section 4. Report the drift and accuracy information as a Data Assessment Report (DAR), and include one copy of this DAR for each quarterly audit with the report of emissions required under the applicable subparts of this part.
As a minimum, the DAR must contain the following information:

1. Source owner or operator name and address.
2. Identification and location of monitors in the CEMS.
3. Manufacturer and model number of each monitor in the CEMS.
4. Assessment of CEMS data accuracy and date of assessment as determined by a RATA, RAA, or CGA described in Section 5 including the RA for the RATA, the A for the RAA or CGA, the RM results, the cylinder gases certified values, the CEMS responses, and the calculations results as defined in Section 6. If the accuracy audit results show the CEMS to be out-of-control, the CEMS operator shall report both the audit results showing the CEMS to be out-of-control and the results of the audit following corrective action showing the CEMS to be operating within specifications.
5. Results from EPA performance audit samples described in Section 5 and the applicable RM's.
6. Summary of all corrective actions taken when CEMS was determined out-of-control, as described in Sections 4 and 5. An example of a DAR format is shown in Figure 1.

8. *Bibliography*

1. ‘‘A Procedure for Establishing Traceability of Gas Mixtures to Certain National Bureau of Standards Standard Reference Materials.’’ Joint publication by NBS and EPA–600/7–81–010. Available from the U.S. Environmental Protection Agency. Quality Assurance Division (MD–77). Research Triangle Park, NC 27711.
2. ‘‘Traceability Protocol for Establishing True Concentrations of Gases Used for Calibration and Audits of Continuous Source Emission Monitors (Protocol Number 1)’’ June 1978. Section 3.0.4 of the Quality Assurance Handbook for Air Pollution Measurement Systems. Volume III. Stationary Source Specific Methods. EPA–600/4–77–027b. August 1977. U.S. Environmental Protection Agency. Office of Research and Development Publications, 26 West St. Clair Street, Cincinnati, OH 45268.
3. Calculation and Interpretation of Accuracy for Continuous Emission Monitoring Systems (CEMS). Section 3.0.7 of the Quality Assurance Handbook for Air Pollution Measurement Systems, Volume III, Stationary Source Specific Methods. EPA–600/4–77–027b. August 1977. U.S. Environmental Protection Agency. Office of Research and Development Publications, 26 West St. Clair Street, Cincinnati, OH 45268.

FIGURE 1 - EXAMPLE FORMAT FOR DATA ASSESSMENT REPORT

Period ending date ———————————————
Year ————————————————————
Company name ———————————————
Plant name ————————————————
Source unit no. ———————————————
CEMS manufacturer ————————————————
Model no. ————————————————
CEMS serial no. ———————————————
CEMS type (e.g., in situ) ———————————
CEMS sampling location (e.g., control device outlet) ——
CEMS span values as per the applicable regulation:(e.g., SO2 ppm, NOx ppm). ————————

I. Accuracy assessment results (Complete A, B, or C below for each CEMS or for each pollutant and diluent analyzer, as applicable.) If the quarterly audit results show the CEMS to be out-of-control, report the results of both the quarterly audit and the audit following corrective action showing the CEMS to be operating properly.

A. Relative accuracy test audit (RATA) for (e.g., SO2 in ng/J).

1. Date of audit.
2. Reference methods (RM’s) used (e.g., Methods 3 and 6).
3. Average RM value (e.g., ng/J, mg/dsm^3, or percent volume).
4. Average CEMS value.
5. Absolute value of mean difference [d].
6. Confidence coefficient [CC].
7. Percent relative accuracy (RA) percent.
8. EPA performance audit results:
   a. Audit lot number (1) (2)
   b. Audit sample number (1) (2)
   c. Results (mg/dsm^3) (1) (2)
   d. Actual value (mg/dsm^3)* (1) (2)

e. Relative error* (1) (2)

B. Cylinder gas audit (CGA) for (e.g., SO2 in ppm).

	Audit point 1	Audit point 2	

1. Date of audit ....
2. Cylinder ID number ....
3. Date of certification ....
4. Type of certification .... (e.g., EPA Protocol 1 or CRM).
5. Certified audit value .... (e.g., ppm).
6. CEMS response value .... (e.g., ppm).
7. Accuracy .... percent.

C. Relative accuracy audit (RAA) for (e.g., SO_2 in ng/J).

1. Date of audit.
2. Reference methods (RM's) used (e.g., Methods 3 and 6).
3. Average RM value (e.g., ng/J).
4. Average CEMS value.
5. Accuracy percent.
6. EPA performance audit results:
   a. Audit lot number (1) (2)
   b. Audit sample number (1) (2)
   c. Results (mg/dsm^3) (1) (2)
   d. Actual value (mg/dsm^3) *(1) (2)
   e. Relative error* (1) (2)

D. Corrective action for excessive inaccuracy.

1. Out-of-control periods.
   a. Date(s).
   b. Number of days.
2. Corrective action taken _____
3. Results of audit following corrective action. (Use format of A, B, or C above, as applicable.)

II. Calibration drift assessment.

A. Out-of-control periods.

1. Date(s).
2. Number of days.

B. Corrective action taken _____

* To be completed by the Agency.

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