

March 04, 2005

MEMORANDUM

SUBJECT: Opacity Monitor Manufacturers May Temporarily Certify Conformance with PS-1
Following either ASTM D6216-98 or ASTM D6216-03

FROM: /s/Conniesue B. Oldham, Group Leader
Air Measurements and Quality Group (D205-02)

TO: Addressees

I would like to alert you to revisions to the American Society of Testing and Materials (ASTM) D6216 Standard Practice for Opacity Monitor Manufacturers to Certify Conformance with Design and Performance Specifications, which affect performance specifications for continuous opacity monitoring set out in Performance Specification 1 (PS-1). When PS-1 of 40 CFR Part 60, Appendix B was published in the Federal Register on August 10, 2000, it incorporated by reference ASTM D6216-98 in its entirety. ASTM completed revisions to D6216-98 late in 2003; the standard practice is now designated ASTM D6216-03.

We have reviewed the revised standard practice, ASTM D6216-03, and agree that the changes have improved the original standard practice (see attachment for a summary of the changes). We are now in the process of updating PS-1 to reference ASTM D6216-03 in place of D6216-98. Until such changes are completed, opacity monitors certified in accordance with either D6216-03 or D6216-98 will be acceptable.

Please contact Solomon Ricks at (919) 541-5242 or by email at ricks.solomon@epa.gov if you have questions or need further explanation.

Attachment

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Summary of Changes

1. Numerous editorial revisions have been included to clarify and correct the standard and eliminate confusion wherever possible.
2. Test to determine conformance with manufacturer's design specifications performed on an annual or monthly basis including angle of projection, angle of view, insensitivity to supply voltage variations, thermal stability, insensitivity to ambient light have been modified to use a consistent 3 meter flange-to-flange set up distance (or equivalent).
3. Procedures for conducting the insensitivity to line voltage variation tests and the procedures for the calibration device repeatability test have been simplified through minor changes.
4. The procedures for the spectral response performance check have been significantly improved based on changes to the specifications for the transmission filter used for the tests. The revised procedure will better detect changes in spectral response for all monitor types and uses more readily available materials.
5. The insensitivity to ambient light test has been significantly modified and is now based on use of artificial lighting under laboratory conditions rather than testing out of doors with natural lighting. The revised test procedure is a more rigorous test for opacity monitors, is a more robust evaluation procedure, and it also facilitates independent audits or observations of these tests.

