



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

AUG 28 2013

Mr. Matthew Todd  
American Petroleum Institute  
1220 L Street, NW  
Washington, DC 20005

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Dear Mr. Todd:

This letter addresses your July 26, 2013, request to use alternative cylinder gas audit (CGA) material when performing the Section 16.0 auditing option of Performance Specification (PS) 2 to comply with the flare monitoring requirements of 40 CFR 60 Subpart Ja – Standards of Performance for Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After May 14, 2007. Sulfur monitoring to assess the root cause analysis threshold under 60.107a(e) requires a total reduced sulfur (TRS) monitor that is certified and maintained according to PS-5 of Appendix B to Part 60 and 60.13(c). As an alternative to the PS-5 relative accuracy test, the CGA described in Section 16.0 of PS-2 is allowed.

The CGA requires test gases that are National Institute of Standards and Technology (NIST) standard reference material or NIST/EPA-approved gas manufacturer's certified reference material (CRM). The monitor is challenged at two points with gas concentrations of 20-30 and 50-60 percent of the instrument span value. The span value for this monitor may typically be in the percent ranges. You note that NIST reference materials and NIST-traceable test gases are not available at these higher concentrations. You ask to use gases that are certified by the manufacturer to be within 2 percent of the listed concentration instead.

We acknowledge that NIST-certified reference gases are not available for TRS gases at the applicable Subpart Ja instrument span values, and realize that alternative gases must be permitted. We believe that gases certified to within 2 percent of the manufacturer's listed concentrations are a reasonable alternative for the CGA in this case. We therefore approve your request to use reduced sulfur cylinder gases certified by the manufacturer to be within 2 percent of the listed concentration as an alternative to the CGA gas specifications described in Section 16.2.4 of PS-2. Since this alternative is applicable to other Subpart Ja sources that monitor TRS, we will be posting this letter on our website at <http://www.epa.gov/ttn/emc/approalt.html> for use by other interested parties.

If you have questions or would like to discuss the matter further, please call Foston Curtis at (919) 541-1063, or e-mail him at [curtis.foston@epa.gov](mailto:curtis.foston@epa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Connie Oldham".

Conniesue B. Oldham, Ph.D., Group Leader  
Measurement Technology Group

cc: Foston Curtis ([curtis.foston@epa.gov](mailto:curtis.foston@epa.gov))  
Dr. Ray Merrill ([merrill.raymond@epa.gov](mailto:merrill.raymond@epa.gov))  
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