
EMISSION MEASUREMENT CENTER
TECHNICAL INFORMATION DOCUMENT

CLARIFICATION OF METHOD 9 CERTIFICATION REQUIREMENTS

(Copy of Letter Sent 6/11/01)

Mr. Thomas H. Rose
Eastern Technical Associates
P.O. Box 58495
Raleigh, NC 27658

Dear Mr. Rose:

I am writing in response to your letter of November 10, 1999, requesting an interpretation of section 3.2 of Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources (40 CFR 60, Appendix A). In particular, you have asked whether the language of section 3.2 intended that (1) the showing of smoke plumes of known opacity (calibration plumes) must precede the entire certification test (25 white plumes and 25 black plumes) or (2) calibration plumes may be shown both prior to and in the middle of (between the sets of 25 white plumes and the 25 black plumes) a certification test.

As noted in Method 9, section 3.2, the showing of calibration plumes is discretionary and no requirements or restrictions are established concerning the use or sequencing of calibration plumes. Thus, we believe the language of section 3.2 allows for showing calibration plumes either prior to the entire certification test (25 white plumes and 25 black plumes) or in the middle of the test (between the sets of 25 white plumes and the 25 black plumes). Until such time as we have data to inform a binding regulatory decision favoring one option over the other, we believe the choice of showing calibration plumes prior to the entire certification test and/or in the middle of (between the sets of 25 white plumes and the 25 black plumes) is also discretionary. We are aware that guidance documents issued in 1975 and in 1984 envision or recommend the first approach described above for the showing of calibration plumes. However, as guidance, neither document can impose legally binding requirements without undergoing notice and comment rulemaking procedures mandated by the Administrative Procedure Act.

Please contact me at (919) 541-4676 or Robin Segall at (919) 541-0893, if you have any questions regarding this letter.

Sincerely,

/signed/

J. David Mobley, Acting Director
Emissions, Monitoring and Analysis Division

cc: Deputy Director, Office of Ecosystem Protection, Region I
Director, Division of Environmental Planning and Protection, Region II
Director, Air Protection Division, Region III
Director, Air, Pesticides, and Toxics Management Division, Region IV
Acting Director, Air and Radiation Division, Region V
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