1. I don't see a performance criterion for the system integrity check in Procedure 5; what should I do?

Through an inadvertent omission, we did not include a specific criterion to define successful completion of the weekly system integrity check for a mercury (Hg) CEMS required under Section 3.1 of Procedure 5 (40 CFR 60, Appendix F). In the interim period until this omission can be corrected through rulemaking, we recommend use of a target criterion where the absolute value of the difference between the oxidized Hg reference gas value and the Hg CEMS response is less than or equal to 10 percent of the oxidized Hg reference gas value. Also during this interim period, results that exceed the target criterion would not constitute the start of an out-of-control period, but would instead serve to inform the CEMS user in regard to overall system performance.

In addition, there appears to be a conflict between the criterion for a successful quarterly gas audit in Section 5.3.3(b) of Procedure 5 (± 15 percent of the average audit value or ± 0.5 µg/m³) and the instructions for calculating the quarterly gas audit results at the end of Section 5.1.2. The intent was to perform the calculation in Equation 12A-1 in Performance Specification 12A relative to the audit gas value as described by the language of the criterion itself (as opposed to the span); in other words, the audit gas reference value would be used as the divisor in Equation 12A-1 as shown below. This, too, will be clarified in a future rulemaking.

$$ME = \frac{|R - A|}{R}x \ 100$$

R - Audit Value of Cylinder (µg/m³)

A - Average CEM response (μg/m³)