



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Office of Air Quality Planning and Standards  
Research Triangle Park, North Carolina 27711

MAR 5 1997

Mr. Cody Cress  
Apex Instruments  
P.O. Box 727  
125 Quantum Street  
Holly Springs, North Carolina 27540

Dear Mr. Cress:

This correspondence is in response to your letter to Mr. Peter Westlin dated February 13, 1997. In the letter you requested USEPA approval with documentation for the following method specification modifications:

- 1) Reduce Method 5-type dry gas meter temperature sensors from two to one. Current Method 5 specifications require the use of two temperature sensors (one located at the inlet to the dry gas meter and one located at the dry gas meter outlet).
- 2) Reduce the diameter size of the Method 201A filter holder assembly from 63-mm to 47-mm. The current specifications list a 63-mm filter assembly which is available from only one specific vendor.
- 3) Incorporate the use of an orifice device to indicate and measure sample flow rate within the Method 6 sampling system. The current Method 6 specifies the use of a rotameter, or equivalent to measure the sample flow rate.

**Dry Gas Meter Temperature Sensors**

EPA has conducted in-house evaluation tests using three sensors (one sensor was used as a control) and found that the outlet temperature sensor provided the most accurate

measurement. Therefore, it is acceptable to use only one temperature sensor if the sensor is positioned either in the meter's plenum or at the gas meter outlet connection.

#### Method 201A Filter Holder Assembly

EPA agrees that the filter size specification, 63-mm, and the text, Andersen filter part number SE274 described in Section 2.1.3 of Method 201A is too specific and intends to amend Section 2.1.3 as follows:

2.1.3 Filter Holder. A filter holder assembly constructed of stainless steel capable of supporting a glass fiber filter, without organic binder. Other materials of construction (e.g., glass, Teflon) may be used, subject to approval of the Administrator. The holder design shall provide a positive seal against leakage from the outside or around the filter. The holder shall be attached as shown in Figure 1. Method 201A Sampling Train.

#### Method 6 Flow Rate Indicator

EPA approves the use of an orifice assembly to indicate and measure the flow rate of the Method 6 type sampling train, provided that the assembly can measure the flow rate to within two percent of the desired flow rate of about 1000 cc/min. Unlike the rotameter, which does not require calibration, the orifice assembly calibration should be verified along with the metering system as described in Section 5.1.1 Initial Calibration and Section 5.1.2 Post-Test Calibration Check.

EPA believes that the revised method specification modifications stated above do not compromise the technical operating and maintenance procedures stated in the specific methods.

If you have any questions or if you would like to discuss the above responses, please call me at (919) 541-5239.

Sincerely,



Clyde E. Riley

Emission Measurement Center

cc: Mike Ciolek (MD-19)  
Foston Curtis (MD-19)  
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