

Reginald Williams

From: Frushour, Charles <Frushour.Charles@epa.gov>
Sent: Thursday, October 26, 2023 10:46 AM
To: Reginald Williams
Cc: Worley, Christopher
Subject: FW: Instrument Air Methodology
Attachments: Scrubbed Instrument Air Demonstration Method.pdf

Reggie,

The document looks fine to me. Note that Instrument Air can be used on a limited basis for P75. Specifically for an O2 analyzer and high level gas (Appendix A section 5.2.4) calibrations. The span of the O2 Instrument needs to be set at 21.0% or greater. As described in the document, ensure that the document is part of the QA/QC plan. I am sure you already know, but refer to Technical Q&A question 9.10 and part 75 Appendix A sections 2.1.3 and 5.2.4.

Charlie

Question 9.10 Topic: Use of Instrument Air for Calibration Question: May a utility use scrubbed instrument air, with an assumed O2 concentration of 20.9% O2, for calibration of an O2 monitor?

Answer: Yes. However, the O2 monitor span must be set greater than or equal to 21.0% O2. Furthermore, the utility must document that the conditioned gas will not contain concentrations of other gases that interfere with instrument O2 readings (a certification statement from the vendor of the gas scrubbing system or equipment will suffice). Also, in the QA/QC plan Section 9: Span, Calibration, and Linearity Part 75 Emissions Monitoring Policy Manual – 2013 9-17 for the plant required by Appendix B, include routine maintenance and quality control procedures for ensuring that the instrument air continues to be properly cleaned.

References: § 72.2; [Appendix A, Sections 2.1.3 and 5.2.4](#); Appendix B, Section 1

From: Reginald Williams <rwilliams@ciscocems.com>
Sent: Monday, October 23, 2023 8:46 PM
To: Frushour, Charles <Frushour.Charles@epa.gov>
Subject: Instrument Air Methodology

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Charles:

To provide our customers some form of guidance regarding the use of purified scrubbed instrument air, we created the attached document. Can you and your team please review and provide feedback regarding its acceptability.

Thanks

Reggie Williams
Environmental Scientist

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