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Final Permit

**ATTACHMENT 20**  
**U.S. EPA REFERENCE METHOD 9**

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## **Method 9 - Visual Determination of the Opacity of Emissions From Stationary Sources**

Many stationary sources discharge visible emissions into the atmosphere; these emissions are usually in the shape of a plume. This method involves the determination of plume opacity by qualified observers. The method includes procedures for the training and certification of observers, and procedures to be used in the field for determination of plume opacity. The appearance of a plume as viewed by an observer depends upon a number of variables, some of which may be controllable and some of which may not be controllable in the field. Variables which can be controlled to an extent to which they no longer exert a significant influence upon plume appearance include: Angle of the observer with respect to the plume; angle of the observer with respect to the sun; point of observation of attached and detached steam plume; and angle of the observer with respect to a plume emitted from a rectangular stack with a large length to width ratio. The method includes specific criteria applicable to these variables.

Other variables which may not be controllable in the field are luminescence and color contrast between the plume and the background against which the plume is viewed. These variables exert an influence upon the appearance of a plume as viewed by an observer, and can affect the ability of the observer to accurately assign opacity values to the observed plume. Studies of the theory of plume opacity and field studies have demonstrated that a plume is most visible and presents the greatest apparent opacity when viewed against a contrasting background. It follows from this, and is confirmed by field trials, that the opacity of a plume, viewed under conditions where a contrasting background is present can be assigned with the greatest degree of accuracy. However, the potential for a positive error is also the greatest when a plume is viewed under such contrasting conditions. Under conditions presenting a less contrasting background, the apparent opacity of a plume is less and approaches zero as the color and luminescence contrast decrease toward zero. As a result, significant negative bias and negative errors can be made when a plume is viewed under less contrasting conditions. A negative bias decreases rather than increases the possibility that a plant operator will be cited for a violation of opacity standards due to observer error.

Studies have been undertaken to determine the magnitude of positive errors which can be made by qualified observers while reading plumes under contrasting conditions and using the procedures set forth in this method. The results of these studies (field trials) which involve a total of 769 sets of 25 readings each are as follows:

(1) For black plumes (133 sets at a smoke generator), 100 percent of the sets were read with a positive error<sup>1</sup> of less than 7.5 percent opacity; 99 percent were read with a positive error of less than 5 percent opacity.

(2) For white plumes (170 sets at a smoke generator, 168 sets at a coal-fired power plant, 298 sets at a sulfuric acid plant), 99 percent of the sets were read with a positive error of less than 7.5 percent opacity; 95 percent were read with a positive error of less than 5 percent opacity. The positive observational error associated with an average of twenty-five readings is therefore established. The accuracy of the method must be taken into account when determining possible violations of applicable opacity standards.

### *1. Principle and Applicability*

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<sup>1</sup> For a set, positive error-average opacity determined by observer's 25 observations-average opacity determined from transmissometer's 25 recordings.

1.1 Principle. The opacity of emissions from stationary sources is determined visually by a qualified observer.

1.2 Applicability. This method is applicable for the determination of the opacity of emissions from stationary sources pursuant to §60.11(b) and for qualifying observers for visually determining opacity of emissions.

## 2. Procedures

The observer qualified in accordance with section 3 of this method shall use the following procedures for visually determining the opacity of emissions:

2.1 Position. The qualified observer shall stand at a distance sufficient to provide a clear view of the emissions with the sun oriented in the 140° sector to his back. Consistent with maintaining the above requirement, the observer shall, as much as possible, make his observations from a position such that his line of vision is approximately perpendicular to the plume direction, and when observing opacity of emissions from rectangular outlets (e.g., roof monitors, open baghouses, noncircular stacks), approximately perpendicular to the longer axis of the outlet. The observer's line of sight should not include more than one plume at a time when multiple stacks are involved, and in any case the observer should make his observations with his line of sight perpendicular to the longer axis of such a set of multiple stacks (e.g., stub stacks on baghouses).

2.2 Field Records. The observer shall record the name of the plant, emission location, type facility, observer's name and affiliation, a sketch of the observer's position relative to the source, and the date on a field data sheet (Figure 9-1). The time, estimated distance to the emission location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), and plume background are recorded on a field data sheet at the time opacity readings are initiated and completed.

2.3 Observations. Opacity observations shall be made at the point of greatest opacity in that portion of the plume where condensed water vapor is not present. The observer shall not look continuously at the plume, but instead shall observe the plume momentarily at 15-second intervals.

2.3.1 Attached Steam Plumes. When condensed water vapor is present within the plume as it emerges from the emission outlet, opacity observations shall be made beyond the point in the plume at which condensed water vapor is no longer visible. The observer shall record the approximate distance from the emission outlet to the point in the plume at which the observations are made.

2.3.2 Detached Steam Plume. When water vapor in the plume condenses and becomes visible at a distinct distance from the emission outlet, the opacity of emissions should be evaluated at the emission outlet prior to the condensation of water vapor and the formation of the steam plume.

2.4 Recording Observations. Opacity observations shall be recorded to the nearest 5 percent at 15-second intervals on an observational record sheet. (See Figure 9-2 for an example.) A minimum of 24 observations shall be recorded. Each momentary observation recorded shall be deemed to represent the average opacity of emissions for a 15-second period.

2.5 Data Reduction. Opacity shall be determined as an average of 24 consecutive observations recorded at 15-second intervals. Divide the observations recorded on the record sheet into sets of 24 consecutive observations. A set is composed of any 24 consecutive observations. Sets need not be consecutive in time

and in no case shall two sets overlap. For each set of 24 observations, calculate the average by summing the opacity of the 24 observations and dividing this sum by 24. If an applicable standard specifies an averaging time requiring more than 24 observations, calculate the average for all observations made during the specified time period. Record the average opacity on a record sheet. (See Figure 9–1 for an example.)

### 3. Qualifications and Testing

3.1 Certification Requirements. To receive certification as a qualified observer, a candidate must be tested and demonstrate the ability to assign opacity readings in 5 percent increments to 25 different black plumes and 25 different white plumes, with an error not to exceed 15 percent opacity on any one reading and an average error not to exceed 7.5 percent opacity in each category. Candidates shall be tested according to the procedures described in section 3.2. Smoke generators used pursuant to section 3.2 shall be equipped with a smoke meter which meets the requirements of section 3.3.

The certification shall be valid for a period of 6 months, at which time the qualification procedure must be repeated by any observer in order to retain certification.

3.2 Certification Procedure. The certification test consists of showing the candidate a complete run of 50 plumes—25 black plumes and 25 white plumes—generated by a smoke generator. Plumes within each set of 25 black and 25 white runs shall be presented in random order. The candidate assigns an opacity value to each plume and records his observation on a suitable form. At the completion of each run of 50 readings, the score of the candidate is determined. If a candidate fails to qualify, the complete run of 50 readings must be repeated in any retest. The smoke test may be administered as part of a smoke school or training program, and may be preceded by training or familiarization runs of the smoke generator during which candidates are shown black and white plumes of known opacity.

3.3 Smoke Generator Specifications. Any smoke generator used for the purposes of section 3.2 shall be equipped with a smoke meter installed to measure opacity across the diameter of the smoke generator stack. The smoke meter output shall display instack opacity based upon a pathlength equal to the stack exit diameter, on a full 0 to 100 percent chart recorder scale. The smoke meter optical design and performance shall meet the specifications shown in Table 9–1.

The smoke meter shall be calibrated as prescribed in section 3.3.1 prior to the conduct of each smoke reading test. At the completion of each test, the zero and span drift shall be checked and if the drift exceeds  $\pm 1$  percent opacity, the condition shall be corrected prior to conducting any subsequent test runs. The smoke meter shall be demonstrated, at the time of installation, to meet the specifications listed in Table 9–1. This demonstration shall be repeated following any subsequent repair or replacement of the photocell or associated electronic circuitry including the chart recorder or output meter, or every 6 months, whichever occurs first.

**Table 9–1—Smoke Meter Design and Performance Specifications**

<b>Parameter</b>	<b>Specification</b>
a. Light source	Incandescent lamp operated at nominal rated voltage.
b. Spectral response of photocell	Photopic (daylight spectral response of the human eye—Citation 3).
c. Angle of view	15° maximum total angle.
d. Angle of projection	15° maximum total angle.
e. Calibration error	$\pm 3\%$ opacity, maximum.

f. Zero and span drift	±1% opacity, 30 minutes.
g. Response time	5 seconds.

3.3.1 Calibration. The smoke meter is calibrated after allowing a minimum of 30 minutes warmup by alternately producing simulated opacity of 0 percent and 100 percent. When stable response at 0 percent or 100 percent is noted, the smoke meter is adjusted to produce an output of 0 percent or 100 percent, as appropriate. This calibration shall be repeated until stable 0 percent and 100 percent readings are produced without adjustment. Simulated 0 percent and 100 percent opacity values may be produced by alternately switching the power to the light source on and off while the smoke generator is not producing smoke.

3.3.2 Smoke Meter Evaluation. The smoke meter design and performance are to be evaluated as follows:

3.3.2.1 Light Source. Verify from manufacturer's data and from voltage measurements made at the lamp, as installed, that the lamp is operated within ±5 percent of the nominal rated voltage.

3.3.2.2 Spectral Response of Photocell. Verify from manufacturer's data that the photocell has a photopic response; i.e., the spectral sensitivity of the cell shall closely approximate the standard spectral-luminosity curve for photopic vision which is referenced in (b) of Table 9–1.



Figure 9-2—Observation Record

Company					Observer				
Location					Type facility				
Test Number					Point of emissions				
Date									
Hr.	Min.	Seconds				Steam plume (check if applicable)		Comments	
		0	15	30	45	Attached	Detached		
	0								
	1								
	2								
	3								
	4								
	5								
	6								
	7								
	8								
	9								
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Company					Observer				
Location					Type facility				
Test Number					Point of emissions				
Date									
Hr.	Min.	Seconds				Steam plume (check if applicable)		Comments	
		0	15	30	45	Attached	Detached		
	30								
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3.3.2.3 Angle of View. Check construction geometry to ensure that the total angle of view of the smoke plume, as seen by the photocell, does not exceed  $15^\circ$ . The total angle of view may be calculated from:  $\Theta = 2 \tan^{-1}d/2L$ , where  $\Theta$  = total angle of view;  $d$  = the sum of the photocell diameter+ the diameter of the limiting aperture; and  $L$  = the distance from the photocell to the limiting aperture. The limiting aperture is the point in the path between the photocell and the smoke plume where the angle of view is most restricted. In smoke generator smoke meters this is normally an orifice plate.

3.3.2.4 Angle of Projection. Check construction geometry to ensure that the total angle of projection of the lamp on the smoke plume does not exceed  $15^\circ$ . The total angle of projection may be calculated from:  $\Theta = 2 \tan^{-1}d/2L$ , where  $\Theta$  = total angle of projection;  $d$ =the sum of the length of the lamp filament + the diameter of the limiting aperture; and  $L$  = the distance from the lamp to the limiting aperture.

3.3.2.5 Calibration Error. Using neutral-density filters of known opacity, check the error between the actual response and the theoretical linear response of the smoke meter. This check is accomplished by first calibrating the smoke meter according to 3.3.1 and then inserting a series of three neutral-density filters of nominal opacity of 20, 50, and 75 percent in the smoke meter pathlength. Filters calibrated within  $\pm 2$  percent shall be used. Care should be taken when inserting the filters to prevent stray light from affecting the meter. Make a total of five nonconsecutive readings for each filter. The maximum error on any one reading shall be 3 percent opacity.

3.3.2.6 Zero and Span Drift. Determine the zero and span drift by calibrating and operating the smoke generator in a normal manner over a 1-hour period. The drift is measured by checking the zero and span at the end of this period.

3.3.2.7 Response Time. Determine the response time by producing the series of five simulated 0 percent and 100 percent opacity values and observing the time required to reach stable response. Opacity values of 0 percent and 100 percent may be simulated by alternately switching the power to the light source off and on while the smoke generator is not operating.

#### 4. Bibliography

1. Air Pollution Control District Rules and Regulations, Los Angeles County Air Pollution Control District, Regulation IV, Prohibitions, Rule 50.
2. Weisburd, Melvin I., Field Operations and Enforcement Manual for Air, U.S. Environmental Protection Agency, Research Triangle Park, NC. APTD-1100, August 1972, pp. 4.1-4.36.
3. Condon, E.U., and Odishaw, H., Handbook of Physics, McGraw-Hill Co., New York, NY, 1958, Table 3.1, p. 6-52.

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# Visible Emissions Field Manual EPA Methods 9 and 22

Prepared by:

Eastern Technical Associates  
PO Box 58495  
Raleigh, NC 27658

and

Entrophy Environmentalist, Inc.  
PO Box 12291  
Research Triangle Park, NC 27709

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EPA Work Assignment Managers: Karen Randolph and Kirk Foster  
EPA Project Officer: Aaron Martin

US. ENVIRONMENTAL PROTECTION AGENCY  
Stationary Source Compliance Division  
Office of Air Quality Planning and Standards  
Washington, DC 20460

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# **Appendix B**

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## **Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources**

## Introduction

(a) Many stationary sources discharge visible emissions into the atmosphere; these emissions are usually in the shape of a plume. This method involves the determination of plume opacity by qualified observers. The methods includes procedures for the training and certification of observers and procedures to be used in the field for determination of plume opacity.

(b) The appearance of a plume as viewed by an observer depends upon a number of variables, some of which may be controllable in the field. Variables which can be controlled to an extent to which they no longer exert a significant influence upon plume appearance include: angle of the observer with respect to the plume; angle of the observer with respect to the sun; point of observation of attached and detached steam plume; and angle of the observer with respect to a plume emitted from a rectangular stack with a large length to width ratio. The method includes specific criteria applicable to these variables.

(c) Other variables which may not be controllable in the field are luminescence and color contrast between the plume and the background against which the plume is viewed. These variables exert an influence upon the appearance of a plume as viewed by an observer and can affect the ability of the observer to assign accurately opacity values to the observed plume. Studies of the theory of plume opacity and field studies have demonstrated that a plume is most visible and presents the greatest apparent opacity when viewed against a contrasting background. Accordingly, the opacity of a plume viewed under conditions where a contrasting background is present can be assigned with the greatest degree of accuracy. However, the potential for a positive error is also the greatest when a plume is viewed under such contrasting conditions. Under conditions presenting a less contrasting background, the apparent opacity of a plume is less and approaches zero as the color and luminescence contrast decrease toward zero. As a result, significant negative bias and negative errors can be made when a plume is viewed under less contrasting conditions. A negative bias decreases rather than increases the possibility that a plant operator will be incorrectly cited for a violation of opacity standards as a result of observer error.

(d) Studies have been undertaken to determine the magnitude of positive errors made by qualified observers while reading plumes under contrasting conditions and using the procedures set forth in this method. The results of these studies (field trials) which involve a total of 769 sets of 25 readings each are as follows:

(1) For black plumes (133 sets at a smoke generator), 100 percent of the sets were read with a positive error of less than 7.5 percent opacity; 99 percent were read with a positive error of less than 5 percent opacity. (Note: For a set, positive error = average opacity determined by observers' 25 observations - average opacity determined from transmissometer's 25 recordings.)

(2) For white plumes (170 sets at a smoke generator, 168 sets at a coal-fired power plant, 298 sets at a sulfuric acid plant), 99 percent of the sets were read with a positive error of less than 7.5 percent opacity; 95 percent were read with a positive error of less than 5 percent opacity.

(e) The positive observational error associated with an average of twenty-five readings is therefore established. The accuracy of the method must be taken into account when determining possible violations of applicable opacity standards.

## 1. Principle And Applicability

**1.1 Principle.** The opacity of emissions from stationary sources is determined visually by a qualified observer.

**1.2 Applicability.** This method is applicable for the determination of the opacity of emissions from stationary sources pursuant to § 60.11(b) and for visually determining opacity of emissions.

## 2. Procedures

The observer qualified in accordance with Section 3 of this method shall use the following procedures for visually determining the opacity of emissions.

**2.1 Position.** The qualified observer shall stand at a distance sufficient to provide a clear view of the emissions with the sun oriented in the 140° sector to his back. Consistent with maintaining the above requirement, the observer shall, as much as possible, make his observations from a position such that his line of vision is approximately perpendicular to the plume direction and, when observing opacity of emissions

from rectangular outlets (e.g., roof monitors, open baghouses, noncircular stacks), approximately perpendicular to the longer axis of the outlet. The observer's line of sight should not include more than one plume at a time when multiple stacks are involved, and in any case the observer should make his observations with his line of sight perpendicular to the longer axis of such a set of multiple stacks (e.g., stub stacks on baghouses).

**2.2 Field Records.** The observer shall record the name of the plant, emission location, facility type, observer's name and affiliation, a sketch of the observer's position relative to the source, and the date on a field data sheet (Figure 9-1). The time, estimated distance to the emission location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), and plume background are recorded on a field data sheet at the time opacity readings are initiated and completed.

**2.3 Observations.** Opacity observations shall be made at the point of greatest opacity in that portion of the plume where condensed water vapor is not present. The observer shall not look continuously at the plume but instead shall observe the plume momentarily at 15-second intervals.

**2.3.1 Attached Steam Plumes.** When condensed water vapor is present within the plume as it emerges from the emission outlet, opacity observations shall be made beyond the point in the plume at which condensed water vapor is no longer visible. The observer shall record the approximate distance from the emission outlet to the point in the plume at which the observations are made.

**2.3.2 Detached Steam Plume.** When water vapor in the plume condenses and becomes visible at a distinct distance from the emission outlet, the opacity of emissions should be evaluated at the emission outlet prior to the condensation of water vapor and the formation of the steam plume.

**2.4 Recording Observations.** Opacity observations shall be recorded to the nearest 5 percent at 15-second intervals on an observational record sheet. (See Figure 9-2 for an example.) A minimum of 24 observations shall be recorded. Each momentary observation recorded shall be deemed to

represent the average opacity of emissions for a 15-second period.

**2.5 Data Reduction.** Opacity shall be determined as an average of 24 consecutive observations recorded at 15-second intervals. Divide the observations recorded on the record sheet into sets of 24 consecutive observations. A set is composed of any 24 consecutive observations. Sets need not be consecutive in time and in no case shall two sets overlap. For each set of 24 observations, calculate the average by summing the opacity of the 24 observations and dividing this sum by 24. If an applicable standard specifies an averaging time requiring more than 24 observations, calculate the average for all observations made during the specified time period. Record the average opacity on a record sheet. (See Figure 9-1 for an example.)

### 3. Qualification and Testing

**3.1 Certification Requirements.** To receive certification as a qualified observer, a candidate must be tested and demonstrate the ability to assign opacity readings in 5 percent increments to 25 different black plumes and 25 different white plumes, with an error not to exceed 15 percent opacity on any one reading and average error not to exceed 7.5 percent opacity in each category. Candidates shall be tested according to the procedures described in Section 3.2. Smoke generators used pursuant to Section 3.2 shall be equipped with a smoke meter which meets the requirements of Section 3.3. The certification shall be valid for a period of 6 months, at which time the qualification procedure must be repeated by any observer in order to retain certification.

**3.2 Certification Procedure.** The certification test consists of showing the candidate a complete run of 50 plumes—25 black plumes and 25 white plumes—generated by a smoke generator. Plumes within each set of 25 black and 25 white runs shall be presented in random order. The candidate assigns an opacity value to each plume and records his observation on a suitable form. At the completion of each run of 50 readings, the score of the candidate is determined. If a candidate fails to qualify, the complete run of 50 readings must be repeated in any retest. The smoke test may be administered as part of a smoke school or training program and may be preceded by training or familiarization runs of the smoke generator during which candidates are shown black and white plumes of known opacity.

**3.3 Smoke Generator Specifications.** Any smoke generator used for the purposes of Section 3.2 shall be equipped with a smoke meter installed to measure opacity across the diameter of the smoke generator stack. The smoke meter output shall display in-stack opacity based upon a pathlength equal to the stack exit diameter, on a full 0 to 100 percent chart recorder scale. The smoke meter optical design and performance shall meet the specifications shown in Table 9-1. The smoke meter shall be calibrated as prescribed in Section 3.3.1 prior to the conduct of each smoke reading test. At the completion of each test, the zero and span drift shall be checked and if the drift exceeds  $\pm 1$  percent opacity, the condition shall be corrected prior to conducting any subsequent test runs. The smoke meter shall be demonstrated, at the time of installation, to meet the specifications listed in Table 9-1. This demonstration shall be repeated following any subsequent repair or replacement of the photocell or associated electronic circuitry including the chart recorder or output meter, or every 6 months, whichever occurs first.

**3.3.1 Calibration.** The smoke meter is calibrated after allowing a minimum of 30 minutes warmup by alternately producing simulated opacity of 0 percent and 100 percent. When stable response at 0 percent or 100 percent is noted, the smoke meter is adjusted to produce an output of 0 percent or 100 percent, as appropriate. This calibration shall be repeated until stable 0 percent and 100 percent opacity values may be produced by alternately switching the power to the light source on and off while the smoke generator is not producing smoke.

**3.3.2 Smoke Meter Evaluation.** The smoke meter design and performance are to be evaluated as follows:

**3.3.2.1 Light Source.** Verify from manufacturer's data and from voltage measurements made at the lamp, as installed, that the lamp is operated within  $\pm 5$  percent of the nominal rated voltage.

**3.3.2.2 Spectral Response of Photocell.** Verify from manufacturer's data that the photocell has a photopic response; i.e., the spectral sensitivity of the cell shall closely approximate the standard spectral-luminosity in (b) of Table 9-1.

**3.3.2.3 Angle of View.** Check construction geometry to ensure that the total angle of view of the smoke plume, as seen by the photocell, does not exceed  $15^\circ$ . The total angle of view may be calculated from:  $\hat{E} = 2 \tan^{-1} (d/2L)$ , where  $\hat{E}$  = total angle of view;  $d$  = the sum of the photocell diameter + the diameter of the limiting aperture; and  $L$  = the distance from the photocell to the limiting aperture. The limiting aperture is the point in the path between the photocell and the smoke plume where the angle of view is most restricted. In smoke generator smoke meters this is normally an orifice plate.

**3.3.2.4 Angle of Projection.** Check construction geometry to ensure that the total angle of projection of the lamp on the smoke plume does not exceed  $15^\circ$ . The total angle of projection may be calculated from:  $\hat{E} = 2 \tan^{-1} (d/2L)$ , where  $\hat{E}$  = total angle of projection;  $d$  = the sum of the length of the lamp filament + the diameter of the limiting aperture; and  $L$  = the distance from the lamp to the limiting aperture.

**3.3.2.5 Calibration Error.** Using neutral-density filters of known opacity, check the error between the actual response and the theoretical linear response of the smoke meter. This check is accomplished by first calibrating the smoke meter according to Section 3.3.1 and then inserting a series of three neutral-density filters of nominal opacity of 20, 50, and 75 percent in the smoke meter pathlength. Filters calibrated within 2 percent shall be used. Care should be taken when inserting the filters to prevent stray light from affecting the meter. Make a total of five nonconsecutive readings for each filter. The maximum error on any one reading shall be 3 percent opacity.

**3.3.2.6 Zero and Span Drift.** Determine the zero and span drift by calibrating and operating the smoke generator in a normal manner over a 1-hour period. The drift is measured by checking the zero and span at the end of this period.

**3.3.2.7 Response Time.** Determine the response time by producing the series of five simulated 0 percent and 100 percent opacity values and observing the time required to reach stable response. Opacity values of 0 percent and 100 percent may be simulated by alternately switching the power to the light source off and on while the smoke generator is not operating.

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**Table 9-1. Smoke Generator Design And Performance Specifications**

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Parameter	Specification
a. Light source	Incandescent lamp operated at nominal rated voltage
b. Spectral response of photocell	Photopic (daylight spectral response of the human eye -Citation 3)
c. Angle of view	15 1/2 maximum total angle
d. Angle of projection	15 1/2 maximum total angle
e. Calibration error	$\pm 3$ % opacity, maximum
f. Zero and span drift	$\pm 1$ % opacity, 30 minutes
g. Response time	$\pm 5$ seconds

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**Bibliography**

1. Air Pollution Control District Rules and Regulations, Los Angeles County Air Pollution Control District, Regulation IV, Prohibitions, Rule 50.
2. Weisburd, Melvin I., Field Operations and Enforcement Manual for Air, U.S. Environmental Protection Agency, Research Triangle Park, NC, APTD-1100, August 1972, pp. 4.1-4.36.
3. Condon, E.U., and Odishaw, H., Handbook of Physics, McGraw-Hill Co., New York, NY, 1958, Table 3.1, p. 6-52.



# Figure 9-2. Observation Record

Page \_\_\_\_\_ of \_\_\_\_\_

Company \_\_\_\_\_ Observer \_\_\_\_\_  
 Location \_\_\_\_\_ Type Facility \_\_\_\_\_  
 Test Number \_\_\_\_\_ Point of Emissions \_\_\_\_\_

Seconds						Steam Plume (Check if applicable)		Comments
Hr	Min	0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
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# Figure 9-2. Observation Record (continued)

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Company \_\_\_\_\_ Observer \_\_\_\_\_  
 Location \_\_\_\_\_ Type Facility \_\_\_\_\_  
 Test Number \_\_\_\_\_ Point of Emissions \_\_\_\_\_

Seconds						Steam Plume (Check if applicable)		Comments
Hr	Min	0	15	30	45	Attached	Detached	
	30							
	31							
	32							
	33							
	34							
	35							
	36							
	37							
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APPENDIX A-4 TO PART 60—TEST  
METHODS 6 THROUGH 10B

- Method 6—Determination of sulfur dioxide emissions from stationary sources
- Method 6A—Determination of sulfur dioxide, moisture, and carbon dioxide emissions from fossil fuel combustion sources
- Method 6B—Determination of sulfur dioxide and carbon dioxide daily average emissions from fossil fuel combustion sources
- Method 6C—Determination of Sulfur Dioxide Emissions From Stationary Sources (Instrumental Analyzer Procedure)
- Method 7—Determination of nitrogen oxide emissions from stationary sources
- Method 7A—Determination of nitrogen oxide emissions from stationary sources—Ion chromatographic method
- Method 7B—Determination of nitrogen oxide emissions from stationary sources (Ultraviolet spectrophotometry)
- Method 7C—Determination of nitrogen oxide emissions from stationary sources—Alkaline-permanganate/colorimetric method
- Method 7D—Determination of nitrogen oxide emissions from stationary sources—Alkaline-permanganate/ion chromatographic method
- Method 7E—Determination of Nitrogen Oxides Emissions From Stationary Sources (Instrumental Analyzer Procedure)
- Method 8—Determination of sulfuric acid mist and sulfur dioxide emissions from stationary sources
- Method 9—Visual determination of the opacity of emissions from stationary sources
- Alternate method 1—Determination of the opacity of emissions from stationary sources remotely by lidar
- Method 10—Determination of carbon monoxide emissions from stationary sources
- Method 10A—Determination of carbon monoxide emissions in certifying continuous emission monitoring systems at petroleum refineries
- Method 10B—Determination of carbon monoxide emissions from stationary sources

The test methods in this appendix are referred to in §60.8 (Performance Tests) and §60.11 (Compliance With Standards and Maintenance Requirements) of 40 CFR part 60, subpart A (General Provisions). Specific uses of these test methods are described in the standards of performance contained in the subparts, beginning with Subpart D.

Within each standard of performance, a section title “Test Methods and Procedures” is provided to: (1) Identify the test methods to be used as reference methods to the facility subject to the respective standard and (2) identify any special instructions or conditions to be followed when applying a method to the respective facility. Such instructions (for example, establish sampling rates, volumes, or temperatures) are to be used either in addition to, or as a substitute for proce-

dures in a test method. Similarly, for sources subject to emission monitoring requirements, specific instructions pertaining to any use of a test method as a reference method are provided in the subpart or in Appendix B.

Inclusion of methods in this appendix is not intended as an endorsement or denial of their applicability to sources that are not subject to standards of performance. The methods are potentially applicable to other sources; however, applicability should be confirmed by careful and appropriate evaluation of the conditions prevalent at such sources.

The approach followed in the formulation of the test methods involves specifications for equipment, procedures, and performance. In concept, a performance specification approach would be preferable in all methods because this allows the greatest flexibility to the user. In practice, however, this approach is impractical in most cases because performance specifications cannot be established. Most of the methods described herein, therefore, involve specific equipment specifications and procedures, and only a few methods in this appendix rely on performance criteria.

Minor changes in the test methods should not necessarily affect the validity of the results and it is recognized that alternative and equivalent methods exist. Section 60.8 provides authority for the Administrator to specify or approve (1) equivalent methods, (2) alternative methods, and (3) minor changes in the methodology of the test methods. It should be clearly understood that unless otherwise identified all such methods and changes must have prior approval of the Administrator. An owner employing such methods or deviations from the test methods without obtaining prior approval does so at the risk of subsequent disapproval and retesting with approved methods.

Within the test methods, certain specific equipment or procedures are recognized as being acceptable or potentially acceptable and are specifically identified in the methods. The items identified as acceptable options may be used without approval but must be identified in the test report. The potentially approvable options are cited as “subject to the approval of the Administrator” or as “or equivalent.” Such potentially approvable techniques or alternatives may be used at the discretion of the owner without prior approval. However, detailed descriptions for applying these potentially approvable techniques or alternatives are not provided in the test methods. Also, the potentially approvable options are not necessarily acceptable in all applications. Therefore, an owner electing to use such potentially approvable techniques or alternatives is responsible for: (1) assuring that

the techniques or alternatives are in fact applicable and are properly executed; (2) including a written description of the alternative method in the test report (the written method must be clear and must be capable of being performed without additional instruction, and the degree of detail should be similar to the detail contained in the test methods); and (3) providing any rationale or supporting data necessary to show the validity of the alternative in the particular application. Failure to meet these requirements can result in the Administrator's disapproval of the alternative.

#### METHOD 6—DETERMINATION OF SULFUR DIOXIDE EMISSIONS FROM STATIONARY SOURCES

NOTE: This method does not include all of the specifications (*e.g.*, equipment and supplies) and procedures (*e.g.*, sampling and analytical) essential to its performance. Some material is incorporated by reference from other methods in this part. Therefore, to obtain reliable results, persons using this method should have a thorough knowledge of at least the following additional test methods: Method 1, Method 2, Method 3, Method 5, and Method 8.

##### 1.0 Scope and Application

###### 1.1 Analytes.

Analyte	CAS No.	Sensitivity
SO <sub>2</sub> .....	7449-09-5	3.4 mg SO <sub>2</sub> /m <sup>3</sup> (2.12 × 10) <sup>-7</sup> lb/ft <sup>3</sup>

1.2 Applicability. This method applies to the measurement of sulfur dioxide (SO<sub>2</sub>) emissions from stationary sources.

1.3 Data Quality Objectives. Adherence to the requirements of this method will enhance the quality of the data obtained from air pollutant sampling methods.

##### 2.0 Summary of Method

2.1 A gas sample is extracted from the sampling point in the stack. The SO<sub>2</sub> and the sulfur trioxide, including those fractions in any sulfuric acid mist, are separated. The SO<sub>2</sub> fraction is measured by the barium-thorin titration method.

##### 3.0 Definitions [Reserved]

##### 4.0 Interferences

4.1 Free Ammonia. Free ammonia interferes with this method by reacting with SO<sub>2</sub> to form particulate sulfite and by reacting with the indicator. If free ammonia is present (this can be determined by knowledge of the process and/or noticing white particulate matter in the probe and isopropanol bubbler), alternative methods, subject to the approval of the Administrator are required. One approved alternative is listed in Reference 13 of Section 17.0.

4.2 Water-Soluble Cations and Fluorides. The cations and fluorides are removed by a glass wool filter and an isopropanol bubbler; therefore, they do not affect the SO<sub>2</sub> analysis. When samples are collected from a gas stream with high concentrations of metallic fumes (*i.e.*, very fine cation aerosols) a high-efficiency glass fiber filter must be used in place of the glass wool plug (*i.e.*, the one in the probe) to remove the cation interferent.

##### 5.0 Safety

5.1 Disclaimer. This method may involve hazardous materials, operations, and equipment. This test method may not address all of the safety problems associated with its use. It is the responsibility of the user to establish appropriate safety and health practices and determine the applicability of regulatory limitations before performing this test method.

5.2 Corrosive reagents. The following reagents are hazardous. Personal protective equipment and safe procedures are useful in preventing chemical splashes. If contact occurs, immediately flush with copious amounts of water for at least 15 minutes. Remove clothing under shower and decontaminate. Treat residual chemical burns as thermal burns.

5.2.1 Hydrogen Peroxide (H<sub>2</sub>O<sub>2</sub>). Irritating to eyes, skin, nose, and lungs. 30% H<sub>2</sub>O<sub>2</sub> is a strong oxidizing agent. Avoid contact with skin, eyes, and combustible material. Wear gloves when handling.

5.2.2 Sodium Hydroxide (NaOH). Causes severe damage to eyes and skin. Inhalation causes irritation to nose, throat, and lungs. Reacts exothermically with limited amounts of water.

5.2.3 Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>). Rapidly destructive to body tissue. Will cause third degree burns. Eye damage may result in blindness. Inhalation may be fatal from spasm of the larynx, usually within 30 minutes. May cause lung tissue damage with edema. 1 mg/m<sup>3</sup> for 8 hours will cause lung damage or, in higher concentrations, death. Provide ventilation to limit inhalation. Reacts violently with metals and organics.

##### 6.0 Equipment and Supplies

6.1 Sample Collection. The following items are required for sample collection:

6.1.1 Sampling Train. A schematic of the sampling train is shown in Figure 6-1. The sampling equipment described in Method 8 may be substituted in place of the midjet impinger equipment of Method 6. However, the Method 8 train must be modified to include a heated filter between the probe and isopropanol impinger, and the operation of the sampling train and sample analysis must be at the flow rates and solution volumes defined in Method 8. Alternatively, SO<sub>2</sub> may be determined simultaneously with particulate



plume appearance include: Angle of the observer with respect to the plume; angle of the observer with respect to the sun; point of observation of attached and detached steam plume; and angle of the observer with respect to a plume emitted from a rectangular stack with a large length to width ratio. The method includes specific criteria applicable to these variables.

Other variables which may not be controllable in the field are luminescence and color contrast between the plume and the background against which the plume is viewed. These variables exert an influence upon the appearance of a plume as viewed by an observer, and can affect the ability of the observer to accurately assign opacity values to the observed plume. Studies of the theory of plume opacity and field studies have demonstrated that a plume is most visible and presents the greatest apparent opacity when viewed against a contrasting background. It follows from this, and is confirmed by field trials, that the opacity of a plume, viewed under conditions where a contrasting background is present can be assigned with the greatest degree of accuracy. However, the potential for a positive error is also the greatest when a plume is viewed under such contrasting conditions. Under conditions presenting a less contrasting background, the apparent opacity of a plume is less and approaches zero as the color and luminescence contrast decrease toward zero. As a result, significant negative bias and negative errors can be made when a plume is viewed under less contrasting conditions. A negative bias decreases rather than increases the possibility that a plant operator will be cited for a violation of opacity standards due to observer error.

Studies have been undertaken to determine the magnitude of positive errors which can be made by qualified observers while reading plumes under contrasting conditions and using the procedures set forth in this method. The results of these studies (field trials) which involve a total of 769 sets of 25 readings each are as follows:

(1) For black plumes (133 sets at a smoke generator), 100 percent of the sets were read with a positive error<sup>1</sup> of less than 7.5 percent opacity; 99 percent were read with a positive error of less than 5 percent opacity.

(2) For white plumes (170 sets at a smoke generator, 168 sets at a coal-fired power plant, 298 sets at a sulfuric acid plant), 99 percent of the sets were read with a positive error of less than 7.5 percent opacity; 95 percent were read with a positive error of less than 5 percent opacity.

<sup>1</sup>For a set, positive error=average opacity determined by observers' 25 observations—average opacity determined from transmissometer's 25 recordings.

The positive observational error associated with an average of twenty-five readings is therefore established. The accuracy of the method must be taken into account when determining possible violations of applicable opacity standards.

### 1. Principle and Applicability

1.1 Principle. The opacity of emissions from stationary sources is determined visually by a qualified observer.

1.2 Applicability. This method is applicable for the determination of the opacity of emissions from stationary sources pursuant to §60.11(b) and for qualifying observers for visually determining opacity of emissions.

### 2. Procedures

The observer qualified in accordance with section 3 of this method shall use the following procedures for visually determining the opacity of emissions:

2.1 Position. The qualified observer shall stand at a distance sufficient to provide a clear view of the emissions with the sun oriented in the 140° sector to his back. Consistent with maintaining the above requirement, the observer shall, as much as possible, make his observations from a position such that his line of vision is approximately perpendicular to the plume direction, and when observing opacity of emissions from rectangular outlets (e.g., roof monitors, open baghouses, noncircular stacks), approximately perpendicular to the longer axis of the outlet. The observer's line of sight should not include more than one plume at a time when multiple stacks are involved, and in any case the observer should make his observations with his line of sight perpendicular to the longer axis of such a set of multiple stacks (e.g., stub stacks on baghouses).

2.2 Field Records. The observer shall record the name of the plant, emission location, type facility, observer's name and affiliation, a sketch of the observer's position relative to the source, and the date on a field data sheet (Figure 9-1). The time, estimated distance to the emission location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), and plume background are recorded on a field data sheet at the time opacity readings are initiated and completed.

2.3 Observations. Opacity observations shall be made at the point of greatest opacity in that portion of the plume where condensed water vapor is not present. The observer shall not look continuously at the plume, but instead shall observe the plume momentarily at 15-second intervals.

2.3.1 Attached Steam Plumes. When condensed water vapor is present within the

plume as it emerges from the emission outlet, opacity observations shall be made beyond the point in the plume at which condensed water vapor is no longer visible. The observer shall record the approximate distance from the emission outlet to the point in the plume at which the observations are made.

2.3.2 Detached Steam Plume. When water vapor in the plume condenses and becomes visible at a distinct distance from the emission outlet, the opacity of emissions should be evaluated at the emission outlet prior to the condensation of water vapor and the formation of the steam plume.

2.4 Recording Observations. Opacity observations shall be recorded to the nearest 5 percent at 15-second intervals on an observational record sheet. (See Figure 9-2 for an example.) A minimum of 24 observations shall be recorded. Each momentary observation recorded shall be deemed to represent the average opacity of emissions for a 15-second period.

2.5 Data Reduction. Opacity shall be determined as an average of 24 consecutive observations recorded at 15-second intervals. Divide the observations recorded on the record sheet into sets of 24 consecutive observations. A set is composed of any 24 consecutive observations. Sets need not be consecutive in time and in no case shall two sets overlap. For each set of 24 observations, calculate the average by summing the opacity of the 24 observations and dividing this sum by 24. If an applicable standard specifies an averaging time requiring more than 24 observations, calculate the average for all observations made during the specified time period. Record the average opacity on a record sheet. (See Figure 9-1 for an example.)

3. Qualifications and Testing

3.1 Certification Requirements. To receive certification as a qualified observer, a candidate must be tested and demonstrate the ability to assign opacity readings in 5 percent increments to 25 different black plumes and 25 different white plumes, with an error not to exceed 15 percent opacity on any one reading and an average error not to exceed 7.5 percent opacity in each category. Candidates shall be tested according to the procedures described in section 3.2. Smoke generators used pursuant to section 3.2 shall be equipped with a smoke meter which meets the requirements of section 3.3.

The certification shall be valid for a period of 6 months, at which time the qualification procedure must be repeated by any observer in order to retain certification.

3.2 Certification Procedure. The certification test consists of showing the candidate a complete run of 50 plumes—25 black plumes and 25 white plumes—generated by a smoke generator. Plumes within each set of 25 black and 25 white runs shall be presented in

random order. The candidate assigns an opacity value to each plume and records his observation on a suitable form. At the completion of each run of 50 readings, the score of the candidate is determined. If a candidate fails to qualify, the complete run of 50 readings must be repeated in any retest. The smoke test may be administered as part of a smoke school or training program, and may be preceded by training or familiarization runs of the smoke generator during which candidates are shown black and white plumes of known opacity.

3.3 Smoke Generator Specifications. Any smoke generator used for the purposes of section 3.2 shall be equipped with a smoke meter installed to measure opacity across the diameter of the smoke generator stack. The smoke meter output shall display instack opacity based upon a pathlength equal to the stack exit diameter, on a full 0 to 100 percent chart recorder scale. The smoke meter optical design and performance shall meet the specifications shown in Table 9-1. The smoke meter shall be calibrated as prescribed in section 3.3.1 prior to the conduct of each smoke reading test. At the completion of each test, the zero and span drift shall be checked and if the drift exceeds ±1 percent opacity, the condition shall be corrected prior to conducting any subsequent test runs. The smoke meter shall be demonstrated, at the time of installation, to meet the specifications listed in Table 9-1. This demonstration shall be repeated following any subsequent repair or replacement of the photocell or associated electronic circuitry including the chart recorder or output meter, or every 6 months, whichever occurs first.

TABLE 9-1—SMOKE METER DESIGN AND PERFORMANCE SPECIFICATIONS

Parameter	Specification
a. Light source .....	Incandescent lamp operated at nominal rated voltage.
b. Spectral response of photocell.	Photopic (daylight spectral response of the human eye—Citation 3).
c. Angle of view .....	15° maximum total angle.
d. Angle of projection .....	15° maximum total angle.
e. Calibration error .....	±3% opacity, maximum.
f. Zero and span drift .....	±1% opacity, 30 minutes.
g. Response time .....	5 seconds.

3.3.1 Calibration. The smoke meter is calibrated after allowing a minimum of 30 minutes warmup by alternately producing simulated opacity of 0 percent and 100 percent. When stable response at 0 percent or 100 percent is noted, the smoke meter is adjusted to produce an output of 0 percent or 100 percent, as appropriate. This calibration shall be repeated until stable 0 percent and 100

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percent readings are produced without adjustment. Simulated 0 percent and 100 percent opacity values may be produced by alternately switching the power to the light source on and off while the smoke generator is not producing smoke.

3.3.2 Smoke Meter Evaluation. The smoke meter design and performance are to be evaluated as follows:

3.3.2.1 Light Source. Verify from manufacturer's data and from voltage measurements

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made at the lamp, as installed, that the lamp is operated within  $\pm 5$  percent of the nominal rated voltage.

3.3.2.2 Spectral Response of Photocell. Verify from manufacturer's data that the photocell has a photopic response; i.e., the spectral sensitivity of the cell shall closely approximate the standard spectral-luminosity curve for photopic vision which is referenced in (b) of Table 9-1.



Hr.	Min.	Seconds				Steam plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
	19							
	20							
	21							
	22							
	23							
	24							
	25							
	26							
	27							
	28							
	29							

FIGURE 9-2—OBSERVATION RECORD (CONTINUED)

Page \_\_\_ of \_\_\_

Company ..... Observer .....  
 Location ..... Type facility .....  
 Test Number ..... Point of emissions .....  
 Date.

Hr.	Min.	Seconds				Steam plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	30							

Hr.	Min.	Seconds				Steam plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	31							
	32							
	33							
	34							
	35							
	36							
	37							
	38							
	39							
	40							
	41							
	42							
	43							
	44							
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	49							
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	51							
	52							
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	59							

3.3.2.3 Angle of View. Check construction geometry to ensure that the total angle of view of the smoke plume, as seen by the photocell, does not exceed 15°. The total angle of view may be calculated from:  $\theta = 2 \tan^{-1} d/2L$ , where  $\theta$ =total angle of view; d=the sum of the photocell diameter+the diameter of the limiting aperture; and L=the distance from the photocell to the limiting aperture. The limiting aperture is the point in the path between the photocell and the smoke plume

where the angle of view is most restricted. In smoke generator smoke meters this is normally an orifice plate.

3.3.2.4 Angle of Projection. Check construction geometry to ensure that the total angle of projection of the lamp on the smoke plume does not exceed 15°. The total angle of projection may be calculated from:  $\theta = 2 \tan^{-1} d/2L$ , where  $\theta$ =total angle of projection; d=the sum of the length of the lamp filament + the diameter of the limiting aperture; and

L=the distance from the lamp to the limiting aperture.

3.3.2.5 Calibration Error. Using neutral-density filters of known opacity, check the error between the actual response and the theoretical linear response of the smoke meter. This check is accomplished by first calibrating the smoke meter according to 3.3.1 and then inserting a series of three neutral-density filters of nominal opacity of 20, 50, and 75 percent in the smoke meter pathlength. Filters calibrated within  $\pm 2$  percent shall be used. Care should be taken when inserting the filters to prevent stray light from affecting the meter. Make a total of five nonconsecutive readings for each filter. The maximum error on any one reading shall be 3 percent opacity.

3.3.2.6 Zero and Span Drift. Determine the zero and span drift by calibrating and operating the smoke generator in a normal manner over a 1-hour period. The drift is measured by checking the zero and span at the end of this period.

3.3.2.7 Response Time. Determine the response time by producing the series of five simulated 0 percent and 100 percent opacity values and observing the time required to reach stable response. Opacity values of 0 percent and 100 percent may be simulated by alternately switching the power to the light source off and on while the smoke generator is not operating.

#### 4. Bibliography

1. Air Pollution Control District Rules and Regulations, Los Angeles County Air Pollution Control District, Regulation IV, Prohibitions, Rule 50.
2. Weisburd, Melvin I., Field Operations and Enforcement Manual for Air, U.S. Environmental Protection Agency, Research Triangle Park, NC. APTD-1100, August 1972, pp. 4.1-4.36.
3. Condon, E.U., and Odishaw, H., Handbook of Physics, McGraw-Hill Co., New York, NY, 1958, Table 3.1, p. 6-52.

#### ALTERNATE METHOD 1—DETERMINATION OF THE OPACITY OF EMISSIONS FROM STATIONARY SOURCES REMOTELY BY LIDAR

This alternate method provides the quantitative determination of the opacity of an emissions plume remotely by a mobile lidar system (laser radar; Light Detection and Ranging). The method includes procedures for the calibration of the lidar and procedures to be used in the field for the lidar determination of plume opacity. The lidar is used to measure plume opacity during either day or nighttime hours because it contains its own pulsed light source or transmitter. The operation of the lidar is not dependent upon ambient lighting conditions (light, dark, sunny or cloudy).

The lidar mechanism or technique is applicable to measuring plume opacity at numerous wavelengths of laser radiation. However, the performance evaluation and calibration test results given in support of this method apply only to a lidar that employs a ruby (red light) laser [Reference 5.1].

#### 1. Principle and Applicability

1.1 Principle. The opacity of visible emissions from stationary sources (stacks, roof vents, etc.) is measured remotely by a mobile lidar (laser radar).

1.2 Applicability. This method is applicable for the remote measurement of the opacity of visible emissions from stationary sources during both nighttime and daylight conditions, pursuant to 40 CFR §60.11(b). It is also applicable for the calibration and performance verification of the mobile lidar for the measurement of the opacity of emissions. A performance/design specification for a basic lidar system is also incorporated into this method.

#### 1.3 Definitions.

Azimuth angle: The angle in the horizontal plane that designates where the laser beam is pointed. It is measured from an arbitrary fixed reference line in that plane.

Backscatter: The scattering of laser light in a direction opposite to that of the incident laser beam due to reflection from particulates along the beam's atmospheric path which may include a smoke plume.

Backscatter signal: The general term for the lidar return signal which results from laser light being backscattered by atmospheric and smoke plume particulates.

Convergence distance: The distance from the lidar to the point of overlap of the lidar receiver's field-of-view and the laser beam.

Elevation angle: The angle of inclination of the laser beam referenced to the horizontal plane.

Far region: The region of the atmosphere's path along the lidar line-of-sight beyond or behind the plume being measured.

Lidar: Acronym for Light Detection and Ranging.

Lidar range: The range or distance from the lidar to a point of interest along the lidar line-of-sight.

Near region: The region of the atmospheric path along the lidar line-of-sight between the lidar's convergence distance and the plume being measured.

Opacity: One minus the optical transmittance of a smoke plume, screen target, etc.

Pick interval: The time or range intervals in the lidar backscatter signal whose minimum average amplitude is used to calculate opacity. Two pick intervals are required, one in the near region and one in the far region.

Plume: The plume being measured by lidar.

Plume signal: The backscatter signal resulting from the laser light pulse passing through a plume.