

Frequently Asked Questions

Under PS-1, can I locate my continuous opacity monitoring system (COMS) at a point in a duct or stack that is not "at least 4 duct diameters downstream from all particulate control equipment or flow disturbances and...at least 2 duct diameters upstream of a flow disturbance..."?

Through an inadvertent omission of a phrase in the latest version of PS-1, there appears to be conflicting language in paragraphs 8.1(2)(i) and 8.1(2)(ii). In particular, paragraph 8.1(2)(i) should not limit the COMS locations to the plus four and two diameter sites, but instead should refer to 8.1(2)(ii) for additional options. Paragraph 8.1(2)(ii) is clear that you can install a COMS in a location that is not at least 4 duct diameters downstream and 2 duct diameters upstream of a flow disturbance as long as you meet the appropriate requirements in the table of 8.1(2)(ii) and the associated figure (i.e., Figures 1-1 through 1-5). If the desired location does not meet the requirements of paragraphs 8.1(2)(i) and 8.1(2)(ii), then you must demonstrate to the EPA Administrator's satisfaction that the average opacity measured at the alternative location is equivalent to the opacity measured at a location meeting the requirements of paragraphs 8.1(2)(i) and 8.1(2)(ii), as described in 8.1(2)(iii). We plan to clarify the language of Section 8.1 of PS-1 in a Federal Register Corrections Notice or our next Methods Update Rulemaking Package.