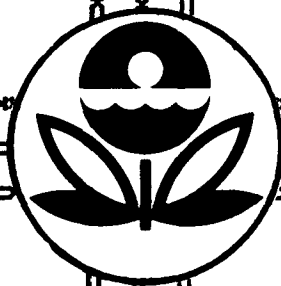


**EPA-450/4-74-005**  
**September 1974**  
**(OAQPS No. 1.2-018)**

**GUIDELINE SERIES**

**DESIGNATION  
OF UNACCEPTABLE  
ANALYTICAL METHODS  
OF MEASUREMENT  
FOR CRITERIA POLLUTANTS**



**U.S. ENVIRONMENTAL PROTECTION AGENCY**  
**Office of Air and Waste Management**  
**Office of Air Quality Planning and Standards**  
**Research Triangle Park, North Carolina 27711**

EPA-450/4-74-005  
(OAQPS No. 1.2-018)

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ANALYTICAL METHODS  
OF MEASUREMENT  
FOR CRITERIA POLLUTANTS**

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National Environmental Research Center  
Research Triangle Park, North Carolina  
September 1974

## OAQPS GUIDELINE SERIES

The guideline series of reports is being issued by the Office of Air Quality Planning and Standards (OAQPS) to provide information to state and local air pollution control agencies; for example, to provide guidance on the acquisition and processing of air quality data and on the planning and analysis requisite for the maintenance of air quality. Reports published in this series will be available - as supplies permit - from the Air Pollution Technical Information Center, Research Triangle Park, North Carolina 27711; or, for a nominal fee, from the National Technical Information Service, 5285 Port Royal Road, Springfield, Virginia 22151.

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(OAQPS Guideline No. 1.2-018)

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# Designation of Unacceptable Analytical Methods of Measurement For Criteria Pollutants

## Introduction

It is well known to all who analyze the air to measure criteria pollutants that some techniques or methods are better than others. Because important decisions, such as air quality standards achievement and State Implementation Plan (SIP) revisions, are based on data derived from these methods, it is imperative that only good quality data be used. Toward this end, we are designating 14 analytical methods as unacceptable for continued use for these purposes. Accordingly, the objective of this guideline is to present the rationale for those methods which are being designated unacceptable, and to provide guidance on the acceptability of methods for future measurements. This will enable the Regional Offices and the State agencies to make decisions concerning implementation of monitoring network requirements, consistent with the objectives and needs of their monitoring program.

## Categories of Analytical Methods

Methods for measuring air pollutants fall into one of three categories: (1) approved, (2) unacceptable, and (3) those methods which are neither approved nor unacceptable (unapproved). At present, the only officially approved methods are the Federal reference methods described in appendices to 40 CFR Part 50, originally promulgated on April 30, 1971 (36FR8186) with the National Ambient Air Quality Standards (NAAQS). This Federal Register also introduced the concept of an "equivalent method", which is any method which can be demonstrated to be "equivalent" to the reference method. Thus, unapproved methods may become approved only by demonstrating equivalence to the reference method.

Those methods designated as unacceptable are not equivalent to the reference methods because they are known to yield measurements of poor accuracy and reliability. They are considered to be obsolete. In each case, suitable analytical methods which produce measurements of greater reliability are available to replace the unacceptable methods.

#### Reference and Equivalency Regulations

Regulations governing the procedures and criteria by which unapproved methods may be determined to be equivalent were proposed in the Federal Register on October 12, 1973 (38 FR 28438) as a new Part 53. Pending revision based on comments from interested persons, the new regulations, when finally promulgated, will require that a method must be tested according to prescribed procedures and meet certain prescribed specifications to be approved as an equivalent method. In essence, manual methods must demonstrate a consistent relationship to the reference method in side-by-side measurements of ambient air. Automated methods (automatic air analyzers) must demonstrate such a consistent relationship as well as meet certain performance specifications. The new regulations will also cover reference methods which are automated methods (i.e., CO and oxidants). An analyzer must meet prescribed performance specifications before it can be determined to be approved as a reference method.

Unapproved methods must be tested according to the prescribed procedures and submitted with an application for approval to the Quality Assurance and Environmental Monitoring Laboratory, NERC, RTP. Approved methods are to be published in the Federal Register. The regulations will apply to SO<sub>2</sub>, CO, and oxidants corrected for SO<sub>2</sub> and NO<sub>2</sub>.

## Acceptability of Analytical Methods

Table I lists those analytical methods for which data were submitted by the States in 1972. We have listed the individual methods as "approved", "unapproved" and "unacceptable". Use of methods designated "unacceptable" should be discontinued as soon as possible. Data derived from those methods will not be accepted or used by the NADB after September 1974.

For SO<sub>2</sub>, CO, and oxidants corrected for SO<sub>2</sub> and NO<sub>2</sub>, unapproved methods may be used until the equivalency regulations are promulgated. After promulgation of those regulations and additional approved methods become available, unapproved methods may be used only until they can be replaced with approved methods, and not later than 5 years after promulgation after which time only approved methods are to be used. For NO<sub>2</sub> and hydrocarbons corrected for methane, guidance for selecting adequate automated methods may be found in the forthcoming EPA Environmental Monitoring Series document (EPA-650/4-74-018), Guidelines for Determining Performance Characteristics of Automated Methods for Measuring Nitrogen Dioxide and Hydrocarbons Corrected for Methane in Ambient Air.

Until these regulations and guidelines become available, the following guidance should be considered:

### Discussion of Criteria Pollutants

1. TSP - The high-volume method is the Federal reference method for total suspended particulates. Since the air quality standard is defined by the method, the high-volume sampler is the only acceptable method. No procedures for determining equivalency of alternate methods have been developed; so all other methods are to be considered unacceptable.

2. Carbon Monoxide - The non-dispersive infrared (NDIR) is the Federal reference method for CO. Automated analyzers based on other principles have not yet been tested with respect to equivalency, and are therefore unapproved.

Table I. 1972-1973 POLLUTANT-METHOD-STATIONS SUMMARY

REVISED

| Pollutant                               | Code  | Method                            | 1972<br>No. of<br>Stations | 1972<br>Percent<br>of Total | 1973<br>No. of<br>Stations | 1973<br>Percent<br>of Total | Approved | Unapproved     | Unacceptable <sup>b</sup> |
|---|-------|-----------------------------------|----------------------------|-----------------------------|----------------------------|-----------------------------|----------|----------------|---------------------------|
| TSP                                     | 11101 | 91 Hi-Vol (FRM) <sup>a</sup>      | 2828                       | 100                         | 3602                       | 100                         | X        |                |                           |
| CO                                      | 42101 | 11 NDIR (FRM)                     | 223                        | 99                          | 278                        | 96                          | X        |                |                           |
|   |       | 12 Coulometric                    | 1                          | 0                           | 2                          | 0                           |          |                | X                         |
|   |       | 21 Flame Ionization               | 2                          | 1                           | 10                         | 4                           |          | X              |                           |
|   |       |                                   | 226                        | 100                         | 290                        | 100                         |          |                |                           |
| SO <sub>2</sub>                         | 42401 | 11 Colorimetric                   | 68                         | 5                           | 89                         | 5                           |          | X              |                           |
|   |       | 13 Conductimetric                 | 80                         | 7                           | 108                        | 6                           |          | X              |                           |
|   |       | 14 Coulometric                    | 76                         | 6                           | 172                        | 9                           |          | X              |                           |
|   |       | 15 Autometer <sup>c</sup>         | 1                          | 0                           | 1                          | 0                           |          | X <sup>c</sup> |                           |
|   |       | 16 Flame Photometric              | 12                         | 0                           | 29                         | 1                           |          | X              |                           |
|   |       | 31 Hydrogen Peroxide <sup>c</sup> | 38                         | 3                           | 38                         | 2                           |          | X <sup>c</sup> |                           |
|   |       | 33 Sequential Conductimetric      | 3                          | 0                           | 6                          | 0                           |          | X              |                           |
|   |       | 91 West-Gaeke-Sulfamic Acid (FRM) | 1040                       | 76                          | 1510                       | 77                          | X        |                |                           |
|   |       | 92 West-Gaeke Bubbler             | 45                         | 3                           | 11                         | 0                           |          |                | Y                         |
|   |       | 93 Conductimetric Bubbler         | 2                          | 0                           | 0                          | 0                           |          |                | Y                         |
|   |       |                                   | 1365                       | 100                         | 1964                       | 100                         |          |                |                           |
| NO <sub>2</sub>                         | 42602 | 11 Colorimetric                   | 110                        | 12                          | 136                        | 8                           |          | X              |                           |
|   |       | 12 Colorimetric                   | 15                         | 1                           | 14                         | 1                           |          | X              |                           |
|   |       | 13 Coulometric                    | 5                          | 0                           | 10                         | 1                           |          | X              |                           |
|   |       | 14 Chemiluminescence              | 36                         | 3                           | 8                          | 0                           |          | X              |                           |
|   |       | 71 J-H Bubbler (orifice)          | 11                         | 1                           | 14                         | 1                           |          |                | X                         |
|   |       | 72 Saltzman                       | 11                         | 1                           | 5                          | 0                           |          |                | X                         |
|   |       | 84 Sodium Arsenite (orifice)      | 5                          | 0                           | 26                         | 1                           |          | X              |                           |
|   |       | 91 J-H Bubbler (frit)             | 816                        | 79                          | 995                        | 60                          |          |                | X                         |
|   |       | 94 Sodium Arsenite (frit)         | 28                         | 3                           | 456                        | 28                          |          | X              |                           |
|   |       | 95 TEA                            |                            |                             |                            |                             |          | X              |                           |
|   |       | 96 TGS                            |                            |                             |                            |                             |          | X              |                           |
|   |       |                                   | 1037                       | 100                         | 1664                       | 100                         |          |                |                           |
| Photochemical<br>O <sub>3</sub> (Ozone) | 44101 | 11 Alkaline KI Instrumental       | 49                         | 13                          | 10                         | 2                           |          |                | X                         |
|   |       | 13 Coulometric <sup>d</sup>       | 10                         | 3                           | 10                         | 2                           |          | X <sup>d</sup> |                           |
|   |       | 14 Neut KI Colorimetric           | 75                         | 21                          | 89                         | 21                          |          | X              |                           |
|   |       | 15 Coulometric                    | 13                         | 4                           | 22                         | 5                           |          | X              |                           |
|   |       | 51 Phenolphthalin                 | 5                          | 1                           | 3                          | 1                           |          |                | X                         |
|   |       | 81 Alkaline KI Bubbler            | 64                         | 18                          | 79                         | 18                          |          |                | X                         |
|   |       | 82 Ferrous Oxidation              | 85                         | 23                          | 91                         | 21                          |          |                | X                         |
|   | 44201 | 11 Chemiluminescence (FRM)        | 62                         | 17                          | 131                        | 30                          | X        |                |                           |
|   |       | 13 Coulometric <sup>d</sup>       | 1                          | 0                           | 1                          | 0                           |          | X <sup>d</sup> |                           |
|   |       |                                   | 364                        | 100                         | 436                        | 100                         |          |                |                           |

<sup>a</sup> FRM = Federal Reference Method.

<sup>b</sup> See Appendix B for an explanation of why these methods are unacceptable.

<sup>c</sup> These methods should be reported under method code 42401 13.

<sup>d</sup> These methods should be under method code 44101 15.



3. Sulfur Dioxide - The manual West-Gaeke - sulfamic acid (24-hour bubbler) method is the Federal reference method for  $\text{SO}_2$ . The other manual methods listed are unacceptable. The similarly named "West-Gaeke" method (SAROAD method code 42401 92) is not equivalent to the reference method (SAROAD method code 42401 91). Since no continuous method has yet been tested for equivalency, they are classified as unapproved.
4. Nitrogen Dioxide - The manual NASN bubbler method is the Federal reference method for  $\text{NO}_2$ . However, in the June 8, 1973, issue of the Federal Register (38 FR 15174), it was proposed that the NASN method be withdrawn as the reference method and a new one designated after testing of proposed candidate methods. Although the method was not officially withdrawn, the problems with variable collection efficiency and  $\text{NO}$  interferences are such that it must be considered unacceptable. All other methods, both manual and continuous, have been classified as unapproved.
5. Photochemical Oxidants (Ozone) - The reference method for photochemical oxidants is a continuous chemiluminescence method based on the gas-phase reaction of ozone with ethylene. This method is specific for ozone. All other methods listed in Table I are total oxidant methods. Six of these methods for total oxidants are being designated unacceptable. While the remaining automated methods are not being designated unacceptable, strong consideration should be given to replacing them with the reference method.
6. Total Hydrocarbons Corrected for Methane - This category is unique in that, while hydrocarbons corrected for methane is a criteria pollutant, the ambient air quality standard is only a guide for achieving the oxidant standard. A gas chromatographic flame ionization technique is the federal reference method for hydrocarbons corrected for methane, but this method is difficult and expensive to use. Other methods are now becoming available and, as mentioned before, guidance for selection of adequate automated methods may be obtained in the EPA Environmental Monitoring Series document (EPA-650/4-74-018), Guidelines for Determining Performance Characteristics of Automated Methods for Measuring  $\text{NO}_2$  and Hydrocarbons Corrected for Methane in the Ambient Air.

### Pollutant Method Code

Correct identification of the pollutant method is of utmost importance in the reporting of air quality data. It will be of little help to upgrade the West-Gaeke bubbler procedure (SAROAD method code 42401 92) for example, to the West-Gaeke-Sulfamic Acid method (SAROAD method code 42401 91) unless the method codes under which the data are reported to the NADB are also changed. See OAQPS Guideline #1.2-017, A Description of the Analytical Techniques and Associated SAROAD Method Codes Used in Storing Data in the National Aerometric Data Bank, for a description of the analytical technique associated with the SAROAD method code.

After the equivalency regulations are promulgated, the pollutant method code will become even more important since there may be a unique identification code for each method which passes the equivalency testing and becomes approved as a reference or equivalent method. This new code may identify not only the method principle but also the instrument model and manufacturer.

### Summary of Regional Office Responsibilities

The Regional Offices should see that those methods designated in Table I as unacceptable are replaced with approved methods as soon as practical. This will insure adequate data for air quality trend analyses and compliance with NAAQS after 9/1/74 when data from unacceptable methods will no longer be used. After promulgation of the equivalency regulations, EPA Regional Offices should assist in the conversion to the exclusive use of approved methods for SO<sub>2</sub>, CO and oxidants corrected for SO<sub>2</sub> and NO<sub>2</sub> and similarly assistance should be provided for selecting adequate methods for NO<sub>2</sub> and total hydrocarbons corrected for methane according to the available guidelines.

To help the Regional Offices identify which states reported data by which method in 1972, we have included Table II, a printout of the data from which Table I was prepared. Note that the printout is by pollutant code and method. Appendix A, which is an extract from OAQPS Guideline #1.2-017, presents a description of the analytical technique associated with the SAROAD method code. Lastly, Appendix B, contains a short paragraph for each method which has been designated unacceptable, giving the rationale for that designation.

Table II. INVENTORY OF AIR POLLUTANT MONITORING SITES, BY STATE, 1972

|       |       | POLLUTANT<br>CODE | METH<br>CODE |               | NUMBER OF<br>SITES |
|-------|-------|-------------------|--------------|---------------|--------------------|
| STATE | COUNT | 11101             | 91           | ALABAMA       | 63                 |
| STATE | COUNT | 11101             | 91           | ALASKA        | 19                 |
| STATE | COUNT | 11101             | 91           | ARIZONA       | 33                 |
| STATE | COUNT | 11101             | 91           | ARKANSAS      | 32                 |
| STATE | COUNT | 11101             | 91           | CALIFORNIA    | 19                 |
| STATE | COUNT | 11101             | 91           | COLORADO      | 69                 |
| STATE | COUNT | 11101             | 91           | CONNECTICUT   | 26                 |
| STATE | COUNT | 11101             | 91           | DELAWARE      | 16                 |
| STATE | COUNT | 11101             | 91           | DIST COLUMBIA | 2                  |
| STATE | COUNT | 11101             | 91           | FLORIDA       | 45                 |
| STATE | COUNT | 11101             | 91           | GEORGIA       | 31                 |
| STATE | COUNT | 11101             | 91           | HAWAII        | 14                 |
| STATE | COUNT | 11101             | 91           | IDAHO         | 30                 |
| STATE | COUNT | 11101             | 91           | ILLINOIS      | 54                 |
| STATE | COUNT | 11101             | 91           | INDIANA       | 128                |
| STATE | COUNT | 11101             | 91           | IOWA          | 30                 |
| STATE | COUNT | 11101             | 91           | KANSAS        | 59                 |
| STATE | COUNT | 11101             | 91           | KENTUCKY      | 90                 |
| STATE | COUNT | 11101             | 91           | LOUISIANA     | 12                 |
| STATE | COUNT | 11101             | 91           | MAINE         | 7                  |
| STATE | COUNT | 11101             | 91           | MARYLAND      | 85                 |
| STATE | COUNT | 11101             | 91           | MASSACHUSETTS | 52                 |
| STATE | COUNT | 11101             | 91           | MICHIGAN      | 109                |
| STATE | COUNT | 11101             | 91           | MINNESOTA     | 59                 |
| STATE | COUNT | 11101             | 91           | MISSISSIPPI   | 2                  |

TABLE II

|       |       | POLLUTANT<br>CODE | METH<br>CODE |                | NUMBER OF<br>SITES |
|-------|-------|-------------------|--------------|----------------|--------------------|
| STATE | COUNT | 11101             | 91           | MISSOURI       | 49                 |
| STATE | COUNT | 11101             | 91           | MONTANA        | 2                  |
| STATE | COUNT | 11101             | 91           | NEBRASKA       | 36                 |
| STATE | COUNT | 11101             | 91           | NEVADA         | 41                 |
| STATE | COUNT | 11101             | 91           | NEW HAMPSHIRE  | 26                 |
| STATE | COUNT | 11101             | 91           | NEW JERSEY     | 79                 |
| STATE | COUNT | 11101             | 91           | NEW MEXICO     | 28                 |
| STATE | COUNT | 11101             | 91           | NEW YORK       | 233                |
| STATE | COUNT | 11101             | 91           | NORTH CAROLINA | 199                |
| STATE | COUNT | 11101             | 91           | NORTH DAKOTA   | 16                 |
| STATE | COUNT | 11101             | 91           | OHIO           | 137                |
| STATE | COUNT | 11101             | 91           | OKLAHOMA       | 95                 |
| STATE | COUNT | 11101             | 91           | OREGON         | 48                 |
| STATE | COUNT | 11101             | 91           | PENNSYLVANIA   | 105                |
| STATE | COUNT | 11101             | 91           | PUERTO RICO    | 5                  |
| STATE | COUNT | 11101             | 91           | RHODE ISLAND   | 23                 |
| STATE | COUNT | 11101             | 91           | SOUTH CAROLINA | 75                 |
| STATE | COUNT | 11101             | 91           | SOUTH DAKOTA   | 2                  |
| STATE | COUNT | 11101             | 91           | TENNESSEE      | 98                 |
| STATE | COUNT | 11101             | 91           | TEXAS          | 192                |
| STATE | COUNT | 11101             | 91           | UTAH           | 8                  |
| STATE | COUNT | 11101             | 91           | VERMONT        | 2                  |
| STATE | COUNT | 11101             | 91           | VIRGINIA       | 122                |
| STATE | COUNT | 11101             | 91           | WASHINGTON     | 57                 |

TABLE II

|          |       | POLLUTANT<br>CODE | METH<br>CODE |                | NUMBER OF<br>SITES |
|----------|-------|-------------------|--------------|----------------|--------------------|
| STATE    | COUNT | 11101             | 91           | WEST VIRGINIA  | 38                 |
| STATE    | COUNT | 11101             | 91           | WISCONSIN      | 7                  |
| STATE    | COUNT | 11101             | 91           | WYOMING        | 4                  |
| STATE    | COUNT | 11101             | 91           | GUAM           | 11                 |
| STATE    | COUNT | 11101             | 91           | VIRGIN ISLANDS | 4                  |
| POLUTCOD | COUNT | 11101             | 91           |                | 2828               |
| STATE    | COUNT | 42101             | 11           | ALABAMA        | 2                  |
| STATE    | COUNT | 42101             | 11           | ALASKA         | 1                  |
| STATE    | COUNT | 42101             | 11           | ARIZONA        | 3                  |
| STATE    | COUNT | 42101             | 11           | CALIFORNIA     | 51                 |
| STATE    | COUNT | 42101             | 11           | COLORADO       | 1                  |
| STATE    | COUNT | 42101             | 11           | DIST COLUMBIA  | 2                  |
| STATE    | COUNT | 42101             | 11           | FLORIDA        | 6                  |
| STATE    | COUNT | 42101             | 11           | GEORGIA        | 2                  |
| STATE    | COUNT | 42101             | 11           | HAWAII         | 1                  |
| STATE    | COUNT | 42101             | 11           | ILLINOIS       | 1                  |
| STATE    | COUNT | 42101             | 11           | INDIANA        | 3                  |
| STATE    | COUNT | 42101             | 11           | IOWA           | 2                  |
| STATE    | COUNT | 42101             | 11           | KANSAS         | 5                  |
| STATE    | COUNT | 42101             | 11           | KENTUCKY       | 7                  |
| STATE    | COUNT | 42101             | 11           | LOUISIANA      | 3                  |
| STATE    | COUNT | 42101             | 11           | MARYLAND       | 19                 |
| STATE    | COUNT | 42101             | 11           | MASSACHUSETTS  | 5                  |
| STATE    | COUNT | 42101             | 11           | MICHIGAN       | 3                  |
| STATE    | COUNT | 42101             | 11           | MINNESOTA      | 3                  |

TABLE II

|          |       | POLLUTANT<br>CODE | METH<br>CODE |                | NUMBER OF<br>SITES |
|----------|-------|-------------------|--------------|----------------|--------------------|
| STATE    | COUNT | 42101             | 11           | MISSOURI       | 10                 |
| STATE    | COUNT | 42101             | 11           | NEBRASKA       | 1                  |
| STATE    | COUNT | 42101             | 11           | NEVADA         | 1                  |
| STATE    | COUNT | 42101             | 11           | NEW JERSEY     | 22                 |
| STATE    | COUNT | 42101             | 11           | NEW MEXICO     | 1                  |
| STATE    | COUNT | 42101             | 11           | NEW YORK       | 13                 |
| STATE    | COUNT | 42101             | 11           | NORTH CAROLINA | 2                  |
| STATE    | COUNT | 42101             | 11           | OHIO           | 13                 |
| STATE    | COUNT | 42101             | 11           | OKLAHOMA       | 4                  |
| STATE    | COUNT | 42101             | 11           | OREGON         | 2                  |
| STATE    | COUNT | 42101             | 11           | PENNSYLVANIA   | 2                  |
| STATE    | COUNT | 42101             | 11           | RHODE ISLAND   | 2                  |
| STATE    | COUNT | 42101             | 11           | TENNESSEE      | 4                  |
| STATE    | COUNT | 42101             | 11           | TEXAS          | 1                  |
| STATE    | COUNT | 42101             | 11           | UTAH           | 4                  |
| STATE    | COUNT | 42101             | 11           | VIRGINIA       | 9                  |
| STATE    | COUNT | 42101             | 11           | WASHINGTON     | 10                 |
| STATE    | COUNT | 42101             | 11           | WEST VIRGINIA  | 1                  |
| STATE    | COUNT | 42101             | 11           | WISCONSIN      | 1                  |
| POLUTCOD | COUNT | 42101             | 11           |                | 223                |
| STATE    | COUNT | 42101             | 12           | OHIO           | 1                  |
| POLUTCOD | COUNT | 42101             | 12           |                | 1                  |
| STATE    | COUNT | 42101             | 21           | KENTUCKY       | 2                  |
| POLUTCOD | COUNT | 42101             | 21           |                | 2                  |

TABLE II

|          |       | POLLUTANT<br>CODE | METH<br>CODE |               | NUMBER OF<br>SITES |
|----------|-------|-------------------|--------------|---------------|--------------------|
| STATE    | COUNT | 42401             | 11           | ARIZONA       | 2                  |
| STATE    | COUNT | 42401             | 11           | COLORADO      | 1                  |
| STATE    | COUNT | 42401             | 11           | DELAWARE      | 6                  |
| STATE    | COUNT | 42401             | 11           | DIST COLUMBIA | 2                  |
| STATE    | COUNT | 42401             | 11           | FLORIDA       | 3                  |
| STATE    | COUNT | 42401             | 11           | ILLINOIS      | 1                  |
| STATE    | COUNT | 42401             | 11           | KENTUCKY      | 5                  |
| STATE    | COUNT | 42401             | 11           | MARYLAND      | 1                  |
| STATE    | COUNT | 42401             | 11           | MASSACHUSETTS | 4                  |
| STATE    | COUNT | 42401             | 11           | MISSOURI      | 5                  |
| STATE    | COUNT | 42401             | 11           | NEW JERSEY    | 22                 |
| STATE    | COUNT | 42401             | 11           | NEW YORK      | 7                  |
| STATE    | COUNT | 42401             | 11           | OHIO          | 4                  |
| STATE    | COUNT | 42401             | 11           | PENNSYLVANIA  | 4                  |
| STATE    | COUNT | 42401             | 11           | WASHINGTON    | 1                  |
| POLUTCOD | COUNT | 42401             | 11           |               | 68                 |
| STATE    | COUNT | 42401             | 13           | ARIZONA       | 2                  |
| STATE    | COUNT | 42401             | 13           | CALIFORNIA    | 18                 |
| STATE    | COUNT | 42401             | 13           | COLORADO      | 1                  |
| STATE    | COUNT | 42401             | 13           | CONNECTICUT   | 1                  |
| STATE    | COUNT | 42401             | 13           | DELAWARE      | 7                  |
| STATE    | COUNT | 42401             | 13           | DIST COLUMBIA | 2                  |
| STATE    | COUNT | 42401             | 13           | FLORIDA       | 1                  |
| STATE    | COUNT | 42401             | 13           | ILLINOIS      | 1                  |
| STATE    | COUNT | 42401             | 13           | INDIANA       | 8                  |

TABLE II

|          |       | POLLUTANT<br>CODE | METH<br>CODE |                | NUMBER OF<br>SITES |
|----------|-------|-------------------|--------------|----------------|--------------------|
| STATE    | COUNT | 42401             | 13           | MARYLAND       | 12                 |
| STATE    | COUNT | 42401             | 13           | MINNESOTA      | 2                  |
| STATE    | COUNT | 42401             | 13           | MISSOURI       | 2                  |
| STATE    | COUNT | 42401             | 13           | NEW YORK       | 1                  |
| STATE    | COUNT | 42401             | 13           | OHIO           | 7                  |
| STATE    | COUNT | 42401             | 13           | OREGON         | 2                  |
| STATE    | COUNT | 42401             | 13           | PENNSYLVANIA   | 2                  |
| STATE    | COUNT | 42401             | 13           | VIRGINIA       | 2                  |
| STATE    | COUNT | 42401             | 13           | WASHINGTON     | 9                  |
| POLUTCOD | COUNT | 42401             | 13           |                | 80                 |
| STATE    | COUNT | 42401             | 14           | ALABAMA        | 2                  |
| STATE    | COUNT | 42401             | 14           | ARIZONA        | 8                  |
| STATE    | COUNT | 42401             | 14           | DIST COLUMBIA  | 2                  |
| STATE    | COUNT | 42401             | 14           | FLORIDA        | 2                  |
| STATE    | COUNT | 42401             | 14           | GEORGIA        | 2                  |
| STATE    | COUNT | 42401             | 14           | INDIANA        | 4                  |
| STATE    | COUNT | 42401             | 14           | KANSAS         | 3                  |
| STATE    | COUNT | 42401             | 14           | KENTUCKY       | 6                  |
| STATE    | COUNT | 42401             | 14           | MASSACHUSETTS  | 2                  |
| STATE    | COUNT | 42401             | 14           | MICHIGAN       | 22                 |
| STATE    | COUNT | 42401             | 14           | MINNESOTA      | 4                  |
| STATE    | COUNT | 42401             | 14           | MISSOURI       | 1                  |
| STATE    | COUNT | 42401             | 14           | NEW YORK       | 12                 |
| STATE    | COUNT | 42401             | 14           | NORTH CAROLINA | 1                  |



TABLE II

|          |       | POLLUTANT<br>CODE | METH<br>CODE |               | NUMBER OF<br>SITES |
|----------|-------|-------------------|--------------|---------------|--------------------|
| STATE    | COUNT | 42401             | 14           | OHIO          | 1                  |
| STATE    | COUNT | 42401             | 14           | PENNSYLVANIA  | 1                  |
| STATE    | COUNT | 42401             | 14           | TENNESSEE     | 1                  |
| STATE    | COUNT | 42401             | 14           | VIRGINIA      | 2                  |
| POLUTCOD | COUNT | 42401             | 14           |               | 76                 |
| STATE    | COUNT | 42401             | 15           | TENNESSEE     | 1                  |
| POLUTCOD | COUNT | 42401             | 15           |               | 1                  |
| STATE    | COUNT | 42401             | 16           | MARYLAND      | 11                 |
| STATE    | COUNT | 42401             | 16           | VIRGINIA      | 1                  |
| POLUTCOD | COUNT | 42401             | 16           |               | 12                 |
| STATE    | COUNT | 42401             | 31           | NEW YORK      | 38                 |
| POLUTCOD | COUNT | 42401             | 31           |               | 38                 |
| STATE    | COUNT | 42401             | 33           | MISSOURI      | 3                  |
| POLUTCOD | COUNT | 42401             | 33           |               | 3                  |
| STATE    | COUNT | 42401             | 91           | ALABAMA       | 13                 |
| STATE    | COUNT | 42401             | 91           | ALASKA        | 1                  |
| STATE    | COUNT | 42401             | 91           | ARIZONA       | 7                  |
| STATE    | COUNT | 42401             | 91           | ARKANSAS      | 2                  |
| STATE    | COUNT | 42401             | 91           | CALIFORNIA    | 16                 |
| STATE    | COUNT | 42401             | 91           | COLORADO      | 2                  |
| STATE    | COUNT | 42401             | 91           | CONNECTICUT   | 4                  |
| STATE    | COUNT | 42401             | 91           | DELAWARE      | 3                  |
| STATE    | COUNT | 42401             | 91           | DIST COLUMBIA | 2                  |
| STATE    | COUNT | 42401             | 91           | FLORIDA       | 34                 |
| STATE    | COUNT | 42401             | 91           | GEORGIA       | 13                 |

TABLE II

|       |       | POLLUTANT<br>CODE | METH<br>CODE |                | NUMBER OF<br>SITES |
|-------|-------|-------------------|--------------|----------------|--------------------|
| STATE | COUNT | 42401             | 91           | HAWAII         | 12                 |
| STATE | COUNT | 42401             | 91           | ILLINOIS       | 38                 |
| STATE | COUNT | 42401             | 91           | INDIANA        | 66                 |
| STATE | COUNT | 42401             | 91           | IOWA           | 2                  |
| STATE | COUNT | 42401             | 91           | KANSAS         | 30                 |
| STATE | COUNT | 42401             | 91           | KENTUCKY       | 98                 |
| STATE | COUNT | 42401             | 91           | LOUISIANA      | 17                 |
| STATE | COUNT | 42401             | 91           | MAINE          | 6                  |
| STATE | COUNT | 42401             | 91           | MARYLAND       | 49                 |
| STATE | COUNT | 42401             | 91           | MASSACHUSETTS  | 53                 |
| STATE | COUNT | 42401             | 91           | MICHIGAN       | 24                 |
| STATE | COUNT | 42401             | 91           | MINNESOTA      | 18                 |
| STATE | COUNT | 42401             | 91           | MISSISSIPPI    | 2                  |
| STATE | COUNT | 42401             | 91           | MISSOURI       | 4                  |
| STATE | COUNT | 42401             | 91           | MONTANA        | 1                  |
| STATE | COUNT | 42401             | 91           | NEBRASKA       | 4                  |
| STATE | COUNT | 42401             | 91           | NEVADA         | 3                  |
| STATE | COUNT | 42401             | 91           | NEW HAMPSHIRE  | 4                  |
| STATE | COUNT | 42401             | 91           | NEW JERSEY     | 8                  |
| STATE | COUNT | 42401             | 91           | NEW MEXICO     | 8                  |
| STATE | COUNT | 42401             | 91           | NEW YORK       | 34                 |
| STATE | COUNT | 42401             | 91           | NORTH CAROLINA | 156                |
| STATE | COUNT | 42401             | 91           | OHIO           | 67                 |
| STATE | COUNT | 42401             | 91           | OKLAHOMA       | 27                 |

TABLE II

|          |       | POLLUTANT<br>CODE | METH<br>CODE |                | NUMBER OF<br>SITES |
|----------|-------|-------------------|--------------|----------------|--------------------|
| STATE    | COUNT | 42401             | 91           | OREGON         | 1                  |
| STATE    | COUNT | 42401             | 91           | PENNSYLVANIA   | 14                 |
| STATE    | COUNT | 42401             | 91           | PUERTO RICO    | 4                  |
| STATE    | COUNT | 42401             | 91           | RHODE ISLAND   | 18                 |
| STATE    | COUNT | 42401             | 91           | SOUTH CAROLINA | 38                 |
| STATE    | COUNT | 42401             | 91           | SOUTH DAKOTA   | 1                  |
| STATE    | COUNT | 42401             | 91           | TENNESSEE      | 37                 |
| STATE    | COUNT | 42401             | 91           | TEXAS          | 13                 |
| STATE    | COUNT | 42401             | 91           | UTAH           | 1                  |
| STATE    | COUNT | 42401             | 91           | VIRGINIA       | 49                 |
| STATE    | COUNT | 42401             | 91           | WASHINGTON     | 4                  |
| STATE    | COUNT | 42401             | 91           | WEST VIRGINIA  | 15                 |
| STATE    | COUNT | 42401             | 91           | WISCONSIN      | 3                  |
| STATE    | COUNT | 42401             | 91           | WYOMING        | 2                  |
| STATE    | COUNT | 42401             | 91           | GUAM           | 9                  |
| STATE    | COUNT | 42401             | 91           | VIRGIN ISLANDS | 3                  |
| POLUTCOD | COUNT | 42401             | 91           |                | 1040               |
| STATE    | COUNT | 42401             | 92           | FLORIDA        | 1                  |
| STATE    | COUNT | 42401             | 92           | MASSACHUSETTS  | 44                 |
| POLUTCOD | COUNT | 42401             | 92           |                | 45                 |
| STATE    | COUNT | 42401             | 93           | INDIANA        | 2                  |
| POLUTCOD | COUNT | 42401             | 93           |                | 2                  |
| STATE    | COUNT | 42602             | 11           | ALABAMA        | 2                  |
| STATE    | COUNT | 42602             | 11           | ARIZONA        | 3                  |
| STATE    | COUNT | 42602             | 11           | CALIFORNIA     | 50                 |

TABLE II

|          |       | POLLUTANT<br>CODE | METH<br>CODE |                | NUMBER OF<br>SITES |
|----------|-------|-------------------|--------------|----------------|--------------------|
| STATE    | COUNT | 42602             | 11           | CONNECTICUT    | 1                  |
| STATE    | COUNT | 42602             | 11           | DIST COLUMBIA  | 1                  |
| STATE    | COUNT | 42602             | 11           | FLORIDA        | 4                  |
| STATE    | COUNT | 42602             | 11           | GEORGIA        | 1                  |
| STATE    | COUNT | 42602             | 11           | KENTUCKY       | 8                  |
| STATE    | COUNT | 42602             | 11           | MAINE          | 1                  |
| STATE    | COUNT | 42602             | 11           | MARYLAND       | 6                  |
| STATE    | COUNT | 42602             | 11           | MASSACHUSETTS  | 1                  |
| STATE    | COUNT | 42602             | 11           | MINNESOTA      | 1                  |
| STATE    | COUNT | 42602             | 11           | MISSOURI       | 8                  |
| STATE    | COUNT | 42602             | 11           | NEVADA         | 1                  |
| STATE    | COUNT | 42602             | 11           | NEW YORK       | 13                 |
| STATE    | COUNT | 42602             | 11           | NORTH CAROLINA | 1                  |
| STATE    | COUNT | 42602             | 11           | OHIO           | 2                  |
| STATE    | COUNT | 42602             | 11           | OKLAHOMA       | 1                  |
| STATE    | COUNT | 42602             | 11           | OREGON         | 1                  |
| STATE    | COUNT | 42602             | 11           | PENNSYLVANIA   | 1                  |
| STATE    | COUNT | 42602             | 11           | TENNESSEE      | 1                  |
| STATE    | COUNT | 42602             | 11           | VIRGINIA       | 2                  |
| POLUTCOD | COUNT | 42602             | 11           |                | 110                |
| STATE    | COUNT | 42602             | 12           | COLORADO       | 1                  |
| STATE    | COUNT | 42602             | 12           | DIST COLUMBIA  | 1                  |
| STATE    | COUNT | 42602             | 12           | ILLINOIS       | 1                  |
| STATE    | COUNT | 42602             | 12           | MISSOURI       | 1                  |

TABLE II

|          |       | POLLUTANT<br>CODE | METH<br>CODE |               | NUMBER OF<br>SITES |
|----------|-------|-------------------|--------------|---------------|--------------------|
| STATE    | COUNT | 42602             | 12           | NEW JERSEY    | 5                  |
| STATE    | COUNT | 42602             | 12           | OHIO          | 1                  |
| STATE    | COUNT | 42602             | 12           | PENNSYLVANIA  | 1                  |
| STATE    | COUNT | 42602             | 12           | RHODE ISLAND  | 2                  |
| STATE    | COUNT | 42602             | 12           | VIRGINIA      | 2                  |
| POLUTCOD | COUNT | 42602             | 12           |               | 15                 |
| STATE    | COUNT | 42602             | 13           | KANSAS        | 2                  |
| STATE    | COUNT | 42602             | 13           | MINNESOTA     | 1                  |
| STATE    | COUNT | 42602             | 13           | NEVADA        | 1                  |
| STATE    | COUNT | 42602             | 13           | TENNESSEE     | 1                  |
| POLUTCOD | COUNT | 42602             | 13           |               | 5                  |
| STATE    | COUNT | 42602             | 14           | ARIZONA       | 1                  |
| STATE    | COUNT | 42602             | 14           | COLORADO      | 1                  |
| STATE    | COUNT | 42602             | 14           | CONNECTICUT   | 1                  |
| STATE    | COUNT | 42602             | 14           | DIST COLUMBIA | 2                  |
| STATE    | COUNT | 42602             | 14           | ILLINOIS      | 2                  |
| STATE    | COUNT | 42602             | 14           | INDIANA       | 1                  |
| STATE    | COUNT | 42602             | 14           | IOWA          | 1                  |
| STATE    | COUNT | 42602             | 14           | KENTUCKY      | 3                  |
| STATE    | COUNT | 42602             | 14           | MARYLAND      | 1                  |
| STATE    | COUNT | 42602             | 14           | MASSACHUSETTS | 1                  |
| STATE    | COUNT | 42602             | 14           | MINNESOTA     | 1                  |
| STATE    | COUNT | 42602             | 14           | MISSOURI      | 2                  |
| STATE    | COUNT | 42602             | 14           | NEBRASKA      | 1                  |
| STATE    | COUNT | 42602             | 14           | NEW MEXICO    | 1                  |

TABLE II

|          |       | POLLUTANT<br>CODE | METH<br>CODE |               | NUMBER OF<br>SITES |
|----------|-------|-------------------|--------------|---------------|--------------------|
| STATE    | COUNT | 42602             | 14           | NEW YORK      | 2                  |
| STATE    | COUNT | 42602             | 14           | OHIO          | 5                  |
| STATE    | COUNT | 42602             | 14           | PENNSYLVANIA  | 5                  |
| STATE    | COUNT | 42602             | 14           | TEXAS         | 2                  |
| STATE    | COUNT | 42602             | 14           | UTAH          | 1                  |
| STATE    | COUNT | 42602             | 14           | VIRGINIA      | 2                  |
| POLUTCOD | COUNT | 42602             | 14           |               | 36                 |
| STATE    | COUNT | 42602             | 71           | MINNESOTA     | 11                 |
| POLUTCOD | COUNT | 42602             | 71           |               | 11                 |
| STATE    | COUNT | 42602             | 72           | INDIANA       | 11                 |
| POLUTCOD | COUNT | 42602             | 72           |               | 11                 |
| STATE    | COUNT | 42602             | 91           | ALABAMA       | 13                 |
| STATE    | COUNT | 42602             | 91           | ALASKA        | 1                  |
| STATE    | COUNT | 42602             | 91           | ARIZONA       | 5                  |
| STATE    | COUNT | 42602             | 91           | ARKANSAS      | 2                  |
| STATE    | COUNT | 42602             | 91           | CALIFORNIA    | 16                 |
| STATE    | COUNT | 42602             | 91           | COLORADO      | 2                  |
| STATE    | COUNT | 42602             | 91           | CONNECTICUT   | 4                  |
| STATE    | COUNT | 42602             | 91           | DELAWARE      | 3                  |
| STATE    | COUNT | 42602             | 91           | DIST COLUMBIA | 2                  |
| STATE    | COUNT | 42602             | 91           | FLORIDA       | 22                 |
| STATE    | COUNT | 42602             | 91           | GEORGIA       | 13                 |
| STATE    | COUNT | 42602             | 91           | HAWAII        | 11                 |
| STATE    | COUNT | 42602             | 91           | ILLINOIS      | 4                  |

TABLE II

|       |       | POLLUTANT<br>CODE | METH<br>CODE |                | NUMBER OF<br>SITES |
|-------|-------|-------------------|--------------|----------------|--------------------|
| STATE | COUNT | 42602             | 91           | INDIANA        | 41                 |
| STATE | COUNT | 42602             | 91           | IOWA           | 2                  |
| STATE | COUNT | 42602             | 91           | KANSAS         | 29                 |
| STATE | COUNT | 42602             | 91           | KENTUCKY       | 87                 |
| STATE | COUNT | 42602             | 91           | LOUISIANA      | 4                  |
| STATE | COUNT | 42602             | 91           | MAINE          | 1                  |
| STATE | COUNT | 42602             | 91           | MARYLAND       | 49                 |
| STATE | COUNT | 42602             | 91           | MASSACHUSETTS  | 54                 |
| STATE | COUNT | 42602             | 91           | MICHIGAN       | 6                  |
| STATE | COUNT | 42602             | 91           | MINNESOTA      | 3                  |
| STATE | COUNT | 42602             | 91           | MISSISSIPPI    | 2                  |
| STATE | COUNT | 42602             | 91           | MISSOURI       | 4                  |
| STATE | COUNT | 42602             | 91           | MONTANA        | 1                  |
| STATE | COUNT | 42602             | 91           | NEBRASKA       | 3                  |
| STATE | COUNT | 42602             | 91           | NEW HAMPSHIRE  | 4                  |
| STATE | COUNT | 42602             | 91           | NEW JERSEY     | 8                  |
| STATE | COUNT | 42602             | 91           | NEW MEXICO     | 7                  |
| STATE | COUNT | 42602             | 91           | NEW YORK       | 9                  |
| STATE | COUNT | 42602             | 91           | NORTH CAROLINA | 155                |
| STATE | COUNT | 42602             | 91           | OHIO           | 67                 |
| STATE | COUNT | 42602             | 91           | OKLAHOMA       | 19                 |
| STATE | COUNT | 42602             | 91           | OREGON         | 1                  |
| STATE | COUNT | 42602             | 91           | PENNSYLVANIA   | 14                 |
| STATE | COUNT | 42602             | 91           | PUERTO RICO    | 4                  |
| STATE | COUNT | 42602             | 91           | RHODE ISLAND   | 18                 |

TABLE II

|          |       | POLLUTANT<br>CODE | METH<br>CODE |                | NUMBER OF<br>SITES |
|----------|-------|-------------------|--------------|----------------|--------------------|
| STATE    | COUNT | 42602             | 91           | SOUTH CAROLINA | 38                 |
| STATE    | COUNT | 42602             | 91           | SOUTH DAKOTA   | 1                  |
| STATE    | COUNT | 42602             | 91           | TENNESSEE      | 41                 |
| STATE    | COUNT | 42602             | 91           | TEXAS          | 13                 |
| STATE    | COUNT | 42602             | 91           | UTAH           | 1                  |
| STATE    | COUNT | 42602             | 91           | VIRGINIA       | 7                  |
| STATE    | COUNT | 42602             | 91           | WASHINGTON     | 10                 |
| STATE    | COUNT | 42602             | 91           | WEST VIRGINIA  | 1                  |
| STATE    | COUNT | 42602             | 91           | WISCONSIN      | 3                  |
| STATE    | COUNT | 42602             | 91           | WYOMING        | 2                  |
| STATE    | COUNT | 42602             | 91           | GUAM           | 9                  |
| POLUTCOD | COUNT | 42602             | 91           |                | 816                |
| STATE    | COUNT | 42602             | 94           | KENTUCKY       | 28                 |
| POLUTCOD | COUNT | 42602             | 94           |                | 28                 |
| STATE    | COUNT | 44101             | 11           | ARIZONA        | 1                  |
| STATE    | COUNT | 44101             | 11           | COLORADO       | 1                  |
| STATE    | COUNT | 44101             | 11           | DIST COLUMBIA  | 1                  |
| STATE    | COUNT | 44101             | 11           | FLORIDA        | 2                  |
| STATE    | COUNT | 44101             | 11           | ILLINOIS       | 1                  |
| STATE    | COUNT | 44101             | 11           | INDIANA        | 2                  |
| STATE    | COUNT | 44101             | 11           | IOWA           | 1                  |
| STATE    | COUNT | 44101             | 11           | KANSAS         | 1                  |
| STATE    | COUNT | 44101             | 11           | MISSOURI       | 1                  |
| STATE    | COUNT | 44101             | 11           | NEW JERSEY     | 4                  |



TABLE II

|          |       | POLLUTANT<br>CODE | MFTH<br>CODE |                | NUMBER OF<br>SITES |
|----------|-------|-------------------|--------------|----------------|--------------------|
| STATE    | COUNT | 44101             | 11           | NEW YORK       | 12                 |
| STATE    | COUNT | 44101             | 11           | NORTH CAROLINA | 2                  |
| STATE    | COUNT | 44101             | 11           | OHIO           | 8                  |
| STATE    | COUNT | 44101             | 11           | PENNSYLVANIA   | 1                  |
| STATE    | COUNT | 44101             | 11           | TENNESSEE      | 4                  |
| STATE    | COUNT | 44101             | 11           | TEXAS          | 1                  |
| STATE    | COUNT | 44101             | 11           | VIRGINIA       | 4                  |
| STATE    | COUNT | 44101             | 11           | WASHINGTON     | 1                  |
| STATE    | COUNT | 44101             | 11           | WISCONSIN      | 1                  |
| POLUTCOD | COUNT | 44101             | 11           |                | 49                 |
| STATE    | COUNT | 44101             | 13           | KANSAS         | 3                  |
| STATE    | COUNT | 44101             | 13           | NEVADA         | 1                  |
| STATE    | COUNT | 44101             | 13           | NEW MEXICO     | 1                  |
| STATE    | COUNT | 44101             | 13           | WASHINGTON     | 5                  |
| POLUTCOD | COUNT | 44101             | 13           |                | 10                 |
| STATE    | COUNT | 44101             | 14           | ALABAMA        | 1                  |
| STATE    | COUNT | 44101             | 14           | ARIZONA        | 1                  |
| STATE    | COUNT | 44101             | 14           | CALIFORNIA     | 56                 |
| STATE    | COUNT | 44101             | 14           | COLORADO       | 1                  |
| STATE    | COUNT | 44101             | 14           | KENTUCKY       | 1                  |
| STATE    | COUNT | 44101             | 14           | MINNESOTA      | 1                  |
| STATE    | COUNT | 44101             | 14           | MISSOURI       | 8                  |
| STATE    | COUNT | 44101             | 14           | OHIO           | 2                  |
| STATE    | COUNT | 44101             | 14           | OREGON         | 1                  |
| STATE    | COUNT | 44101             | 14           | PENNSYLVANIA   | 1                  |

TABLE II

|          |       | POLLUTANT<br>CODE | METH<br>CODE |                | NUMBER OF<br>SITES |
|----------|-------|-------------------|--------------|----------------|--------------------|
| STATE    | COUNT | 44101             | 14           | TENNESSEE      | 1                  |
| STATE    | COUNT | 44101             | 14           | VIRGINIA       | 1                  |
| POLUTCOD | COUNT | 44101             | 14           |                | 75                 |
| STATE    | COUNT | 44101             | 15           | CALIFORNIA     | 12                 |
| STATE    | COUNT | 44101             | 15           | VIRGINIA       | 1                  |
| POLUTCOD | COUNT | 44101             | 15           |                | 13                 |
| STATE    | COUNT | 44101             | 51           | OKLAHOMA       | 5                  |
| POLUTCOD | COUNT | 44101             | 51           |                | 5                  |
| STATE    | COUNT | 44101             | 81           | MINNESOTA      | 7                  |
| STATE    | COUNT | 44101             | 81           | NORTH CAROLINA | 7                  |
| STATE    | COUNT | 44101             | 81           | OKLAHOMA       | 13                 |
| STATE    | COUNT | 44101             | 81           | SOUTH CAROLINA | 37                 |
| POLUTCOD | COUNT | 44101             | 81           |                | 64                 |
| STATE    | COUNT | 44101             | 82           | KANSAS         | 3                  |
| STATE    | COUNT | 44101             | 82           | KENTUCKY       | 76                 |
| STATE    | COUNT | 44101             | 82           | OHIO           | 6                  |
| POLUTCOD | COUNT | 44101             | 82           |                | 85                 |
| STATE    | COUNT | 44201             | 11           | ALABAMA        | 2                  |
| STATE    | COUNT | 44201             | 11           | COLORADO       | 1                  |
| STATE    | COUNT | 44201             | 11           | DIST COLUMBIA  | 1                  |
| STATE    | COUNT | 44201             | 11           | FLORIDA        | 4                  |
| STATE    | COUNT | 44201             | 11           | GEORGIA        | 1                  |
| STATE    | COUNT | 44201             | 11           | HAWAII         | 1                  |
| STATE    | COUNT | 44201             | 11           | ILLINOIS       | 1                  |

TABLE II

|          |       | POLLUTANT<br>CODE | METH<br>CODE |                | NUMBER OF<br>SITES |
|----------|-------|-------------------|--------------|----------------|--------------------|
| STATE    | COUNT | 44201             | 11           | INDIANA        | 1                  |
| STATE    | COUNT | 44201             | 11           | KANSAS         | 2                  |
| STATE    | COUNT | 44201             | 11           | KENTUCKY       | 2                  |
| STATE    | COUNT | 44201             | 11           | LOUISIANA      | 3                  |
| STATE    | COUNT | 44201             | 11           | MARYLAND       | 6                  |
| STATE    | COUNT | 44201             | 11           | MICHIGAN       | 1                  |
| STATE    | COUNT | 44201             | 11           | MISSOURI       | 1                  |
| STATE    | COUNT | 44201             | 11           | NEBRASKA       | 3                  |
| STATE    | COUNT | 44201             | 11           | NEW YORK       | 12                 |
| STATE    | COUNT | 44201             | 11           | NORTH CAROLINA | 2                  |
| STATE    | COUNT | 44201             | 11           | OHIO           | 7                  |
| STATE    | COUNT | 44201             | 11           | OKLAHOMA       | 2                  |
| STATE    | COUNT | 44201             | 11           | PENNSYLVANIA   | 1                  |
| STATE    | COUNT | 44201             | 11           | SOUTH CAROLINA | 1                  |
| STATE    | COUNT | 44201             | 11           | TENNESSEE      | 1                  |
| STATE    | COUNT | 44201             | 11           | TEXAS          | 1                  |
| STATE    | COUNT | 44201             | 11           | VIRGINIA       | 5                  |
| POLUTCOD | COUNT | 44201             | 11           |                | 62                 |
| STATE    | COUNT | 44201             | 13           | OREGON         | 1                  |
| POLUTCOD | COUNT | 44201             | 13           |                | 1                  |



APPENDIX A.\*  
FEDERAL REFERENCE METHODS  
UNAPPROVED METHODS  
UNACCEPTABLE METHODS

APPENDIX B.  
RATIONALE FOR RANKING THE METHODS  
AS UNACCEPTABLE

\*Extracted from Guideline Document OAQPS 1.2-017, A Description of the Analytical Techniques and Associated SAROAD Method Codes Used in Storing Data in the National Aerometric Data Bank.

## Federal Reference Methods

- 11101 91 SUSPENDED PARTICULATE - HI-VOL - GRAVIMETRIC  
Air is drawn at 40 to 60 ft<sup>3</sup>/min through a glass fiber filter, by means of a blower, and the suspended particles having a diameter between 100 and 0.1  $\mu$ m are collected. The suspended particulate is calculated by dividing the net weight of the particulate by the total air volume sampled and reported in density units as  $\mu$ g/m<sup>3</sup>. Heavy loading of suspended particulate, oily particulates, or high humidity can cause reduced air flow through the filter. Therefore, flow rates should be measured before and after the sampling period.
1. "Rules and Regulations," Federal Register, Vol 36, No. 228, U.S. Government Printing Office, Washington, D.C., (Nov. 25, 1971), p 22388.
  2. Intersociety Committee, "Methods of Air Sampling and Analysis," American Public Health Association, Washington, D.C., 1972, p 356.
  3. "Air Quality Data for 1967, "APTD-0741, APTIC, Research Triangle Park, North Carolina, 1971, p. 17.

42101 11 CARBON MONOXIDE - INSTRUMENTAL - NON-DISPERSIVE  
INFRA-RED

The non-dispersive infrared instrument has a sample cell, a reference cell, and a detector. The detector is divided by a flexing diaphragm into two equal cells filled with equal concentrations of CO. The reference cell is filled with a CO-free air. When infrared radiation is passed into the sample cell some of the radiation is absorbed by CO in this cell in proportion to the concentration

of CO and the rest is transmitted to the detector. In the detector, the radiation causes the CO to expand flexing the diaphragm in proportion to the transmitted infrared radiation. Since the reference cell is filled with zero CO air, the reference cell side of the detector exerts a constant pressure on the diaphragm. When the CO is introduced into the sample cell, unequal amounts of residual radiation reach the two compartments of the detector causing an unequal expansion of the detector gas. This unequal expansion causes the diaphragm to deflect, creating a change of electrical capacitance in an external circuit, and ultimately an amplified signal which is suitable for input to a servo-type recorder. The detector is calibrated by placing CO standards in the sample cell and recording the electrical signals.

1. "Rules and Regulations," Federal Register, Vol. 36, No. 228, (Nov. 25, 1971), p. 22391.

42401 91 SULFUR DIOXIDE-GAS BUBBLER WEST-GAEKE-SULFAMIC ACID

Sulfur dioxide is collected in a tetrachloromercurate solution, forming a stable dichlorosulfitomercurate complex. When acid-bleached pararosaniline is added to the collected SO<sub>2</sub> together with formaldehyde, the amino groups ( $-NH_3^+$ ) form a red violet compound called pararosaniline methylsulfonic acid which is measured spectrophotometrically. The method is described in the Federal Register. (The NASN procedure, however, uses 1.725 g/l sulfamic acid rather than 6 g/l and does not use EDTA). The sulfamic acid eliminates interference from oxides of nitrogen.

1. "Rules and Regulations," Federal Register, Vol. 36, No. 228, U. S. Government Printing Office, Washington, D. C., (Nov. 25, 1971), p. 22385.

2. West, P. W. and G. C. Gaeke, (1956), "Fixation of Sulfur Dioxide as Disulfito-Mercurate (II) and Subsequent Colorimetric Estimation," *Anal. Chem.* 28, 1819.

3. Intersociety Committee, "Methods of Air Sampling and Analysis," American Public Health Association, Washington, D. C., 1972, p. 447.

4. "Air Quality Data for 1967, "APTD 0741, APTIC, Research Triangle Park, N. C., 1971, p. 20.

44201 11 OZONE - INSTRUMENTAL-CHEMILUMINESCENCE

Ambient air to be measured and ethylene are delivered simultaneously to a mixing cell where ozone reacts with the ethylene to emit light which is measured by a photomultiplier tube. If the air and ethylene flow rates are constant, the resulting photomultiplier signal can be related to the input ozone concentration. Analyzers are calibrated with known ozone concentration standards.

1. "Rules and Regulations, "Federal Register, Vol. 36, No. 228, U. S. Government Printing Office, Washington, D.C., (Nov. 25, 1971), p. 22392.

2. " A Chemiluminescence Detector for Ozone Measurement," Bureau of Mines Report of Investigation RI-7650, United States Department of the Interior, U. S. Government Printing Office, Washington, D. C., 1972.



## Unapproved Methods

- 42101 21 CARBON MONOXIDE - INSTRUMENTAL - FLAME IONIZATION  
Ambient air is passed through two gas chromatographic columns in series, the first retains most pollutants but passes CO and CH<sub>4</sub>, and the second passes only CO. The CO then flows through a Ni catalyst where it is converted to CH<sub>4</sub> which is measured by a flame ionization detector. The resulting measured current is related to the CO concentration of the input ambient air by dynamic calibration with known CO concentration standards.
1. Rotterdam, Warsaw, and Bucharest, "The Status of Instrumentation in Air Pollution Control," Environmental Control Seminar Proceedings, U. S. Department of Commerce, (May 5-June 4, 1971), p 217.
- 42401 11 SULFUR DIOXIDE-INSTRUMENTAL-WEST GAEKE-COLORIMETRIC  
A continuous analyzing system is set up such that the ambient air flows through a glass beaded absorption column concurrently with 0.02M sodium tetrachloro-mercurate. Dichlorosulfitomercurate ion is formed reacted with acid-bleached pararosaniline and formaldehyde to produce a red-purple pararosaniline methylsulfonic acid which is quantitatively measured colorimetrically. The zero (100%T) baseline is established with pure reagents for 1 hr and the instrument is then dynamically calibrated with known SO<sub>2</sub> concentration standards. Air flow rate and reagent flow rate must be calibrated and maintained accurately.
- 42401 13 SULFUR DIOXIDE-INSTRUMENTAL-CONDUCTIMETRIC  
Sulfur dioxide is absorbed in acidic H<sub>2</sub>O<sub>2</sub> which oxidizes the SO<sub>2</sub> to H<sub>2</sub>SO<sub>4</sub>. The resulting change in conductivity can be measured, compensated for

temperature, and related to the input SO<sub>2</sub> concentration by dynamic calibration with known SO<sub>2</sub> concentration standards. However, specificity is poor because any materials that alter the conductivity of the reagent are potential interfering agents.

1. Beckman Air Quality Analyzer Operating and Service Manual, Scientific and Process Inst. Div., Fullerton, California, 16TW352, (Aug. 1966).
2. Thomas, M.D., (1932), "Automatic Apparatus for the Determination of Small Concentrations of Sulfur Dioxide in Air," Anal. Chem. 5, 253.
3. M. B. Jacobs, "The Chemical Analysis of Air Pollutants," Chemical Analysis, Vol 10, Interscience Publishers, Inc., New York, N.Y., (1960), p 394.
4. Water, Atmospheric Analysis, (1971), "Annual Book of ASTM Standards," American Society for Testing and Materials, Philadelphia, Pa., Part 23, p 272.

42401 14 SULFUR DIOXIDE-INSTRUMENTAL-COULOMETRIC

The air to be measured is passed through a cell containing a neutral buffered iodide or bromide electrolyte where an electrical current or potential maintains a constant concentration of free I<sub>2</sub> or Br<sub>2</sub>. When SO<sub>2</sub> in the input air reacts with the I<sub>2</sub> or Br<sub>2</sub>, the change in electrical current or potential necessary to restore or maintain the original concentration of I<sub>2</sub> or Br<sub>2</sub> (coulometric titration) is a quantitative measure of the SO<sub>2</sub> input. If the input flow rate is constant, the SO<sub>2</sub> concentration can be related to the electrical signal by dynamic calibration with known SO<sub>2</sub> concentration standards.

42401 16 SULFUR DIOXIDE-INSTRUMENTAL-GC FLAME PHOTOMETRIC

Chromatographic columns are used to separate SO<sub>2</sub>, H<sub>2</sub>S, CS<sub>2</sub>, and CH<sub>3</sub>SH. Effluent from the columns is

burned in a hydrogen-rich flame. A photomultiplier tube is used to detect the 395 nm emission band characteristic of sulfur. The electrical signal is related to the input concentration by dynamic calibration with known  $\text{SO}_2$ ,  $\text{H}_2\text{S}$ ,  $\text{CS}_2$ , or  $\text{CH}_3\text{SH}$  concentration standards.

1. H. H. Willard, L. L. Merritt, and J. A. Dean, "Instrumental Methods of Analysis," D. Van Nostrand Company, Inc., 4th Edition, 1965, p 309.

42401 33 SULFUR DIOXIDE-DAVIS INSTRUMENT-SEQUENTIAL-CONDUCTIMETRIC

Water is deionized by passage through an amberlite resin column; then its conductivity is measured. Ambient air, having first passed through a scrubber of amberlite resin and soda-lime to remove  $\text{CO}_2$ , is next passed through the deionized water where the  $\text{SO}_2$  is absorbed. The increased conductivity of the water is a measure of the  $\text{SO}_2$  concentration of the air.

1. Thomas, M.D. and J. N. Abersold, (1929), "Automatic Apparatus for the Determination of Small Concentrations of Sulfur Dioxide in Air," Anal. Chem. 1, 14.

42602 11 NITROGEN DIOXIDE-INSTRUMENTAL-COLORIMETRIC

The Lyshkow modification of the Griess-Saltzman reagent is used in various continuous  $\text{NO}_2$  analyzers. Users should consult the manufacturer's literature for details of reagent preparation.

1. "Rules and Regulations" Federal Register, Vol 38, No. 110, USGPO Wash., D.C., (June 8, 1973), p 15176.

2. Lyshkow, N. A., (1965), "A Rapid Sensitive Colorimetric Reagent for Nitrogen Dioxide in Air" J. Air Poll. Control Assoc. 15 (No. 10) 481.

42602 12 NITROGEN DIOXIDE-INSTRUMENTAL-COLORIMETRIC

The original Griess-Saltzman reagent is used in various continuous  $\text{NO}_2$  analyzers. Users should

consult the manufacturer's literature for details of reagent preparation.

1. "Rules and Regulation," Federal Register, Vol 38, No. 110, USGPO, Wash., D.C., (June 8, 1973) p 15176.
2. Saltzman, B. E., (1954) "Colorimetric Micro Determination of Nitrogen Dioxide in the Atmosphere" Anal. Chem. 26, 1949.

42602 13 NITROGEN DIOXIDE-INSTRUMENTAL-COULOMETRIC

Air to be measured is passed through a cell containing neutral buffered iodide-iodine solution causing an established equilibrium between iodine and iodide to be unbalanced. The current required to re-establish the equilibrium (coulometric titration) is a measure of the input  $\text{NO}_2$  concentration. If the input flow rate is constant, the  $\text{NO}_2$  concentration can be related to the electrical signal by dynamic calibration with known  $\text{NO}_2$  concentration standards.

42602 14 NITROGEN DIOXIDE-INSTRUMENTAL-CHEMILUMINESCENCE

The ambient air to be measured is drawn over a heated catalytic converter which reduces  $\text{NO}_2$  to NO. The NO is then analyzed by method 42601 14, and the original  $\text{NO}_2$  concentration is obtained by subtracting the concurrent NO concentration.

1. "Rules and Regulation," Federal Register, Vol 38, No. 110, USGPO, Wash., D.C., (June 8, 1973) p 15176.
2.  $\text{NO}/\text{NO}_x/\text{NO}_2$  Analyzer Bulletin, Bulletin 4133, Beckman Instruments, Inc., Fullerton, Calif.

42602 84 NITROGEN DIOXIDE-GAS BUBBLER-NASN SODIUM ARSENITE-ORIFICE

The method is much like method 42602 71 except for the absorber (1.0g of  $\text{NaAsO}_2$ ). Ambient air is introduced into the absorber by means of an orifice

in the bubbler. The orifice is usually not calibrated.

1. "Rules and Regulation," Federal Register, Vol 38, No. 110, USGPO, Wash., D.C., (June 8, 1973), p 15175.
2. Christie, A. A., R. G. Lidzey, and D. W. F. Radford (1970), "Field Methods for the Determination of Nitrogen Dioxide in Air." Analyst 95, 519.
3. Merryman, E. L., et.al., "Effects of NO, CO<sub>2</sub>, CH<sub>4</sub>, H<sub>2</sub>O and Sodium Arsenite on NO<sub>2</sub> Analysis," presented at the Second Conference on Natural Gas Research and Technology. Atlanta, Georgia, June 5, 1972.

42602 94 NITROGEN DIOXIDE-GAS BUBBLER-NASN-SODIUM ARSENITE-FRIT

This method is identical to method 42602 71 except that 1.0g/l of NaAsO<sub>2</sub> is added to the absorbing solution, and a fritted bubbler is used instead of an orifice bubbler.

1. Christie, A. A., R. G. Lidzey, and D. W. F. Radford, (1970), "Field Methods for the Determination of Nitrogen Dioxide in Air." Analyst 95, 519.
2. Merryman, E. L. et al., "Effects of NO, CO<sub>2</sub>, CH<sub>4</sub>, H<sub>2</sub>O and Sodium Arsenite on NO<sub>2</sub> Analysis," presented at the Second Conference on Natural Gas Research and Technology. Atlanta, Georgia, June 5, 1972.
3. "Selected Method for the Measurement of Air Pollutants," U.S. Department of Health, Education, and Welfare 999-AP-11, Robert A. Taft Sanitary Engineering Center, Cincinnati, Ohio, May 1965, p C-4.

44101 11 TOTAL OXIDANT-INSTRUMENTAL-ALKALINE KI

Identical to method 44101 14 except 1 N sodium hydroxide is used instead of the phosphate buffer in the absorbing solution.

- 44101 14 TOTAL OXIDANT-INSTRUMENTAL-COLORIMETRIC-NEUTRAL KI  
Air to be measured is contacted with neutral phosphate buffered potassium iodide. Oxidants convert the KI to  $I_2$  or  $KI_3$  which is measured spectrophotometrically at 352 nm. If the input air flowrate is constant, the color density can be related to the oxidant concentration. Analyzers are calibrated dynamically with known standard concentrations of ozone. Sulfur dioxide interference may be minimized by use of a  $CrO_3$  pre-scrubber, which also causes an NO interference.
1. Intersociety Committee, "Methods of Air Sampling and Analysis," American Public Health Association, Wash., D.C., 1972, p 356.
  2. Water, Atmospheric Analysis, (1971), "Annual Book of ASTM Standards," American Society for Testing and Materials, Philadelphia, Pa., Part 23, p 518.
  3. Wartburg, A. F., and B. E. Saltzman, (1965), "Absorption Tube for Removal of Interfering  $SO_2$  in Analysis of Atmospheric Oxidant" Anal. Chem. 37, 779.
- 44101 15 TOTAL OXIDANT-INSTRUMENTAL-COULOMETRIC-NEUTRAL KI  
Air to be measured is passed through a cell containing potassium iodide and two electrodes. Oxidants convert iodide ions to  $I_2$  which is reduced at the cathode of the cell causing a current to flow through an external circuit. If the flow rate is constant, this electrical signal can be related to the input concentration of oxidants. Analyzers are calibrated dynamically with known standard concentrations of ozone.

## Unacceptable Methods

### 42101 12 CARBON MONOXIDE - INSTRUMENTAL - COULOMETRIC

Atmospheric air is drawn through a heated  $I_2O_5$  column where  $I_2$  is liberated. The  $I_2$  is directed into an electrochemical cell where  $I_2$  is measured coulometrically.

1. Beckman Instrumentation, Bulletin 3000 4411-4, Beckman Instruments, Inc., Fullerton, California.

### 42401 15 SULFUR DIOXIDE-INSTRUMENTAL-THOMAS AUTOMETER

The Thomas Autometer is a conductimetric analyzer developed in 1929. There are later models. The method is similar to method 42401 13.

### 42401 31 SULFUR DIOXIDE-DAVIS INSTRUMENT-HYDROGEN PEROXIDE

The Davis instrument is a conductimetric instrument, and, as such, this method is much like method 42401 13.

### 42401 92 SULFUR DIOXIDE-GAS BUBBLER-WEST-GAEKE

This method is similar to method 42401 91 except that the sample absorbing reagent is 0.1M tetrachloromercurate; the starch which is used for standardization is made with mercuric iodide; and sulfamic acid is not used except when high concentrations of  $NO_2$  are expected. The sulfamic acid is added to the sample after collection.

1. "Selected Methods for the Measurement of Air Pollutants" U.S. Department of Health, Education, and Welfare 999 AP-11, Robert A. Taft Sanitary Engineering Center, Cincinnati, Ohio, May 1965, p A-1.

2. Nauman, R. V., et al., (1960), Anal Chem. 32, 1307.

3. West, P. W. and F. Ordoveza, (1962), Anal. Chem. 34, 1324.

42401 93 SULFUR DIOXIDE-GAS BUBBLER-CONDUCTIMETRIC

This manual conductimetric method uses the same principle as the instrumental conductimetric method. The absorber is a multiple-jet bubbler system and the sampling is not continuous. The details are described in the reference.

1. Intersociety Committee, "Methods of Air Sampling and Analysis," American Public Health Association, Washington, D.C., 1972, p 456.

42602 71 NITROGEN DIOXIDE-GAS BUBBLER-JACOBS-HOCHHEISER-  
50 ml TUBE + ORIFICE

Ambient air to be measured is bubbled through a sodium hydroxide solution where NO<sub>2</sub> forms a stable solution of sodium nitrite. The nitrite ion produced is reacted with phosphoric acid, sulfanilamide, and N-1 naphthylethylenediamine dihydrochloride; and measured colorimetrically at 540 nm.

42602 72 NITROGEN DIOXIDE-GAS BUBBLER-SALTZMAN (50 ml TUBE +  
ORIFICE)

The sample is absorbed in the Griess-Saltzman reagent and after 15 min the stable pink color is measured colorimetrically at 550 nm; cannot be used for sampling period over 30 minutes.

1. Intersociety Committee, "Methods of Air Sampling and Analysis," American Public Health Association, Washington, D.C., 1972, p 329.

2. Saltzman, B. E., (1954), "Colorimetric Micro-Determination of Nitrogen in the Atmosphere," Anal. Chem. 26, 1949.

44101 81 TOTAL OXIDANT-GAS BUBBLER-ALKALINE KI

Oxidants in sampled ambient air are absorbed in an alkaline KI solution in a bubbler. A stable



product is formed which can be stored with little loss for several days. Analysis is completed by addition of phosphoric acid-sulfuric acid reagent, liberating iodine, which is then determined spectrophotometrically at 352 nm.

1. Selected Methods for the Measurement of Air Pollutants U.S. DHEW 999-AP-11, RATSEC Cincinnati, Ohio, 1965, p E-1.

2. Water, Atmospheric Analysis, (1971), "Annual Book of ASTM Standards," American Society for Testing and Materials, Philadelphia, Pa., Part 23, p 391.

3. M. B. Jacobs, (1960), "The Chemical Analysis of Air Pollutants," Chemical Analysis, Vol 10, Interscience Publishers, Inc., New York, N. Y., p 219.

44101 82 TOTAL OXIDANT-GAS BUBBLER-FERROUS OXIDATION

Air to be measured is filtered through a Whatman No. 4 paper at 1 ft<sup>3</sup>/min; then bubbled through two impingers in series containing acidified ferrous ammonium sulfate absorbing solution. After sampling ammonium thiocyanate is added, and the resultant color is measured with a colorimeter and green filter.

1. M. B. Jacobs, (1960), "The Chemical Analysis of Air Pollutants," Chemical Analysis, Vol 10, Interscience Publishers, Inc., New York, N. Y., p 228.

44201 13 OZONE - INSTRUMENTAL - COULOMETRIC

This method is identical to method 44101 15.

1. Mast, G. M. and H. E. Saunders, (Oct. 1962), "Research and Development of the Instrumentation of Ozone Sensing," Instrument Soc. of Amer. Trans., 1, 375.

2. Bufalini, J. J., (1968), "Gas Phase Titration of Atmospheric Ozone," Environ. Sci. Tech. 2, 703.

3. Wartburg, A. F., and B. E. Saltzman, (1965), "Absorption Tube for Removal of Interfering SO<sub>2</sub> in Analysis of Atmospheric Oxidant" Anal. Chem. 37, 779.

42602 91 NITROGEN DIOXIDE-GAS BUBBLER-JACOBS-HOCHHEISER (100 ml TUBE + FRIT)

This method is identical to method 42602 71, except that a fritted bubbler is used instead of an orifice bubbler and the volume of the absorbing solution is doubled.

1. "Selected Methods for the Measurement of Air Pollutants," U.S. Department of Health, Education, and Welfare 999-AP-11, Robert A. Taft Sanitary Engineering Center, Cincinnati, Ohio, May 1965, p C-4.
2. Purdue, L. J., et.al., (1972), "Reinvestigation of the Jacobs-Hochheiser Procedure for Determining Nitrogen Dioxide in Ambient Air," Environ. Sci. and Tech. 6, 152.

44101 13 TOTAL OXIDANTS-INSTRUMENTAL-MAST MODEL 742-2

Identical to method 44101-15.

1. Mast, G. M. and H. E. Saunders, (Oct. 1962), "Research and Development of the Instrumentation of Ozone Sensing," Instrument Soc. of Amer. Trans., 1, 375.
2. Bufalini, J. J., (1968), "Gas Phase Titration of Atmospheric Ozone," Environ Sci Technol 2, 703.
3. Wartburg, A. F., and B. E. Saltzman, (1965), "Absorption Tube for Removal of Interfering SO<sub>2</sub> in Analysis of Atmospheric Oxidant" Anal. Chem. 37, 779.

44101 51 TOTAL OXIDANT-GAS BUBBLER-PHENOLPHTHALIN

Phenolphthalin, in the presence of CuSO<sub>4</sub>, is oxidized to phenolphthalein by ambient air oxidants. Air is passed through 10 ml of reagent at 800 ml/min for 10 min. The color is read using a colorimeter and a green filter.

1. M. B. Jacobs, (1960), "The Chemical Analysis of Air Pollutants," Chemical Analysis, Vol 10, Interscience Publishers, Inc., New York, N. Y., p 226.

## APPENDIX B

### Rationale for Ranking the Methods as Unacceptable

- CO 42101 12 COULOMETRIC  
Interferences with this method include mercaptans, hydrogen sulfide, olefins, acetylenes, and water vapor. In addition, the slow response, need for careful column preparation, and the need for well controlled temperatures and flow rates make this an unreliable procedure.
- SO<sub>2</sub> 42401 15 THOMAS AUTOMETER  
This is a conductimetric analyzer. Data collected using this analyzer should be reported as 42401-13.
- SO<sub>2</sub> 42401 31 DAVIS INSTRUMENT  
This is a conductimetric analyzer. Data collected using this analyzer should be reported as 42401-13.
- SO<sub>2</sub> 42401 92 WEST-GAEKE BUBBLER  
This method differs only slightly from 42401-91 and offers no substantial advantages. Method 42401-91 should thus be used for uniformity.
- SO<sub>2</sub> 42401 93 CONDUCTIMETRIC BUBBLER  
The method lacks specificity; Method 42401-91 should be used to obtain better measurements.
- NO<sub>2</sub> 42602-71 J-H BUBBLER (orifice)
- NO<sub>2</sub> 42602 91 J-H BUBBLER (frit)  
The objections to these methods have been detailed in 38 FR 15174 (June 8, 1973): The collection efficiency is a function of NO<sub>2</sub> concentration and the presence of NO introduces a positive interference.

NO<sub>2</sub> 42602 72 SALTZMAN

This manual method suffers from interferences from SO<sub>2</sub>, ozone, PAN, and prolonged exposure to light, and cannot be used for periods over 30 minutes.

TOTAL O<sub>x</sub> 44101 11 ALKALINE KI-INSTRUMENTAL

The alkaline KI method produces such variable results in different hands that data from one site cannot be compared with data from another.

TOTAL O<sub>x</sub> 44101 13 MAST MODEL 742-Z

This method is identical to method 44101-15. Data collected using this analyzer should be reported as 44101-15.

TOTAL O<sub>x</sub> 44101 51 PHENOLPHTHALIN

Results of this method do not agree with those obtained by other total oxidant methods.

TOTAL O<sub>x</sub> 44101 81 ALKALINE KI BUBBLER

The alkaline KI method produces such variable results in different hands that data from one site cannot be compared with data from another.

TOTAL O<sub>x</sub> 44101 82 FERROUS OXIDATION

Results of this method do not agree with those obtained by other total oxidant methods.

OZONE 44201 13 COULOMETRIC

This method is identical to method 44101-15. Data collected using this method should be reported as 44101-15.

| <b>TECHNICAL REPORT DATA</b><br><i>(Please read Instructions on the reverse before completing)</i>  |  |   |
|---|--|---|
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| 16. ABSTRACT    This report contains a designation of the acceptability of various analytical measurement methods currently in use. Each monitoring method is placed into one of three categories i.e., approved-Federal Reference Method (FRM) or equivalent; unapproved - not yet determined to be equivalent to the FRM; and unacceptable - known to yield measurements of poor accuracy and reliability and in most cases obsolete. |  |   |
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