

1. There is a 10% quarterly RAA requirement. If the normal concentration being measured is less than 10 ppm, or between 10 and 100 ppm, should they get the same sliding acceptability scale as is being used during the RATA?

Yes, the quarterly RAA requirement is a sliding acceptability scale just like the RATA detailed in Section 13.1 of PS-16.

2. When conducting a quarterly Relative Accuracy Audit (RAA) for an excess emission PEMS, is testing at three operating loads required during the test?

Section 9.3 states the RAA is to be conducted according to the relative accuracy test audit (RATA) procedures found in section 8.2, except only three sets of measurement data (runs) are required. While section 8.2 clearly states that the RATA for excess emissions PEMS is required to be conducted at three load levels, there is no mention of conducting the RAA at multiple load levels. Based on this, the RAA is not required to be conducted at multiple load levels.

3. There appears to be an error in the Relative Accuracy criteria found in Section 13.1. What was intended here?

Yes, there is an error in section 13.1 of PS-16. The table below shows the intended RA criteria.

If emissions during the test are:	RA Criteria
> 100 ppm (0.2 lb/mmBtu)	≤10%, calculated using Eq. 16.4
< 100ppm (0.2 lb/mmBtu), but > 10ppm (0.02 lb/mmBtu)	≤20%, calculated using Eq. 16.4
≤ 10 ppm (0.01 lb/mmBtu)	Absolute mean difference between the PEMS measurements and the RM measurements must not exceed 2 ppm (or 0.01 lb/mm Btu)
For diluent only PEMS	An alternative criterion of ± 1 percent absolute difference between the PEMS and RM may be used if less stringent.