



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

## REQUEST FOR COMMENTS

September 15, 2004

**TO: INTERESTED PARTIES**  
**FROM: EXECUTIVE OFFICER / AIR POLLUTION CONTROL OFFICER**  
**SUBJECT: REQUEST FOR COMMENTS – LABORATORY METHODS**

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Staff of the Bay Area Air Quality Management District are soliciting comments on proposed additions and amendments to the Manual of Procedures, Volume III, Laboratory Methods. These are necessary for the enforcement of amended regulations or to incorporate advances in analytical equipment. The following changes to the Laboratory Methods are proposed:

**Introduction:** The methodology now includes a section specifying that minor, intermediate and major changes can be made to a procedure if it is not applicable to the type of sample submitted. This requires the agreement of the Air Pollution Control Officer (APCO), user and manufacturer, and in the case of a major change, EPA approval is needed. A disclaimer has been added to indicate that specification of brand names in the methods does not constitute endorsement of that particular brand.

**Proposed Method 10A: Determination of Sulfur in Petroleum and Petroleum Products.** Petroleum and petroleum products such as fuel oils, residual oils and crude oils are analyzed for sulfur content by the energy dispersive X-ray Fluorescence Spectroscopy technique. The method is fast, non-destructive and requires minimal sample handling. It is more accurate and has a lower detection limit than Method 10. Method 10A supplements Method 10 and is only applicable to samples which do not contain water. Method 10A will be used to determine compliance with Regulation 9: Inorganic Gaseous Pollutants, Rule 1: Sulfur Dioxide, Section 304: Limit on Sulfur Content in Liquid and Solid Fuels; and Regulation 2: Permits, Rule 1: General Requirements, Sections 123 3.2 and 123 3.7 for the Limits on Sulfur Content.

The proposed amendments to the following methods exclude a provision allowing APCO discretion to alter the procedure because discretion is now addressed in the introduction, add clarity, correct errors, and add flexibility by allowing the use of other appropriate solvents, sample dilutions, and gas chromatographic columns and operational parameters:

- **Method 21: Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings**
- **Method 22: Determination of Compliance of Volatile Organic Compounds for Solvent Based Coatings**
- **Method 31: Determination of Volatile Organic Compounds in Paint Strippers, Solvent Cleaners and Low Solids Coatings**
- **Method 33: Determination of Dissolved Critical Volatile Organic Compounds in Wastewater Separators**
- **Method 41: Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride**

- **Method 43: Determination of Volatile Methylsiloxanes in Solvent Based Coatings, Inks, and Related Materials**
- **Method 45: Determination of Butanes and Pentanes in Polymeric Materials**
- **Method 46: Determination of the Composite Partial Pressure of Volatile Organic Compounds in Cleaning Products**

Staff will be receiving comments on the proposed revisions through October 29, 2004.

A copy of any of the proposed methods may be obtained from the District's web site at <http://www.baaqmd.gov/pln/ruledev/workshops.asp>. For paper copies, comments or questions regarding any of the methods, please contact James Hesson, Laboratory Manager at (415) 749-4625 or [jhesson@baaqmd.gov](mailto:jhesson@baaqmd.gov), Cleofina David, Principal Air Quality Chemist at (415) 749-4622 or [cdavid@baaqmd.gov](mailto:cdavid@baaqmd.gov), or Dinesh Patel, Senior Air Quality Chemist at (415) 749-4627 or [dpatel@baaqmd.gov](mailto:dpatel@baaqmd.gov).