STATIONARY COMBUSTION TURBINES Emissions Information Collection

Test Procedures, Methods and Reporting Requirements for the Section 114 Request for Stationary Combustion Turbines

This document provides an overview of the required testing, approved sampling and analysis methods, target pollutants and units of measure, and reporting requirements for stationary combustion turbines that are required to provide emission test data to the U.S. Environmental Protection Agency (EPA) under Clean Air Act (CAA) section 114 (42 U.S.C. 7414). The purpose for this testing is to gather data on air pollutant emissions from stationary combustion turbines in this source category to inform the EPA's decision-making process for regulation of these sources. All recipients must complete and submit test results no later than 9 months after receipt of this request. The document is organized as follows:

- 1.0 Testing Procedures and Methods
- 2.0 How to Report Data
- 3.0 How to Submit Data
- 4.0 Contact Information for Questions on Test Plan and Reporting

1.0 Testing Procedures and Methods

The EPA requires emissions and other test data for several pollutants, including specific hazardous air pollutants (HAP), criteria pollutants, and potential surrogate groups. If the EPA is requesting that you complete emissions testing, the cover letter of this CAA section 114 request will include a list of emissions sources selected for testing at your facility. For stationary combustion turbines as specified in Enclosure 1 of your section 114 cover letter, you must perform an emissions test for some combination of pollutants (*i.e.*, simultaneous measurements per group) and diluents according to the test protocols and test methods for air emissions presented in Section 1.1 of this document.

You may have conducted tests for some of these pollutants already. If you have conducted any of the requested groups of tests (*i.e.*, any complete set of tests required to be conducted simultaneously as described in Footnote 2 to Table 1) in the past 5 years, these test data may be submitted for this section 114 request according to the procedures in Section 2 and no additional testing for those pollutants is required, provided the test data you submit is representative of your operations and the previous testing met the testing requirements specified in this document (*e.g.*, test method, sample volume) and contains all required data elements.

Please refer to the Stationary Combustion Turbines website (https://www.epa.gov/stationary-sources-air-pollution/stationary-combustion-turbines-national-emission-standards) for additional

testing information. Please note that you do not have to submit a test plan to the EPA for approval prior to testing; however, we recommend that you prepare a test plan for your own use to assist in the planning of the test program and to verify that you address all of the testing and reporting requirements specified in this document. Please note that you also must report your process and emissions testing data using the EPA's Electronic Reporting Tool (ERT), where applicable. You are directed to the ERT website (https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert) for a more complete and interactive description of the ERT, list of methods currently supported by the ERT, and a link to download the ERT. Some of the emissions test methods listed in this document are supported in the ERT while others are not (e.g., U.S. EPA Method 320).

You must follow all of the procedures as specified in the test methods, including the quality assurance and quality control measures, and document the results in the ERT and in any test report provided to the EPA. For this program, you do not need to obtain audit materials from your state or local agency or from the EPA. You may apply any third-party audit materials you have on hand and document the results, but you are not required to do so.

If Enclosure 1 of your section 114 cover letter is missing any stationary combustion turbines subject to 40 CFR part 63, subpart YYYY, or if any of the stationary combustion turbines included in Enclosure 1 are misclassified (e.g., units are not in the appropriate test group or are not subject to subpart YYYY), please contact Melanie King (see Section 4.0 of this document). If a facility has units that are required to be tested according to your section 114 cover letter but you are unable to respond to an item exactly as requested and you are unable to test another similar unit, please explain why you cannot respond and/or provide any information you believe may be related in a submission to Melanie King (see Section 4.0 of this document) within 35 days of postmark date of your section 114 cover letter. *NOTE*: The EPA reserves all of its enforcement rights provided by CAA section 113, including the right to bring a claim in the U.S. District Court to enforce the CAA section 114 obligation to comply with all the requests described in this document.

1.1 Stack Test Methods

You must follow the stack test method procedures described in this section for each stationary combustion turbine that you are required to test.

The owner/operator of the stationary combustion turbine must certify that the unit tested was operating in a normal and representative manner during the performance test. The owner/operator must also certify that it operated the air pollution control device (APCD), if any, on the unit tested in accordance with manufacturers' specifications and requirements for proper operation during the emissions testing.

1.1.1 Sample Location

You should collect emissions samples for the identified pollutants downstream of the last relevant APCD (*i.e.*, stack or other point representing the composition of the flue gases at the exit to the atmosphere), unless otherwise indicated. You must use U.S. EPA Method 1 or 1A of Appendix A-1 to 40 CFR Part 60, as applicable, to select the locations and number of traverse

points for sampling for the tests in this section. See https://www.epa.gov/emc/method-1-samplevelocity-traverses and https://www.epa.gov/emc/method-1a-small-ducts for copies of the methods and guidance information for sampling situations not meeting Method 1 criteria.

1.1.2 Emissions Measurement Methods

Table 1 summarizes the testing required to be performed for each type of stationary combustion turbine. When possible, testing for each of the pollutants listed in Table 1 should be conducted simultaneously for your stationary combustion turbine. However, if simultaneous testing is not possible, then you must at least conduct the tests for formaldehyde and carbon monoxide simultaneously and conduct the tests for filterable particulate matter (PM) and HAP metals testing simultaneously. It is not necessary to test the different pollutants in any particular order.

The primary reason for concurrent testing is to obtain a clear understanding about the overall HAP emissions profile from each emission process point. A second reason is to gather information that will help us evaluate the correlations of emissions of one pollutant to another pollutant, to potentially establish surrogate relationships. For example, the metal HAP tests and PM tests from the APCD or main stack are required to be done at the same time. Where a predictable relationship between metal HAP and PM exists, a surrogate relationship can be established for compliance purposes. *Tests that are required to be concurrent under this test request that are not done in this manner may be considered invalid and may need to be repeated.*

Table 1 also presents a list of the test methods to use for completing the required tests. For copies of the U.S. EPA test methods and additional information, please refer to the EPA's Emission Measurement Center (EMC) website, https://www.epa.gov/emc.

Report all pollutant emission data as indicated in Table 1. Report the results of your emissions tests according to the directions provided in Section 2.0 of this document.

Unless otherwise specified, each pollutant emissions test should consist of at least seven test runs for the sampling duration and/or volume indicated for each specified unit.

Table 1. Summary of Test Methods¹

Pollutant ²	Method	Alternative Procedure	Target Reported Units of Measure
Formaldehyde (50000)	U.S. EPA Method 320. Minimum sample time of 1 hour per run. Validate according to Section 13.0 of Method 320. ^{3,4}	ASTM D-6348- 12e1 ^{3,4,5}	lb/hr, ppmvd, and ppmvd @ 15% O ₂
Carbon monoxide	U.S. EPA Method 10.* Minimum sample time of 1 hour per run.	CEMS ⁶ (if installed).	lb/hr, ppmvd, and ppmvd @ 15% O ₂
Acid gases (Hydrochloric acid and Hydrogen fluoride)	U.S. EPA Method 320. Minimum sample time of 1 hour per run. Validate according to Section 13.0 of Method 320. ^{3,4}	ASTM D-6348- 12e1 ^{3,4,5}	lb/hr, ppmvd, and ppmvd @ 15% O ₂
Metals ⁷ and PM (filterable)	U.S. EPA Method 29.* Collect a minimum volume of 141 dscf (4 dscm) per run. Use inductively coupled (argon) plasma with mass spectrometry (ICAP/MS) for the analytical finish with the exception of mercury analysis, which should be conducted by cold vapor atomic absorption spectroscopy (CVAAS), Analyze front and back half samples separately. Report results for front half and back half analyses for individual metals separately. Determine filterable PM emissions according to section 8.3.1.1. Maintain a filter temperature of 248°F ± 25°F.	You may opt to conduct a separate EPA Method 5* test with a filter temperature of 248°F ± 25°F in lieu of measuring PM with the Method 29 train.	lb/hr and concentration (for metals, mg/dscm and mg/dscm @ 15% O ₂ and for PM, gr/dscf and gr/dscf @ 15% O ₂)
Gas flow rate	U.S. EPA Method 2*, 2A, 2B, 2C*, 2D, 2F, or 2G, as appropriate, simultaneous with each pollutant test run.		acfm, scfm, and dscfm
O ₂ /CO ₂	U.S. EPA Method 3A* or 3B, as appropriate, simultaneous with each pollutant test run.		percent volume, dry
Moisture	U.S. EPA Method 4* or Method 320, simultaneous with each pollutant test run.	ASTM D-6348- 12e1 ⁴	percent volume

¹ lb/hr = pounds per hour; ppmvd = parts per million by volume, dry basis; % = percent; O₂ = oxygen; dscf = dry standard cubic feet; dscm = dry standard cubic meters; °F = degrees Fahrenheit; mg/dscm = milligrams per dry standard cubic meter; gr/dscf = grains per dry standard cubic foot; acfm = actual cubic feet per minute; scfm = standard cubic feet per minute; dscfm = dry standard cubic feet per minute.

² For each turbine, at a minimum, conduct simultaneous sampling for formaldehyde and carbon monoxide and simultaneous sampling for metals and PM

³ Method detection limit for FTIR measurements is considered to be the Minimum Analyte Uncertainty (MAU) and should be calculated per the method. Alternatively, if the FTIR measurements are performed according to ASTM D6348 the method detection limit is considered to be the Minimum Detection Concentration #3 (MDC#3) and should be calculated per the method.

⁴ For analyte spiking, you must use the analyte(s) of interest, the use of surrogate compound(s) is prohibited for the purpose of this section 114 request.

⁵ The test plan preparation and implementation in the Annexes to ASTM D6348-03, Sections A1 through A8 are mandatory; (2) For ASTM D6348-03 Annex A5 (Analyte Spiking Technique), the percent R must be determined for each target analyte (A5.8) and be within 30%; (3) The percent R value for each target analyte must be reported in the test report; and (4) the analytical accuracy of the algorithm (A7.6) must be documented and reported in the test report.

⁶ If you provide data from a plant Continuous Emissions Monitoring System (CEMS), your CEMS must be certified according to the appropriate performance specification in 40 CFR part 60 Appendix B, and you must perform the continuing quality assurance/control measures outlined in 40 CFR part 60 Appendix F.

⁷ Metals to be tested include antimony (Sb), arsenic (As), beryllium (Be), cadmium (Cd), chromium (Cr), cobalt (Co), lead (Pb), manganese (Mn), mercury (Hg), nickel (Ni), and selenium (Se).

^{*} Methods supported by ERT.

During testing, you should monitor, record and report process data for each test run. For process data that you record during testing, make clear the correlation between emissions measurements and process data (e.g., identify Method 5, run 1 for the associated process data on the process data details tab of the ERT or be sure to enter the process data on the correct row of the Stationary Combustion Turbines Testing Supplement, as applicable; see Section 2.2 for more information on the Stationary Combustion Turbines Testing Supplement).

The process data to be documented during each test run (as applicable) include:

- Fuel type (*e.g.*, natural gas, propane, fuel oil), and heat input (British thermal units per hour (Btu/hr)).
- Actual fuel feed rate during test (based on HHV) and permitted fuel feed rate (based on HHV) (MMBtu/hr). You must explain the procedure that you used (e.g., EPA Method 19) to determine the actual fuel feed rate and provide the calculation in the notes field for this data element in the Microsoft® Excel template that is used to report results to the EPA.
- Turbine load (percent).
- Emission unit operating temperature (°F).
- Operating parameters relevant for the APCD, including, for example, oxidation catalyst inlet temperature.

You must keep the following records for 3 years:

- Documentation that each emissions test was conducted in accordance with the enclosed sampling protocol; and
- The results of each emissions test.

1.2 Ensuring Data Quality of the Source Tests Performed

While in most cases we are not specifying numerical minimum detection levels for the tests to be performed, we have specified the testing conditions and methods required, including minimum test run sample volumes or times when appropriate, which we believe will provide data of a quality sufficient for decision making.

We remind source owners and testers of the CAA section 114(a)(1) requirement to provide information requested for the development of emissions standards using methods that provide data necessary for the decisions. This information includes data of quality sufficient to support those decisions. For the most part, we can identify test methods and procedures that will satisfy those decision-making needs (e.g., minimum sampling times). In other cases, we recognize that the source owner's or tester's selection of test procedures or equipment could bear significantly on the quality of the data. See Appendix A of this document for information regarding guidance for calculating and reporting values measured below method detection levels.

We believe that the CAA is clear that it is incumbent on the source owner/operator and the tester to apply methods and procedures that result in data quality necessary for our decisions, including providing for the lowest possible detection limits considering practical and reasonable limitations. For example, source owners/operators and testers should not automatically choose to

use low or medium quality equipment for testing (e.g., for cost reasons) if high quality equipment is reasonably available. We will review test reports in light of this expectation and will be particularly mindful of whether the testing procedures applied are representative of the highest reasonably expected capabilities (e.g., comparing reported minimum measurement detection levels between tests and testers).

On completion of your required tests, please provide a complete test report, including appendices. A complete test report includes the following information, at a minimum:

- General identification information for facility including a mailing address; the actual facility address; the owner or operator, responsible official, or an appropriate representative (where applicable) and an email address for this person; and the appropriate Federal Registry System (FRS) number for the facility);
- A brief process description, including a flow diagram clearly showing the turbine and the sampling site;
- A complete unit description, including the unit ID, the stationary combustion turbine subcategory, the appropriate source classification code (SCC), the latitude and longitude of the emission point being tested (decimal degrees to five decimal points), and the maximum permitted process rate (where applicable);
- Emissions control measures in use during the test, including:
 - o APCD description and APCD ID (if applicable)
 - A description of any pollution prevention or other HAP emission reduction approaches being implemented during the test program;
- Any process data and control device monitoring data required in this document;
- Sampling site description; description of sampling and analysis procedures and any modifications to standard procedures; quality assurance procedures;
- Description of any deviations from the test methods or other anomalies that occurred with the process or APCD operations during the test;
- Run-by-run emission data in the units of measure specified in Table 1;
- Stack or exhaust gas flow rate (as determined using U.S. EPA Method 2 or alternatives) at the time of and during the emissions test, as appropriate;
- Example calculations of all applicable stack gas parameters, emission rates and analytical results, as applicable;
- Raw field sampling data sheets and notes;
- Laboratory data and analysis reports, including instrument calibrations and raw analytical data;
- Chain-of-custody documentation;
- Explanation of laboratory data qualifiers;
- Quality assurance and quality control activities performed;
- Identification information for the company conducting the performance test, including a contact person and his/her email address; and
- Any other information required by the test method, a relevant standard, or the Administrator.

If we believe that a source owner/operator or tester has failed to meet the requirement of the CAA to provide data of sufficient quality or quantity for our decisions, we can and will request

additional measurements that require the use of improved testing procedures. The permitted facility representative and the testing company representative must complete the Final Verification form of the ERT certifying that the report is accurate and complete.

2.0 How to Report Data

The method for reporting the results of any testing and monitoring requests depend on the type of tests and the type of methods used to complete the test requirements. This section discusses the requirements for reporting the data.

2.1 Reporting Stack Test Data within ERT

For testing conducted using one of the methods listed in Table 2, you must report your data using the EPA's ERT Version 6.0 or newer. ERT is a Microsoft Access® database application available at https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert. If you are not a registered owner of Microsoft Access®, you can install the runtime version of Microsoft Access® from the link on the ERT website in order to run the ERT Application. The ERT must be downloaded onto your computer prior to data entry. A series of Microsoft Excel®-based templates can be used to assist with the upload of the field sampling data. These templates are also available on the ERT website. After completing the data entry into the ERT, you will also need to attach supporting documentation to the Attachments module of the ERT. The supporting documentation should include: complete lab reports, chain of custodies, field data and sample/moisture recovery sheets, CEMS raw data, calibrations of equipment, gases and instruments, QA/QA data, audit sample results (if applicable), and field notes. If a full test report is attached in the ERT, any of the preceding supporting documentation included in the full test report does not need to also be individually attached. The ERT database file should be transmitted to EPA using one of the options described in Section 3.0 of this document.

The list of fields within the ERT with notes explaining whether the field is required or optional can be found on the Stationary Combustion Turbines website (https://www.epa.gov/stationary-sources-air-pollution/stationary-combustion-turbines-national-emission-standards).

Table 2: List of ICR Test Methods Supported by ERT

EPA Test Methods (40 CFR parts 60 and 61; EMC website, https://www.epa.gov/emc)	
Methods 1 through 4 (testing locations, velocity, moisture, dilution gases)	
Method 3A (O ₂ and CO ₂)	
Method 5 (filterable PM)	
Method 10 (Carbon Monoxide)	
Method 29 (metals and filterable PM)	

^{*}For data entry purposes- if PM is collected by Method 29, the data entry is only performed once by selecting PM as a compound/analyte under Method 29.

2.2 Reporting Other Test Data Not Listed in ERT

At present, of the methods required by this request, only the methods shown in Table 2 are supported by the ERT. For testing you conducted using a method not currently supported by the ERT (including the use of a plant CEMS), you must report the results of this test in the Stationary Combustion Turbines Testing Supplement. The Stationary Combustion Turbines Testing Supplement can be downloaded from the Stationary Combustion Turbines website (https://www.epa.gov/stationary-sources-air-pollution/stationary-combustion-turbines-national-emission-standards).

You must report the results of each test on the appropriately labeled form corresponding to the specific tests requested at your emissions source. If you conducted testing at more than one source at a facility using methods not currently supported by the ERT, follow the instructions in the Stationary Combustion Turbines Testing Supplement, found on the Stationary Combustion Turbines website. For plant CEMS data used in lieu of EPA Method 10, the test run average is calculated as the average of the one-minute averages collected over the duration of the test run.

After completing the Stationary Combustion Turbines Testing Supplement, you must also submit an electronic copy of the emission test report (PDF format preferred) for air sampling. If the complete emission test report is attached to the ERT file containing the associated flow rate measurements, a second copy does not need to be submitted. Both the completed Stationary Combustion Turbines Testing Supplement and the emission test report(s) should be included as attachments to the ERT file for simultaneous tests done using methods supported by the ERT (at a minimum, EPA Methods 1 through 3) and transmitted to the EPA as described in Section 3.0 of this document. For plant CEMS data used in lieu of EPA Method 10, the one-minute averages during each of the seven test runs must be included as an attachment in the ERT and the test run averages reported in the testing supplement.

2.3 Guidance for Calculating and Reporting Measurements Less Than In-Stack Method Detection Levels for Emissions Data Submitted in Response to CAA Section 114 Requests

See Appendix A to this document for guidance on calculating and reporting measurements less than detection levels for emissions data collection programs.

3.0 How to Submit Data

As explained in the previous section, where applicable, you must report your data using the ERT. If the ERT does not support a particular pollutant or method, you must report your data using the data reporting tools we provide and include the additional file as an attachment to your ERT submittal. When you are ready to submit your data to the EPA, compile electronic copies of all *nonconfidential** requested files (including files that do not contain any Confidential Business Information (CBI) as well as files that have been redacted to remove CBI) and email the files to the address shown in your section 114 cover letter.

* Please Note: The EPA's procedures for handling CBI are described in Enclosure 4 of the letter accompanying the section 114 request. If you claim that some of the information being submitted is CBI, DO NOT use the method described above to submit your CBI. You must create a separate submission containing all files associated with this request (*i.e.*, all information claimed to be CBI and non-CBI portions combined). Clearly mark the materials submitted with the words "Confidential Business Information." Send these files under separate cover *only* to Ms. Tiffany Purifoy at one of the CBI addresses shown in your section 114 cover letter.

For the security of your data, the EPA recommends sending your confidential files to the EPA's CBI Office as described in Section 6 of Enclosure 4 of your section 114 cover letter. If you compile the materials onto a CD, DVD, or USB flash drive to mail to the CBI office, the EPA recommends sending it via *registered* U.S. Mail using *return receipt requested*, Federal Express, or other method for which someone must provide a signature upon receipt.

4.0 Contact Information for Questions on Test Plan and Reporting

For questions on how to report data using the ERT, contact:

Theresa Lowe U.S. EPA (919) 541-4786 lowe.theresa@epa.gov

For questions on the test methods, contact:

David Nash U.S. EPA (919) 541-9425 nash.david@epa.gov

OR

Ned Shappley U.S. EPA (919) 541-7903 shappley.ned@epa.gov

OR

Kevin McGinn U.S. EPA (919) 541-3796 mcginn.kevin@epa.gov

¹ Under CAA section 114(c), emissions data is not entitled to confidential treatment.

For other questions on the required testing in your section 114 cover letter or this document, including emissions sources selected for testing, contact:

Melanie King U.S. EPA (919) 541-2469 King.Melanie@epa.gov

Appendix A

Guidance for Calculating and Reporting Measurements Less Than In-Stack Method Detection Levels for Emissions Data Submitted in Response to Section 114 Requests

Please identify the status of measured values relative to detection levels in the Stationary Combustion Turbines Testing Supplement or in the ERT using the descriptions below. For each reported emissions value, insert the appropriate flag (BDL, DLL, or ADL) in the *Flag* line of the ERT or in the *Flag* column of the Stationary Combustion Turbines Testing Supplement for the row that corresponds to that run.

- **BDL** (below detection level) all analytical values used to calculate and report an instack emissions value are less than the laboratory's reported detection level(s);
- **DLL** (detection level limited) at least one but not all values used to calculate and report an in-stack emissions value are less than the laboratory's reported detection level(s); or
- **ADL** (above detection level) all analytical values used to calculate and report an instack emissions value are greater than the laboratory's reported detection level(s).

When reporting and calculating individual test run data:

- You must use the approach specified in the test method for calculation and determination of the analytical method detection level (MDL). If the method does not specify the approach and calculation of the MDL, you must determine the MDL in accordance with the procedures specified in Section 15 of Method 301 (located in Appendix A of 40 CFR part 63).
- For analytical data reported from the laboratory as above the MDL, include the ADL flag in the *Outlet Detect Flag* column of the Stationary Combustion Turbines Testing Supplement as appropriate or in the *Comments* line in the ERT.
- For analytical data reported from the lab as BDL, "non-detect" or "below detection level":
 - o Include a <u>brief</u> description of the procedures used to determine the analytical detection and in-stack detection level:
 - In the Analytical Comments column of the Stationary Combustion Turbines Testing Supplement; or
 - In the *Comments* line of Lab Data tab in the Run Data Details in the ERT.
 - O Describe these procedures completely in the complete test report, including the measurements made, the standards used, and the statistical procedures applied.
 - O Calculate the in-stack emissions rate for any analytical result reported as BDL using the relevant MDL, sampling volumes, and other relevant run-specific parameters (such as O₂ or flow rate). The reported value must assume that the analyte is present at the full MDL value.
 - Report the calculated emissions concentration or rate result:

- As a numerical value (*i.e.*, no brackets or < symbol) in the Stationary Combustion Turbines Testing Supplement, columns *Outlet Mass* and/or *Outlet Concentration* as appropriate; select the appropriate flag in the *Outlet Detect Flag* column as appropriate; or
- As a numerical value in the **ERT** with the appropriate flag in the **Comments** line.
- Report as numerical values (*i.e.*, no brackets or < symbol) any analytical data measured above the MDL, including any data between the MDL and a laboratory-specific reporting or quantification level (*i.e.*, flag as ADL).
- For pollutant measurements composed of multiple components or fractions (*e.g.*, mercury and other metals sampling trains), when the result for the value for any component is measured below the MDL:
 - Calculate in-stack emissions rate or concentrations as outlined above for each component or fraction;
 - o Sum the measured values and/or calculated values (using the MDL as outlined above) for all of the components or fractions; and
 - O Report the sum of all components or fractions:
 - As a numerical value (i.e., no brackets or < symbol) in the Stationary Combustion Turbines Testing Supplement; columns *Outlet Mass* and/or *Outlet Concentration* as appropriate and select the appropriate flag in the *Outlet Detect Flag* column as appropriate; or
 - As a numerical value in the **ERT** with the appropriate flag in the **Comments** line.
 - If all components or fractions are BDL, the appropriate flag is BDL. If the components or fractions are a mix of BDL, DLL, and ADL, then the appropriate flag is DLL. [Note: If all components or fractions are above the MDL, the appropriate flag is ADL.]
 - O In addition to reporting the sum of the components or fractions, report the individual component or fraction values for each run if the Stationary Combustion Turbines Testing Supplement or ERT format allows. If the Stationary Combustion Turbines Testing Supplement or ERT format does not allow reporting of the individual components or fractions (i.e., the format allows reporting only a single sum value):
 - For the Stationary Combustion Turbines Testing Supplement, for each applicable run, report the appropriate flag in the *Outlet Detect Flag* column and report the values for the measured or MDL value for each component or fraction as used in the calculations (*e.g.*, 0.036, [<0.069], 1.239, [<0.945] for a four-fraction sample) in the *Analytical Comments* column; or
 - For the **ERT**, next to the sum reported as above, report on the *Comments* line the appropriate flag and the measured or MDL value for each component or fraction as used in the calculations (*e.g.*, 0.036, [<0.069], 1.239, [<0.945] for a four-fraction sample).

- For measurements conducted using the instrumental test methods (e.g., Methods 3A):
 - o Record gaseous concentration values <u>as measured</u> including negative values and flag as ADL; do not report as BDL.
 - o Calculate and report in-stack emissions rates using these measured values.
 - Include relevant information relative to calibration gas values or other technical qualifiers for measured values in the *Comments* line in the *ERT* or *Method Comments* line column of the Stationary Combustion Turbines Testing Supplement.