REQUEST FOR QUOTATION

January 22, 2019

PROJECT: Analysis of Non-Methane Organic Compounds

QUOTES DUE BY: 5:00 PM on Tuesday, February 12, 2019

OVERVIEW

The San Joaquin Valley Unified Air Pollution Control District (District) participates in the United States Environmental Protection Agency (USEPA) Enhanced Photochemical Assessment Monitoring Station (PAMS) monitoring program. It is the District’s responsibility to collect the air samples, and to solicit laboratories that will analyze and upload to EPA’s Air Quality System (AQS) using AIRS parameter codes. Part of this program involves sampling for non-methane organic compounds (NMOC) adhering to the 1998 USEPA PAMS Technical Assistance Document (TAD).

The District is issuing this Request for Quotation (RFQ) in order to retain a qualified contractor who will analyze canisters collected in 2019. This contract is for the 2019 PAMS season only.

To be considered for this project, contractors must meet the minimum eligibility requirements, and submit cost-effective proposals that satisfy this RFQ’s quotation requirements. The District will pay on a per canister basis. Payments will be made subsequent to proper verification of completed monthly data submission to EPA’s AQS database and District evaluation of EPA Quality Control Reports, confirming that the work was completely and satisfactorily carried out.

Because District funding for the project may include federal funds:

- Contractor shall comply with all federal and state conflict of interest laws, statutes, and regulations, which apply to performance of this Agreement and shall be applicable to all parties and beneficiaries and any officer, agent, or employee of District under this Agreement.

- The contractor shall comply with all federal and state conflict of interest laws, statutes, and regulations, which shall be applicable to all parties and beneficiaries under this Agreement and any officer, agent, or employee of District.
The contractor must not be presently debarred, suspended, proposed for debarment, declared ineligible, voluntarily excluded from participation or otherwise excluded from or ineligible for participation under federal assistance programs. Contractor must ensure that all subcontractors employed for conduct of this project also certify compliance with this provision of law to the contractor.

A contractor or any individual identified in the proposal that appears in the Excluded Parties List System (EPLS) is not eligible for award of a contract. The EPLS is a central registry that contains information regarding entities debarred, suspended, proposed for debarment, excluded, or otherwise declared ineligible from receiving Federal contracts. Access to the EPLS is available at www.epls.gov.

The contractor certifies by signing the signature page of the original copy of the submitted proposal and any amendment signature page(s) that the proposer is not presently debarred, suspended, proposed for debarment, declared ineligible, voluntarily excluded from participation, or otherwise excluded from or ineligible for participation under federal assistance programs.

The contractor will provide certification that commercial general liability insurance coverage ($1,000,000 per occurrence) for bodily and personal injuries or for property damage as well as Workers Compensation Insurance as in accordance with the California Labor Code are obtained and are in full force.

The District reserves the right to reject any and all quotations, and to make no awards.

**Submittal Instructions**

A contractor who submits a quotation in response to this RFQ must adhere to the following instructions:

1. The deadline for submitting quotations is 5:00 PM on Tuesday, February 12, 2019. Quotations received after this time and date will not be accepted.

2. Quotations are to be mailed to the following address:

   San Joaquin Valley Unified Air Pollution Control District
   Attn: Stephen Shaw
   Senior Air Quality Specialist
   1990 E. Gettysburg Avenue
   Fresno, CA 93726-0244
3. The envelope should be marked with title “Quotation for Analysis of Non-Methane Organic Carbons.”

4. Include five (5) hard copies and one (1) electronic copy of the quotation.

**MINIMUM ELIGIBILITY REQUIREMENTS**

Contractors must meet the following minimum eligibility requirements:

1. Successful completion of PAMS analyses for a public agency within the last 5 years.
2. Possess demonstrated ability to create and upload AQS data files.
3. Completion of Attachment A (Itemized Cost List).

**QUOTATION REQUIREMENTS**

At a minimum, submitted quotations are to individually address the above 3 ‘Minimum Eligibility Requirements’ and numbers 2 through 10 of the below ‘Quotation Requirements:’

1. Not exceed 24 pages in length (including cover letter and reference material) and pages must be numbered.
2. Describe previous experience in the documentation and analysis of PAMS canisters (references are required).
3. Provide qualifications of contractor staff who will be assigned to this project and describe the role of each assigned staff member to be used in the project.
4. Generally describe the process that the contractor will use in the analyses of the samples.
5. Describe previous experience with AQS, including uploading data into AQS, and including a report from AQS of data that was uploaded by your respondent.
7. Describe previous experience with PAMS-type analysis of non-methane organic compounds (NMOC) listed in Attachment B excluding acetaldehyde, acetone, and formaldehyde.
8. Include a price quote on Attachment A (Itemized Cost List) for the analysis of an Audit Sample or Performance Evaluation that the District may request.

9. Include a price quote for each of the following items on a per canister basis:
   a. The cost of analysis of the canisters.
   b. The cost of the creation of the AQS transaction files and uploading the files.
   c. Documentation of invalid samples and missing sample runs.
   d. The evacuation, cleaning, and certification of sample canisters.
   e. The repair of canisters by part:
      i. valve
      ii. gauge
      iii. elbow

**GENERAL PROJECT GUIDELINES**

The following is a description of the general project guidelines, requirements, and responsibilities that both the District and contractor will hold during the life of the project:

1. At any time the District may require that the contractor successfully complete an analysis of an Audit Sample or Performance Evaluation in order for the District to evaluate the performance of the lab.

2. In 2019, there are expected to be 520 samples sent to the contractor for analysis, but this number may increase up to a maximum of 680 or decrease depending on the number of samples collected. PAMS sampling will be conducted during the months of June, July, and August of 2019.

3. The contractor shall perform NMOC analyses using the 1998 USEPA PAMS TAD (the District will not allow for different collection or sampling devices other than what is currently in use).

4. There are 57 required compounds to be analyzed as listed in Attachment B (excluding acetaldehyde, acetone, and formaldehyde). No other compounds are requested or desired.

5. The District will supply the NMOC samples in 6L SUMMA stainless steel canisters owned by the District.

6. If warranted, the contractor shall provide the District specific instructions detailing the specific procedures for shipping the canisters. If the contractor prefers that the collected samples be returned to them using a specific kind of container, other than what the District proposes to use, then the contractor must supply these materials to the District as part of the contract. The containers/shipping materials must meet all of Department of Transportation and Federal Aviation
Administration requirements for safe handling and transport provided by shipping companies like UPS or FedEx. If the contractor desires the District to use a particular written form for tracking the exposed sample (i.e. a ‘Chain of Custody’ (COC) form other than the form the District provides), the contractor will supply a sufficient quantity of these forms for use by District staff.

7. Analyzed, cleaned, and certified canisters shall be in the District’s possession within 11 days of the contractor receiving them. All canisters are to be shipped via UPS ground shipping. If canister shipments need to be expedited, then the contractor is responsible for any additional cost. The contractor will contact and coordinate with the District with regards to shipping locations and addresses (Fresno and Bakersfield). The contractor is responsible for all recording keeping regarding the shipping of canisters to the individual District locations, recording the number of canisters being sent to each location, and the shipment’s date. The District is responsible for all shipping costs of canisters (including audit samples) sent to the District and/or returned to the contractor for this job. The contractor shall be responsible for the shipping cost of canisters that are returned to the District with unacceptable conditions, such as less than -20 PSI of vacuum, missing fitting caps, or with a broken gauge. The certification tag shall include a check list for these items.

8. The contractor will make any needed repairs to the canisters such as valve, gauge, or elbow replacement. Payment for any such repairs shall be in accordance with the contract.

9. The contractor is responsible for all record keeping and shipping costs of other materials being sent to the District and/or the audit laboratory for this project. The District is responsible for recording keeping and shipping costs to return the above mentioned materials (other than canisters) to the contractor.

10. Payment schedule:

   a. Since this is a short term contract, the District prefers invoicing when all the work is completed to the satisfaction of the District. Upon receiving the invoice, the District will compare what was uploaded to AQS with the documentation provided by the contractor and ensure that all of the contract requirements are met. Once everything is verified, the contractor will send a single invoice to the District and payment will be made.

   b. The District recognizes that some respondents require monthly invoices and that is also acceptable to the District. Once the District has concluded that the monthly deliverables are acceptable (verification of completed monthly data submission to EPA AQS and District evaluation of EPA Quality Control Reports – confirming that the work was completely and satisfactorily carried out) the contractor may submit a monthly billing statement based upon the site, sample collection date, and time of sample collection and the number of samples for that month (June, July, and
August). The billing will not be based on the date of the ‘Chain of Custody’ form, the date the canisters were received at the laboratory, or the date of the laboratory’s internal tracking system. Each monthly billing will list the gross amount but will invoice at 90% as 10% will be retained until all three month’s billings and all services (analyses, reports, audits, performance evaluations, etc.) are successfully completed and rendered to the satisfaction of the District. The 10% retained is the District’s guarantee for satisfactory completion. When all of the above prerequisites have been completed and deemed satisfactory, the District will accept an invoice for the retained amount and the final payment will be dispensed.

11. The contractor shall retain and archive a copy of all paper and electronic records of this project for a minimum of three (3) years. The archived records will include any documentation pertaining to the analysis and reduction of raw and processed data, including calibrations, samples, and run sequences. In the case where there is a need of clarification or investigation of the reported data, the contractor will provide any and all necessary information as requested so that the entire analysis can be reconstructed.

12. The contractor will be available by phone to discuss issues related to this project on the same business day that the District places the call with the contractor. The contractor shall notify the District immediately upon the discovery of any irregularities during the course of the project.

13. It is understood by the Contractor that time is of the essence in the performance of this project.

14. Since this Agreement exceeds Ten Thousand Dollars ($10,000), the contractor will be subject to examination and audit of the auditor general for a period of three (3) years after final payment under contract.

**QUALITY CONTROL REQUIREMENTS**

The following procedures will be employed to ensure the quality of the project and the resulting data:

1. The contractor is to provide their own certified EPA-PAMS Reference Gas Cylinder for calibration standard purposes. The Gas Cylinder must include the PAMS VOC Target Compounds. These gases must be traceable to a National Institute of Standards and Technology (NIST) standard.

2. Samples shall be promptly analyzed to prevent degradation of the hydrocarbon species, and to facilitate timely return of the canisters to the District. Analyzed, cleaned, and certified canisters shall be returned and be in the District’s possession within 11 days of the contractor receiving them. All canisters are to

*RFQ – NMOC*
be shipped via UPS ground shipping. If canister shipments need to be expedited, then the contractor is responsible for any additional cost.

3. The contractor will analyze contents of only the valid samples as identified in District ‘Chain of Custody’ (COC) forms. The contractor will not analyze contents of invalid samples. For invalid samples, the contractor will repair canisters as necessary, and prepare, clean, and certify canisters for subsequent sampling. The contractor will appropriately document missing samples.

4. Upon completion of analysis, the contractor will evacuate, clean, and certify each canister for future sampling and analysis before returning it to the District. Preparation shall include cleaning the canister, vacuum verification of -30 PSI and leak testing. Canisters received with less than -20 PSI will be deemed defective with a leak problem and returned for correction at the contractor’s expense.

5. The contractor will analyze and include in the reports one (1) clean and certified canister per day as a part of the quality control certification process. Another report is to include the number of canisters passed and failed with regards to the total number of canisters that went through the certification process.

6. The contractor will provide written documentation indicating the methodology used for analytical instrument calibration, analysis and quality control/assurance. Copies of all related paperwork used to conduct data analysis such as chromatograms, instrument calibrations, etc., shall be supplied to the District in an electronic form (DVD, Flash Drive, Compact Disc, etc.)

7. At no additional cost, the contractor will analyze for audit purposes, any canister(s) sent to the contractor by a CARB, USEPA, and/or EPA approved National Air Toxics Trend Stations (NATTS) Laboratory designated by the District. The contractor shall provide copies of these audit results to the District. The results shall include all pertinent information regarding calibration reports and standard certificates.

**DATA REQUIREMENTS**

The following is a list of requirements for the collection and reporting of the data involved in this project:

1. The contractor will only report data for the 57 compounds that are required to be analyzed as listed in the North American Research Strategy for Tropospheric Ozone (NARSTO) Measurement Methods Compendium; excluding acetaldehyde, acetone, and formaldehyde (Attachment B). No other compounds are requested or desired.
2. The laboratory will upload the results of the analysis to AQS as ‘Reported Data.’

3. Laboratory equipment must be capable of detecting and measuring levels of VOCs as low as one (1) parts per billion carbon (PPBc) but reporting all detection levels.

4. Reported data is to meet Level IV criteria according to EPA guidelines for PAMS documentation (Laboratory Documentation Requirements For Data Validation, Document Control Number 9QA-07-89, January 1990).

5. Data is to be reported to the District in both parts per billion carbon (PPBc) and parts per billion volume (PPBv).

6. The data formatted and uploaded to the AQS database is to utilize PPBc.

7. All measured values are to be reported. Any data below the Practical Quantification Limit (PQL) will be reported and flagged with “LJ”. All non-detectable data will be reported as zero and flagged with “ND”. Other Qualifier Codes can be used if necessary.

8. The contractor will submit monthly e-mails summarizing the analyzed data during the course of the project.

9. The contractor’s monthly data files and reports will provide the resulting data on a single CD, DVD, or flash drive:

   a. The CD, DVD, or flash drive shall have a subdirectory dedicated to each site’s files labeled with the site’s name and AIRSCODE. Each site will have monthly subdirectories containing all of the relevant files for that month as described elsewhere in this RFQ.


   c. This CD, DVD, or flash drive will be sent to the District after all the data is uploaded into AQS.

10. All laboratory activities and completed data file uploaded reports (to include passage of EPA Quality Control Reports) are to be submitted to the District and AQS by no later than November 30, 2019.

EVALUATION OF RESPONSES TO THIS RFQ

Each response to this RFQ will be evaluated with particular emphasis on how well the respondent complies with the information requested in this RFQ, experience in PAMS-
type analysis, experience in uploading to EPA’s AQS system, cost of postage, and cost for services as shown on Attachment A. Not providing all of the information requested in this RFQ will lower the overall score and may be grounds to disqualify the response from further review.

**INQUIRIES**

Technical and administrative questions concerning this RFQ should be directed to Stephen Shaw, Senior Air Quality Specialist, San Joaquin Valley Unified Air Pollution Control District at steve.shaw@valleyair.org or (559) 230-6000. An editable copy of Attachment A (Itemized Cost List) is available on request.
Attachment A

Itemized Cost List
# Itemized Cost List for 2019 PAMS NMOC

Show all costs on the following table.

<table>
<thead>
<tr>
<th>Cost per Canister</th>
<th>Costs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cost per analysis of each valid sample</td>
<td></td>
</tr>
<tr>
<td>Cost per canister for evacuation, cleaning, &amp; certification</td>
<td></td>
</tr>
<tr>
<td>Cost of audit sample or performance evaluation</td>
<td></td>
</tr>
<tr>
<td><strong>AIRS Upload Costs</strong></td>
<td></td>
</tr>
<tr>
<td>Cost per canister for file creation and uploading data into AQS</td>
<td></td>
</tr>
<tr>
<td>Cost of reporting one (1) missing or invalid sample</td>
<td></td>
</tr>
<tr>
<td><strong>Costs of Repairs</strong></td>
<td></td>
</tr>
<tr>
<td>Cost per canister for the repair of the valve</td>
<td></td>
</tr>
<tr>
<td>Cost per canister for the repair of the gauge</td>
<td></td>
</tr>
<tr>
<td>Cost per canister for the repair of the elbow</td>
<td></td>
</tr>
</tbody>
</table>

**Other costs not included in the above**

1.

2.

3.

**Sub-Totals**

- Cost of 520 canisters analysis, cleaning, & certification
- Cost of preparing and uploading 520 samples into AQS
- Cost of repairing the value, gauge, and elbow of 12 canisters
- Cost of one (1) audit sample or performance evaluation
- Total cost for 'Other Costs'

**Grand Total for Project (Sum of the Sub-Totals)**
Attachment B

PAMS Compounds
Sampling and Analysis Summary Information for PAMS VOC Target Species


Note 3: At a simple level, sampling procedures fall into either canister techniques or adsorbent techniques. But the five methods, TO2,3,14A,15 and 17, provide for alternatives within these two categories. In addition, adsorbents vary with respect to breakthrough limits and VOC volatilities. The abbreviations shown include: Can = canister of any type, CMS = carbon molecular sieve adsorbent; Cry = cryogenic concentration technique; and Ads = adsorbent of any type. Adsorbents vary with respect to breakthrough limits and VOC volatilities. The abbreviations shown include: Can = canister of any type, CMS = carbon molecular sieve adsorbent; Cry = cryogenic concentration technique; and Ads = adsorbent of any type.

Note 4: Gas chromatograph is the designated separation method for both mass spectrometer and flame ionization methods.

Note 5: Although mass spectrometer is the method of detection given for the most recent EPA methods, flame ionization is shown as an alternative detector for Methods TO14A and TO2.

Note 6: Detailed descriptions of methods TO1 through TO17 are shown at: http://www.epa.gov/ttn/amtic/airtox.html.
METHODS FOR PAMS VOCs (note 1)

<table>
<thead>
<tr>
<th>Method Designation</th>
<th>Collector</th>
<th>Analyzer</th>
<th>Detector</th>
<th>Volatility category</th>
<th>Boiling pt. range (C)</th>
<th>Most Appropriate Compounds</th>
<th>Detection limit (ppbv)</th>
<th>Cost comments and ratings:</th>
<th>Procedural Steps in Methods</th>
<th>Separation</th>
<th>Detection, Identification, and Measurement</th>
</tr>
</thead>
<tbody>
<tr>
<td>TO-1</td>
<td>Tenax cartridge</td>
<td>GC</td>
<td>MS</td>
<td>Less volatile</td>
<td>80 to 200</td>
<td>aromatic hydrocarbons, benzenes, toluene, and xylene</td>
<td>0.01 to 100</td>
<td>2: MS is costly, but no cannister required</td>
<td>1. Collect sample by drawing ambient air through Tenax cartridge. 2. Return to lab. Heat cartridge and purge with inert gas.</td>
<td>4. Hold GC column at low temperature, then heat as VOCs are introduced.</td>
<td>5. Separate by GC and identify and measure by MS. ECD and FID are mentioned, but not identified as part of this method.</td>
</tr>
<tr>
<td>TO-2</td>
<td>Carbon molecular sieve cartridge</td>
<td>GC</td>
<td>MS, FID</td>
<td>Medium volatile</td>
<td>-15 to 120</td>
<td>benzene, toluene</td>
<td>0.1 to 200</td>
<td>1: FID not as costly as MS, and no cannister required</td>
<td>1. Collect sample by drawing ambient air through CMS cartridge. 2. Return to lab and purge water vapor from cartridge with dry air and heated helium. 3. Transfer VOCs to cryog. loop (trap), then heat trap for insertion of VOCs into GC.</td>
<td>4. Hold GC column at low temperature, then heat as VOCs are introduced.</td>
<td>5. Separate by GC and identify and measure by MS. FID is identified as a possibly preferable for this method.</td>
</tr>
<tr>
<td>TO-3</td>
<td>Cryogenic canister</td>
<td>GC</td>
<td>FID</td>
<td>Medium volatile</td>
<td>-10 to 200</td>
<td>many VOCs</td>
<td>0.1 to 200</td>
<td>1: Cryogenic canister system raises cost, but FID is cheaper than MS. 2: May use Nafion or non-drier before air goes into cryogenic container.</td>
<td>1. Collect sample by drawing ambient air directly into cryogenic trap (container), e.g., immersed in liquid argon. 2. Return to lab and purge water vapor from cartridge with dry air and heated helium. 3. Transfer VOCs to cryog. loop (trap), then heat trap for insertion of VOCs into GC.</td>
<td>4. Hold GC column at low temperature, then heat as VOCs are introduced.</td>
<td>5. Identify and measure compounds by FID (provides det. limits of 1 to 5 ng for many compounds).</td>
</tr>
<tr>
<td>TO-5</td>
<td>DNPH liquid impinger</td>
<td>HPLC</td>
<td>UV</td>
<td>Very volatile</td>
<td>-35 to 56</td>
<td>aldehydes and ketones</td>
<td>1 to 50</td>
<td>2: Uses HPLC</td>
<td>1. Draw ambient air into mid-sized impinger containing 10 ml DNPH reagent. 2. Place solution in vial and return to lab. Remove sclostatic layer, extract aq.</td>
<td>3. Evaporate organic layers and dissolve residue in methanol. 4. Inject into HPLC.</td>
<td>5. Determine derivatives using UV detector at 370 nm.</td>
</tr>
<tr>
<td>TO-11A</td>
<td>DNPH Cartridge</td>
<td>HPLC</td>
<td>UV</td>
<td>Very volatile</td>
<td>-35 to 56</td>
<td>aldehydes and ketones</td>
<td>0.5 to 100</td>
<td>2: Similar to TO-5, but use of cartridge might be more costly</td>
<td>1. Draw ambient air into DNPH coated cartridge. Place cartridge in glass vial and seal. 2. Return to lab. Remove cartridge and wash with acetonitrile.</td>
<td>4. Acetonitrile solution is diluted and injected into HPLC. 5. Determine derivative by UV detection at 350 nm.</td>
<td></td>
</tr>
<tr>
<td>TO-14A</td>
<td>Canister / cryog. trap</td>
<td>GC</td>
<td>FID/ECD or MS</td>
<td>Medium volatile (covers almost all VOCs)</td>
<td>-29 to 213</td>
<td>non-polar VOCs</td>
<td>0.2 to 25</td>
<td>2: Canister system req., FID optional</td>
<td>1. Draw ambient air into canister (e.g., 6L) equipped with flow control device. 2. Return to lab. Dry with Nafion dryer or alternative. 3. Transfer VOCs to cryog. loop (trap), then heat trap for insertion of VOCs into GC.</td>
<td>4. Separation in GC for transfer either to MS or to combination-detector system.</td>
<td>5. TO-14A describes either a two-way MS system (SCAN mode) or a three-way FID/PID.</td>
</tr>
<tr>
<td>TO-15</td>
<td>Canister / sorbent trap</td>
<td>GC</td>
<td>MS</td>
<td>Medium volatile (covers almost all VOCs)</td>
<td>-50 to 240</td>
<td>polar/non-polar VOCs</td>
<td>0.2 to 25</td>
<td>3: Canister plus solid adsorbent with MS</td>
<td>1. Draw ambient air into canister (e.g., 6L) equipped with flow control device. 2. Return to lab. Pass sample through multisorbent packed tube. Purge water vapor with helium. 3. Cryogenic trap concentrator optional.</td>
<td>4. Separation in GC.</td>
<td>5. Identify and measure compounds by MS</td>
</tr>
<tr>
<td>TO-16</td>
<td>None</td>
<td>FID/MS, open path</td>
<td>Infra-red spectrom.</td>
<td>Less volatile (covers med. also)</td>
<td>25 to 500</td>
<td>polar/non-polar VOCs</td>
<td>2: No sampling system req., but complex field equipment</td>
<td>1: No specific sampling system. All of the air in the line of the FTIR is &quot;sampled&quot;</td>
<td>2: None</td>
<td>2: None</td>
<td>2: None</td>
</tr>
<tr>
<td>TO-17</td>
<td>Adsorbent tube</td>
<td>GC</td>
<td>MS</td>
<td>Very volatile (covers med. also)</td>
<td>-60 to 200</td>
<td>polar/non-polar VOCs</td>
<td>0.2 to 25</td>
<td>2: Uses multisorbent cartridge and MS</td>
<td>1. Draw ambient air through a multisorbent packed tube. 2: Seal and push tube. Return to lab. Tube may be stored before analysis. 3: Transfer VOCs to intermediate adsorbent trap or directly to GC, by heating sampling tube.</td>
<td>4. Separation in GC.</td>
<td>5. Identify and measure compounds by MS</td>
</tr>
</tbody>
</table>

Notes:
2. Temperature ranges for the methods are found in the Compendium referenced above, Table 2, pages 5-10, or in the descriptions of the Methods, where the temperature range for the method is inferred from tests for detection of VOCs. Boiling Points and CAS numbers are found in "CRC Handbook of Chemistry and Physics."" 76th Edition, D. R. Lide, ed., Boca Raton, Florida, 1995. Section 3, pp.3-19.
3. Effective temperature ranges for adsorbents are found in the description for TO-17, Table 1, pp. 17-33 to 17-44.

FOR VERY VOLATILE VOCs:
Choose an adsorbent (multisorbent) with capability of adsorbing the required BP range. Then choose a TO Method with an adsorbent sampling procedure.

FOR MEDIUM VOLATILE VOCs:
Choose either a canister or an adsorbent system which covers the BP range as precisely as possible, so as to avoid the cost of excess capability.

FOR LESS VOLATILE VOCs:
Choose either a canister or an adsorbent system of lowest possible cost.

Note 1: See VOC Species Information on Previous Page.