



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

SEP 25 2019

Mr. Rohit Surathu
Senior Technical Manager
Alliance Source Testing, LLC
255 Grant Street SE
Suite 600
Decatur, AL 35601

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Dear Mr. Surathu:

I am writing in response to your letter dated September 17, 2019, requesting approval for use of alternative sample recovery procedures for Method 23 (40 CFR 60, Appendix A) on behalf of the Sanders Lead Company. Your company has been contracted by Sanders Lead Company to conduct air emissions testing for chlorinated dibenzo(p)dioxins (dioxins) and chlorinated dibenzofurans (furans) at their Troy, Alabama facility. Your letter indicates testing will be conducted to demonstrate compliance with 40 CFR 63, Subpart X, National Emission Standards for Hazardous Air Pollutants for Secondary Lead Smelting (Subpart X). This testing is required to comply with Alabama Department of Environmental Management Permit No. 210-0005-X034.

Subpart X requires that an affected facility measure dioxins and furans in emissions using the sampling and analytical procedures in Method 23. Method 23 specifies that the samples be recovered from the sampling train glassware using acetone, methylene chloride, and toluene. Your letter requests we approve an alternative test procedure to omit the methylene chloride rinse in recovering the stack gas sample from the sampling train glassware when performing Method 23. You note the hazardous nature of methylene chloride and the prior broadly applicable EPA approvals for this alternative procedure for Method 23 testing at other source categories including Secondary Aluminum Production, Portland Cement Manufacturing, and Incinerators and Waste Combustors (ALT-034, ALT-036, and ALT-052 at www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods).

Data collected by EPA has demonstrated that sample recovery rinses using toluene are as effective as those using methylene chloride and that substitution of toluene for methylene chloride does not significantly change the quantity of dioxins and furans recovered from the sampling equipment. Based on these findings, we are approving your request to use toluene in lieu of methylene chloride for field recovery rinses of Method 23 sampling trains with the following provisos:

- You may recover the acetone sample recovery rinses separate from the toluene sample recovery rinses for shipping purposes.
- The toluene sample recovery rinses must be combined with other the sample fractions prior to extraction and analysis.

- A copy of this approval letter must be included in the report for each testing program where these alternative testing procedures are applied.

Since these alternative procedures are applicable to all of the facilities subject to 40 CFR 63, Subpart X, we will announce on EPA's Web site (<https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods>) that our approval of this modification to Method 23 is broadly applicable to all facilities subject to performance tests under Subpart X. Also, we are currently planning to propose amendments to Method 23 and will include these method modifications in our proposed amendments. Should this proposal become final, this alternative approval may be rescinded.

If you have any questions regarding this approval or need further assistance, please contact Ray Merrill at (919) 541-5225 or merrill.raymond@epa.gov.

Sincerely,



Steffan M. Johnson, Group Leader
Measurement Technology Group

cc: Laura Aymett, Alliance Source Testing
Gerri Garwood, EPA/OAQPS/SPPD
Jon Howard, ADEM Air Division
Maria Malave, EPA/OECA
Tonisha Dawson, EPA/OAQPS/SPPD
EPA Regional Testing Contacts