



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

APR 15 2009

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. David Elam
Dow Chemical Company
2301 N. Brazosport Blvd
Freeport, TX 77541-3257

Dear Mr. Elam:

In your January 20, 2009 letter, you asked permission to use alternative procedures in Methods 26 and 29 when determining hydrogen chloride and metals emissions from the B-33 rotary kiln incinerator at your Freeport, Texas facility. The unit is subject to the requirements of 40 CFR Part 63, Subpart EEE, National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors. You asked to use the following deviations.

Method 26A

In Method 26A, you propose to replace the post-analysis recalibration check with a single mid-range standard and a blank after every tenth sample. You will restrict this mid-level check to 10 percent deviation from the initial calibration. In addition, a laboratory control sample from a second source laboratory will be analyzed with each batch of samples to ensure the accuracy of the primary calibration standard.

You also asked to prepare the calibration standards in water instead of dilute sulfuric acid or sodium hydroxide as prescribed. You note this will reduce analytical errors and better approximate the final sample matrix due to sampling dilution from moisture condensation, neutralization by carbon dioxide, and a 1:10 dilution routinely used to prepare the samples for analysis. Matrix effects will be monitored through the matrix spike that is required by the method.

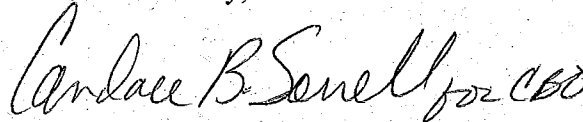
Method 29

In Method 29, you propose to use 0.4 percent hydrochloric acid (HCl) in the digestate for the front-half sample fraction. You believe this is necessary to achieve maximum mercury recovery during the microwave extraction. A similar HCl solution is used in the front-half digestion of the Ontario Hydro method.

These proposed deviations in the Methods 26A and 29 procedures appear to be acceptable for the reasons stated. Therefore, we approve their use at Dow's B-33 rotary kiln incinerator at the Freeport, Texas facility. Since this alternative method is applicable to other similar facilities in this source category, we will be posting this letter on our website at <http://www.epa.gov/ttn/emc/approalt.html> for use by other interested parties.

If you have questions or would like to discuss the matter further, please call Foston Curtis at (919) 541-1063, or you may e-mail him a message at curtis.foston@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Conniesue Oldham for CEO".

Conniesue Oldham, Ph.D, Group Leader
Measurement Technology Group

cc: Foston Curtis (Mail Code E143-02)
Larry Landry, Region 6
John Smith, Texas CEQ