



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

January 22, 2014

JAN 27 2014

Mr. Larry Goldfine  
ARI Environmental, Inc.  
951 Old Rand Road  
Unit 106  
Wauconda, Illinois 60084

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Dear Mr. Goldfine:

This letter is in response to your December 6, 2013, request to use an alternative nitrogen dioxide (NO<sub>2</sub>) test gas for the Method 7E (Appendix A of 40 CFR Part 60) converter efficiency test. Method 7E recommends a test gas in the 60-80 ppm range, but allows other concentrations as needed. You have experienced stability problems with cylinder gases at these concentrations, and ask that gases certified in the 500 to 1,000 ppm or more range be allowed with Method 205 (Appendix M of 40 CFR Part 51) dilution into the appropriate test range.

We are aware of the stability issues associated with low-concentration NO<sub>2</sub> cylinder gases. We believe the precision limits in Method 205 are sufficient to ensure that generated gases will be of suitable quality for the Method 7E converter efficiency test. We, therefore, approve your request to use a Method 205-certified gas dilution system in the generation of NO<sub>2</sub> test gases for the Method 7E converter efficiency test. Since this alternative is applicable to other sources that require the use of Method 7E, we will post this letter on our website at <http://www.epa.gov/ttn/emc/approalt.html> for use by other interested parties. Please note that this approval does not extend to Part 75 testing.

If you have questions or would like to discuss the matter further, please contact Ray Merrill at (919) 541- 5225, or [merrill.raymond@epa.gov](mailto:merrill.raymond@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Robin D. Segall".

Robin Segall, Acting Group Leader  
Measurement Technology Group

cc: Ray Merrill