



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

March 15, 2021

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Jordan Williamson
CEO
GAS Inc.
303 W. 3rd Street
Elk City, OK 73644

Dear Mr. Williamson:

We are writing in response to your letter received on September 17, 2020, in which you request the approval of alternative testing procedures. The EPA's Office of Air Quality Planning and Standards (OAQPS) is the delegated authority for consideration of major alternatives to test methods and procedures as set forth in 40 CFR parts 60 and 63 under which your request must be addressed. GAS Inc. is requesting a change to one of the test methods, ASTM D6348-03, used for conducting performance tests to determine compliance under 40 CFR part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (Subpart JJJJ) and 40 CFR part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Performance for Stationary Reciprocating Internal Combustion Engines (Subpart ZZZZ). The change being requested will be used to check detector linearity of the Fourier Transform Infrared (FTIR) instrumentation used to conduct this method. Specifically, you are requesting that the procedures of section 8.3.3 of Method 320 (40 CFR part 60, Appendix A), another FTIR-based method allowed under Subparts JJJJ and ZZZZ, be used in lieu of section A6.4.1 of ASTM D6348-03 when conducting testing using ASTM D6348-03 under 40 CFR part 60, Subpart JJJJ and 40 CFR part 63, Subpart ZZZZ.

In your request, you state that this alternative linearity check procedure will produce consistent results when utilizing either Method 320 or ASTM D6348-03. Additionally, some FTIR instrumentation does not allow for reducing the size of the aperture in the instrument and, thus, it would not be feasible to properly conduct the entirety of the ASTM D6348-03 method in its current form using such an instrument.

Based on our understanding of FTIR instrument principles and recognition that the requested alternative determination of detector linearity is both technically sound and contained within Method 320, we are approving the requested change. We believe that this alternative is acceptable for use for use in testing all engines subject to 40 CFR part 60 Subpart JJJJ and 40 CFR part 63, Subpart ZZZZ. Also, we will post this letter as ALT-141 on EPA's website (at www.epa.gov/emc/broadly-applicable-approved-alternative-testmethods) to announce that our

approval of this alternative test method is broadly applicable to engines for the purposes of meeting Subparts JJJJ and ZZZZ.

If you should have any questions or require further information regarding this approval, please contact David Nash of my staff at 919-541-9425 or email at *nash.dave@epa.gov*.

Sincerely,

Steffan M. Johnson, Group Leader
Measurement Technology Group

cc:

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