UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

OCT 2 8 2008

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Chris Wrenn
TCR Tecora
PO Box 58358
Raleigh, NC 27604

Dear Mr. Wrenn:

In your August 25, 2008 correspondence, you asked permission to use an alternative procedure for determining sample volume and flow rate for Method 5 (40 CFR Part 60, Appendix A) and Method 5 derivates such as Methods 8, 23, and 29. Method 5 allows for alternative metering systems, subject to the approval of the Administrator, that are capable of maintaining sampling rates within 10 percent of isokinetic and of determining sample volumes to within 2 percent. Method 5 does not address alternatives such as the Isostack metering system that you propose to use to determine sample flow rates.

Based on the documentation you supplied, we agree that the alternative determination of sample flow rates by the Isostack metering system is adequate to maintain sampling rates within 10 percent of isokinetic and that this system does not require a meter orifice. This approval does not remove any calibration requirements of Method 5. All calibrations shall be performed with the exception of those related ΔH@ (defined in Section 9.2.1 of Method 5). The sample flow rate system shall be calibrated in lieu of ΔH@ and shall not deviate by more than 5 percent. As long as these requirements are met, we approve your request to use the alternative metering system. We agree that the system will provide data of similar quality as the Method 5 required system, while potentially reducing the labor burden of taking measurements.

Since this broad approval is applicable to all Federal standards in 40 CFR 60, 61 and 63, we will be posting this letter to our website at http://www.epa.gov/ttn/emc/approalt.html for use by other interested parties.

If you have any questions or would like to discuss this matter further, please call Jason DeWees at (919) 541-9724, or you may email him at dewees.jason@epa.gov

Sincerely,

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