



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

FEB 24 2009

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. David Bagwell
Managing Member
Horizon Engineering
13585 NE Whitaker Way
Portland, OR 97230

Dear Mr. Bagwell:

This is in response to your letter dated February 10, 2009, asking us to approve a modification to EPA Method 23. Your company has been contracted by Coos County Solid Waste Department to conduct air emissions testing for dioxins and furans at the Beaver Hill Solid Waste Disposal Site in Coos Bay, Oregon. This testing is required to comply with their Title V Operating Permit No. 06-0099. The permit limits the emissions of total dioxins and furans and requires that the incinerator demonstrate compliance with that emission limit by measuring its dioxin and furan emissions with the sampling and analytical procedures in EPA Method 23. You are proposing to modify EPA Method 23 by using only acetone and toluene as the recovery solvents instead of using acetone, methylene chloride, and toluene as specified in the method. In addition, you would like to combine the acetone and toluene rinses (both front half and back half), filter, and XAD-2 trap into one sample prior to extraction and analysis instead of analyzing the toluene rinse separately as required by the method.

EPA has determined from EPA Method 23 quality assurance data that toluene recovery rinses are as effective as methylene chloride rinses and do not significantly change the amount of dioxins and furans recovered from the sampling equipment. Based on these findings, we approve the substitution of toluene for methylene chloride as the recovery solvent for EPA Method 23. Because we are allowing you to substitute the toluene rinse for the methylene chloride rinse, there is no need to analyze the toluene rinse separately. It may be combined with the other sample fractions prior to extraction and analysis.

Because we believe that these modifications are acceptable for use at any incinerator or waste combustor, this approval to modify EPA Method 23 applies to any other waste incinerator or waste combustor facilities that your company or any other testing company may test. We will announce on EPA's web site (at <http://www.epa.gov/ttn/emc/tmethods.html#CatB>) that our approval of these modifications to EPA Method 23 is broadly applicable to all waste incinerators and waste combustors.

If you need further assistance, please contact Gary McAlister at (919) 541-1062.

Sincerely,

Robin P. Segall for CBO

Connisue B. Oldham, Ph.D., Group Leader
Air Measurements and Quality Group

cc: Rai Peterson, Oregon Department of Environmental Quality, Eugene, Oregon
Paul Boys, EPA Region 10