



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

MAR 04 2010

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Patrick Clark, P.E.
Airtech Environmental Services Inc.
601A Country Club Drive
Bensenville, IL 60106

Dear Mr. Clark:

This letter is in response to your February 9, 2010, request for approval of an alternative to the requirements to perform Method 3B and Method 4 as specified in 40 CFR Part 63, Subpart EEE (Hazardous Waste Combustor MACT).

The Hazardous Waste Combustor MACT requires Performance Specification (PS) 4B, which then references PS 4A and PS 3. In Section 8.2 of PS 3 it states, "Reference Method. Unless otherwise specified in an applicable subpart of the regulations, Method 3B or other approved alternative is the RM for O₂ or CO₂." You are requesting that Method 3A be accepted as an alternative for this application. Method 3A is an acceptable alternative for Method 3B in this case because Method 3A is more sensitive and has better accuracy and precision than Method 3B. We agree with the reasoning of your request and are approving your request to use Method 3A in lieu of Method 3B.

In Section 6.4.1 of "Appendix to Subpart EEE of Part 63--Quality Assurance Procedures for Continuous Emissions Monitors Used for Hazardous Waste Combustors," it states, "Moisture Correction. Method 4 of Appendix A, part 60 of this chapter, must be used to determine moisture content of the stack gasses." You stated that all three of the required continuous emission monitoring systems (CEMS) use moisture removal systems and read on a "dry" basis, that your reference method system uses a moisture removal system, and that both systems are therefore on a "dry" basis and thus no moisture correction is required. We agree with you that the only reason stack gas moisture needs to be determined during a RATA is in a case where one of the measurements is performed on a "wet" basis and the other measurement is on a "dry" basis. We also agree with you that during compliance monitoring with the CEMS that moisture does not have to be measured continuously because your monitor makes a "dry" measurement. We agree with the reasoning of your request and are approving your request to forego the performance of Method 4 in the "dry" configurations that you have described for either the RATA test or for compliance monitoring.

We believe that this alternative is acceptable for use at any hazardous waste combustor subject to the emission limits under 40 CFR Part 63 Subpart EEE. Therefore, we will announce on EPA's website (www.epa.gov/ttn/emc) that our approval of these alternatives are broadly applicable to all hazardous waste combustors for the purpose of meeting the requirements of Subpart EEE.

If you have any questions or concerns, please feel free to contact Dan Bivins of my staff at (919) 541-5244.

Sincerely,



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