UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

March 10, 2014

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

SUBJECT: Withdrawal of Broadly Approved Alternative Test Methods 061 and 087 (ALT-061 and 087), Waiver of Stratification Testing for Engines

FROM: Steffan Johnson, Acting Group Leader
Measurement Technology Group (E143-02)

TO: Regional Air Directors and Air Branch Managers

Ms. Alice Edwards, of the Alaska Department of Environmental Conservation, submitted a comment letter to the docket for the Revisions to Test Methods and Testing Regulations proposal (EPA-HQ-OAR-2010-0114) on March 9, 2012. She made two important points regarding simplification of the gas stratification requirements associated with engine testing: 1) that stratification could potentially be introduced by catalytic controls that are being used on some engines and, 2) that there is likely a significant population of internal combustion engines subject to at least one of the three subparts (Subparts IIII and JJJJ in 40 CFR Part 60 and Subpart ZZZZ in 40 CFR Part 63) that have exhaust stacks greater than 12 inches in diameter, which could reasonably be sampled at multiple points.

For the Revisions to Test Methods and Testing Regulations final rule published on February 27, 2014 (79 FR 11228), we decided that for cases where gaseous emissions and diluent gases are being measured from federally regulated engines, we will allow ducts less than or equal to 6 inches in diameter to be sampled at a single point at the centroid of the duct. Ducts greater than 6, but less than 12 inches in diameter, will need to be sampled at three specified traverse points unless they have been demonstrated to be unstratified according to Method 7E. For ducts equal to or greater than 12 inches in diameter, if the sampling port location meets the minimum Method 1 criterion for distance from disturbances (such as catalyst beds), they may be sampled at three points; the two stack diameter distance downstream from the nearest disturbance will provide for gas mixing and, coupled with a three-point traverse, yield a representative sample. If they don't meet the Method 1 criterion for distance from disturbances, ducts equal to or greater than 12 inches in diameter will be subject to stratification testing for determination of sampling points.

Additionally, we now recognize that the broadly applicable alternative test method approvals referred to as ALT-061 and ALT-087 (www.epa.gov/ttn/emc/approalt.html) issued on September 22, 2009, and July 27, 2011, respectively, should be withdrawn. We approved the use of single-point sampling at the centroid of the exhaust when sampling gaseous emissions and diluent gases from federally regulated engines in the *Federal Register* notice dated February 15, 2012.

However, based on our consideration of the comment letter from Ms. Edwards and our ultimate decision regarding finalization of Revisions to Test Methods and Testing Regulations, we no longer believe that this alternative is appropriate.

Therefore, we are withdrawing the broadly applicable alternatives, ALT-061 and ALT-087, and will post this withdrawal letter on our website at http://www.epa.gov/ttn/emc/approalt.html. Although we have decided to retract these two broadly applicable test methods, we will continue to grant case-by-case approvals, as appropriate, and will (as state, local, and tribal agencies and the EPA Regional Offices should) consider the need for an appropriate transition period for users either to request case-by-case approval or to transition to an approved method.

For any questions or comments, please contact Robin Segall at (919) 541-0893 or at segall.robin@epa.gov. Thank you for your attention to this matter.