UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

MAR 31 1999

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

MEMORANDUM

SUBJECT: Request for the Approval of Method 25B as an Alternative to Method 25A in 40 CFR Part 63 Subpart Y

FROM: J. David Mobley, Acting Division Director
Emissions, Monitoring and Analysis Division (MD-14)

TO: Barbara A. Finazzo, Division Director
Environmental Science and Assessment
US EPA, Region 2 (MS100)

I am writing in response to a letter dated March 3, 1999, in which your office requested the approval of Method 25B (40 CFR Part 60, Appendix A) as an alternative to Method 25A (40 CFR Part 60, Appendix A). Specifically, Section 63.565 of Subpart Y of 40 CFR Part 63, National Emission Standards for Marine Tank Vessel Loading Operations specifies the use of Method 25A for compliance determination. The source category (gasoline-loading) requesting the use of Method 25B in place of Method 25A believes that the high loading concentrations at the inlet of the control device would be more appropriately measured by Method 25B.

Since Subpart XX of 40 CFR Part 60 for emissions from bulk gasoline terminals allows use of either Method 25A or Method 25B, and since these two sources are similar in terms of control devices and emission characteristics, the Emission Measurement Center has determined that Method 25B may be used as an alternative to Method 25A for the performance testing requirement in Subpart Y for sources loading gasoline. Please call Rima Dishakjian of my staff at (919) 541-0443 if we can be of further assistance in this matter.

cc: Rima Dishakjian (MD-19)
William H. Lamason (MD-19)
Dore LaPosta, Region 2 (2DESA-MAB)
Dave Markwordt (MD-13)
Robin Segall (MD-19)
Don Wright, Region 2 (2DESA-MAB)

Linda Murphy, Region I
Kathleen Callahan, Region II
Judith Katz, Region III
Winston Smith, Region IV
David Kee, Region V
Robert Hanneschlager, Region VI
Art Spratlin, Region VII
Richard Long, Region VIII
David Howekamp, Region IX
Anita Frankel, Region X