UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

JUL 2 1 2010

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Howard Schiff
TRC Companies Inc.
650 Suffolk Street
Wannalancit Mills
Lowell, MA 01854

Dear Mr. Schiff:

In an alternative methods approval letter dated February 25, 2010, we granted Derenzo & Associates permission to use the TECO Model 55C analyzer in place of Method 18 to measure methane from internal combustion engines subject to 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. You brought to our attention that the proposed analyzer more appropriately measures non-methane organics and should be allowed as an alternative to the "cutter" analyzers already allowed by the regulation.

We see your point and appreciate your bringing it to our attention. This letter grants approval to use the TECO Model 55C analyzer to measure non-methane organic compounds from Subpart JJJJ engines. The analyzer may also be used by others at other Subpart JJJJ engines. We will announce this as broadly applicable to all stationary spark ignition combustion engines on EPA's web site (at http://www.epa.gov/ttn/emc/tmethods.html#CatB).

If you need further assistance, please contact Foston Curtis at (919) 541-1063 or Gary McAlister at (919) 541-1062.

Sincerely,

Connie Oldham

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

cc: Michael Brack, Derenzo & Associates
Foston Curtis, E143-02
Gary McAlister E143-02

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