UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

JUN 3 2004

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Herbert T. Dixon, Jr.
Vice President
TESTAR, Inc.
7424-108 ACC Boulevard
Raleigh, NC 27617

Dear Mr. Dixon:

This is in response to your letter dated May 6, 2004, that requested approval for a modification to EPA Method 23 (40 CFR 60, Appendix A). Method 23 is required for determining compliance with polychlorinated dibenzo-p-dioxin and polychlorinated dibenzofuran emission limits in 40 CFR 60.30b - 60.39b (Subpart Cb), 40 CFR 60.50a - 60.59a (Subpart Ea), 40 CFR 60.50b - 60.59b (Subpart Eb), and 40 CFR 63.1340 - 63.1359 (Subpart LLL). In your letter you also cited Subpart Ca. Subpart Ca was withdrawn in 1995 when Subpart Cb became a final rule.

Method 23 specifies that the tester use acetone, methylene chloride, and toluene to recover the sample from the sampling train glassware. You have requested that we approve an alternative test procedure to omit the methylene chloride rinse. You are proposing this modification on behalf of your clients who operate municipal waste combustors subject to either Subpart Cb, Ea or Eb or operate Portland cement plants subject to Subpart LLL at the locations shown in the enclosure.

In addition, you requested approval of the same modification to EPA Method 0023A (EPA Publication # SW-846) on behalf of your clients who operate hazardous waste combustors. Method 0023A is required for determining compliance with polychlorinated dibenzo-p-dioxin and polychlorinated dibenzofuran emission limits in 40 CFR 264.340 - 264.347 (Subpart O). EPA's Office of Solid Waste is responsible for the emission limits on hazardous waste combustors in 40 CFR 264.343 as well as Method 0023A, and we do not have the delegated authority to approve alternatives to their test procedures.

Based on data that the EPA collected on the relative efficiency of rinsing with methylene chloride and toluene as opposed to rinsing with toluene alone, we agree that it is acceptable to omit the methylene chloride rinse. Therefore, we are approving your request to omit the methylene chloride rinse from Method 23, when the method is used to determine compliance with either 40 CFR 60.30b - 60.39b (Subpart Cb), 40 CFR 60.50a - 60.59a (Subpart Ea), 40 CFR

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60.50b - 60.59b (Subpart Eb), or 40 CFR 63.1340 - 63.1359 (Subpart LLL) at the individual facilities specified in the enclosure (Tables I, II, and III).

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

Sincerely,

Robin R. Segall for CBO

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

Enclosure

cc: Jack Harvanek, Region I
Donald Wright, Region II
Chris Pilla, Region III
Dave McNeal, Region IV
Nabil Fayoumi, Region V
Charles Ritchey, Region VI
Don Bahnke, Region VII
Stanley Tong, Region IX
Paul Boys, Region X

ATTACHMENT 1
MUNICIPAL WASTE COMBUSTION FACILITIES

Facility Name	Facility Address
Wheelabrator Saugus, Inc.	Saugus, MA
Wheelabrator North Andover, Inc.	North Andover, MA
Wheelabrator Millbury, Inc.	Millbury, MA
Wheelabrator Concord, Inc.	Concord, NH
Wheelabrator Claremont, Inc.	Claremont, NH
Wheelabrator Lisbon, Inc.	Lisbon, CT
Wheelabrator Bridgeport, Inc.	Bridgeport, CT
Wheelabrator Hudson Falls, Inc.	Hudson Falls, NY
Wheelabrator Westchester, Inc.	Peekskill, NY
Wheelabrator Falls, Inc.	Morrisville PA
Wheelabrator Gloucester, Inc.	Westville, NJ
Wheelabrator Baltimore, Inc.	Baltimore, MD
Wheelabrator North Broward, Inc.	Pompano Beach, FL
Wheelabrator South Broward, Inc.	Ft. Lauderdale, FL
Wheelabrator Pinellas, Inc.	St. Petersburg, FL
Wheelabrator McKay Bay, Inc.	Tampa, FL
Wheelabrator Ridge, Inc.	Auburndale, FL
Wheelabrator Spokane, Inc.	Spokane, WA
Covanta Haverhill, Inc.	Haverhill, MA
Mid-Conn Resource Recovery Facility	Hartford, CT
Bristol Resource Recovery Facility	Bristol, CT
Wallingford Resource Recovery Facility	Wallingford, CT
Onondaga County Resource Recovery Facility	Syracuse, NY
Babylon Resource Recovery Facility	Babylon, NY
Huntington Resource Recovery Facility	Huntington, NY
Warren County Resource Recovery Facility	Oxford, NJ
Union County Resource Recovery Facility	Rahway, NJ
Lancaster County Resource Recovery Facility	Bainbridge, PA
Montgomery County Resource Recovery Facility	Dickerson, MD
Alexandria Waste to Energy Facility	Alexandria, VA
I-95 Energy / Resource Recovery Facility	Lorton, FL
Huntsville Resource Recovery Facility	Huntsville, AL
Lake County Resource Recovery Facility	Okahumpka, FL
Pasco County Resource Recovery Facility	Spring Hill, FL
Hillsborough County Resource Recovery Facility	Tampa, FL
Lee County Resource Recovery Facility	Ft. Meyers, FL
Michigan Waste Energy, Inc.	Detroit, MI
Kent County Resource Recovery Facility	Grand Rapids, MI
Indianapolis Resource Recovery Facility	Indianapolis, IN
Hennepin Resource Recovery Facility	Minneapolis, MN
Marion County Resource Recovery Facility	Salem, OR
Stanislaus Resource Recovery Facility	Crows Landing, CA
Honolulu Resource Recovery Venture	Honolulu, HI
York County Resource Recovery Facility	York, PA

ATTACHMENT 1
MUNICIPAL WASTE COMBUSTION FACILITIES
(continued)

Metro-Dade Resource Recovery Facility	Miami, FL
Panama City Resource Recovery Facility	Panama City, FL
Camden County Resource Recovery Facility	Camden, NJ
Montenay Charleston Resource Recovery, Inc.	Charleston, SC
Southeastern Connecticut Resource Recovery Facility	Preston, CT
Hempstead Resource Recovery Facility	Hempstead, NY
Mid-Maine Waste Action Corporation	Auburn, ME
Maine Energy Recovery Company	Biddeford, ME
SPSA	Portsmouth, VA