

Dr. Vipin Varma
NCASI
Southern Regional Center
P.O. Box 141020
Gainesville, Florida 32614-1020

Dear Dr. Varma:

I am writing in response to your request dated June 5, 2003, asking that we review the data that you submitted supporting your request to modify NCASI Method CI/SG/PULP-94.02 by eliminating the backup silica gel tubes from the sampling train when it used to measure only methanol. The modified method would be renamed as NCASI Method CI/SG/PULP-94.03. We agree with your conclusion that the modified method met Method 301 criteria for measuring methanol in air emissions samples from various sources at pulp and paper mill regulated under 40 CFR Part 63, Subpart S, Paragraph 446. I have summarized in the enclosed Table the correction factors for the different sources. During any future testing, the tester must document and use the appropriate correction factor to correct the data from the test method.

As we discussed, each specific source must make its own alternative test method request. However, we can and will consider the validation data that you submitted in evaluating an alternative method request from any source similar to the ones at which you collected your validation data.

If you have any questions about our comments or you would like to meet to discuss them, please contact Gary McAlister of my staff at (919) 541-1062.

Sincerely,

J. David Mobley, Acting Director
Emissions, Monitoring and Analysis Division

cc: K. C. Hustvedt (MD-13)
Stephen A. Shedd (MD-13)
Jeffrey A. Telander (MD-13)

Enclosure

OAQPS/EMAD/SCGB/GMcALISTER/lcheek/MD-19/541-1062/09/21/90

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Table. NCASI Method CI/SG/PULP-94.02

Source	Validated	Correction Factor
Brownstock Washer Hood	Yes	None
Bleach Plant Scrubber Inlet	Yes	None
Smelt Dissolving Tank	Yes	1.04
Recovery Furnace	Yes	1.04