



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

APR 18 2018

Dr. Charles G. Simon
VOC Reporting, Inc.
14260 W. Newberry Road, No. 136
Newberry, FL 32669

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Dear Dr. Simon,

I am writing in response to your letter and report dated November 17, 2017, in which you seek an alternative test method modification to Method 25 (40 CFR part 60, Appendix A). Your request is limited to approval of an alternative filter holder system and filter size for Method 25. The alternative filter is 56% of the diameter and made of the same glass fiber filter material specified in Method 25. The alternative filter holder is operated at the same temperature(s) specified in Method 25.

You requested an alternative filter holder system for all applications of Method 25 in 40 CFR parts 60 and 63. Specifically, you requested use of this alternative filter, filter holder, and filter heater box for the subparts listed in Tables 1 and 2.

Table 1. 40 CFR 60 Subparts Affected by this Alternative Request

CFR Subpart	CFR Rule or Subpart Title
Subpart EE	Standards of Performance for Surface Coating of Metal Furniture
Subpart MM	Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations
Subpart RR	Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations
Subpart SS	Standards of Performance for Industrial Surface Coating: Large Appliances
Subpart TT	Standards of Performance for Metal Coil Surface Coating
Subpart WW	Standards of Performance for the Beverage Can Surface Coating Industry
Subpart SSS	Standards of Performance for Magnetic Tape Coating Facilities
Subpart VVV	Standards of Performance for Polymeric Coating of Supporting Substrates Facilities
Subpart WWW	Standards of Performance for Municipal Solid Waste Landfills
Subpart XXX	Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification after July 17, 2014

Table 2. 40 CFR 63 Subparts Affected by this Alternative Request

CFR Subpart	CFR Rule or Subpart Title
Subpart Y	National Emission Standards for Marine Tank Vessel Loading Operations
Subpart CC	National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries
Subpart KK	National Emission Standards for the Printing and Publishing Industry
Subpart SS	National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process
Subpart MMMM	National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products
Subpart OOOO	National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles
Subpart PPPP	National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products
Subpart QQQQ	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products
Subpart RRRR	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture
Subpart SSSS	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil
Subpart BBBB	National Emission Standards for Hazardous Air Pollutants for Semiconductor Manufacturing
Subpart HHHH	National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing

Method 25 is prescriptive on the use of a specific filter holder and size filter, requiring you to make a formal request for flexibility to the method. Your request is based on modernized equipment that is smaller, lighter weight, and easier to use and clean. You claim that the miniaturization and modularization of the Method 25 test equipment minimizes the sampling system footprint allowing it to be used in space-limited applications simultaneous with other concurrent stack test methods. You note that the alternative filter holder reduces background contamination, since your filter holder design allows test teams to solvent clean the filter holder prior to the Method 25 bake-out, thus reducing the blank bias of the reference method. Your system separates the flow measurement devices from the filter housing, thus permitting vertical, as well as horizontal, port sampling. You also claim that your alternative filter holder can be implemented at a lower cost because the filter exchange and leak check can be performed in less time than that specified in Method 25.

Your alternative request includes a description of the alternative Method 25 equipment including:

- 1) An alternative 12.5 mm (1/2 in) diameter filter and cartridge filter holder.
- 2) A filter holder block including two cartridge heaters that are used to maintain the required Method 25 filter temperature during sampling.
- 3) A filter cartridge that can be inserted into a block of 316-stainless steel, equipped with a means to provide a leak tight seal for the filter during sampling.
- 4) An alternative filter holder heater box lined with high-temperature insulation, containing direct heating elements and a temperature sensor capable of maintaining the Method 25 specified filter temperature.

You provided Method 301 (40 CFR part 63, Appendix A) validation data from a series of field test programs that compared the results of Method 25 conducted with the method-specified Gelman Style filter holder system in parallel with Method 25 conducted with your alternative Millennium Instruments Method 25 filter holder system. The results from these tests demonstrated that the alternative equipment met the precision and bias criteria for method equivalence in Method 301.

With this letter, we are approving your request for the alternative use of filter, filter holder, and filter heater box as specified above for 40 CFR parts 60 and 63 subparts that require use of Method 25. We have judged the alternative filter, filter holder and heater block for Method 25 to be generically the same and technically sound for broad application to Method 25 and believe that this alternative approval is appropriate for use in place of the prescriptive requirements in Method 25 for filter, filter holder, and filter box heater. For this reason, we will post this letter on our website as ALT-128 at <https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods> so that after the date of this letter, other interested parties may make use of this alternative method.

Those opting to use this alternative must include a copy of this approval letter in each report containing data generated with this alternative method. If you have any questions regarding this approval or need further assistance, please contact Ray Merrill at (919) 541-5225 or merrill.raymond@epa.gov.

Sincerely,



Steffan M. Johnson, Group Leader
Measurement Technology Group

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