



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

AUG 23 2007

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Phil Tays
Vice President and Plant Manager
Wise Alloys, LLC
4805 Second Street
Muscle Shoals, Alabama 35661

Dear Mr. Tays:

This is in response to your letter dated June 5, 2007, asking us to approve three modifications to EPA Method 23 (40 CFR Part 60, Appendix A). You are planning to conduct air emissions testing for dioxins and furans at your two secondary aluminum facilities in Muscle Shoals, Alabama. This testing is necessary to comply with the testing requirements specified in 40 CFR Part 63.1500, National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production. This standard requires that you measure dioxin and furan emissions using the sampling and analytical procedures in EPA Method 23. 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 to omit the methylene chloride rinse. Method 23 also refers to EPA Method 5 (40 CFR Part 60, Appendix A), but Method 5 was revised to require the addition of a temperature sensor located so that the sensing tip is in direct contact with sample gas passing through the filter. You are requesting that you be allowed to omit the sample gas filtration-temperature sensor from the Method 23 sampling train. In addition, you would also like to use a Teflon-coated stainless steel sample nozzle instead of the borosilicate glass, quartz, nickel, or nickel-plated stainless steel nozzle specified in the method.

Based on data that the EPA collected on the relative efficiency of rinsing with methylene chloride and toluene as opposed to toluene alone, we agree that it is acceptable to omit the methylene chloride rinse.

As you pointed out in your request, Method 23 combines the filterable particulate matter and non-filterable sample fractions of the Method 23 sample train for analysis, so there is no reason to monitor the sample gas filtration temperature. Therefore, we approve your request to omit the sample gas filtration-temperature sensor from the Method 23 sampling train.

We also agree that Method 23 already allows the tester to use Teflon tubing in the sampling train in areas where the Teflon tubing would directly contact the sample gas, so there would be no reason to prohibit Teflon-coated stainless steel nozzles so long as the temperature of

the sample gas stream does not exceed the upper temperature limit to which Teflon can be continuously exposed without softening or experiencing some other type of performance problem. For the PTFE Teflon that you wish to use, this approval would apply to any gas stream where the temperature is always less than 290°C (554°F). In addition, the brush that is used to recover sample from the nozzle must be made from a non-abrasive material so that the Teflon coating will not be scratched.

Because we believe that this procedure is acceptable for use at any secondary aluminum facility, this approval to modify Method 23 applies to its use at the following two facilities and to any other secondary aluminum facility owned by your company:

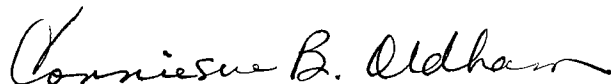
Alabama Reclamations Operations
Wise Alloys, LLC
4805 Second Street
Muscle Shoals, AL 35661
ADEM Facility No. 701-0006

Alloys Complex
Wise Alloys, LLC
4805 Second Street
Muscle Shoals, AL 35661
ADEM Facility No. 701-0007.

In addition, these modifications to Method 23 may be used by any other company that owns a secondary aluminum production facility if they choose to use them. We will announce on EPA's web site (at <http://www.epa.gov/ttn/emc/tmethods.html#CatB>) that our approval of this modification to Method 23 is broadly applicable to all secondary aluminum facilities. Also, we are currently planning to propose amendments to Method 23 and we will include these modifications in our proposed amendments.

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

Sincerely,



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