



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

MAY 01 2008

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Mr. Chris LeMay  
E. Roberts Alley & Associates, Inc.  
300 10<sup>th</sup> Ave., South  
Nashville, TN 37203

Dear Mr. LeMay:

This letter is in response to your e-mail dated April 14, 2008, which requests the approval of an alternative test method. Your company has been contracted by Wabash Alloys to test their secondary aluminum production facilities in Wabash and Tipton, Indiana. This testing is required to comply with the testing requirements specified in 40 CFR Part 63, Subpart RRR – National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production. This standard requires that you measure hydrogen chloride (HCl) emissions using EPA Method 26A. You are proposing to use EPA Method 26 as an alternative to Method 26A. You are only proposing to use Method 26 in locations where water droplets are not present because Method 26 does not include the necessary procedures to collect a representative sample of water droplets if they are present.

We agree that it is acceptable to use Method 26 instead of Method 26A to measure HCl emissions from secondary aluminum production facilities where you can demonstrate that there are no water droplets in the emission stream. You can demonstrate that there are no water droplets in the emission stream by showing that the vapor pressure of water in the emission stream that you will be testing is less than the equilibrium vapor pressure of water at the emission stream temperature, and by certifying that the emission stream is not controlled by a wet scrubber. Provided that you meet these conditions, you may use Method 26 as an alternative to Method 26A for testing the secondary aluminum production facilities at Wabash Alloys in Wabash and Tipton, Indiana.

Because we believe that these modifications are acceptable for use at any secondary aluminum production facility, this approval to allow Method 26 as an alternative to Method 26A for testing emission streams that are shown to be free of water droplets applies to any other secondary aluminum production facility that your company or any other testing company may test. We will announce on EPA's web site (at <http://www.epa.gov/ttn/emc/tmethods.html#CatB>) that our approval to use Method 26 as an alternative to Method 26A is broadly applicable to all secondary aluminum production facilities.

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

Sincerely,

A handwritten signature in cursive script that reads "Conniesue B. Oldham". The signature is fluid and extends to the right with a long, sweeping tail.

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