



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

JUN 24 2009

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

**MEMORANDUM**

**SUBJECT:** Use of an Unheated Sampling Line in ASTM D6522

**FROM:** Conniesue B. Oldham, Ph.D., Group Leader  
Measurement Technology Group

A handwritten signature in cursive script that reads "Conniesue Oldham".

**TO:** Cynthia J. Reynolds, Director  
Technical Enforcement Program, Region 8

We are writing in response to your inquiry regarding the use of an unheated sampling line when testing for carbon monoxide (CO) emissions from a compressor engine subject to 40 CFR Part 60, Subpart ZZZZ, National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. Emissions Science, Inc. has proposed using an unheated sampling line with ASTM D6522 in an upcoming test of internal combustion engines at the Pump Canyon Compression Station in La Plata County, Colorado. Emission Science noted that a heated sampling line is not normally required in Agency methods when measuring CO. The ASTM D6522 method is also designed for nitrogen oxides testing, and a heated line is important in this case. However, when only testing for CO, the heated line is not needed.

We agree that the use of an unheated sampling line with ASTM D6522 is acceptable when only CO is measured. We, therefore, approve the use of an unheated sampling line when only CO is determined by the method. Since this modification to ASTM D6522 is applicable to other sources testing only for CO, we will be posting this letter on our website at <http://www.epa.gov/ttn/emc/approalt.html> for use by other interested parties.

Please contact Foston Curtis of my staff at (919) 541-0893 or [curtis.foston@epa.gov](mailto:curtis.foston@epa.gov) if you have any questions regarding this memo or would like additional information.

cc: Gary McAlister, E143-02  
Scott Throwe, EPA/OECA/OC