



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

FEB 25 2010

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Michael J. Brack
Field Services Manager
Derenzo & Associates, Inc.
39395 Schoolcraft Road
Livonia, MI 48150

Dear Mr. Brack:

This is in response to your correspondence dated February 15, 2010, asking us to approve an alternative to Method 18 that will be used in conjunction with Method 25A to determine nonmethane organic compounds (NMOC) from an internal combustion engine. The source is subject to 40 CFR Part 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, and must use Method 18 to determine the methane fraction for subtraction from the collective measurement of methane and NMOC by Method 25A.

You propose to use the TECO Model 55C analyzer to measure methane in place of Method 18. You note that this analyzer, which uses gas chromatography and flame ionization detection to separate and measure methane from other organics, is comparable to the "cutter" analyzers already allowed by the regulation.

We are familiar with the operation of the TECO Model 55C analyzer and believe, in principle, it will produce results similar to the "cutter" analyzers. Therefore, we are approving your request to use the TECO Model 55C as an alternative to Method 18 for measuring methane. This alternative method is also acceptable for use at any engine that is covered by the regulations cited above. 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 18 is broadly applicable to all stationary spark ignition internal combustion engines.

If you need further assistance, please contact Foston Curtis at (919) 541-1063.

Sincerely,

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

Conniesue B. Oldham, Ph.D., Group Leader
Air Measurements and Quality Group