



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

SEP 23 2013

Ms. Natasha Meskal  
Ecotek  
17610 Beach Blvd.  
Suite 47  
Huntington Beach, CA 92647

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Dear Ms. Meskal:

This letter is in response to your August 3, 2013, request to use South Coast Air Quality Management District (SCAQMD) Method 100.1 as an alternative to EPA Method 10 in determining carbon monoxide (CO) emissions from an internal combustion engine at Well #5 in the Mesa Consolidated Water District. The engine is subject to Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, which requires that CO emissions be measured by Method 10. This engine is also subject to SCAQMD Rule 1110.2, which requires CO measurement using Method 100.1. You ask that we allow the use of Method 100.1 to measure CO under Subpart ZZZZ in place of Method 10 in order to preclude duplicate testing with very similar methods to satisfy both regulations. You also ask that Method 100.1 be approved on a broadly applicable basis for federally-regulated engines, since all engines under SCAQMD jurisdiction are already subject to or will become subject to Subpart ZZZZ in the near future.

Method 100.1 is very similar to Method 10 in format, equipment, and performance requirements. The minor differences in the two methods make Method 100.1 the more stringent of the two. For these reasons, we believe Method 100.1 is an acceptable alternative to Method 10. Therefore, we approve the use of SCAQMD Method 100.1 in place of Method 10 when measuring CO from federally-regulated engines. Since this alternative is applicable to other federally-regulated engines, we will be posting this letter on our website at <http://www.epa.gov/ttn/emc/approalt.html> for use by other interested parties.

If you have questions or would like to discuss the matter further, please call Foston Curtis at (919) 541-1063, or email him at [curtis.foston@epa.gov](mailto:curtis.foston@epa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Connie B. Oldham for CBO".

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

cc: Foston Curtis ([curtis.foston@epa.gov](mailto:curtis.foston@epa.gov))  
Steve Bancroft, Mesa Consolidated Water District ([steveb@mesawater.org](mailto:steveb@mesawater.org))  
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