



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Dr. Wendy Coulson  
Innovative Environmental Solutions, Inc.  
c/o Gary Choquette  
CPS-11-6B  
Pipeline Research Council International  
15059 Conference Center Drive  
Suite 130  
Chantilly, Virginia 20151

8/25/2020

Dear Dr. Coulson:

We are writing in response to your letter of May 1, 2020, requesting approval on behalf of the member companies of the Pipeline Research Council International (PRCI), for the use of a new test method in lieu of the option to use ASTM D6522-00 to demonstrate compliance with performance testing requirements in 40 CFR Part 60, Subparts JJJJ<sup>1</sup> and 40 CFR Part 63, Subparts ZZZZ<sup>2</sup> and DDDDD<sup>3</sup>. The Office of Air Quality Planning and Standards, as the delegated authority, must make the determination on major alternatives to test methods and associated procedures required under 40 CFR Parts 59, 60, 61, 63, and 65.

The alternative method proposed in your submittal is an updated approach for the use of portable gas analyzers equipped with electrochemical sensors. In conjunction with this letter, you have also submitted a candidate method to our office as a potential "Other Test Method" to be posted to the EPA Emission Measurement Center website at <https://www.epa.gov/emc>. The draft method was developed by Innovative Environmental Solutions (IES), Inc., under a PRCI project, and the project team members conferred with EPA staff during its development. You declare that your candidate method will minimize costs associated with performance testing while ensuring equivalent or improved data quality as compared to the existing method.

You state that your proposed method leverages the inherent linearity of "healthy" electrochemical sensors to support use of a single upscale calibration point and defined calibration gas concentrations dependent on the expected concentrations to be measured. In a trade-off, this candidate method includes prescriptive operational requirements and data quality objectives beyond ASTM 6522-00 which are meant to ensure the "health" of the electrochemical sensors. You also provided significant technical information to support your proposed method including empirical results using the quality assurance/quality (QA/QC) and testing procedures identified in the candidate method in the form of three data reports.<sup>456</sup> These reports detailed the

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<sup>1</sup> Nitrogen Oxides, Carbon Monoxide, and Oxygen

<sup>2</sup> Carbon Monoxide and Oxygen

<sup>3</sup> Oxygen

<sup>4</sup> Considerations for Developing a New Electrochemical Cell Portable Analyzer Test Method, Innovative Environmental Solutions, Inc., for the Pipeline Research Council International, Inc., Catalog PR-312-14206-R01, May 2015

<sup>5</sup> Portable Analyzer Test Method Update for Common Analyzers Phase 2 Report, Innovative Environmental Solutions, Inc., for the Pipeline Research Council International, Inc., Catalog PR-312-17204-R01, August 2017

<sup>6</sup> Portable Analyzer Test Method Update for Common Analyzers Phase 3 Report, Innovative Environmental Solutions, Inc., for the Pipeline Research Council International, Inc., Catalog PR-312-17204-R01, October 2017

technical basis for the method approach, the QA/QC procedures, and the results of field and laboratory evaluations.

We have reviewed your submittal in detail and thoroughly considered the potential of your proposed method, have found it to be acceptable, and have posted it as 'Other Test Method 39 (OTM-39)', on the EPA website as [https://www.epa.gov/sites/production/files/2020-08/documents/otm-39\\_performance\\_method\\_using\\_portable\\_gas\\_analyzers\\_08\\_24\\_2020.pdf](https://www.epa.gov/sites/production/files/2020-08/documents/otm-39_performance_method_using_portable_gas_analyzers_08_24_2020.pdf) along with links to the supporting data. Based on the data you provided demonstrating the validity of OTM-39, we are approving your alternative test method request to allow the use of OTM-39 in lieu of ASTM D6522-00 for 40 CFR Part 60, Subparts JJJJ and 40 CFR Part 63, Subparts ZZZZ and DDDDD. those subparts detailed in paragraph one of this letter. It is reasonable that this alternative test method approval be broadly applicable to the testing requirements allowing use of ASTM D6522-00 under those subparts and for that reason, we will post this letter as ALT-138 on our website at <http://www3.epa.gov/ttn/emc/approalt.html> for use by other interested parties.

This alternative test method approval is applicable for use to demonstrate compliance with a promulgated standard in subparts of 40 CFR 60 and 63. This approval does not address the use of this alternative method for performance testing using OTM-39 required under State Implementation Plans (SIP) or state/local/tribal regulations. Application of this alternative test method for such regulations is subject to the approval of the administrative authority for such programs.

If you should have any questions or require further information regarding this approval, please call Ned Shappley of my staff at 919-541-7903 or email him at [shappley.ned@epa.gov](mailto:shappley.ned@epa.gov).

Sincerely,



Steffan M. Johnson, Group Leader  
Measurement Technology Group

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