



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

MAR 24 2010

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. John A. Ambrose, President
Rentech Energy Midwest Corporation
16675 Highway 20 West
East Dubuque, IL 61025

Dear Mr. Ambrose:

I am writing in response to your letter dated February 26, 2010, in regards to an alternative method request on behalf of the Rentech Energy Midwest facility in East Dubuque, Illinois. The two nitric acid production units at this facility are required to demonstrate compliance with 40 CFR Part 60, Subpart G, Standards of Performance for Nitric Acid Plants. You are requesting to use Method 320 (40 CFR Part 63, Appendix A) instead of Method 7, which is the test method cited in Subpart G. The use of Method 320 would allow you to collect real time data in order to certify the continuous monitors installed at these units.

We are approving the use of Method 320 in lieu of Method 7 with the following caveats. In order to allow the use of Method 320 at nitric acid plants, the tester must insure that no condensation be allowed to form in the sampling line by heating the sampling line up to and including the FTIR sampling cell (NO_2 dissolves in water, and could thus drop out in the condensate and not be measured as NO_x). Also, the tester must follow the Quality Control procedures in Section 9.0 of Method 320 for all the compounds of interest (this entails the dynamic spiking of the target compounds), and the recovery values must be within acceptable limits as defined by Method 320.

Since this alternative method approval is applicable to other facilities wishing to make the substitution, we will be posting this letter on our web site at <http://www.epa.gov/ttn/emc/approalt.html> for use by other nitric acid facilities.

If you have further questions in this matter, please contact Rima Howell of my group at (919) 541-0443.

Sincerely,

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

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

cc: Kevin Berg, Rentech (kberg@rtkmidwest.com)
Nathan Frank, Region 5 (frank.nathan@epa.gov)
Dave Bloomberg, Illinois EPA (david.bloomberg@illinois.gov)