UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

MAY 23 2008

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

MEMORANDUM

SUBJECT: Dow Chemical Company Request to Use an Alternative Relative Accuracy Procedure under 40 CFR Part 63 Subpart EEE

FROM: Conniesue B. Oldham, Ph.D., Group Leader Conniesue Oldham
Measurement Technology Group, AQAD (E143-02)

TO: Dr. Kishor Fruitwala
Media Planning and Permitting Division (6PD-A)

In the correspondence forwarded to us by Mr. Harry Shah of Region 6, Dow Chemical Company asks to use an alternative relative accuracy (RA) procedure to evaluate the carbon monoxide (CO) continuous emission monitoring system (CEMS) on its F-2820 thermal treatment unit in Freeport, Texas. The unit is subject to 40 CFR Part 63 Subpart EEE, National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors. The CEMS must be tested annually using the RA procedure in Performance Specification (PS) 4B.

Dow requests approval to use the alternative RA procedure described in Section 7.3 of PS-4B. This procedure uses system integrity checks rather than the RA test. It is allowed by approval of the regulator where conditions do not favor meaningful RA tests, such as consistently low CO emissions, or low emissions with periodic interruptions by short-duration, high-concentration spikes. Dow has submitted records showing that the F-2820 unit consistently emits very low levels of CO.

We approve Dow's request to use the alternative RA procedure in Section 7.3 of PS-4B at its F-2820 unit. The consistently low emissions from the unit make the use of the RA procedure impractical. Since this alternative method is applicable to other similar facilities in this source category, 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 desire further discussion of this matter, please contact Foston Curtis of the Emission Measurement Center at (919) 541-1063, or you may email him at curtis.foston@epa.gov.

cc: Foston Curtis, E143-02
Harry Shah, Region 6