Dear Ms. Lorence:

I am writing in response to your letter dated November 25, 2008, regarding an alternative method request. Your request involves DuPont's Yerkes facility in Buffalo, New York, which is required to comply with the Miscellaneous Organic NESHAP (40 CFR Part 63, Subpart FFFF). This facility must monitor the wastewater for Methyl Methacrylate (MMA) using EPA Methods 25D, 305, 624, 625, 1624 or 1625. Your facility would like to use one of the wastewater methods to monitor MMA, but none of the wastewater methods cited in the rule list MMA as a target compound. Therefore, you are proposing to use EPA Method 8260B, one of the methods listed in the SW-846 compendium, which does have MMA listed as a target compound.

Based on the fact that no wastewater method has been cited in the rule to measure the target compound, we hereby approve your petition for the use of SW-846 Method 8260B to test for MMA at the DuPont Yerkes facility. Since this alternative method approval is broadly applicable to other facilities facing this issue, we will post this letter on our website at http://www.epa.gov/tnn/emc/tmethods.html/#CatB.

If you have additional questions on this matter, please contact Rima Howell of my staff at (919) 541-0443.

Sincerely,

Connie Oldham, Ph.D., Group Leader
Air Measurements & Quality Group

cc: Kenneth Eng, Region 2 (by email)
    Al Carlacci (by email: axcarlac@gw.dec.state.ny.us)
    Larry Sitzman (by email: lbsitzma@gw.dec.state.ny.us)