



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

JUN 11 2009

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Allison Lauf
Compliance Manager
Clean Water Limited
300 Cherokee Drive
Dayton, OH 45427

Dear Ms. Lauf:

I am writing in response to your letter dated June 8, 2009, in regards to an alternative method request on behalf of the Clean Water Limited facility located in Dayton, Ohio. Your facility is required to demonstrate compliance with 40 CFR Part 63, Subpart DD, National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations. Subpart DD requires that total organic HAP emissions be measured using Method 18 (40 CFR Part 60, Appendix A). You are requesting the use of Method 25A (40 CFR Part 60, Appendix A) to demonstrate compliance, because your treatment facilities receive waste from many unrelated sources. The variability of the wastes which your facility accepts makes it difficult to conduct Method 18 testing (since Method 18 requires that the target compounds be identified before the test in order to supply the correct calibration gases and analytical scheme).

We agree with your assessment that waste variability makes Method 18 impractical for these types of facilities. Also, Method 25A would measure non-HAP organic compounds, thus biasing the results high, thus favoring the environment with a more stringent standard. Based on this reasoning, we are approving the use of Method 25A in lieu of Method 18 at the Clean Water Limited facility cited above. Since this approval is applicable to other Off-Site Waste facilities subject to Subpart DD, we will be posting this response letter on our web site at <http://www.epa.gov/ttn/emc/approalt.html>.

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

Sincerely,

A handwritten signature in black ink that reads "Conniesue B. Oldham for CBO".

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

cc: Erik Hardin, Region 5 (by email)
Eileen Moran, RAPCA (moranec@rapca.org)