



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

APR 21 2010

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Steve Engleman
Senior Project Manager
CH2M Hill
6 Hutton Centre Drive, Suite 700
Santa Ana, CA 92707

Dear Mr. Engleman:

I am writing in response to your letter dated April 12, 2010, in regards to an alternative method request on behalf of the Kinder Morgan Carson Terminal in Carson, California. This facility is required to demonstrate compliance with 40 CFR Part 63, Subpart GGGGG, Site Remediation MACT. Section 63.694(l) of Subpart GGGGG 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, since it would be less costly than Method 18 testing.

In your case, 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 Kinder Morgan terminal cited above. Since this alternative method approval is applicable to other sources complying with this regulation, we will be posting this approval on our web site (at <http://www.epa.gov/ttn/emc/approalt.html>) for use by other interested sources.

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

Sincerely,

A handwritten signature in blue ink that reads "Connie Oldham".

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

cc: Steve Engleman (by email at steve.engleman@ch2m.com)
Stan Tong, Region 9 (by email at tong.stanley@epa.gov)
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