



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

NOV 30 2010

Mr. Joseph L. Wilwerding
Mr. Graham E. Harris
Sage Environmental Consulting
1905 Sherman Street, Suite 1010
Denver, Colorado 80203

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Dear Mssrs. Wilwerding and Harris:

This letter is in response to your October 19, 2010, letter to Mamie Miller requesting clarification on the use of Method 21 monitoring practices for components that have been coated with commercially available products to protect from external conditions such as corrosion. You specifically request EPA's confirmation that: for coated components, leak, detection and repair (LDAR) monitoring must be performed above the coating along the component interface where leakage may occur and at the equipment locations described by Method 21, using applicable leak thresholds to define when component repair is required.

EPA agrees that LDAR monitoring must be performed above the coating along the component interface where leakage may occur, at the equipment locations described by Method 21, using applicable leak thresholds to define when component repair is required. Additionally, EPA believes monitoring of coated components needs to be performed above the coating at other locations where visible signs, such as staining/discoloration, blistering, or breach in the coating, would indicate a leak may have occurred, using applicable leak thresholds to define when component repair is required. Furthermore, monitoring of coated components needs to be performed at other locations where any leaks from the component are expected to be emitted to the atmosphere, such as the points of termination of the coating, using applicable leak thresholds to define when component repair is required.

This response has been coordinated with the EPA Office of Air Quality Planning and Standards. If you have any questions, please contact Scott Throwe of my staff at (202) 564-7013.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard F. Duffy".

Richard F. Duffy, Acting Director
Compliance Assessment and Media Programs Division
Office of Compliance