



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

SEP 28 2007

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Michael Mowery
President
MiSun Environmental Services
MiSun, LLC
3427 Bold Meadows Court
Knoxville, TN 37938

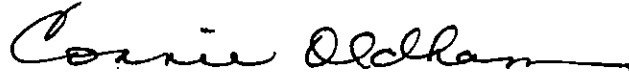
Dear Mr. Mowery:

This is in response to your letter dated September 4, 2007 asking us to approve a modification to EPA Method 23. Your company has been contracted by Cemex, Inc., to conduct air emissions testing for dioxins and furans at their cement plant in Xenia, Ohio. This testing is required to comply with the testing requirements specified in 40 CFR Part 63.1349, National Emission Standards for Hazardous Air Pollutants for the Portland Cement Manufacturing Industry. This standard requires that you measure dioxin and furan emissions using the sampling and analytical procedures in EPA Method 23. You are proposing to modify Method 23 by using only acetone and toluene as the recovery solvents instead of using acetone, methylene chloride, and toluene as specified in the method. In addition, you would like to combine the acetone and toluene rinses (both front half and back half), filter, and XAD-2 trap into one sample prior to extraction and analysis instead of analyzing the toluene rinse separately as required by the method.

EPA has determined from Method 23 quality assurance data that toluene recovery rinses are as effective as methylene chloride rinses and do not significantly change the amount of dioxins and furans recovered from the sampling equipment. Based on these findings, we approve the substitution of toluene for methylene chloride as the recovery solvent for Method 23. Because we are allowing you to substitute the toluene rinse for the methylene chloride rinse, there is no need to analyze the toluene rinse separately. It may be combined with the other sample fractions prior to extraction and analysis.

Because we believe that these modifications are acceptable for use at any cement kiln, this approval to modify Method 23 applies to any other cement manufacturing facilities that your company or any other testing company may test. We will announce on EPA's web site (at <http://www.epa.gov/ttn/emc/tmethods.html#CatB>) that our approval of these modifications to Method 23 is broadly applicable to all cement kilns. If you need further assistance, please contact Gary McAlister at (919) 541-1062.

Sincerely,



Conniesue B. Oldham, Ph.D., Group Leader
Air Measurements and Quality Group