



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

DEC 07 2007

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Peter B. Lloyd, P.E., Ph.D.
Program Manager
Compliance Assistance & Permitting Division
Forsyth County Environmental Affairs Department
537 North Spruce Street
Winston-Salem, NC 27101-1362

Dear Dr. Lloyd:

This letter is in response to your letter dated August 29, 2007, regarding a request you received to use Method 29 (40 CFR 60, Appendix A) in place of Method 101A (40 CFR 61, Appendix B) to demonstrate compliance with subpart E of 40 CFR part 61, National Emission Standards for Mercury. Specifically, the requestor wishes to obtain permission to use Method 29 in place of Method 101A in order to also collect emissions data on arsenic, cadmium and nickel with a single test method. This mercury testing is required in order to comply with the Method 101A testing requirements specified in §61.53(d) of the rule for sludge drying and incineration plants.

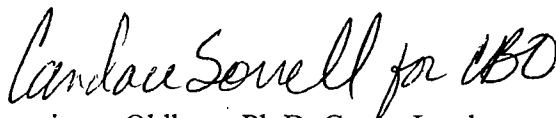
With this letter, we are approving Method 29 as an alternative to Method 101A subject to the following limitations:

1. The procedures for preparation of mercury standards and sample analysis in sections 13.4.1.1 through 13.4.1.3 of ASTM D6784-02 shall be followed instead of the procedures in sections 7.5.33 and 11.1.3 of Method 29.
2. The Quality Assurance//Quality Control procedures in section 13.4.2 of ASTM D6784-02 shall be performed instead of the procedures in section 9.2.3 of Method 29.
3. In addition, at his option, a tester may use the sample recovery and preparation procedures in ASTM D6784-02 instead of the Method 29 procedures, as follows: sections 8.2.8 and 8.2.9.1 of Method 29 may be replaced with sections 13.2.9.1 through 13.2.9.3 of ASTM D6784-02 ; sections 8.2.9.2 and 8.2.9.3 of Method 29 may be replaced with sections 13.2.10.1 through 13.2.10.4 of ASTM D6784-02; section 8.3.4 of Method 29 may be replaced with section 13.3.4 or 13.3.6 of ASTM D6784-02 (as appropriate); and section 8.3.5 of Method 29 may be replaced with section 13.3.5 or 13.3.6 of ASTM D6784-02 (as appropriate).

Because we believe that these modifications are acceptable for use at any sludge drying or sludge incineration facility, this approval to use Method 29 (with the conditions as noted above) applies to any other sludge drying or sludge incineration facility that may require testing under 40 CFR Part 61, Subpart E. We will announce on EPA's web site (at <http://www.epa.gov/ttn/emc/tmethods.html#CatB>) that our approval of the application of Method 29, as described above, is broadly applicable to all sludge drying and sludge incineration facilities.

If you need further assistance on this matter, please contact William Grimley at (919) 541-1065.

Sincerely,

A handwritten signature in black ink that reads "Connie Oldham for CEO". The signature is written in a cursive, flowing style.

Connie Oldham, Ph.D, Group Leader
Measurement Technology Group

cc: Maria Malave, OECA
RO Air Branch Chiefs