



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

AUG 07 2008

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Wayne Stollings
Triangle Environmental Services, Incorporated
P.O. Box 13294
Durham, NC 27709

Dear Mr. Stollings:

In your July 29, 2008 correspondence, you asked permission to use an alternative recalibration procedure for Method 3C, which measures nitrogen, oxygen, methane, and carbon dioxide in landfill gas samples. Method 3C allows for extended use of the analyzer calibration if a single point recheck after the test day is at a concentration within 20 percent of the sample concentrations. You are proposing to use a calibration recheck similar to Method 25 that is based on a drift criteria rather than retesting within a concentration window.

In your proposed alternative, the response factor for a single concentration recheck must be within 10 percent of the original calibration response factor for that concentration. If this criterion is not met, then the initial calibration using at least three concentration levels would have to be repeated.

For the initial calibration, you proposed that triplicate injections of any single concentration agree within 5 percent of their mean to be valid. Method 3C does not specify repeatability limits for either calibration injections or single point recalibration checks.

We approve your request to use this alternative recalibration procedure for Method 3C. We believe its concept is superior to the current Method 3C requirement because it does not require the maintenance of multiple gases that are needed to perform a calibration recheck under the current concentration range requirement. Your procedure also offers performance criteria that are lacking in Method 3C. Additionally, we will revise Method 3C in a future rulemaking to adopt this alternative for re-verifying the method's calibration. Since this alternative procedure is applicable to other similar facilities in this source category, we will be posting this letter on our website at <http://www.epa.gov/ttn/emc/approalt.html> for use by other interested parties.

If you have questions or would like to discuss the matter further, please call Foston Curtis at (919) 541-1063, or you may e-mail him a message at curtis.foston@epa.epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Conniesue Oldham". The signature is written in black ink and is positioned above the printed name.

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

cc: Foston Curtis
Gary McAlister