



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

SEP 26 2008

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Thomas Schmelter  
Project Manager  
Bureau Veritas North America, Inc.  
45525 Grand River Avenue, Suite 200  
Novi, MI 48374

Dear Mr. Schmelter:

I am writing in response to your letter dated September 19, 2008, in regards to an alternative method request on behalf of the Andersons Marathon Ethanol, LLC facility in Greenville, Ohio. The two thermal oxidizers/waste heat recovery boilers at this facility are required to demonstrate compliance with 40 CFR Part 60, Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. You are requesting to use Method 320 (40 CFR Part 63, Appendix A) instead of Methods 6C, 7E, and 10 to demonstrate compliance. The use of Method 320 would allow you to collect data not only for carbon monoxide, sulfur dioxide, and nitrogen oxides, but also for other Hazardous Air Pollutants this facility is required to measure.

Method 320 is a self-validating method, in that it has built-in spiking procedures to validate the measurement of compounds from sources which have not previously been validated. Therefore, I am approving the use of Method 320 in lieu of Methods 6C, 7E and 10 as long as the Quality Control procedures in Section 9.0 of Method 320 are followed for all the compounds of interest, and the recovery values are within acceptable limits. Since this alternative method approval is applicable to other facilities wishing to make the substitution, we will be posting this letter on our web site at <http://www.epa.gov/ttn/emc/approalt.html> for use by other interested parties.

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

Sincerely,

A handwritten signature in cursive script that reads "Connie Oldham".

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

cc: Lisa Jeter, Ohio Regional Air Pollution Control Agency ([jeterla@rapca.org](mailto:jeterla@rapca.org))  
Maria Cruset, Ohio Regional Air Pollution Control Agency ([crusetme@rapca.org](mailto:crusetme@rapca.org))  
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