



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

OCT 06 2008

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Mr. Ken Smith  
Element One, Inc.  
5022-C Wrightsville Avenue  
Wilmington, NC 28403

Dear Mr. Smith:

I am writing in response to your letter dated September 9, 2008, asking for approval of modifications to Method 12 for lead (40 CFR Part 60, Appendix A-5), Methods 103 and 104 for beryllium, and Methods 108, 108A and 108B for arsenic (40 CFR Part 61, Appendix B). You are proposing to modify these methods to use inductively coupled plasma-mass spectrometer (ICP-MS) in place of atomic absorption spectrometry (AAS) for sample analysis. These samples have been collected in fulfillment of the requirements of 40 CFR Parts 60, 61, and 63.

Because ICP-MS is identified in Method 29 (40 CFR Part 60, Appendix A-8) as an option in place of AAS for analysis of lead, beryllium and arsenic, we hereby approve your request, provided you follow the procedures for ICP-MS analysis described in Method 6020 (EPA Office of Solid Waste, publication SW-846), or its newer version, Method 6020A.

In a subsequent email you requested similar approval to use ICP-MS in place of AAS for analysis of Method 306 (40 CFR Part 63, Appendix A) samples for total chromium. This request is also approved for analysis performed per Method 6020 or 6020A, since ICP-MS is also identified in Method 29 as an option for chromium analyses.

Because we believe that these modifications are acceptable for general use, this approval to modify Methods 12, 103, 104, 108, 108A, 108B and 306 will be posted on our web site (at <http://www.epa.gov/ttn/emc/tmethods.html#CatB>) as being broadly applicable.

If you need further assistance, please contact Bill Grimley at (919) 541-1065.

Sincerely,

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

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