



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

DEC 19 2008

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

MEMORANDUM

SUBJECT: Approval of Alternative Test Method for Puerto Nuevo Wastewater Treatment Plant, San Juan, Puerto Rico

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

TO: Marcus E. Kantz, Team Leader
Air and Water QA Team (MS-220)
EPA Region 2

This letter is in response to your email dated December 11, 2008, regarding a request submitted to your office to use an alternative test method at the Puerto Nuevo wastewater treatment plant in San Juan, PR. The request is to use Method 29 (40 CFR Part 60, Appendix A) in place of Methods 101A (misidentified as Method 101), 103 and 104 (40 CFR Part 61, Appendix B) to demonstrate compliance with Subparts C and E of 40 CFR Part 61, National Emission Standards for Beryllium and Mercury, respectively. Specifically, the requestor wishes to obtain permission to use Method 29 in place of Methods 101A, 103, and 104 in order to simultaneously collect specific emissions data for both beryllium and mercury with a single test method. This testing is required to comply with both the Method 103 or 104 testing requirements specified in § 61.33 (a) and the Method 101A testing requirements specified in § 61.53(d) of the 40 CFR Part 61 rules as they pertain to sewage sludge drying and incineration plants.

With this letter, we are approving Method 29 as an alternative to Method 101A for the San Juan site, 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

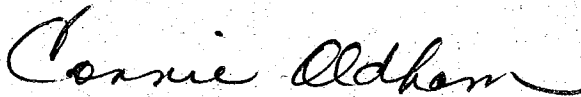
Method 29 may be replaced with Section 13.3.4 or 13.3.6 of ASTM D6784-02 (as appropriate); and Section 8.3.5 of Method 29 may be replaced with Section 13.3.5 or 13.3.6 of ASTM D6784-02 (as appropriate).

Also with this letter we are approving Method 29 in place of Methods 103 and 104 for testing at the San Juan site, without qualifications.

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, Subparts C and E. We will announce on EPA's web site (at <http://www.epa.gov/ttn/emc/tmethods.html#CatB>) that our approval of the use of Method 29, as described above, is broadly applicable to all sludge drying and incineration facilities subject to 40 CFR Part 61.

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

Sincerely,



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

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