



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

JAN 29 2010

Steven E. Yuchs, Ph.D.  
Special Projects Manager  
ARI Environmental, Inc.  
951 Old Rand Road, Unit 106  
Wauconda, IL 60084

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Dear Dr. Yuchs:

I am writing in response to your letter of January 12, 2010, requesting alternative method approvals on behalf of the Akzo Nobel Surface Chemistry facility in Morris, Illinois. You are conducting a test of the John Zink Hazardous Waste Incinerator at this facility. Your letter states that this unit is subject to both 40 CFR Part 264, Subpart O and 40 CFR Part 63, Subpart EEE. You are requesting the use of Method 320 (40 CFR Part 63, Appendix A) and Method 23 (40 CFR Part 60, Appendix A) in lieu of SW-846 Methods 0011 and 0023A, respectively.

The Office of Air Quality Planning and Standards does not have the authority to approve alternative methods to regulations in 40 CFR Part 264, but we do have the authority to approve alternative methods to regulations in 40 CFR Part 63. Based on our research, 40 CFR Part 264, Subpart O has been superseded by 40 CFR Part 63, Subpart EEE, which means that my office does have the authority to issue this alternative method approval.

We have determined that Method 23 is equivalent to SW-846 Method 0023A, and are approving its use at the facility cited above. Method 320 is a self-validating method (you have conducted its required validation procedures at this facility in 2008); thus, we are also approving its use at this facility in lieu of SW-846 Method 0011 for formaldehyde.

Since this alternative method approval is applicable to other facilities subject to 40 CFR Part 63, Subpart EEE, we will be posting this letter on our web site (<http://www.epa.gov/ttn/emc/approalt.html>) for use by other interested sources. Please contact Rima Howell at (919) 541-0443 or Gary McAlister at (919) 541-1062 if you have further questions on this matter.

Sincerely,

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

cc: Marco Salenda, Akzo Nobel (by email at [marco.salenda@sc.akzonobel.com](mailto:marco.salenda@sc.akzonobel.com))  
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