



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

AUG 16 2012

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Jim Serne, P.E., QSTI
Principal Engineer, Air Measurements
5540 Centerview Drive, Suite 100
Raleigh, NC 27606

Dear Mr. Serne:

I am writing in response to your email request dated June 20, 2012, for consideration of alternative procedures for sampling the emissions from batch operations (furnaces) at secondary aluminum production facilities as required by 40 CFR 63, Subpart RRR. Subpart RRR, the National Emission Standard for Hazardous Air Pollutants for Secondary Aluminum Production, in 40 CFR 63.1511(b)(3) states that the "performance test for a batch process must consist of three separate runs", and that "sampling for each run must be conducted over the entire process operating cycle." Additionally, section 8.2.5 of EPA Method 5, states that the "sampling time at each point shall be the same."

In your request, you state that for the measurement of particulate emissions, the length of the process operating cycle for batch processes may not be known in advance, making it difficult to determine an exact sampling time per sample point. As a solution to this issue, you offer the following alternative sampling approach for batch processes that do not have a predetermined length for their process operating cycle. If the exact process operating cycle length is not known, choose a minimum operating cycle length and begin sampling assuming this minimum length will be the run time. Then, after each point has been sampled once, begin sampling each point again in the reverse order until the operating cycle is complete. Continue this process for all required runs.

We have reviewed your proposal and agree that an alternative sampling procedure for batch processes regulated under Subpart RRR is warranted. Therefore, for batch processes subject to 40 CFR 63.1511(b)(3), and that are required to be sampled using an isokinetic train based on the procedures detailed in Method 5, I approve the following alternative test procedures:

- If the exact process operating cycle length is not known, choose a minimum operating cycle length and begin sampling assuming this minimum length will be the run time. For example, if the process operating cycle is known to last from four to six hours, then assume a sampling time of four hours and divide the sampling time evenly between the required number of sampling points.
- After each point has been sampled once, begin sampling each point again for the same time per sampling point in the reverse order until the operating cycle is complete. **All points must be sampled at least once during each test run.**
- In order to distribute the sampling for all runs most evenly across the sampling points and area, do not perform all runs using the same sampling point order (e.g., if there are four ports and sampling for run 1 began in port 1, then sampling for run 2 could begin in port 4 and continue in reverse order.)

Since this alternative method approval is applicable to other facilities conducting testing under 40 CFR 63.1511(b)(3), 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.

Please contact Kim Garnett of my staff at (919) 541-1158 or garnett.kim@epa.gov if you have any questions regarding this memo or would like additional information.

Sincerely,



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

cc: Michael A. Palazzolo, Alcoa
Rick Begly, PA DEP