



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

MAY 28 2013

Ms. Paula Watkins, Manager
International Standards & Measurement
American Petroleum Institute
1220 L Street, NW
Washington, DC 20005

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Dear Ms. Watkins:

This letter is in response to your letter dated April 2, 2013, concerning the American Petroleum Institute's request for U.S. EPA's approval of ASTM D6377-10, "Standard Test Method for Determination of Vapor Pressure of Crude Oil: VPCR_x (Expansion Method)," as a broadly applicable alternative test method to determine true vapor pressure of crude oil for source applicability determination requirements of regulations under 40 CFR Parts 60, 61, 63 and 65, which condition applicability of the regulations to crude oil storage vessels or transfer operations on the basis of the true vapor pressure of the crude oil. The regulations in question in the request include 40 CFR Part 60, Subparts K, Ka and Kb; 40 CFR Part 61, Subpart FF; 40 CFR Part 63, Subparts G, Y, CC, EEEE and GGGGG; and 40 CFR Part 65, Subpart C. In support of this request, your letter notes that the ASTM test methods currently cited by EPA in the previously cited subparts for the determination of vapor pressure refer to ASTM D6377-10 as being suitable for vapor pressure measurements of crude oils.

While EPA recognizes the validity of ASTM D6377-10, it is noted that Section 1.1 of D6377-10 specifies that the method is suitable for testing samples that exert a vapor pressure between 25 and 180 kPa at 37.8°C. Accordingly, we cannot approve the method for purposes of source applicability requirements for crude oils that exhibit a vapor pressure less than 25 kPa.

We do believe, however, that ASTM D6377-10 is appropriate within the method's defined scope of applicability, and approve its use as a broadly applicable alternative test method for the regulatory subparts previously cited for determination of vapor pressures of crude oils that have a vapor pressure within the range of 25 to 180 kPa at 37.8°C.

Since this approval is applicable to all facilities affected by the regulatory subparts previously cited that may wish to use this option under the limitation described above, we will be posting this letter on our website at <http://epa.gov/ttn/emc/approalt.html> for use by other interested parties.

If you have further questions in this matter, please contact William Grimley of my group at 919-541-1065.

Sincerely,

A handwritten signature in blue ink that reads "Conniesue B. Oldham".

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

cc: Ken Garing (garing.ken@epa.gov)
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