



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

MAR 26 1998

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Tom Zdeb
Woodward-Clyde
2020 E. First Street
Suite 400
Santa Ana, California 92705

Dear Mr. Zdeb:

This letter is in response to your memorandum requesting clarification of previously approved alternatives in Method 25C when used for nonmethane organic compound (NMOC) determination at municipal solid waste landfills. You also asked for permission to use additional modifications to the method. The clarifications and modifications you requested and our responses are listed below.

Clarification 1. Due to the limited lengths of stainless-steel liners used for the previously approved Geoprobe samplers, can Teflon liners be used routinely instead? **Teflon liners may be used routinely in place of stainless-steel liners.**

Clarification 2. Can Teflon tubing be used routinely as a sampling line as long as it is leak-tight? **Yes.**

Clarification 3. The previous approval stated that "Geoprobes and similar probes are acceptable assuming they are retracted from the drop-away tip sufficiently to allow a gas gap equivalent to that experienced by a probe with lower perforations." It is not clear that "gas gap equivalent to that experienced" explicitly allows the use of probes that are not perforated along the bottom 30 percent of their length. **Non-perforated probes are allowed as long as they meet the "gas gap equivalent."**

Clarification 4. The allowed number of samples that can be composited per sample vessel and the degree of accuracy that is required in measuring the individual composite sample volumes needs clarification. **Samples from different sample probes may be composited in a single vessel provided (1) each sample has a minimum volume of 1 liter, (2) all composited samples are of the same volume, and (3) no sample is collected when a constant flow rate can no longer be maintained because of reduced sample vessel vacuum. Method 25C does not specify a volume measurement accuracy for composites. We believe the required recording of flow rates, sampling times, and vessel pressures give sufficient indication of collected sample volume.**

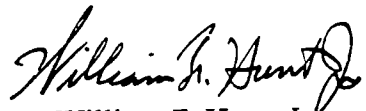
Clarification 5. What is the current availability of Method 25C audit samples? **Audit samples for Method 25C currently are not available. In cases where Method 25 audits are used for Method 25C, expected levels of performance are not known.**

Modification 1. A portable vacuum gauge capable of measuring pressure within 1 mm cannot be located. Would gauges having a resolution of 0.1 in. (2.54 mm) be acceptable? In addition, these gauges are only available with brass couplings. Are brass couplings allowed to connect the pressure gauge to the sampling system if it is connected by a stainless steel tee that allows it to remain outside of the gas stream being sampled? **Method 25C mentions a pressure gauge when referring to the U-tube manometer. U-tube manometers are available with 1-mm resolution and must be used in this case for the desired measurement accuracy. The use of gauges with 0.1 in. resolution is not allowed, and therefore, the associated brass couplings will not be needed.**

Modification 2. In performing the presampling probe purge, commercial pumps often degrade quickly as a result of field conditions and are not easily serviced. Can a hand-driven pump be used for this purpose in conjunction with a Tedlar bag that is time-filled to allow the purge flow rate and volume to be measured? **The hand-driven pump and bag setup is allowed for the probe purge as long as two probe volumes are purged.**

If you would like to discuss these responses, feel free to call Foston Curtis at (919) 541-1063 or you may e-mail him a message at curtis.foston@epamail.epa.gov.

Sincerely,



William F. Hunt, Jr.

Director

Emissions, Monitoring, and
Analysis Division

cc: Patricia Bowlin, Region IX
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