



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

APR 28 1998

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

**MEMORANDUM**

**SUBJECT:** Use of Test Method 316 for Measuring Formaldehyde in Sources Subject to Subpart III of 40 CFR Part 60

**FROM:** William F. Hunt, Jr.  
Director, Emissions, Monitoring, and  
Analysis Division (MD-14)

**TO:** David Kee  
Director, Air & Radiation Division  
Region V (A18J)

This memorandum provides our response to a request for approval of an alternative test method for use in lieu of an applicable EPA reference method. Mr. Todd Trowbridge of Capital Resin Corporation requested an alternative to Test Method 18 (40 CFR Part 60, Appendix A).

Capital Resin is a formaldehyde plant emitting formaldehyde and other organic compounds which are to be measured by Method 18 under applicable sections of 40 CFR 60.614. Formaldehyde is difficult to measure with Method 18. For this reason, the Agency has considered the request to use Test Method 316, which is a colorimetric method for measuring formaldehyde. This method has been proposed for inclusion in 40 CFR Part 63, Appendix A, and is currently on the Emission Measurement Center web site at <http://www.epa.gov/airprog/oaqps/emc/tmethods.htm>. For sources emitting formaldehyde and subject to this rule, we will allow the use of Method 316 for the measurement of formaldehyde.

Please contact Rima Dishakjian of my staff at (919) 541-0443 if further questions arise concerning this issue.

cc: Linda Murphy, Region I  
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