



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK NC 27711

MAR - 4 1998

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

**MEMORANDUM**

**SUBJECT:** Use of Test Method 316 for Measuring Formaldehyde in Sources Subject to the Hazardous Organic NESHAP (HON) Rule

**FROM:** *for* William F. Hunt, Jr. *David Kee*  
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. Barry Hunter of Hayden Environmental requested an alternative to Test Method 18 (40 CFR Part 60, appendix A).

Mr. Hunter represents a formaldehyde plant emitting formaldehyde and other organic compounds which are to be measured by Method 18 under applicable sections of the HON. Formaldehyde is difficult to measure with Method 18. For this reason, the Agency is considering modifying the HON to allow the use of Test Method 316, which is a colorimetric method for measuring formaldehyde. This method has been proposed and is currently on the Emission Measurement Center web site at <http://www.epa.gov/airprog/oaqps/emc/tmethods.htm>. Until the time that the HON rule can be amended to address the formaldehyde issue, we will allow the use of Method 316 for those sources which are known to emit 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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