



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

SEP 22 2009

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Jacob A. Gustin
HLP Engineering, Incorporated
P.O. Box 52805
Lafayette, Louisiana 70505-2805

Dear Mr. Gustin:

In your August 25, 2009 letter, you asked permission to use single-point testing in place of Method 1 or 1A for the required testing of engine emissions at the ConocoPhillips Lake Pelto Compressor Barge located offshore of southern Louisiana. The engines at the facility are subject to 40 CFR Part 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. They are located over water and are difficult to test due to limited space. For the engines positioned over the side of the platform, access is impossible without using a spud barge or building additional platforms.

You propose to use single-point testing with the aid of an extendable electrician's pole. This would allow the tester to work safely from the platform. The testing diagram you submitted shows how the sampling equipment would allow for testing from the centroid of the exhaust stack.

We approve your use of the single-point testing as described in lieu of Method 1 or 1A for the engines at the noted Louisiana facility. We are currently reviewing the need for multi-point testing at stationary engines and are finding that it may not enhance representative sampling at many engines. Thus, we will be posting this letter on our website at <http://www.epa.gov/ttn/emc/approalt.html> for use by other interested parties in similar situations.

If you have questions or would like to discuss the matter further, please call Foston Curtis at (919) 541-1063 or you may e-mail him at curtis.foston@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Connie B. Oldham".

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

cc: Timothy Bergeron, LA DEQ
Foston Curtis (E143-02)
Charles Ritchey, Region 6



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