



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

AUG 10 2017

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Clayton Elliott
Senior Project Manager
TRC Environmental
9225 US Hwy 183 South
Austin, TX 78747

Dear Mr. Elliott:

I am writing in response to your letter of July 7, 2017, in which you request an alternative test method for a requirement found in 40 CFR 60, Subpart Ja, Standards of Performance for Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After May 14, 2007 (Subpart Ja). The Leader of the Measurement Technology Group in the Office of Air Quality Planning and Standards, as the delegated authority, must make the determination on any major alternatives to test methods and procedures required under 40 CFR parts 59, 60, 61, 63, and 65.

As you point out in your letter, §60.105a(b)(2)(ii) of Subpart Ja requires that performance evaluations of each carbon dioxide (CO₂) and oxygen (O₂) monitor used to determine the coke burn-off rate must be conducted according to Performance Specification 3 (40 CFR 60, Appendix B, PS-3) using only Method 3 (40 CFR 60, Appendix A) as the reference test method. However, §60.105a(d)(4) of Subpart Ja requires that the performance evaluations of each O₂ monitor used to demonstrate compliance with the PM limit found in §60.102a(b)(1) be conducted according to PS-3 using Method 3, 3A, or 3B (40 CFR 60, Appendix A) as the reference test method. As a result of the difference in these two requirements, you are seeking approval to be allowed to use Method 3A to evaluate the performance of O₂ and CO₂ monitors subject to the requirements of §60.105a(b)(2)(ii) of Subpart Ja.

After reviewing the information provided, we approve your request to use Method 3A as the reference test method to evaluate the performance of O₂ and CO₂ monitors subject to the requirements of §60.105a(b)(2)(ii) of Subpart Ja. Since this alternative method could be applicable to other facilities subject to the requirement found in 40 CFR 60.105a(b)(2)(ii), we will post this letter on our website as Alt-121 at <https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods> for use by other interested parties. A copy of this approval must be included in the reports for performance evaluation tests where it is used.

If you have any questions regarding this determination, please contact Ms. Kim Garnett of my staff at 919-541-1158 or garnett.kim@epa.gov.

Sincerely,



Steffan M. Johnson, Leader
Measurement Technology Group

cc: EPA Regional Testing Contacts
Andrew Bouchard, EPA/OAQPS/SPPD
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