



OFFICE OF AIR QUALITY PLANNING AND STANDARDS
RESEARCH TRIANGLE PARK, NC 27711

June 25, 2025

Mr. Mike Maraghy
Operations Director
Canomara LLC
PO Box 941
Simsbury, Connecticut 06070

Dear Mr. Maraghy:

We are writing in response to your emailed letter dated May 15th, 2025, in which you seek broad approval of an alternative test method for measuring volatile organic compounds (VOC) from Stationary Spark Ignition Internal Combustion Engines (Engines) subject to 40 CFR part 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (Subpart JJJJ). 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. Your proposed alternative test method and our approval decisions are discussed below.

Specifically, you are requesting the use of Method 320 (40 CFR part 63, Appendix A) to measure of methane and ethane, for the purpose of excluding those compounds from the total VOC measurement measured by Method 25A (40 CFR part 60, Appendix A), in lieu of Method 18 (40 CFR part 60, Appendix A) as required by Section 60.4244 and Table 2 of Subpart JJJJ. In your request you state that Method 320 is included in Subpart JJJJ for the measurement of moisture, nitrogen oxides, carbon monoxide, and individual VOC species. You also state that Method 320 is applicable to the analysis of vapor phase organic compounds which absorb energy in the mid-infrared spectral region, such as methane and ethane, and that like Method 18, it is self-validating by following the performance criteria included in the method. You also contend that the use of Method 320 provides measurement flexibility and can simplify test programs by reducing equipment and method requirements when used for multiple target parameters.

Based on a thorough review of your request, we agree with your contention that Method 320 can provide an appropriate and sound measurement of methane and ethane for the purpose of excluding those compounds from the total VOC measurement from Engines. We also agree that the performance criteria in Method 320 are sufficient for validating methane and ethane from different types of Engines and fuel combinations. Therefore we approve the use of Method 320 to measure of methane and

ethane, for the purpose of excluding those compounds from the total VOC measurement measured by Method 25A, in lieu of Method 18 as required by Section 60.4244 and Table 2 of Subpart JJJJ.

A copy of this approval letter and the attachment must be included in all test reports that use this alternative test method. Because the alternative method described herein may be of interest to other entities subject to 40 CFR part 60, Subpart JJJJ, we believe it is reasonable to allow broad application of this method to subject facilities and we will post this letter as ALT-159 on the EPA website at <https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods> for use by such parties.

If you have any questions regarding this approval or need further assistance, please contact Ned Shappley at (919) 541-7903 or shappley.ned@epa.gov.

Sincerely,

Steffan M. Johnson, Group Leader
Measurement Technology Group

cc:

Greg Fried, OECA/AED

Kim Garnett, OAQPS/AQAD

Michael A. Klein NJDEP

Elizabeth Leturgey, OECA/OC

Richard Ruvo, EPA Region 2

Regional Testing Contacts