



REGION 7

LENEXA, KS 66219

July 15, 2026

SENT VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ed Bruce
Hazardous Materials Compliance and
Sustainability Manager
H&T Kansas LLC
10301 Astra Parkway
DeSoto, Kansas 66018

Dear Mr. Bruce:

On February 5, 2026, H&T Kansas LLC requested approval of an alternative approach for monitoring perchloroethylene from a carbon adsorber used to control emissions from halogenated solvent cleaning machines, located within the Panasonic Energy facility in DeSoto, Kansas. Additional information was provided to the EPA on March 19, 2026. These solvent cleaning machines are subject to 40 CFR part 63, subpart T—National Emission Standards for Halogenated Solvent Cleaning.

40 CFR 63.466(e) requires monitoring of any halogenated solvent cleaning machine that uses a carbon adsorber. This monitoring consists of weekly sampling of the exhaust from the carbon adsorber using a colorimetric detector tube while the solvent cleaning machine is in the working mode and venting to the carbon adsorber. H&T requests authorization to instead continuously monitor the concentration of perchloroethylene from the carbon adsorption beds with an inline infrared spectrophotometer. The monitor is located in the duct above the carbon bed for each washer and is calibrated and maintained following the manufacturer's specifications. The monitor takes a reading every minute. These one-minute readings will then be compared to the 100 parts per million (ppm) threshold prescribed in 40 CFR 63.463(e)(2)(vii)(A).

H&T's proposed monitoring approach has several advantages, making it an equivalent option to what is required by 40 CFR 63.466(e). The proposed alternative monitoring approach will identify issues quickly since it takes a continuous reading every minute. The monitor's accuracy is also higher than the required colorimetric detector tube (i.e., ± 25 ppm vs ± 0.368 ppm), making it just, if not more, accurate. Finally, the proposed monitoring approach also ensures safety, since data from the monitor are fed into H&T's Manufacturing Execution System, enabling alarms and the shutdown of equipment if the concentration of perchloroethylene reaches unsafe levels.

The Environmental Protection Agency therefore approves this proposed alternative monitoring approach pursuant to 40 CFR 63.466(g) and 63.8(f). Please contact Ward Burns at burns.ward@epa.gov with any questions regarding this letter.

Sincerely,

VEDA HAKAMI
STOY

Digitally signed by VEDA
HAKAMI STOY
Date: 2026.07.16
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Alyse Stoy
Acting Director
Enforcement and Compliance Assurance Division

CC: Gyanendra Prasai, Kansas Department of Health and Environment, Gyanendra.X.Prasai@ks.gov