



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

March 29, 2000

Dr. Elaine Chang
Assistant Deputy Executive Officer
Office of Planning, Rule Development and Area Sources
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

Subject: Approval of South Coast Method 25.3 - Determination of Low Concentration Non-Ethane Non-Methane Organic Compound Emissions from Clean Fueled Combustion Sources

Dear Dr. Chang:

On March 14, 2000, EPA Region 9 received an electronic copy of the following test method from South Coast Air Quality Management District (SCAQMD):

Method 25.3 - Determination of Low Concentration Non-Ethane Non-Methane Organic Compound Emissions from Clean Fueled Combustion Sources - March 2000

SCAQMD Method 25.3 is designed to measure volatile organic compound (VOC) concentrations below 50 ppm as carbon. Duplicate gas samples are withdrawn from a source at a constant rate through condensate traps followed by evacuated canisters. VOC concentration as non-Methane non-Ethane Organic Compounds (NMNEOC) is determined by combining the results from the analyses of the condensate in each trap and the gas in its associated canister. The traps are analyzed for total organic carbon by liquid injection into an infra-red total organic carbon analyzer. The canisters are analyzed for NMNEOC using GC/Oxidation/Reduction/FID.

SCAQMD Method 25.3 is for use on combustion sources using clean fuels such as natural gas, refinery fuel gas, butane, LPG, landfill gas, digester gas, methanol and ethanol. The resulting concentration as measured by the method must be less than 50 ppm.

South Coast has incorporated earlier EPA comments on the draft method to include a correction factor of 1.086 to be applied to data collected with SCAQMD 25.3 at each use. EPA Region 9 approves SCAQMD Method 25.3 for use in SIP approved rules in California.

EPA welcomes the opportunity to review SCAQMD's Method 25.3. If you have any

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questions, please do not hesitate to have your staff contact Stanley Tong at (415) 744-1191.

Sincerely,



Andrew Steckel
Chief, Rulemaking Office

cc: Rima Howell, EMC
Robin Segall, EMC
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