



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

June 28, 2006

Mr. Dan Belik
Rule Development Manager
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Subject: Approval of Amendments to Bay Area Air Quality Management District Test Methods

Dear Mr. Belik:

The Bay Area Air Quality Management District (BAAQMD) submitted the following test methods to US EPA Region 9 for approval for use in California State Implementation Plan (SIP) rules.

- Test Method 10A *Determination of Sulfur in Petroleum and Petroleum Products, Adopted 5/18/05*
- Test Method 21 *Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings, Amended 5/18/05*
- Test Method 22 *Determination of Compliance of Volatile Organic Compounds for Solvent Based Coatings, Inks and Other Related Products, Amended 5/18/05*
- Test Method 31 *Determination of Compliance of Volatile Organic Compounds in Paint Strippers, Solvent Cleaners and Low Solids Coatings, Amended 5/18/05*
- Test Method 33 *Determination of Dissolved Critical Volatile Organic Compounds in Wastewater Separators, Amended 5/18/05*
- Test Method 41 *Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride, Amended 5/18/05*
- Test Method 43 *Determination of Volatile Methylsiloxanes in Solvent Based Coatings, Inks and Related Materials, Amended 5/18/05*
- Test Method 45 *Determination of Butanes and Pentanes in Polymeric Materials, Amended 5/18/05*
- Test Method 46 *Determination of the Composite Partial Pressure of Volatile Organic Compounds in Cleaning Products, Amended 5/18/05*

EPA Region 9 previously reviewed changes made to these test methods and provided preliminary approval in letters to the BAAQMD dated October 16, 2001, May 28, 2003, April 13, 2004, and July 27, 2004, subject to approval of the methods by the BAAQMD Board. The

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(cont.)

BAAQMD also submitted changes to their Manual of Procedures, Volume III, Section 4.2 to allow the District to make minor and intermediate changes to their test methods, and to clarify that major changes must be approved by EPA.

EPA Region 9 has reviewed the final versions of the above adopted/amended test methods and changes to BAAQMD's Manual of Procedures, and finds them technically acceptable and approves their use in SIP approved rules. The above methods have not been reviewed for use to determine compliance with Federal New Source Performance Standards (NSPS) or with National Emission Standards for Hazardous Air Pollutants (NESHAPS).

If you have any questions, please do not hesitate to have your staff contact Stanley Tong at (415) 947-4122.

Sincerely,



Andrew Steckel
Chief, Rulemaking Office

cc: James Hesson, BAAQMD
Cleofina David, BAAQMD
Robin Segall, EMC
Cindy Castronovo, CARB
Robert Rogen, CARB