H. Gregor Rigo, PhD
President
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Dear Dr. Rigo:

This is a follow-up regarding your letter of August 30, 1999 to Administrator Carol Browner regarding, among other things, the recently-promulgated Hazardous Waste Combustion Maximum Achievable Control Technology (HWC MACT) rule. In my interim response of October 1, 1999, I indicated that we would update you by November 5 on our approach and progress on the issues you have raised.

Method precision is an important and complex issue that needs to be addressed to ensure that the Agency's standards are achievable and enforceable. As you know, the American Society of Mechanical Engineers' (ASME) Research Committee on Industrial and Municipal Waste is currently investigating the issue of method precision in great detail, and we look forward to reviewing their conclusions. We believe that this independent effort will shed some light on the technical questions you have raised. We, therefore, are inclined to wait for the results of the ASME Research Committee=s work before we pursue the matter further. I would like to point out, however, that emissions variability, including method imprecision, has been addressed in developing the HWC MACT rule, as documented fairly extensively in the preamble to the final HWC rule and supporting documents.

Our internal discussion with the Emissions Measurement Center (EMC) in the Office of Air Quality Planning and Standards on the issue of method precision also suggests that it may be useful to await the results of the ASME Research Committee study B particularly on the issue of whether the practical limit of quantitation (PLQ) concept in Method 301 has significant technical drawbacks. However, based on these discussions with EMC, I would like to make clear that the Agency has not tied the acceptability of EPA methods to the statement in Method 301 that the PLQ corresponds to an uncertainty of $\pm$ 30% at the 99% confidence level. On our part of this issue, I would simply reiterate that we believe method precision and other factors that affect emissions variability have been appropriately addressed in establishing the final HWC

MACT standards. Should new information come to light at a later date, we will take appropriate action at that time.

We very much appreciate your interest in this difficult technical issue. However, under the current circumstance of the ASME Research Committee work, we simply are not in a position to pursue this issue independently with you at this time. Please feel free to contact Mr. Bill Lamason, Group Leader, EMC (919-541-5374) once ASME releases the results of its analysis.

Sincerely yours,

Elizabeth A. Cotsworth, Director
Office of Solid Waste

cc: Bill Lamason, EMC, OAQPS
Bob Holloway, OSW