

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
100 ALABAMA STREET, S.W.
ATLANTA, GEORGIA 30303-3104

4APT-ARB

Mr. Alan W. Klimek, P.E., Director
Division of Air Quality
North Carolina Department of Environment,
Health, and Natural Resources
Post Office Box 29580
Raleigh, North Carolina 27626-0580

SUBJ: Inconsistency in the Calculation of Volatile Organic Compound (VOC) Emission Rates
Using the Results of U.S. Environmental Protection Agency (EPA) Methods 25 and 25A.

Dear Mr. Klimek:

The purpose of this letter is to provide you with technical guidance regarding an area of inconsistency that recently came to the attention of Region 4 during the review of a potential enforcement case. This inconsistency involves the way various agencies have used the results of Method 25 and 25A testing to calculate VOC emission rates. Method 25 measures total VOC concentrations in terms of carbon and Method 25A measures total VOC concentrations in terms of the calibration gas used during the testing. Depending upon how the test data will be used, it may be necessary to convert Method 25 and 25A test results to an "as VOC" basis, and the enclosed issue paper provides more details regarding when and how the results of these methods must be converted to an "as VOC" basis.

The failure of a facility to properly convert test results to an "as VOC" basis may have enforcement implications in some circumstances if the company used the test results to demonstrate compliance or to determine the applicability of a regulation. The intent of this letter, however, is to provide technical guidance regarding the circumstances under which Method 25 and 25A must be converted to an "as VOC" basis, rather than to provide detailed enforcement guidance. There are many case-specific factors that must be considered when deciding whether a violation has occurred, and if so, the type of action that should be taken. Therefore, we recommend that you contact Region 4 for guidance involving cases where Method 25 or 25A test results should have been converted to an "as VOC" basis but were not.

Questions regarding technical issues involving the conversion of Method 25 and 25A results to an "as VOC" basis should be directed to Mr. David McNeal of my staff at (404) 562-9102. Questions involving enforcement issues related to this topic should be directed to Ms. Beverly Spagg or to Mr. Richard DuBose at (404) 562-9170 and (404) 562-9168, respectively.

Sincerely yours,

Winston A. Smith
Director
Air, Pesticides and Toxics
Management Division

Enclosure