



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Jennifer Kelley  
Director of Environmental Compliance  
AMVAC  
4100 E. Washington Blvd  
Commerce, CA 90023

1/25/2023

Dear Ms. Kelley:

This letter is in response to your January 10, 2023, request for an alternative test method for use on Units F-P1161 and F-P1162 at AMVAC Chemical Corporation (AMVAC) located in Axis, Mobile County, Alabama. According to the information provided, Units F-P1161 and F-P1162 at AMVAC is subject to 40 CFR part 63, Subpart VVVVVV, National Emissions Standard for Hazardous Air Pollutants for Chemical Manufacturing Area Sources (Subpart VVVVVV). The Office of Air Quality Planning and Standards, as the delegated authority, must make the determination on any major alternatives to test methods and procedures required under 40 CFR parts 59, 60, 61, 63, and 65. Your proposed alternative test method and our approval decisions are discussed below.

According to the information provided, Units F-P1161 and F-P1162 at AMVAC are subject to Section 63.11496(g) of Subpart VVVVVV, which states:

*“If you are complying with the emission limits and other requirements for continuous process vents in Table 3 to this subpart, the provisions in paragraphs (g)(1) through (8) of this section apply in addition to the provisions in 40 CFR Part 63, Subpart SS.”*

40 CFR 63, Subpart SS, Section 63.997(e)(2)(iii)(C)(1) goes on to state:

*“The emission rate correction factor (or excess air), integrated sampling and analysis procedures of Method 3B of 40 CFR Part 60, Appendix A, or the manual method in ANSI/ASME PTC 19.10-1981 - Part 10 (incorporated by reference, see § 63.14), shall be used to determine the oxygen concentration.”*

Based on the regulations cited above, AMVAC is required to use Method 3B (40 CFR part 60, Appendix A) to determine the oxygen concentration for Units F-P1161 and F-P1162. As

a result, you seek an approval to use Method 3A (40 CFR part 60, Appendix A) in lieu of Method 3B.

After reviewing the information contained in your request and considering Method 3A is as sensitive and has better accuracy and precision than Method 3B, we agree with the reasoning of your request and are approving the use of Method 3A as an alternative to Method 3B on Units F-P1161 and F-P1162 at AMVAC when complying with Section 60.11496(g) of Subpart VVVVVV.

**Please note that a copy of this determination must be included in all test reports that use this alternative method.**

Additionally, it has come to our attention there is currently a shortage of the chemicals needed to conduct Method 3B. Due to this shortage and the fact that Method 3A is as sensitive and has better accuracy and precision than Method 3B this alternative method may be of use to others. Therefore, we feel it is reasonable that this approval be broadly applicable to all units required the use Method 3B under 40 CFR parts 59, 60, 61, 63, and 65. For this reason, we will post this letter as ALT-151 on our website at <https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods> for use by other interested parties.

If you have any questions or concerns, please feel free to contact Walter Lin of my staff at (919) 541-1341.

Sincerely,



Steffan Johnson  
Group Leader  
Measurement Technology Group

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