



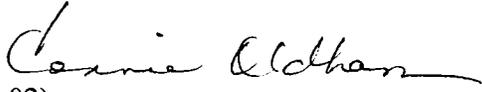
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

JUL 31 2008

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

MEMORANDUM

SUBJECT: Voluntary Consensus Standard Results for Standards of Performance for Medical and Infectious Waste Incineration

FROM: Conniesue B. Oldham, Group Leader 
Measurement Technology Group (E143-02)

TO: Robert Wayland, Group Leader
Energy Strategies Group (D243-01)

At your request, the Measurement Technology Group (MTG) of the Office of Air Quality Planning and Standards (OAQPS) conducted searches and reviews to address the National Technology Transfer and Advancement Act (NTTAA) requirements on the use of voluntary consensus standards (VCS). The NTTAA directs EPA to use VCS in regulatory and procurement activities unless doing so would be inconsistent with applicable law or otherwise impracticable. This memorandum documents the results of the MTG searches and reviews to determine if VCS are available and practical for use in lieu of stationary source methods cited in the Standards of Performance for Medical and Infectious Waste Incineration.

In 1998, OAQPS began implementing the requirements of the NTTAA by conducting searches to identify VCS. Searches continue to be performed to meet the requirements of the NTTAA. While we have made a reasonable effort to identify and evaluate potentially practical VCS, our findings do not necessarily represent all potential alternative standards which may exist.

The MTG participates in the American Society for Testing and Materials (ASTM), which is one of the most active VCS organizations on emissions testing, and has been invited to participate in the USA Technical Advisory Group for International Organization for Standardization (ISO) relating to emissions monitoring. We expect these additional efforts will help us to support a periodic review of all EPA reference methods and performance standards for possible incorporation by reference (IBR) of VCS in lieu of or as alternatives to EPA procedures. We anticipate that these activities will provide an opportunity for further review, consideration and possible IBR of VCS overlooked in the National Standards Service Network (NSSN) searches or finalized after Federal agency review in the EPA rulemaking process.

We conducted searches for the New Source Performance Standards (NSPS) for the Standards of Performance for Medical and Infectious Waste Incineration through the Enhanced NSSN Database managed by the American National Standards Institute (ANSI). We also contacted VCS organizations, and accessed and searched their databases.

This rulemaking involves technical standards. EPA has decided to use two VCS in this rule. One VCS, ASME PTC 19.10-1981, "Flue and Exhaust Gas Analyses," is cited in this rule for its manual method of measuring the content of the exhaust gas as an acceptable alternative to EPA Method 3B. This standard is available from the American Society of Mechanical Engineers (ASME), P.O. Box 2900, Fairfield, NJ 07007-2900; or Global Engineering Documents, Sales Department, 15 Inverness Way East, Englewood, CO 80112.

Another VCS, ASTM D6784-02, "Standard Test Method for Elemental, Oxidized, Particle-Bound and Total Mercury Gas Generated from Coal-Fired Stationary Sources (Ontario Hydro Method)," is cited in this rule as an acceptable alternative to EPA Method 29 (portion for mercury only) for measuring mercury. This standard is available from the American Society for Testing and Materials (ASTM), 100 Barr Harbor Drive, Post Office Box C700, West Conshohocken, PA 19428-2959; or ProQuest, 300 North Zeeb Road, Ann Arbor, MI 48106.

The EPA has decided to use the following EPA methods in this rule: Method 1, of 40 CFR part 60, appendix A-1; Methods 3, 3A, and 3B of 40 CFR part 60, appendix A-2; Method 5 of 40 CFR part 60, appendix A-3; Methods 6C, 7E, 9, 10, and 10B of 40 CFR part 60, appendix A-4; Methods 22 and 23 of 40 CFR part 60, appendix A-7; and Methods 26 and 29 of 40 CFR part 60, appendix A-8.

During the search, if the title or abstract (if provided) of the VCS described technical sampling and analytical procedures that are similar to EPA's reference method, the MTG ordered a copy of the standard and reviewed it as a potential equivalent method. All potential standards were reviewed to determine the practicality of the VCS for this rule. This review requires significant method validation data which meets the requirements of EPA Method 301 for accepting alternative methods or scientific, engineering and policy equivalence to procedures in EPA reference methods. The MTG may reconsider determinations of impracticality when additional information is available for particular VCS.

The search identified 16 other VCS that were potentially applicable for this rule in lieu of EPA reference methods. After reviewing the available standards, EPA determined that 16 candidate VCS (ASTM D3154-00 (2006), CAN/CSA Z223.2-M86 (1999), ASTM D5835-95 (2007), ISO 10396:1993, ANSI/ASME PTC 19-10-1981-Part 10, ISO 12039:2001, ANSI/ASME PTC-38-1980 (1985), ASTM D3685/D3685M-98 (2005), ISO 9096: 1992 (2003), CAN/CSA Z223.1-M1977, ASTM D3162-94 (2005), CAN/CSA Z223.21-M1978, EN 1948-3 (1996), EN 1911-1,2,3 (1998), EN 13211:2001, CAN/CSA Z223.26-M1987) identified for measuring emissions of pollutants or their surrogates subject to emission standards in the rule would not be practical due to lack of equivalency, documentation, validation data and other important

technical and policy considerations. These 16 methods are listed in Attachment 1, along with the EPA review comments.

I hope our research into this matter has been useful and timely to your Group's efforts in this rulemaking. Please contact me at (919) 541-7774 with any further questions in this matter.

Attachments

cc: Mary Johnson, EPA/SPPD (D243-01)
Donna Lee Jones, EPA/SPPD (D243-02)
Michael Toney, EPA/AQAD (E143-02)