UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

ENVIRONMENTAL SERVICES DIVISION
ATHENS, GEORGIA 30605-2720

4ES

February 29, 1996

MS SYLVIA LABIE
FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
QUALITY ASSURANCE SECTION
LABORATORY COMPLEX
2600 BLAIR STONE ROAD
TALLAHASSEE FL 32399-2400

RE: Interim Alternate Test Procedure (ATP) Approval for EPA Method 1664: N-Hexane Extractable Material (HEM) and Silica Gel Treated-N Hexane Extractable Material (SGT-HEM) by Extraction and Gravimetry (Oil and Grease and Total Petroleum Hydrocarbons), April 1995.

Dear Ms. Labie:

A notice of proposed rulemaking was published in the Tuesday, January 23, 1996, Federal Register, Volume 61, Number 15, which will allow the use of EPA Method 1664 for the analysis of oil and grease, and petroleum hydrocarbons. This rule, if promulgated, will withdraw currently approved methods for oil and grease listed in 40 CFR Part 136 which use 1,1,2-trichloro-1,2,2-trifluoroethane (CFC-113; Freon-113) as the extraction solvent, and replace these methods with EPA Method 1664 using n-hexane as the extraction solvent.

BACKGROUND

Sections 604, 606 and 608 of the 1990 Clean Air Act amendments phased out the production of Class I chlorofluorocarbons (CFCs) and reduced use and emissions of Class I CFCs to the lowest achievable levels. Pursuant to Section 606, production of most Class I substances, including Freon-113, is phased out as of January 1, 1996 except for a few exemptions for essential uses. On May 10, 1995, a global exemption for laboratory and essential uses of CFCs was granted for the 1996 and 1997 control period (60 FR 24970). This exemption explicitly allowed for the production of CFCs for laboratory uses through December 31, 1997. However, because laboratory testing is a very small part of Freon-113 consumption (less than 1 percent), it appears that production of Freon-113 has essentially ceased and that stocks available for laboratory use are limited to those currently on hand at the vendors.

As early as the second quarter of 1995, State, local and

private laboratories were reporting difficulties in obtaining Freon-113 for analytical purposes to EPA's Region 4 Environmental Services Division (ESD). These reports have increased to 3-5 calls daily from laboratories requesting ATP approval for use of EPA Method 1664 with n-hexane as the extraction solvent. Laboratories report that even when available, solvent costs have increased to $700-800 per gallon.

ACTION

EPA, Region 4, is granting interim limited use (LU) ATP approval to use EPA Method 1664, April 1995 (Document No. EPA-821-B-94-004b), for the analysis of oil and grease - total recoverable, and petroleum hydrocarbons - total recoverable. This interim approval is effective immediately and is valid until Method 1664 is officially promulgated by publication of the final rule in the Federal Register or is withdrawn from consideration by EPA. Laboratories desiring use of Method 1664 for NPDES testing need not apply to EPA Region 4 on a case-by-case basis. Use of the method is allowed with the following restrictions:

(1) During the interim approval period, the method must be used exactly as written. The alternate extraction and concentration procedures (performance based approach) mentioned in the method will not be allowed by the Region until the final rule is published. All quality control acceptance criteria required in the method must be met.

(2) When laboratories begin using Method 1664 for total recoverable petroleum hydrocarbons and total recoverable oil and grease testing, the use of freon extraction methods for NPDES testing must be discontinued because the HEM, SGT-HEM and Freon-113 methods may not produce equivalent results when comparative tests are performed on discharges. Because of these differences, the exact date of change from EPA Method 413.1 to EPA Method 1664 must be documented by the laboratory.

This LU ATP approval applies only to laboratories performing testing for NPDES permits in Region IV. Questions related to this interim LU ATP approval should be directed to the ESD Laboratory Evaluation and Quality Assurance Section at (706) 546-2013, -3287, or -2447.

Sincerely,

Russell L. Wright, Jr.
Director
Environmental Services Division