



Florida Department of Environmental Protection

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DARM-OGG-20 (Revised)

To: District Air Program Administrators
Local Program Administrators

From: Division of Air Resource Management
Office of Permitting and Compliance (OPC)

Date: November 2017

Subject: Guidance on EPA Method 26 Testing Requirements
Industrial Boiler MACT, Subpart DDDDD, and the Mercury and Air Toxics
Standards (MATS) for Power Plants, Subpart UUUUU;
Both in 40 CFR 63

EPA's new Industrial Boiler MACT and more recent MATS for Power Plants require stack testing to demonstrate compliance with the emissions standard for the hazardous air pollutant, hydrogen chloride (HCl). Subpart DDDDD and UUUUU allow the use of either EPA Method 26 or 26A to determine HCl emissions. EPA has provided related guidance on these methods at <http://www3.epa.gov/ttn/emc/methods/method26a.html>.

Some test companies and facilities have requested approval for a "Modified EPA Method 26" that allow the use of the Method 5 meter box and larger impingers as allowed by EPA Method 26A. The ability to use standard test equipment will save time and perhaps reduce the number of personnel needed per project but still maintain the accuracy of the method. The Department authorizes this minor change, provided:

- The sample is extracted at an average flow rate of approximately 20 liters per minute - similar to EPA Method 26A. If the sample flow rate is less than 15 liters per minute, then a pre-test purge must be conducted.
- If moisture condensation is present in the sample train, a post-test purge must be conducted.
- The pre-test and post-test sample train leak check procedures specified in Method 26A must be used.
- All other QA requirements and procedures of Method 26 must be followed.

When the Compliance Authority is notified of the scheduled compliance test, the alternative test method and a copy of this memo should be provided. Note that the Modified EPA Method 26 indicated above should not be used to also measure particulate matter.

If you have any questions, please contact the Environmental Administrator of the Compliance & Enforcement Section in OPC, at 850-717-9106.