



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

JUL 26 2011

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Harlan C. Reid
Rust-Oleum Corporation
8105 95th Street
Pleasant Prairie, WI 53158

Dear Mr. Reid:

In your June 8, 2011 correspondence, you asked permission to use an alternative procedure for determining the water content of coatings for Method 24 (40 CFR Part 60, Appendix A-7). Method 24 allows the use of a number of versions of ASTM D 3792 (GC Procedure) or ASTM D 4017 (Karl Fisher Titration), but you have requested the use of ASTM D 7358-07, which you feel is superior to ASTM D 4017.

Based on our review of ASTM D 7358-07, we agree that this method is acceptable for determining the water content of coatings. The comparative precision data presented in the method demonstrates that ASTM D 7358-07 is as precise as ASTM D 4017. We agree that ASTM D 7358-07 would provide data of similar quality as ASTM D 4017, while potentially reducing the complexity of making the measurement. Therefore, we are approving the use of ASTM D 7358-07 with Method 24.

Since this approval is broadly applicable to all Federal standards in 40 CFR 60, 61 and 63 requiring the use of Method 24, we will be posting this letter to our website at <http://www.epa.gov/ttn/emc/approalt.html> for use by other interested parties.

If you have any questions or would like to discuss this matter further, please call Candace Sorrell at (919) 541-1064, or you may email her at sorrell.candace@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Connie Oldham".

Conniesue Oldham, Ph.D., Group Leader
Measurement Technology Group