



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

Mr. Justin Furman
Environmental Specialist
Oxy Vinyls, LP
P.O. Box 411
Route 130 & Porcupine Rd.
Pedricktown, NJ 08067

OCT 17 2018

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Dear Mr. Furman:

I am writing in response to your letter dated August 13, 2018, in which you request approval for use of SW-846 Method 8260C (<https://www.epa.gov/sites/production/files/2015-07/documents/epa-8260c.pdf>) as an alternative to the prior version, SW-846 Method 8260B, for analysis of volatile organic compounds (VOC) in stripped resin and wastewater samples in order to meet the requirements in 40 CFR 63, Subpart HHHHHHH, "Polyvinyl Chloride and Copolymers Production: National Emission Standards for Hazardous Air Pollutants (NESHAP)." You indicate that you must comply with requirements in both 40 CFR 63.11960(e)(1)(i) and 63.11980(a)(2)(i) at your polyvinyl chloride (PVC) plant located at Route 130 & Porcupine Rd, Pedricktown, NJ, 08067. You use Method SW-846 Method 8260 to measure applicable compounds listed in Table 10 to Subpart HHHHHHH of Part 63.

We note that SW-846 Method 8260C has now been revised and we address the applicability of that revision (SW-846 Method 8260D <https://www.epa.gov/hw-sw846/sw-846-test-method-8260d-volatile-organic-compounds-gas-chromatographymass-spectrometry>) to 40 CFR 63 HHHHHHH for stripped resin and wastewater samples in addition to your request to use Method 8260C.

With this letter, we are approving your request to use SW-846 Method 8260C and approve SW-846 Method 8260D as alternatives to SW-846 Method 8260B to meet the requirements for stripped resin and wastewater sample analysis found in 40 CFR 63, Subpart HHHHHHH. Since SW-846 analytical methods are intended to be guidance methods that contain general information on how to perform an analytical procedure or technique, and the performance data included in these methods are provided for guidance purposes only, we are adding specific performance criteria to this alternative method approval that must be met in the application of SW-846 Methods 8260C or D for demonstration of compliance with 40 CFR 63, Subpart HHHHHHH as follows:

- 1) Prior to initial calibration, your quadrupole instrument performance must meet the ion ratio criteria for the reference compound 4-Bromofluorobenzene found in Table 3 of Method 8260. Other tuning criteria may be used depending on the type of mass detector used provided the method performance is not adversely affected. You must document and record results for your criteria.

- 2) Your initial calibration (ICAL) must include five (5) standard concentrations that span the typical range of analysis. For average response factor determination, the relative standard deviation of the response factors in the ICAL must be less than 20 percent. For linear regression or quadratic regression calibration, $R \geq 0.995$ or $R^2 \geq 0.99$, respectively.
- 3) Calibration points above the lower limit of quantitation must agree with the true value of the standard within 30 percent.
- 4) Calibration verification (CCV) standards must be prepared from a second source and must agree with initial calibration results within 30 percent. Retention times for internal standards in the CCV must be within 30 seconds of the ICAL results.
- 5) Target analyte concentrations in blank samples must be less than half of the lower limit of quantitation or less than 10 percent of the concentration of field samples.
- 6) Matrix spike recoveries must be between 70 and 130 percent of the spike value.
- 7) A copy of this approval letter must be included in the report for each testing program where these alternative testing procedures are applied.

Since these alternative methods and procedures are applicable to all the facilities subject to 40 CFR 63, Subpart HHHHHHHH, we will announce on EPA's website (at <https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods>) that our approval of this alternative is broadly applicable to non-vinyl chloride VOC hazardous air pollutant measurement in stripped resin and wastewater samples subject to 40 CFR 63, Subpart HHHHHHHH. Should the alternative approvals authorized in this letter be superseded by formal actions to revise 40 CFR 63, Subpart HHHHHHHH, this approval may be rescinded.

If you have any questions regarding this approval or need further assistance, please contact Ray Merrill at (919) 541-5225 or merrill.raymond@epa.gov or Jason Dewees at (919) 541-9724 or deweese.jason@epa.gov.

Sincerely,



Steffan M. Johnson, Group Leader
Measurement Technology Group

cc. Robert Buettner EPA/Region 2
Jennifer Caparoso EPA/OAQPS/SPPD
Maria Malave EPA/OECA
Barrett Parker EPA/OAQPS/SPPD
Anthony Williams NJ/DEP