



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

July 27, 2022

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

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

07/27/2022

Dear Mr. Furman:

I am writing in response to your letter dated June 16, 2022, in which you request approval for use of SW-846 Method 8270E (https://www.epa.gov/sites/default/files/2019-01/documents/8270e_revised_6_june_2018.pdf) and SW-846 Method 8015D (https://www.epa.gov/sites/default/files/2015-12/documents/8015d_r4.pdf) as alternatives to the prior versions, SW-846 Method 8270D, for analysis of semivolatile organic compounds (SVOC) and SW-846 Method 8015C for the analysis of alcohol compounds, 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 8270 and SW-846 Method 8215 to measure the applicable compounds listed in Table 10 to Subpart HHHHHHH of Part 63.

Your request and justification are based on the circumstance that the New Jersey Department of Environmental Protection's ("NJDEP") laboratory certification process no longer certifies the prior method versions, SW-846 8270D or SW-846-8015C, as conforming to compliance rules. You indicate that NJDEP does certify the revised test methods SW-846-8270E and SW-843-8015D for the purpose of analysis of the target compounds you are required to measure in 40 CFR 63, Subpart HHHHHHH.

We take note that SW-846 Method 8270D and SW-846 Method 8015C have been revised since 40 CFR 63, Subpart HHHHHHH was promulgated, and we must consider the applicability of those revisions for stripped resin and wastewater samples in addition to your request to use these two revised SW-846 Methods.

With this letter, we are approving your request to use SW-846 Method 8270E and SW-846 Method 8015D as alternatives to SW-846 Method 8270D and SW-846 Method 8015C to meet the requirements for stripped resin and wastewater sample analysis found in 40 CFR 63, Subpart HHHHHHHH. Considering that SW-846 analytical methods are intended to be guidance for measurement of applicable target compounds, and these methods contain general information on how to perform an analytical procedure or technique, and the included performance data are provided for guidance purposes only, we are adding the following provisos that must be met in the application of SW-846 Methods 8270E and SW-846 Method 8015D for demonstration of compliance with 40 CFR 63, Subpart HHHHHHHH as follows:

- 1) You must use sample preparation techniques that generated acceptable performance for your sample matrix as listed in Method 8270E or Method 8015D applicable to the target compounds you measure.
- 2) Criteria or procedures identified in SW-846 Method 8270E and SW-846 Method 8015D with the phrase “must” are requirements for this alternative approval.
- 3) If compounds are measured above the lowest calibration standard concentration, but the sample fails to meet the method performance criteria, the sample results are invalid. Corrective action for the cause for failure must be determined and rectified and the sample(s) must be reanalyzed if the sample is available, or resampled and reanalyzed if the sample is not available.
- 4) You must flag data (typically with a J flag) that meets the qualitative identification criteria in each method but is below the lowest level of quantitation.
- 5) To report results as non-detects, you must meet the criteria in the method and find no instrument response for the qualitative identification criteria in each method.

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 with the listed provisos 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
John Cox, EPA/OECA
Barrett Parker, EPA/OAQPS/SPPD
Viadimir Korolev, NJ/DEP