

CHEMICALS



Wood
INTEROFFICE / LAKE CHARLES

TO J. Wyche
FROM M. Wood
DATE January 3, 1977
SUBJECT VCM Emission Test Method
Reference: Your Memo of 12/21/76 to H. J. Hoenes, Jr.

The following comments are a review of EPA Test Method No. 106 problems.

A. Incinerator Emissions and Moisture Correction in General

Provision has been added in Equation 106-2 on page 46571 for moisture correction. However, the method for obtaining water vapor content is incorrect (Section 6.5). This applies to saturated ambient water vapor which has absolutely nothing to do with the sampling of the source. Even if the calculation was properly applied, this would still not allow for condensate.

B. Vinyl Chloride Standards (Section 5.2.2)

EPA has not changed their view on standards, but at least better defined what is acceptable. Nitrogen standards, either static or dynamic, pose no serious problem.

C. G.C. Methods

This portion of the procedure still sticks very closely to equipment and techniques apparently immediately available to the standard writer. This incorrectly implies his methods are best.

Section 6.4 requires both manual peak height and disc integrator or planimeter area measurements. Requiring the VC standard peak shape and sample peak shape to be geometrically similar is proper. I don't believe, however, a disc integrator or planimeter is a necessity for accuracy (1).

1. McNair, H. M. and Bonelli, E. J., Basic Gas Chromatography, Varian Aerograph, Walnut Creek, CA (1969) p 158.

SL 043653

January 3, 1977

D. Sampling in General

Strangely, the person preparing the sampling procedure has been as liberal and even vague as the analytical procedure author has been too restrictive. Sample volume, sampling duration, sampling rate, nor proportionality procedure are defined.

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cc: H. J. Hoenes, jr.

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