

Tenneco Chemicals

A Tenneco Company



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January 25, 1978

Mr. Don R. Goodwin, Director
Emission Standards & Engineering Division
U. S. Environmental Protection Agency
Research Triangle Park
North Carolina 27711

RE: Part 61 National Emission Standards
for Hazards Air Pollutants
- Appendix B: Methods 106 and 107
- Alternative Methods

Dear Mr. Goodwin:

Tenneco Chemicals, Inc. requests approval of its Analytical Methods:

GCF-3.0 Determination of Vinyl Chloride from Stationary Sources
(Revised 1/12/78)

and

GCF-1.0A Determination of Vinyl Chloride Content in Polyvinyl
Chloride Resin Samples (Revised 11/18/77)

GCF-4.0 Determination of Vinyl Chloride Content in Polyvinyl
Chloride Resin Slurry Samples (Revised 11/2/77)

GCF-5.0 Determination of Vinyl Chloride Content of In-Process
Wastewater Samples (Revised 11/4/77)

as alternates to Reference Methods 106 and 107, respectively.

These methods have been revised to reflect specific comments by Mr. William Grimley in an August 16, 1977 letter to Mr. Marcus Kantz (Region II NESHAPS Coordinator). The formal procedures include specific sampling methods which are appropriate for the individual sample type, the particular process or equipment limitation, etc. These are geared to minimize inaccuracies due to loss of vinyl chloride resulting from improper handling.

The methods were developed by our R & D staff based on GC principals accepted by analytical chemists. These have been incorporated into

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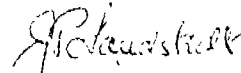
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plant procedures at our Burlington and Fleminton, New Jersey (Region II)
and Pasadena, Texas (Region VI) sites.

Should you have any questions concerning this request, please contact me.

Very truly yours,

TENNECO CHEMICALS, INC.



J. P. Sandstedt, Manager
Environmental Sciences

JPS:cg

cc: Mr. K. W. Grimley, Jr. -- EPA, Emission Testing Branch
Mr. Marcus Kantz -- EPA, Region II
Mr. Gary Bernath -- EPA, Region VI
Dr. Louis R. Roberts -- Texas Quality Control Board

bcc: Mr. W. P. Anderson
Mr. G. I. Rozand