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May 20, 1980

Mr. J. F. Erdmann, P.E.
Union Carbide Corporation
Chemicals & Plastics
P. O. Box 471
Texas City, Texas 77590

RECEIVED

MAY 23 1980

J. F. E.

Re: TACB Account No. GB-0076-J

Dear Mr. Erdmann:

This letter is in response to your request of January 21, 1980, for a variance from the sampling schedule specified in Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAPS), Subparts A and F and Appendix B, Methods 106 and 107. It is your opinion that the requirements of this regulation are much more stringent than necessary because your process differs from that commonly found in industry at the time this regulation was enacted. The data included in your report supports this opinion.

There are some questions about the accuracy of the statistical evaluation of this data. Of primary concern is the assumption that the data follow a normal distribution. The mean and standard deviation reported do not indicate that this assumption is valid. The source of your statistical treatment, Engineering Statistics and Quality Control by Irving J. Burr, emphasizes this assumption by placing it in italics which indicates it must be necessary before this treatment can be used. Secondly, we are not sure that sampling the same day every week could be considered random sampling.

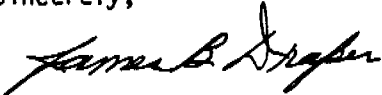
Although your proposed sampling plan is not acceptable for the above reasons, the TACB realizes that some variance is in order. Since your data does not follow normal distribution, however, a more pragmatic approach to determining new sampling requirements may be necessary.

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We will be glad to discuss this matter further at your convenience. If you have any questions please give Mr. Charles Shevlin of my staff a call at 512/451-5711, Ext. 251.

Sincerely,



James B. Draper, P.E., Chief
Source Evaluation Section

cc: Howard Houston, Compliance Division
Sabino Gomez, Regional Supervisor, Bellaire

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