

EPA Comments on the *Trial Burn Plan / MACT CPT Plan for the Polyester Burner Unit – Revision 2* (January 31, 2008) Volume II of III

Main Burn Plan

Section 6.5, page 3, Table 6-3

At a minimum, the reference from “targeted” VOCs and SVOCs in Table 6-3 should be revised with a footnote to indicate that full scan analyses will be performed, in order to be consistent with Section 7 of Appendix A (QAPP). For an example, see the footnotes in Table 4-3 of the QAPP.

Appendix A, Quality Assurance Project Plan

Section 4.2.7, page 7, Paragraph 1

Please see the above comment on the Main Burn Plan on full scan analyses. The text discussion should indicate that full scan analyses for semivolatiles will be performed, as it was noted in Section 4.2.5 for volatiles. The discussion should be consistent with the tables in the QAPP (the footnotes are correct for both Tables 4-3 and 7-1 of the QAPP). Also, the text discussions appear to be correct in Sections 7.2.4 and 7.2.6 of the QAPP.

Section 13.4.4, page 4, Management of Non Detects

The use of the “full non-detect value” being equal to the “reporting limit” is confusing given common terminology by different labs to their common “reporting limit” ... in fact, the very last sentence of this section is not accurate since reporting by the lab should be the same regardless of how compliance calculations are conducted and summarized in the main Burn Report (i.e., for compliance purposes).

Please revise the discussion to be consistent with Section 3.3 of the QAPP (page 3) in terms of those detection limits necessary for the project since Section 3.3 is clear with regard to necessary detection limit reporting, where the QAPP redefines the term “reporting limit” to specific project needs outlined for each method. Most laboratories have a different meaning for “reporting limit” and may overlook the discussion in Section 3.3 due to the current less descriptive discussion found in Section 13.4.4. Please either delete Section 13.4.4 or use suggested revised wording for Section 13.4.4 as follows:

Detection limits for each method will be reported as specified in Section 3.3 of this QAPP. For the purpose of determining compliance with various standards, and for use in the screening level risk assessment, the full non-detect method specified detection limit value will be used for all compounds to ensure total train mass for each compound can be calculated from the analytical data set. In general, tables to be generated for the final report will involve calculations using either detected values or the full non-detect values for all compounds, in order to ensure total train mass for each compound (both feed and emissions data).

Although dioxin and furan emission results would typically be handled separately for purposes of demonstrating compliance with a MACT standard, where non-detects may be treated as zero for compliance purposes, no D/F standard is currently established for the Bostik's Polyester Unit. Therefore, the use of zero for emission calculations is unnecessary. Since the dioxin and furan results will only be used for risk assessment purposes (where full non-detect values must be used), the full non-detect detection limit must be reported. For purposes of Notice of Compliance (NOC) reporting, a separate and additional calculation may be performed for dioxin and furan congeners, but such calculation will be in addition to and delineated separately from the actual emission rates considering full detection limit values and so noted in the summary tables.

EPA recommends a pre-test conference call between Bostik, ENSR, the Bostik's contract laboratories, and EPA in order to discuss the following considerations for the project (for clarity's sake):

1. Total Train Mass and Detection Limits as Specified in the QAPP
2. D/F detection limits anticipated since only 3-hour runs are planned and a split will occur for PAH analysis (Table 4-3, page 3 of Section 4.2 of QAPP).
3. Any other questions about SOPs versus project specific needs?/Open Discussion.

May 20, 2008