



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1201 ELM STREET, SUITE 500  
DALLAS, TEXAS 75270-2102

December 6, 2021

TRANSMITTED VIA EMAIL  
Liliana Sarpong@oxy.com

Liliana Sarpong  
Sr. Environmental Engineer  
Oxy Vinyls Houston Operations  
Pasadena PVC Plant  
P.O. Box 849  
Pasadena, TX 77501-0849

Re: Alternative Monitoring Request: Oxy Vinyls, LP Houston Operations – Pasadena Polyvinyl Chloride (PVC) Plant, 40 Code of Federal Regulations (CFR) Part 63 Subpart HHHHHHHH Alternate Monitoring Parameter, Scrubber #2

Dear Ms. Sarpong:

This correspondence is in response to the alternative monitoring request the U.S. Environmental Protection Agency (EPA) Region 6 received on November 8, 2021, which was dated September 21, 2021. Oxy Vinyls requests approval of an alternative monitoring parameter for demonstration of compliance with the PVC Major Source National Emission Standard for Hazardous Air Pollutants (NESHAP) of Part 63 Subpart HHHHHHHH. Oxy Vinyls provided additional information on November 12, 2021, in support of the request.

Upon review of the information submitted, EPA Region 6 conditionally approves your request to substitute a measured outlet pressure at the scrubber outlet with ambient pressure for the purpose of monitoring pressure drop. Pressure drop across the scrubber will be determined by subtracting the ambient pressure from the measured inlet pressure. EPA notes that we previously approved a similar alternative monitoring request on September 3, 2015, for an existing scrubber at the facility. This conditional approval is for conducting alternative parametric monitoring on a second scrubber for the same process.

The PVC Major Source NESHAP § 63.11935(a) and (d) require that the owner or operator of an affected source establish operating limits for each operating parameter specified in Table 5. Part 63 Subpart A § 63.8(f) and § 63.11985(c)(4) allow for the approval of alternative monitoring parameters. In order to evaluate an alternative monitoring request, the source must submit to EPA a request that provides:

- (i) A description of the parameter(s) to be monitored to ensure the control technology or pollution prevention measure is operated in conformance with its design, and achieves the specified emission limit, and an explanation of the criteria used to select the parameter(s);
- (ii) A description of the methods and procedures that will be used to demonstrate that the parameter indicates proper operation of the control device, the schedule for this demonstration, and a statement that

the facility will establish an operating limit for the monitored parameter(s) as part of the notification of compliance status if required under this subpart, unless this information has already been submitted; and, (iii) The frequency and content of monitoring, recording, and reporting, if monitoring and recording is not continuous. The rationale for the proposed monitoring, recording, and reporting system must be included, per § 63.11985(c)(5).

In its request, Oxy Vinyls proposed to substitute ambient pressure for the measured outlet pressure of the scrubber, which is required by Table 5 of Subpart HHHHHHHH. Oxy Vinyls also indicated that the facility will continue to measure inlet pressure. According to the request, the second scrubber will operate at low pressure, similar to the first scrubber, such that the expected pressure at the outlet will be the same as ambient atmospheric pressure. Oxy Vinyls selected the proposed monitoring parameter because any pressure changes in the scrubber would be indicated by changes to the inlet side. The calculation of pressure drop, as determined by the difference between inlet and outlet pressure, will remain the same, as approved for the first scrubber. The only change from rule requirements is the way that the alternate operating parameter is determined and recorded (i.e., ambient pressure is added to obtain absolute pressure). The outlet pressure of the scrubber (in inches water gauge) is expected to be zero, due to operating at atmospheric conditions. Therefore, the pressure reading obtained at the inlet of the scrubber will be equal to the pressure drop. The frequency and data collected for pressure drop monitoring, recording, and reporting will not change as a result of the alternate monitoring parameter and will be similar to that for the other existing scrubber.

Pursuant to §§ 63.11985(c)(3)(ii) & (iii), Oxy Vinyls submitted a site-specific performance test plan (Test Plan) to the Texas Commission on Environmental Quality (TCEQ) on October 7, 2021 and copied EPA Region 6 on November 12, 2021. The performance test is scheduled to be conducted during the week of December 5, 2021, in accordance with § 63.11896. As noted in the Test Plan, the scrubber pressure drop will be recorded during the performance test. The operating limit for pressure drop on the second scrubber will be established using engineering assessments and manufacturer's recommendations, which is allowed by § 63.11935(d)(2). The Appendix to the Test Plan presents the basis for establishing the scrubber pressure operating parameter limit. All other operating parameter limits, which are listed in Table A of the Test Plan Addendum, will be established during the performance test. The operating parameter limits listed in Table A of the Test Plan Addendum will be established and reported with the Notice of Compliance Status (NOCS), which will be submitted after completion of the performance test. After the performance test, any values which exceed the operating parameter limits will be recorded and reported in accordance with rule requirements.

If any modifications are made to the scrubber that affect the approved alternate parameter monitoring conditions, this approval may become void, and a new approval will be necessary. Questions regarding this conditional approval may be directed to Diana Lundelius of my staff, 214-665-7468, or [Lundelius.diana@epa.gov](mailto:Lundelius.diana@epa.gov).

EPA acknowledges that the COVID-19 pandemic may impact your business. If that is the case, please contact us to discuss any specific issues affecting your facility

Sincerely,  
**STEVEN  
THOMPSON**

Digitally signed by STEVEN THOMPSON  
DN: c=US, o=U.S. Government, ou=Environmental  
Protection Agency, cn=STEVEN THOMPSON,  
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Date: 2021.12.06 14:41:16 -0600

Steve Thompson  
Chief,  
Air Enforcement Branch

ECC: Joseph Doby, Air Section Manager, TCEQ Region 12, [joseph.doby@tceq.texas.gov](mailto:joseph.doby@tceq.texas.gov)