



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III**

Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2852

VIA ELECTRONIC MAIL

Phillip Sparks
Environmental Leader
AdvanSix- Hopewell
905 East Randolph Road
Hopewell, Virginia 23860
Phillip.Sparks@AdvanSix.com

Re: Request for Alternative Monitoring/Request for Clarification under 40 C.F.R. Part 63, Subpart FFFF at the Hopewell Facility

Dear Mr. Sparks:

The United States Environmental Protection Agency, Region III, is in receipt of your letter dated September 30, 2022, submitted by AdvanSix. The correspondence is regarding a request for an alternative monitoring method (“AMM”) or request for clarification for the AdvanSix facility located at 905 East Randolph Road in Hopewell, Virginia (AdvanSix-Hopewell). Specifically, the request seeks clarification of new monitoring requirements or approval to use a site-specific monitoring approach related to the updated Miscellaneous Organic NESHAP (MON) rule, 40 C.F.R. Part 63, Subpart FFFF, as finalized on August 12, 2020.

AdvanSix-Hopewell operates a chemical manufacturing facility that produces chemistries for plant nutrients, chemical intermediates, and nylon solutions, specializing in ammonium sulfate and caprolactam. The September 30th request concerns the Area 16 portion of the facility, where the caprolactam separation process occurs. The provisions of the updated MON, which removed the startup, shutdown, and malfunction (SSM) provisions, prompted AdvanSix-Hopewell to implement a backup control system for periods when the Area 16 thermal oxidizer, FU-16, is not available. AdvanSix-Hopewell is planning to use a series of non-regenerative carbon adsorber beds that the Area 16 equipment will vent to when FU-16 is down. The proposed monitoring plan includes a Method 25A-type flame ionization device (FID) analyzer to be located between the carbon adsorber beds to detect breakthrough concentrations from the first bed, indicating the bed needs to be replaced. AdvanSix-Hopewell is proposing to conduct daily calibration drift checks of the FID utilizing a zero gas and span gas, not certified gases. The daily calibration drift will be calculated as the difference between the reference gas concentrations and the analyzer readings. AdvanSix-Hopewell states that the FID will be adjusted if the daily calibration exceeds 10% of the span value.

EPA Region III, in consultation with EPA’s Office of Air Quality and Planning Standards (OAQPS), has determined that the proposed operating procedures outlined in AdvanSix-Hopewell’s request do not differ substantially from the procedures required by 40 C.F.R. § 63.2450(e)(7). Therefore, neither an AMM request, nor an AMM approval is required, and EPA is hereby denying AdvanSix’s AMM request. Additionally, note that per Method 21 (Section 7.2) calibration gas cylinders must be analyzed and certified by the manufacturer. EPA Region III conferred with both OAQPS and

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the Virginia Department of Environmental Quality to formulate this response. Please note that nothing in this letter alters any compliance requirements of the Permit or the MON rule. If you have further questions regarding this matter, please contact Erin Malone, Enforcement and Compliance Assurance (ECAD), Air Section, at malone.erin@epa.gov.

Sincerely,

**KAREN
MELVIN**
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KAREN MELVIN
Date: 2023.06.07
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Karen Melvin, Director
Enforcement and Compliance Assurance Division

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