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OFFICE OF
AIR QUALITY PLANNING
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Certified Mail

Ms. Mary Bachynsky
Air Programs and Permits Manager
Formosa Plastics Corporation - USA
9 Peach Tree Hill Road
Livingston, New Jersey 07039

Dear Ms. Bachynsky:

The U.S. Environmental Protection Agency (EPA) sent your company a letter on August 21, 2009, pursuant to section 114 of the Clean Air Act (CAA), requesting information on your company's polyvinyl chloride (PVC) and copolymer production operations. The letter included a requirement to conduct 30 days of resin sampling at each of your facilities (Baton Rouge, LA, Delaware City, DE, and Point Comfort, TX). On March 31, 2010, we received resin sampling results for your facilities. Additionally, on September 16, and, as corrected on September 28, 2010, as a result of industry concerns with the resin sampling, the Vinyl Institute, on behalf of its members, and Georgia Gulf submitted revised data that, according to the Vinyl Institute, included a reanalysis of your company's resin sampling results.

After reviewing the resin sampling results that you submitted on March 31, 2010, we requested from your company clarifying information, including test reports that would document the sampling and analysis procedures, and the quality assurance/quality control procedures used to collect, prepare, and analyze the sample. While you have responded to some of these requests, we have not received all of the information that was requested, including the test reports. After reviewing the revised data provided by the Vinyl Institute on September 28, 2010, we requested that you provide additional information, clarifying the basis for the revised data, including, but not limited to, an explanation of the analyses that were conducted, assumptions that were made, and supporting calculations. Your response of September 28, 2010, failed to provide the requested information.

In order to assess the original resin sampling results and revised data submitted concerning your facility, we need additional information. Pursuant to section 114 of the CAA, we request that you provide the following information by November 15, 2010.

A. For purposes of assessing your original resin sampling results submitted on March 31, 2010, you must provide test reports for your Baton Rouge, LA, Delaware City, DE, and Point Comfort, TX facilities that specifically include the following information:

1. A simplified block diagram depicting the location in the process where each of the resin samples was taken (e.g., stripper bottom, centrifuge, dryer), and throughput rates for the total wet resin and dry resin samples;

2. Provide the names of the companies responsible for collecting, storing, transporting, and/or analyzing resin samples. Specifically, identify whether your employees, an emissions testing company, an analytical laboratory, or some other party was responsible for collecting the resin samples. If another party collected the resin samples, name that party. In the same manner, identify the group responsible for storing, transporting, and analyzing resin samples;

3. Identify the methods used to collect, store, transport, and analyze the resin samples. Specifically, certify which of the following methods was used: EPA Method 107, EPA Method 107A, EPA Method SW 846 with the specific sampling extraction and analytical methods, or another method. If another method was used, summarize that method and include a complete copy of the method along with your test report;

4. A certification that each party responsible for collecting, storing, transporting, and analyzing the resin:

a. Was familiar with and understood the provisions and requirements of each method (for EPA Method 107, these include the Interferences; Safety; Equipment and Supplies; Reagents and Standards; Sample Collection, Preservation, Storage, and Transport; Quality Control; Calibration and Standardization; Analytical Procedure; and Calculations and Data Analysis provisions and requirements);

b. Performed its role without deviating from the EPA method used to collect, store, transport, and analyze resin samples; or

c. Lists each and every deviation from the EPA method, along with an assessment of the impact on the sampling results for each and every deviation.

5. A description of the procedure(s) used to obtain and maintain the integrity of the resin samples prior to analysis, including but not limited to:

a. How the resin samples were collected;

b. Type of container used to collect samples (e.g., vials, glass jars);

c. The capacity of the sample containers;

d. Length of time between sample collection and sample analysis;

e. Procedure(s) used to preserve samples (e.g., samples maintained at a certain temperature, identification of preservatives added, head space);

6. If samples were composited, identification of the process(es) by which the samples were composited; otherwise, a statement that samples were not composited;

7. Identification of the process(es) used to extract the sample for analysis (e.g., semi-volatile, volatile, and solid portions) for the PVC resin and the slurry water/slurry resin;

8. The procedure(s) used to analyze the sample (e.g., flame ionization detection and gas chromatography), as well as a list of reagents used during the analysis for which the samples were analyzed, the analytes used during the analysis, and a description of how the semi-volatile, volatile organic compounds, methanol (if applicable), aldehydes, and total solid samples were prepared and analyzed;

9. A narrative describing the procedure(s) used to maintain the integrity of the resin samples during analysis, including, but not limited to:

a. Steps taken to reduce loss of analyte immediately before and during analysis;

b. Duration of sample analysis; and

c. Temperature of sample during analysis;

10. A description of the process used to report the results of the analysis, including an explanation that clarifies how the original resin sampling raw data were translated into mass values. The explanation must include all assumptions, as well as sample calculations for each type of calculation conducted; and

11. For each compound identified during analysis, the method detection level and the means by which the detection level was calculated. Affirm the value reported in the CAA section 114 resin sampling results are the method detection level, or some other level (e.g., reportable quantification level, method quantification) and supply calculations used to determine these values.

B. For purposes of assessing the revised data for your facility that the Vinyl Institute submitted on September 28, 2010, you must provide a narrative that explains how the results from your original resin sampling data were revised, and why the results were revised. Be sure to include all assumptions and analyses underlying the September 28, 2010, revised data, along with complete sample calculations necessary to demonstrate how the original resin sampling data were used to derive the revised data.

All of the information identified above must be received by November 15, 2010. In addition, we request that you include a certification by one of your company's officers that the information submitted is true, accurate, and complete. If you have any questions, please contact Ms. Jodi Howard, Coatings and Chemicals Group, at (919) 541-4607.

Sincerely,

Peter Tsirigotis
Director
Sector Policies and Programs Division

cc: Ms. Judith Katz, U.S. EPA, Region 3 (3AP10), Air Division Director,
1650 Arch Street, Philadelphia, PA 19103

Mr. Stephen Ours, DE DNR & Environmental Control, AWMD,
715 Grantham Lane, New Castle, DE 19720

Mr. Carl Edlund, U.S. EPA, Region 6 (6EN-AA), Air Division Director,
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Ms. Celena Cage, Environmental Scientist Manager, LDEQ, Enforcement Division,
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Mr. Michael Beatty, TX Commission on Environmental Quality,
Post Office Box 13087, Austin, TX 78711-3087