



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

OCT 26 2007

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Andrew C. Lucas
Environmental Engineer
Hercules Incorporated
Aqualon Division
1111 Hercules Road
Hopewell, VA 23860

Dear Mr. Lucas:

I am writing in response to your letter dated October 16, 2007, in regards to an alternative method request on behalf of the Hercules cellulose products manufacturing plant in Hopewell, Virginia. Your facility is required to demonstrate compliance with 40 CFR Part 63, Subpart UUUU, National Emission Standards for Hazardous Air Pollutants for Cellulose Products Manufacturing. Tables 3 and 4 of Subpart UUUU require that total organic HAP emission controls be demonstrated using several methods, including Method 18 (40 CFR Part 60, Appendix A). You are requesting the use of Method 320 (40 CFR Part 63, Appendix A) to demonstrate compliance, since it would allow real time optimization of control device operating parameters.

Method 320 is a self-validating method, and has been approved previously as an alternative to Method 18 for the measurement of various Hazardous Air Pollutants. Therefore, I am approving the use of Method 320 for the purposes of demonstrating compliance with Subpart UUUU at the Hercules Hopewell facility. Since this alternative method approval is applicable to other facilities wishing to make the substitution, we will be posting this letter on our web site at <http://www.epa.gov/ttn/emc/approalt.html> for use by other interested parties.

If you have further questions in this matter, please contact Rima Howell of my group at (919) 541-0443.

Sincerely,

A handwritten signature in cursive script that reads "Conniesue B. Oldham".

Conniesue B. Oldham, Ph.D., Group Leader
Measurement Technology Group

cc: John M. Reinhardt, VDEQ Piedmont Regional Office