

CLARIFICATION NUMBER CAO-00-055, REV. 0
OVA USE
(SECTION B1-1a(1))

ISSUE

Is any detector capable of detecting all analytes to levels below the PRQL allowed, or can only an organic vapor analyzer (OVA) be used?

CONCLUSION

The term "OVA" can mean one instrument/detector or a combination of several, as long as the site practices meet the requirement to detect the 29 organic compounds targeted in Table B3-2.

DISCUSSION

The method description in B1-1a(1) defines the use of an organic vapor analyzer (OVA) to compensate for real-time equipment blanks being unavailable. The requirement specifies that the OVA must detect all analytes in Table B3-2 of Attachment B-3.

"OVA" should be taken generically. The observation in the article that a photoionization detector (PID) may not detect one isomer of trichloro-trifluoroethane notes a limitation of PIDs, one of several possible detector types. The method requires checking the on-line equipment blank data by periodically confirming the OVA measurements with equipment blanks as per Section B1-1.