

Vista Polymers Inc.
A Subsidiary of
Vista Chemical Company

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December 8, 1986

Mr. Jerry Banks, P.E.
North Air Emissions Section
Mississippi Department of Natural Resources
Bureau of Pollution Control
P. O. Box 10385
Jackson, MS 39209

VISTA

Dear Mr. Banks:

As a result of the revisions to 40 CFR Part 61, National Emission Standards for Hazardous Air Pollutants: Vinyl Chloride promulgated September 30, 1986, the Aberdeen facility of Vista Polymers, a division of Vista Chemical Company, is requesting approval of a waiver of compliance to provide for continued operation of our facility. This waiver is discussed below. We request approval of this waiver as soon as possible.

Installation of equipment will be necessary to comply with 61.242-6 Standards: Open-Ended Valves or Lines. The plant has valves which come under the definition of an open-ended valve and are not excluded from the provisions of 61.242-6 by 61.65 (b)(8)(iii). These valves are a critical part of the process and are required for continued operation.

Installation of a second valve will be necessary for all these valves except for valves upstream of the reactor monometers which will be replaced with pressure/vacuum gauges. Installation of this equipment within ninety days of the effective date of the revised regulations is not possible and therefore a waiver is required for continued plant operation. A schedule for the installation of these valves is given below:

	<u>Completion Date</u>
a. Definitive Process Design Complete	March 1, 1987
b. Valve Purchase Orders Issued	June 1, 1987
c. Initial On-Site Construction Started	Nov. 1, 1987
d. Construction or Installation Complete	Jan. 1, 1988
e. Commencement of Operation Equipment	Feb. 1, 1988

Reporting on the progress of these items will be included in the quarterly report as required by 61.70.

Please direct any questions concerning this request to Veldon Messick at (601) 369-3634.

Sincerely,

John Friend
Plant Manager