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4APT-AEB

MEMORANDUM**SUBJECT:** Alternative Vinyl Chloride Sampling Frequency Proposed by Vista Chemical, Aberdeen, Mississippi**FROM:** Winston A. Smith, Director
Air, Pesticides and Toxics Management Division**TO:** John S. Seitz, Director
Office of Air Quality Planning
and Standards (MD-10)**DRAFT**

The purpose of this memorandum is to request concurrence with a Region 4 determination regarding an alternative vinyl chloride sampling frequency proposed for the referenced facility which is subject to 40 C.F.R. Part 61, Subpart F - National Emission Standard for Vinyl Chloride. Approximately 30 to 35 batches of polyvinyl chloride (PVC) resin are produced each day in the ten reactors at Vista Chemical, and these reactors are subject to the emission standard in 40 C.F.R. §61.70(c)(4)(i). In accordance with 40 C.F.R. §61.64(f)(1)(ii), Vista must collect a sample of PVC resin from each batch and must determine the residual concentration of vinyl chloride monomer in each sample.

In the attached request dated December 14, 1995, Vista Chemical asked for approval to collect and analyze one sample of PVC resin per day instead of one sample of resin per batch. Based upon the review of the historical information and statistical analysis provided by Vista, Region 4 believes that the request for a reduction in resin sampling frequency should be approved. Concurrence with this determination is being requested from your office because, under the terms of delegations signed on August 7, 1995, the authority to approve alternative test methods was granted to the Office of Air Quality Planning and Standards.

If you have any questions or need additional information, please contact Mr. David McNeal of my staff at (404) 347-3555, extension 4158.

Attachment

DRAFT

OPTIONAL FORM NO. 10 (7-90)

FAX TRANSMITTAL		DATE: 1/30/96	
TO: John S. Seitz	FROM: Winston A. Smith	SUBJECT: Alternative Vinyl Chloride Sampling Frequency	
601/961-5742	404-347-3555	404-347-3555	
FAX NO. 601/961-5742		FAX NO. 404-347-3555	