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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 30 1996

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

MEMORANDUM

SUBJECT: Alternative Vinyl Chloride Sampling Frequency Proposed
by Vista Chemical, Aberdeen, Mississippi

FROM: Elliott Gilberg, Director *Elliott Gilberg*
Chemical, Commercial Services and
Municipal Division

TO: Winston Smith, Director
Air, Pesticides and Toxics Management
Division

This is in response to your request received February 28, 1996. In your correspondence you requested guidance regarding applicability of regulations implementing 40 CFR Part 61, Subpart F - National Emission Standard for Vinyl Chloride.

In accordance with 40 CFR 61.64(f)(i), Vista must collect a sample of polyvinyl chloride resin (pvc) from each batch and must determine the residual concentration of vinyl chloride monomer in each sample. The Aberdeen PVC Plant uses ten reactors to produce 30 to 35 batches of PVC resin per day and are therefore requesting approval to collect and analyze one sample of pvc resin per day instead of one sample of resin per batch.

The request for the reduction in resin sampling frequency constitutes a monitoring alternative and is therefore approved under Section 61.14(g). In making this determination the Agency considered historical information along with statistical analysis of the probability of noncompliance when testing less frequently as provided by Vista Chemical.

If you have any questions or concerns regarding this response please contact Dawn Banks-Waller of my staff at (202) 564-7034.

cc: David McNeal
William Grimley
William Lamason

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages =

To <i>Andrew Covington</i>	From <i>Jeff Ken Knight</i>
Dep./Agency <i>Mississippi DEQ</i>	Phone # <i>(202) 564-7033</i>
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