



Interoffice Communication

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To B. I. Raffle - Houston
From M. G. Hayes - Westlake
Date September 22, 1981
Subject VCM EXPANSION - PSD

The VCM Expansion has been delayed for an indeterminate period. The conversion of the oxy process, however, will proceed. The basic question is how PSD permitting which has occurred will be affected. Attached are permitting determinations by EPA and the State.

1. The non-applicability determination states construction must commence within 18 months of August 7, 1980. Does conversion of the oxy process constitute commencement of construction for expansion purposes?
2. What constitutes breaks in construction should oxy conversion be considered commencement for PSD purposes? What time frame should be considered?
3. If not, is there a mechanism by which the non-applicability determination may be extended? If so, for how long?
4. In light of questions 1-3, please address how VCM expansion emissions should be considered when addressing contemporaneous emissions for permitting other projects.

In preparing a response, please address any other areas you feel pertinent. If you have questions, please let me know.

M. G. Hayes

M. G. Hayes

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Enclosure

cc + enc.: RTF JADeB GLF JCL JJH

for VCM Raffle

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