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VISTA

TO: Distribution

FROM: J. C. Ledvina
DATE: July 25, 1984

SUBJ: PROPOSED VCM STANDARD REVISIONS

Interoffice
Communication

Attached is EPA's proposed revisions to the VCM Standard. These proposals will be presented at a NAPCTAC (National Air Pollution Control Technical Advisory Committee) meeting August 29 and 30. Following NAPCTAC review, EPA will formally propose in the Federal Register.

As you will see, EPA is proposing numerical performance standards for relief valve discharges which appears favorable. However, they are revising the definition of "relief valve" (see pg. 47) such that incinerator bypasses at LC VCM are considered relief valve discharges.

In what appears to be a very positive proposal from Vista's standpoint, EPA is proposing to revise the ROL/residual VCM standard for in-reactor stripping. It looks like they are taking our ROL compliance concept and making it a standard.

On the negative side, EPA is proposing a more stringent leak detection program similiar to the benzene fugitive standard.

The Vinyl Institute is meeting on July 31 to discuss the proposal. I plan to attend that meeting. I also plan to attend the NAPCTAC meeting.

I'm interested in your comments, particularly on the definition of relief valve and ROL. I need to know before August 19 if we want to make comments at the NAPCTAC meeting.

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Enclosure

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