



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

JUL 11 1984

MEMORANDUM

SUBJECT: Vinyl Chloride NESHAP Enforcement Strategy

FROM: Edward E. Reich, Director
Stationary Source Compliance Division
Office of Air Quality Planning and Standards

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TO: Air and Waste Management Division Directors
Region II, IV, and VI

Air Management Division Directors
Regions I, III, V, and IX

Regional Counsels
Regions I-VI and IX

Attached is our strategy for the enforcement of the vinyl chloride NESHAP standard. This strategy was developed as a product of the Regional submittals we received in response to our memoranda of June 28, 1983 and January 23, 1984.

In putting together this strategy, we have found that most of the Regional Offices have sources which should receive priority for enforcement action. We expect these Regions to act on the basis of this strategy and to prepare cases expeditiously. Although this strategy focuses primarily on stripping violations and on reactor opening loss violations, all parts of the standard should be examined when preparing cases.

In transmitting this information to us, several of your offices have indicated that individual companies have asked that some of the information be treated as confidential. This material is contained in Table 5, "Summary of RVD Responses", which is being sent to you under separate cover. No Agency

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d termination has been made on the confidentiality of these requests. However, because this material has been separated from the rest of the strategy, the bulk of the strategy may now be circulated to State and local enforcement agencies.

We would appreciate your prompt attention to this material. Please contact Doreen Cantor of SSCD at 382-2874, or Elliott Gilberg of OECM at 382-2864, with any comments or questions.

Attachment