

01-V/C/PVC-GPV

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J. A. Mullins

To: The SPI-PVC Manufacturing Technology Committee  
Re: EPA Test Methods for Vinyl Chloride

Ladies and Gentlemen:

On November 18, 1980, the Environmental Protection Agency ("EPA") published a proposed rule making "minor and technical" changes to Test Methods 106 and 107 in Appendix B of the Vinyl Chloride Regulations. 45 Fed. Reg. 76346 (copy attached). The Agency will receive comments until January 19, 1981.

Scott Bowen at Beveridge, Fairbanks & Diamond, noted that the publication, although denominated a proposed rule, contained language used in final rule promulgations. He has requested that EPA publish a notice in the Federal Register confirming that the notice is a proposed revision.

Because the Test Methods described here are only required in the case of a dispute between the Agency and a source regarding the level of emissions, and because similar Test Methods have been part of the vinyl chloride

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