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August 8, 1984

VISTA

Meredith Scheck
The Vinyl Institute
355 Lexington Avenue
New York, NY 10017

SUBJECT: PROPOSED VCM STANDARD COMMENTS

Dear Ms. Scheck:

I've marked up the draft comments you sent out recently. I have additional comments in two areas. Under the definition of "in vinyl chloride service", we are concerned that equipment such as PVC reactors which are often "in VCM service" will be considered "in VCM service" even when they do not contain over 10% VCM. Vinyl Institute's comments do not consider situations where it is normal for equipment to be in and out of VCM service several times a day. All I can suggest is that we modify our comments to factor in the current condition of the equipment at the time of monitoring.

Even considering the Vinyl Institute's suggested wording changes, a reactor undergoing a hydrostatic test that has a relief valve lift will be considered as having a RVD from equipment "in vinyl chloride service". This is ridiculous.

My second comment concerns Section 61.64(f) -- Reactors used as strippers. The current standard allows averaging all batches of the same resin type produced during a calendar day. As currently written, 61.64(f)(1) and (2) do not allow averaging. Averaging is very important. I suggest language be added to both clauses to read ...

"...(1) The emissions of vinyl chloride is not to exceed 2.12 g/kg. (0.00202 lb/lb) weighted average for each calendar day ..."

"...(2) The emissions of vinyl chloride ... is not to exceed 0.42 g/kg (0.00042 lb/lb) weighted average for each calendar day ..."

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Comments are just coming in from our plants so we may have more to add later. Since we have some concerns that may be unique to Vista, we plan to comment at NAPCTAC on August 30.

Sincerely,


Joseph C. Ledvina, Director
Environmental Activities

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cc W. C. Holbrook - BFG
Ron Bryan
Mike Hayes
Velden Messick
Paul Warner