

APR 28 1977

DATE April 27, 1977

COPY TO D. C. Coldiron

J. T. Sweeney

61.62(a), (b) - pertaining to ethylenedichloride plants

61.63(a) - pertaining to vinyl chloride plants

61.64(a)1 - reactor exhaust

61.64(b) - stripper exhaust

61.64(c) - vent streams from mixing, weighing and holding containers

61.64(d) - monomer recovery system

61.65(b)1(ii) - loading/unloading lines

61.65(b)2 - slip gauges

61.65(b)5 - manual venting of gases

61.65(b)6 (ii) - equipment opening

61.65(b)9 (ii) - vinyl chloride removed from
in-process wastewater"

Under Section 61.70 Semi-Annual Report, and particularly Paragraph 61.70(c)(1), the six month report is to include ". . . a record of any emissions which averaged over any hour period (commencing) on the hour are in excess of the emission limits prescribed . . . {The paragraphs listed above.}"

In view of my recent discussions with Leon Lazarus concerning the wastewater stripper ("in-process wastewaters"), it is interesting to note that the Standard does not include a VCM check on the stripped waters. In my view, this omission means we don't have to monitor this stream at all. Perhaps we should get a legal opinion?

W. P. Anderson

-2-

April 27, 1977

Please be advised that when this subject was raised at the SPI Technical Committee Meeting, it was agreed that industry would go for "one sample per day." This is the position I took with Leon on April 26. The above opinion could change this position.


J. P. Sandstedt

JPS/db