

file: Allen

CONDEA Vista Company
Highway 25
Aberdeen, Mississippi 39730-0091
(601) 369-8111



July 3, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Z 407 142 831

Mr. Dewayne Headrick
Compliance Support Section
Mississippi Department of Environmental Quality
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Headrick:

CONDEA Vista Company's Aberdeen Plant is required by 40 CFR 61.70 (c)(2)(ii), (c)(2)(iii), (c)(4)(i) and (c)(4)(ii) to sample and analyze stripped PVC resin batches for the purpose of demonstrating compliance with the emission limitations set forth in 61.64 (e) and (f).

On April 30, 1996, the EPA approved an alternative monitoring method involving a reduction in the frequency of the sampling and analysis required in 61.70 (c)(4)(i) and (c)(4)(ii). These sections required CONDEA Vista to sample and analyze each batch of resin stripped in the reactors for residual vinyl chloride monomer (RVCM) and calculate a weighted daily average RVCM content of the PVC produced. The approved alternative method requires only one sample per day be analyzed. This method was approved based on the ability of our process to consistently produce RVCM levels far below the limitations in 61.64 (f).

The alternative method however did not address sampling and analysis of PVC resin stripped externally in continuous stripping columns. 61.70 (c)(2)(i) and (c)(2)(ii) require that each stripper be sampled every eight hours and the sample analyzed for RVCM.

When converting to the newly approved sampling schedule, the reduced sampling frequency was mistakenly applied to the externally stripped batches. Each batch of internally stripped resin continued to be sampled while externally stripped batches were sampled once per day. Before the mistake was caught and corrected, two eight-hour samples (one each on June 12th and 13th) of externally stripped resin were not analyzed before being destroyed.

The new external stripping column for which the samples were missed is capable of producing more consistent, lower RVCM results than the equipment for which the reduced sampling and analysis frequency was approved. Samples collected in June before and after the missed samples averaged 0.7 ppm RVCM. The emission limitations in 61.64 (f) require that the stripping operation produce 400 ppm or less RVCM. Therefore, CONDEA Vista does not believe the emission limitations contained in 61.64 (e) were violated.

If you require further information, please call me at (601) 369-3637.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth G. Akins". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kenneth G. Akins
Environmental and Laboratory Manager

c: JCL, LLZ