

August 14, 1978

United States Environmental Protection Agency
Suite 300
1421 Peachtree Street
Atlanta, Georgia 30309

Attention: Mr. Thommie A. Gibbs, Chief
Air Engineering Branch

Dear Sir:

Attached for your review is a "Compliance Manual" for our plant.

This document is intended principally for internal use within our plant. It describes facilities and procedures necessary for us to maintain compliance with the vinyl chloride emission standard. Its primary use is to identify for plant operations, maintenance and engineering personnel the specific conditions which are necessary for emission control.

Contained within the booklet are our proposals concerning compliance emission testing. These are specified in Sections VII and VIII. These sections can serve as a discussion basis on the emission sampling for compliance verification which we will conduct as soon as possible.

Contained in Section VI is a calculational method relative to the reactor opening loss emission requirement. In our process, the reactor atmosphere prior to opening is above 212°F, at a slight vacuum and in excess of 95% water vapor. We have been unable to sample this source. We would like to have the calculational method, with associated reactor operating data for each batch, certified as an equivalency.

Contained in Section VIII is a discussion of the analytical methods for analyzing emission samples. Method 106 contains very slight differences from the method in the Federal Register. The differences simplify the calculation and have no effect on the calculated result. We ask that the method described in Section VIII be certified as equivalent.

Section IX contains our proposals concerning emission recordkeeping following verification of compliance via emission testing. The recordkeeping described will allow us to determine net plant vinyl chloride emissions as well as allow us to insure proper operational maintenance of compliance equipment. Please review this proposal for adequacy within the intent of the Emission Standard.

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I will be in contact with Dr. James Wu of your office later this week concerning a meeting on emission compliance testing. In the meantime if there are any questions please contact me.

Douglas Michels

Douglas Michels
Chief Process Engineer

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Attachment

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