

Vista Polymers
A Division of
Vista Chemical Company

5200 Southeast 59th Street
Post Office Box 15360

Oklahoma City, Oklahoma 73155
Phone (405) 672-4551

November 8, 1990

P 403 788 602

Linn Wainner
Air Quality Control Section
Oklahoma City-County Health Department
921 Northeast 23rd
Oklahoma City, OK 73105

VISTA

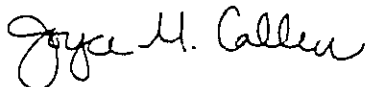
Dear Mr. Wainner:

Test Method 107 in Appendix B of 40 CFR, Part 61 requires that a polyvinyl chloride slurry sample be analyzed within 24 hours of the time the sample is collected. As we discussed with Mr. Curt Goeller of your office, we have completed a study which shows that there is no significant loss of residual vinyl chloride in polyvinyl chloride slurry samples analyzed up to five days after the sample is collected. Based on the results of this study, we are requesting approval of an alternate method which requires slurry samples to be analyzed within five days of sampling rather than within 24 hours. The approval of this request will allow us to avoid violations of the Standard if analyzer maintenance problems or other situations arise which may delay slurry analysis beyond 24 hours of sampling.

We have discussed this change with Mr. Martin Brittain of the EPA Region VI office in Dallas. Mr. Brittain suggested that we perform the test at two different levels of residual vinyl chloride - a relatively low level and a level approaching the Subpart F limit of 400 parts per million. This has been done. The results of the two tests are attached. Both tests show that there was no significant loss of VCM over the five - day test periods.

I will contact you within the next week to set up an appointment to review the study. If you have any questions, please call me or Andy Wiles at 672-4551.

Sincerely,



JOYCE M. CALLEN
ENVIRONMENTAL COORDINATOR

cc: Martin Brittain - Cover letter only P 403 788 603

