

TO: Distribution

FROM: D. R. Booth

DATE: July 10, 1990

Interoffice
Communication

SUBJECT: EPA's Section 114 Request Response

VISTA

Enclosed is the final Section 114 Response. It was prepared through the efforts of the following team:

Glen Hollinger
Dana Neely
Ray Plewa
Sean Shephard
Sam Watson

I would like to thank each team member for his/her contributions, all of which made this response possible in a timely and professional manner.

This report provides a valuable service for the future.

D.R. Booth

D. R. Booth
Sr. Environmental Coordinator

br(5)

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June 28, 1990

CONFIDENTIAL**VISTA**

Ms. Penny Lassiter
U.S. Environmental Protection Agency
Office of Air Quality Planning & Standards
Research Triangle Park
North Carolina 27711

Dear Ms. Lassiter:

In response to Jack R. Farmer's letter of March 16, 1990 and your letter received in April, the following items are being submitted.

- 1) Enclosure 1, revised to include the additional production data requested.
- 2) Enclosure 2 for Vista's Ethylene Unit (Process 1), LAB Plant (Process 6), and one submission for both EDC Process (Processes 2 & 5) and the Vinyl Chloride Process (Process 4).

As you recall, you waived the request for information regarding the Alcohols Unit (Process 8) during our phone call in April.

In addition Vista believes it necessary to caution the U.S. EPA regarding the use of this information. This data as you requested is based on 1989 operations. With the promulgation of the new Toxicity Characteristic Rule, a large number of organic chemical manufacturers will have newly regulated RCRA wastewaters. Many manufacturers are so dramatically modifying their wastewater sources, and treatment systems that the data submitted will most likely not be representative in two years. We request that this be given due consideration in the development of any new standards.

If you have any questions regarding these submittals, please refer them to David Booth of our Environmental Department at (318) 494-5031.

Sincerely,

John Friend / JFB
John Friend
Plant Manager

br(C2)

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