



INTERNAL CORRESPONDENCE

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CHEMICALS AND PLASTICS

SOUTH CHARLESTON PLANT P. O. BOX 8004, SOUTH CHARLESTON, W. VA. 25303

To (Name) Mr. R. H. Gregory, Jr.
 Division
 Location NEW YORK OFFICE

Date May 23, 1975

Originating Dept.

Answering letter date

Copy to Mr. J. L. Carvajal
 Dr. W. P. Miller, 511
 Dr. A. B. Steele, NYO-28
 Dr. T. T. Szabo, NYO-32
 Mr. G. J. Triplett, NYO-46

Subject Draft-Sub Part F
 National Emission Standard
 for Vinyl Chloride
Dated April 24, 1975

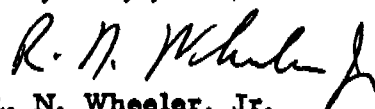
Dear Mr. Gregory:

Study of § 61.60 Applicability and 61.61 Definitions of the subject standard leads me to draw the following conclusions:

1. Ethylene dichloride plants, where chlorine and ethylene are reacted to form ethylene dichloride, are not covered by the standard; only those ethylene dichloride plants where oxygen or air, hydrogen chloride, and ethylene are reacted are covered.
2. Union Carbide's latex manufacture involves only polymers containing less than 50% by weight vinyl chloride. These operations are not covered under the proposed standard.

Would you please review the draft standard and give your opinion with regard to the above conclusions. These are significant to our latex and ethylene dichloride manufacturing operations.

Very truly yours,


 R. N. Wheeler, Jr.

RNWJr/ra

UCC
025641

5-13-75

Work Orders - So. Cal.

Disip. Resins

	#	
Monitoring System - N.C.	86,000	
Disp.	37,000	
Disp.	30,000	
Gen'l Projects	95,000	

Solvent Resins -

	#	
Monitoring -	37,000	

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DO NOT
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Texas City

	\$	
Supp. Monitor	28,000	
VECT Monitor	39,000	
Re-Use Centrifuge Eff	159,000	
Unimp Res. Hoppe Can	59,000	
Water Fall Plate	98,000	
Vent Gas Disp.	650,000	
{ Prep. of Vcl Tank Cars		
for Paint + to Land.		
Replace Van Lamps	46,000	
Addition to Amhib	23,000	

Solvent