



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

May 15, 2014

Mr. Barry Christenson
Air Quality Manager
Occidental Chemical Corporation (OxyVinyls, LP)
Post Office Box 809050
Dallas, Texas 75380-9050

Dear Mr. Christenson:

Pursuant to section 114 of the Clean Air Act (CAA), the U.S. Environmental Protection Agency (EPA) is collecting information to characterize hazardous air pollutant emissions from process vents at polyvinyl chloride and copolymer (PVC) production facilities.

PVC production is subject to the provisions of 40 CFR Part 63, Subparts HHHHHHHH and DDDDDD. The purpose of this request is to gather process vent data and other information necessary to inform our reconsideration of these emissions standards.

We request the following testing be performed for your PVC production facility, OxyVinyls, LP – Deer Park, TX as specifically listed below and discussed in Attachment B of Enclosure 1 (tables 1.1 and 1.6) to this letter:

Pollutants to be tested		
HCl	TOHAP	THC

We are also requesting other information regarding PVC production at your facility and are providing the survey response forms in Microsoft® Excel spreadsheet format. Test results that are collected using test methods that are supported by EPA’s Electronic Reporting Tool (ERT) must be submitted using the ERT. We are also providing PVC process vent response forms in Microsoft® Excel spreadsheet format for test methods that are not supported by the ERT. Please see Enclosure 1, Attachment B for specific ERT submission instructions.

The requested testing is designed to collect information on emissions and other relevant aspects of PVC process vents. Enclosure 1 contains a summary of the information we are requesting.

Supplemental information is contained in the following enclosures:

Description	Enclosure #
Maximum Achievable Control Technology (MACT) Standards Development Information Collection Request	Enclosure 1
Section 114 Authority and CBI claims	Enclosure 2
CBI emissions data disclosure	Enclosure 3
Designation of ERG as authorized representative	Enclosure 4
Policies and Procedures for handling CBI	Enclosure 5
Certification Statement	Enclosure 6
2014 PVC 114 Process Vent Testing Workbook	N/A
2014 PVC 114 Process Vent Testing Workbook Example	N/A

The testing request is designed to collect emissions information, which by law cannot be confidential information. You are required to return all requested information on or before **November 17, 2014**.

Please e-mail the completed non-confidential survey and testing workbook response to:

CCG-PVC@epa.gov

There is a small amount of information requested in the survey concerning production and production capacity which you may seek to claim as confidential. If you are submitting confidential business information (CBI) as described in Enclosure 3, you must mail a separate CD-ROM or DVD-ROM disk containing only the CBI portion of your data to EPA. Clearly mark the disk with the words "Confidential Business Information" and send via U.S. Postal Service Express Mail, registered mail, or private courier to:

Jodi Howard
U.S. Environmental Protection Agency
OAQPS/SPPD/RCG (Mail Code E143-01)
109 T.W. Alexander Drive
Research Triangle Park, NC 27711

DO NOT ELECTRONICALLY TRANSMIT CONFIDENTIAL BUSINESS INFORMATION TO EPA.

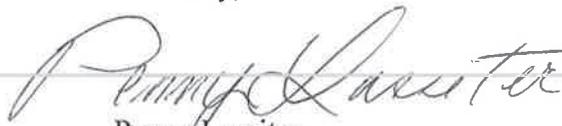
If you would like to use the required Section 114 testing to satisfy the initial compliance requirements for process vents in the PVC rules (40 CFR part 63, subparts DDDDDD and HHHHHH), please contact Cynthia Kaleri at Region 6, at (214) 665-6772 or kaleri.cynthia@epa.gov to discuss the requirements prior to beginning the 114 testing.

Be aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment as explained in Section 113 of the Clean Air Act (42 USC §7413). Failure to comply fully with this request for information may subject you to an enforcement action. We may use any information submitted in response to this request in an administrative, civil, or criminal action.

If you have questions regarding this request, please contact Ms. Jodi Howard, Refining and Chemicals Group, at (919) 541-4607 or howard.jodi@epa.gov.

Thank you for your assistance in this effort.

Sincerely,



Penny Lassiter

Group Leader

Refining and Chemicals Group
Sector Policies and Programs Division

6 Enclosures

cc: Steve Thompson, USEPA, Region 6, Air, Toxics & Inspections Coordination Branch,
w/Enclosure 1 only

Michael Beatty, TX Commission on Environmental Quality, w/Enclosure 1 only