



Properly Calculated MACT Floors Proposed by Vinyl Institute PVC MACT Working Group

Reference: Corrected Comments of The Vinyl Institute, Inc. PVC MACT Working Group, September 12, 2011

| | Existing Sources | | New Sources | |
|---------------------------|-----------------------|--------------------|-----------------------|--------------------|
| | VCM Daily Limit (ppm) | TOHAP Limit* (ppm) | VCM Daily Limit (ppm) | TOHAP Limit* (ppm) |
| Suspension | 38 | 120 | 7.3 | 38 |
| Dispersion | 1300 | 1900 | 480 | 310 |
| Vinyl Acetate Copolymer** | 790 | 2000 | 790 | 2000 |
| Blending*** | 140 | 140 | 140 | 140 |

*Limit would be a monthly average for the first 11 months following the implementation date of the rule and a 12-month rolling average thereafter.

** The Working Group did not calculate MACT floors for copolymers other than vinyl acetate copolymer.

***Blending HAPs based on PolyOne Supplement submitted 9-30-11

| Regulated HAP | 99% UPL | MACT Floor Emission Limit |
|-------------------------|---------|---------------------------|
| Vinyl Chloride | 16.98 | 10* |
| Hydrogen chloride (ppm) | 140.66 | 141 |
| Total organic HAP (ppm) | 47.12 | 48 |
| THC | 12.64 | 13 |
| CDD/CDF (TEQ) (ng/dscm) | 0.019 | 0.021** |

* UPL value was lowered to existing NESHAP limit
 **Any number below 0.1 should be treated as being uncertain because the limits of quantitation below that level are uncertain. Accordingly, work practice standards should be set at this level.

| All Units ppmw | Existing Sources | | New Sources | |
|--|--------------------------------|------------------------------|--------------------------------|------------------------------|
| | Vinyl Chloride rolling average | Vinyl Chloride monthly limit | Vinyl Chloride rolling average | Vinyl Chloride monthly limit |
| WW Stripper Discharge monthly sampling | 0.481 | 6.777 | 0.133 | 0.276 |



Recommended Resin Subcategories

