September 12, 1979

Mr. Eric Cohen
Chief, Air Compliance Section
Region V, U.S. EPA
230 South Dearborn St.
Chicago, Illinois 60604

Dear Mr. Cohen:

The General Tire & Rubber Company, in compliance with the National Emission Standard for Vinyl Chloride, Section 61,65, is reporting an emergency relief valve discharge.

On September 11, 1979 at 5:50 a.m., the rupture disc blew and the relief valve opened on Reactor 310. The loss of vinyl chloride to the atmosphere is estimated to be 255 pounds. This loss was calculated based on the difference in level of the batch in the stripper compared to other batches, and the conversion of the batch at the time the relief valve opened:

a.	Vinyl chloride charged to the reactor	10,750 lbs.
b.	Polyvinyl chloride formed at the time the relief valve opened $\frac{13 \text{ hr}}{14.5 \text{ hr/batch}} \times 9800 \text{ lb/batch}$	8,786 lbs.
c.	Pounds vinyl chloride in reactor when relief valve opened	1,964 lbs.
d.	Change in level in stripper as compared to other batches	13%
e.	Total vinyl chloride lost to the atmosphere	255 lbs.

The relief valve discharge was the result of excess initiator charged to the reactor which caused the batch to overheat near the end of the polymerization cycle. A temperature rise at the end of the polymerization cycle is normal for this product. The polymer operator failed to recognize that the batch was out of control until it was too late.

A training session for all operators is underway this week and will be completed by September 21, 1979. During these training sessions, operators are being instructed as to the most probable causes of reactor-overpressurization leading to emergency discharges, how to recognize conditions leading to these discharges, and what corrective action must be taken to avoid them.

Very truly yours,

ORIGINAL SIGNED BY

G. E. Brumbaugh
Technical Superintendent

GEB:sm

cc: A. D. Jeffrey
R. W. Laundrie
H. E. Jewett
E. S. Kierstead
C. E. Reynolds