



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST
CHICAGO, ILLINOIS 60604



Mr. Harlan E. Jewett
Plant Manager
General Tire & Rubber Company
P. O. Box 68
Ashtabula, Ohio 44004

JAN 27 1977

file
Glenn
James O. McDonald
James O. McDonald

Dear Mr. Jewett:

Thank you for your replies, dated January 7, 1977, and January 14, 1977, to our letter dated December 23, 1976, requesting information on hexachlorobenzene (HCB) at your plant in Ashtabula.

On the basis of the additional facts you have supplied, we agree that the probability of any HCB production at your facility is as you have stated virtually nil. Our inquiry to your firm resulted from an incorrect listing in the Directory of Chemical Producers, published by Stanford Research Institute. This reference included your Ashtabula plant among the manufacturers of toluene diisocyanate which has a chlorinated hydrocarbon intermediate.

*** You are hereby relieved of any further obligation to respond to our inquiry dated December 23, 1976, provided that the statements in your letters referred to above are true to the best of your knowledge. We regret any inconvenience caused by the misinformation with regard to your manufacturing processes.

Should any additional information on this subject come to your attention, or should you have any specific questions, please contact Glenn Pratt or Jon Barney of my staff at the above address or by calling 312/353-2098.

Very truly yours,

James O. McDonald
James O. McDonald, Director
Enforcement Division

cc: Ned Williams, Director
Ohio EPA, w/copy of responses

Steve Gunsel, Ohio EPA, w/copy of responses

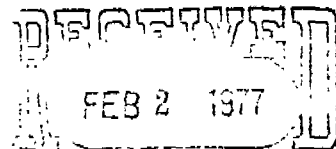
Country

we said

14-21,000 or

Compliance - 2%

like someone to know - Thanks



GENERAL TIRE & RUBBER CO.

GENC 004300

File
EPA

R. Jackson
G. Brumbaugh
E. Senra

H. Jewett

January 21, 1977

Steam Purge on Reactor

The Info you requested:

- 1) Vac 24" or less initially.
- 2) Vac falls off when steam injected to 24-16".
- 3) Steam pressure 20-40# is used.
- 4) 5 min. purge is used and vac re-established to 24" (About).
- 5) Residual MVC 200-1000 on experiments.

These are general conditions and probably will need optimized for our reactors.

H. E. Jewett

HEJ/1bb

GENC 004301

file

January 14, 1977

U.S. Environmental Protection Agency
Enforcement Division, Region V
~~230 South Dearborn Street~~
Chicago, Illinois 60604

Attention: Mr. Jon Barney

Dear Sir:

This memo is to confirm our phone conversations of January 12 and 13, 1977 concerning HCB.

General Tire does not produce TDI (Toluene Diisocyanate) at Ashtabula. The TDI facility is owned by Olin Corporation, and they solely manage the operation. We do supply them steam and other minor services.

In view of the problem with certified/registered mail deliveries, General Tire will send two mailings to each individual, one regular mail and one certified.

We trust this meets your approval. If you need any further information we will be glad to assist your office.

Very truly yours,

THE GENERAL TIRE & RUBBER COMPANY

Harlan E. Jewett
Plant Manager

HEJ:am

GENC 004302

January 7, 1977

U. S. Environmental Protection Agency
Enforcement Division, Region V
230 South Dearborn Street
Chicago, Illinois 60604

Attention: Mr. David Kaa, Acting Director

Dear Sir:

General Tire is in receipt of your letter stamped December 23, 1976, requesting information and data on HCB (Hexachlorobenzene).

Your letter states "according to our information, the chloro-alkali or chlorinated hydrocarbons manufacturing processes employed at your facility at the above address have the potential for producing HCB as a byproduct." General Tire would like to advise your office that this facility is not a chlor-alkali or chlorinated hydrocarbon manufacturing process. The General Tire plant ceased production of chlorinated hydrocarbon in 1967, at which time a process was used to produce vinyl chloride from hydrogen chloride and acetylene. This process, however, was not a chlorination process, and HCB was not a byproduct of this process. The acetylene used was carbide acetylene and not hydrocarbon acetylene, so there were no aromatic heavy ends in the acetylene.

Since 1967, the Ashtabula plant has received vinyl chloride monomer in tank cars, and the heavy ends past trichloroethylene are less than 1 ppm in the monomer. 95% of the monomer is polymerized each cycle, and the recovered monomer is recovered and returned to the process, so that the possibility of HCB in our effluent is nil.

Based upon the above facts that this location is not a chloro-alkali or chlorinated hydrocarbon producing location, and that the existence of HCB in our process is not possible, General Tire requests to be exempted from complying with your request under Section 308, 33 U.S.C. 1318 and Section 114. For your information, a complete description of the processes at this plant was furnished to the E.P.A. Standards and Engineering group in Durham, North Carolina in 1974, under authority of Section 114.

GENC 004303

General Tire would also like to inform your office that if this request is denied, we cannot comply with the 20-day period on testing for HCB, and request a waiver to allow 60 days for testing and reporting.

The undersigned certifies that, to the best of his knowledge and belief, the Ashtabula plant of General Tire has never used (HCB) Hexachlorobenzene in its processes.

Sincerely,

THE GENERAL TIRE & RUBBER COMPANY

Marlan E. Jewett
Plant Manager

MEJ/ikb

No. 636821

RECEIPT FOR CERTIFIED MAIL—30c (plus postage)

SENT TO		POSTMARK OR DATE
1156PH Regina V		1-7-77 Y 6
STREET AND NO.		
236 S. DEARBORN ST.		
P.O., STATE AND ZIP CODE		
CHICAGO ILL 60614		
OPTIONAL SERVICES FOR ADDITIONAL FEES		
RETURN	1. Shows to whom and date delivered	15c
RECEIPT	With restricted delivery	65c
SERVICES	2. Shows to whom, date and where delivered	35c
	With restricted delivery	85c
RESTRICTED DELIVERY		50c
SPECIAL DELIVERY (extra fee required)		

PS Form 3800
Aug. 1975

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See other side)

GPO: 1975-O-591-452

GENC 004305