



INTER-ORGANIZATION MEMO

TO: LEGAL DEPARTMENT
ATTENTION: W. J. Henrick
FROM: R. W. Laundrie
DATE: April 6, 1981
SUBJECT:

File
side Permit
with Ashtabula
RECEIVED
APR 6 1981

SUBJECT: GTR Permit No. OH 0002283, NPDES Consolidated Permit, W. Laundrie
Renewal for Ashtabula Plant.

The attached letter from Region V Enforcement Division has me upset, to say the least.

It indicates that our people at Ashtabula agreed to an almost open-ended research project to determine the amount, to the 10 ppb level, of all conceivable and even inconceivable side reaction compounds in our effluent. Neither the plant nor Research has the present capability to conduct analytical determinations to this level. Our capability is in the area of 100 ppb, at best.

I'm concerned that this open-ended research project can lead to the useless expenditure of tens of thousands of dollars. Searching for unintentional side reactions or by-products is an endless chore.

Note paragraph 3 on page 2. Where do we get this capability? It requires competence in physiology, toxicology, medicine, statistics, limnology, etc., and many other professional fields.

I see a no-win situation developing. First, guess what's there - then analyze for your guesses - then EPA will rule on the findings.

Neither best management plans for the PVC industry nor Effluent Guidelines have been published for PVC industry. Why is General being tapped for this chore? Borden at Iliopolis is not being required to go through this exercise. We're checking other companies as to their status.

I feel we should tell EPA to run their own research project at their cost.

I suggest withdrawal of any agreements made and let them send the 308 letter which in the past has been more specific. I think the whole request as depicted in the letter is unreasonable.

After you digest, let's sit down to plan strategy.


R. W. Laundrie

W. C. Lang - w/attachment
Ron Frase - w/attachment
H. Jewett - w/o attachment

GENC 19826