

Note to File

Advised by Don Brown
on May 2nd, 2003, approval
3:00 pm CDT, not to
send this disclosure.

Kenneth
5/5/03

May 2, 2003

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7002 0860 0000 9882 8754

Ms. Anne Heard
Environmental Accountability Division
USEPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303

Re: Georgia Gulf Chemical and Vinyls, LLC
Voluntary Disclosure of Noncompliance with National Emission Standard for
Hazardous Air Pollutants Subpart F

Dear Ms. Heard:

At this time Georgia Gulf Chemicals and Vinyls, LLC (GGCV), Aberdeen, Mississippi facility would like to notify the United States Environmental Protection Agency (EPA) of our discovery of a possible noncompliance with the emission standard under 40 CFR 61.65(b)(9)(i) for calendar years 1998-2003. We sincerely regret this oversight and assure you that we are committed to correcting this noncompliance.

The Aberdeen facility manufactures polyvinyl chloride (PVC) resins. Our facility's SIC Code is 2821.

A number of possible exceedences of the emission standard contained in §61.65(b)(9)(i) was discovered during a systematic compliance review by plant operations personnel. This emission standard requires that *inprocess wastewater* be reduced to below 10 ppm vinyl chloride before being exposed to the atmosphere. A review of available data from January 1, 1998-present indicated potential exceedences of the standard on 33 of 1,280 samples taken. Prior to this review, we were not aware of the number of exceedences that had occurred. It should be noted that §61.65, §61.70, and §61.71 do not require sampling and analysis, reporting or recordkeeping for *inprocess wastewater*. Upon discovery of the possible noncompliance, we promptly provided this disclosure and notification. We have not previously been contacted by EPA or the Mississippi Department of Environmental Quality concerning this matter.

Previously, this data was used to gauge equipment performance and determine when maintenance might be required. Currently, we are reviewing the data to

determine on a statistical basis if equipment and/or procedures are sufficient to meet the applicable standard.

GGCV has not previously been cited for any violations of §61.65 at the Aberdeen facility. Furthermore, any increase in emissions due to potential exceedences was less than 0.06% of average annual emissions and has not resulted in any substantial and imminent endangerment to human health and the environment. Finally, our possible noncompliance has not resulted in a violation of the specific terms of any judicial order, administrative order or consent agreement.

Once again, we sincerely regret this oversight and are committed to achieving full compliance with all applicable requirements and expeditiously as possible. We will fully cooperate with EPA in any of its efforts to ensure full compliance with these requirements.

If you have any further questions, please contact Kenny Akins at (662) 369-3637.

Sincerely,

Brandon S. Nadler
Plant Manager

C: Ms. Jan Patton
Mississippi Department of Environmental Quality
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385