

RECEIVED

OCT 22 1984

R. W. FRASE

Re: Ashtabula County
Gen Corp. - Diversitech General
02 04 01 0006 P001

Mr. H. Graff, Technical Superintendent
Gen Corp. - Diversitech General
Polymers Division
Middle Road, P.O. Box 68
Ashtabula, Ohio 44004

~~October 20, 1984~~

Dear Mr. Graff:

During our meeting at your plant on October 12, 1984, we discussed the various aspects of Director Maynard's letter of September 24, 1984, to Roy L. Jackson of Diversitech General. We also discussed the various responses required by the letter which Diversitech General must submit to this office by November 12, 1984. Finally, we talked about the proposed sale of the plant and how this might affect our eventual issuance of a Permit to Operate for the PVC polymerization process.

Our primary discussion concerned the Leak Detection and Elimination (LDE) program. Your previous submittals have not been quite as comprehensive and detailed as we would like. Specifically, you should resubmit your letter of May 29, 1984, and include the following:

- (1) A more detailed plan of action. The leak detection response time list should be revised to show that an immediate attempt to fix all leaks will be made and that, failing immediate repair, the equipment will be tagged and the repair made at the earliest possible time but no later than the response time shown in your previous plan.
- (2) Your submittal should include a revised Form I. This form should include a space to indicate when (date & time) the VCM levels return to below 15 ppm as measured by the Bendix after the corrective action is taken or the search for the leak is curtailed. The person completing the form should include more detail as to the source or cause of the leak as well as the corrective action taken.
- (3) A commitment to respond to a leak, as measured by the Bendix, on a 24-hour per day, 7 day per week basis. You should indicate that the lab technician and/or the foreman on duty will make it their top priority to respond to all leaks and repair them as per your leak detection response time list. You should include your suggested break-off point (ppm of leak and duration of search). Below this point, the search may be put off until morning or other such time as personnel

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become available to continue it. Above this point, the OSHA Compliance Supervisor, Technical Superintendent, or other qualified personnel will be called in to continue the search. We will review your suggested break-off point and negotiate a change if necessary.

- (4) A new analysis of the leak definition done on the same basis as the original definition was set. It should be done using the previous full years monitoring data. If the analysis shows that the leak definition should be lowered, we can discuss this further at a later date. We will not raise the current leak definition.
- (5) A commitment to include in future semi-annual reports, a summary of the leaks which occurred during the previous six month period. This summary should include, by monitoring point I.D., the following:
 - a. number of leaks,
 - b. maximum and average concentration during the leaks,
 - c. most prevalent causes,
 - d. the percentage repaired immediately,
 - e. the percentage tagged for later repair, and
 - f. the percentage where no cause could be determined.

This summary is not necessarily meant to be a permanent addition to your semi-annual report. If your LDE program shows that continued progress is being made to reduce the quantity and magnitude of leaks, this requirement may be discontinued.

- (6) A commitment to have on hand at all times an adequate supply of spare parts and circuit boards to minimize the down time of the Bendix units. The supply adequacy should be determined by a review of the maintenance and repair records of the equipment. Personnel trained to make these minor repairs should be at the plant or on-call at all times. If a major repair is required, so that one of the Bendix units has to be sent back to the factory, the Northeast District Office should be notified at the earliest opportunity.

During my review of your monitoring and leak detection records, I concluded that your performance has improved. By reviewing your Form I's, and the Bendix printouts, I was able to follow the response made to each leak and the time involved to reduce the levels to below the leak definition. Many of the leaks for which the source or cause could not be determined returned to acceptable levels in a relatively short (about 1 hour) period of time.

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You should also submit the Standard Operating Procedure required by 40 CFR Section 61.65 (c). I think that you now know what is required in this regard.

Regarding the residual RCVM excursions, you should submit a more detailed explanation of the cause of the exceedance and what actions will be taken to minimize or eliminate future exceedances. You should do this for the three exceedances mentioned in the Director's letter as well as in future semi-annual reports.

The Laftrol KP-54 Packed Tower Scrubber must be made operable before the plant may be restarted. A preventive maintenance program for both scrubbers should be instituted.

The Agency has taken the position that the Permit to Operate can not be renewed even if the deficiencies cited in the Director's letter and discussed above are satisfied. We need to be convinced that the new owners will operate the plant in full compliance with 40 CFR Subpart F, the applicable Ohio regulations, and the provisions of this letter. At the very least, we will need to review the first semi-annual report submitted by the new owners and conduct a thorough inspection and records review prior to renewal of the Permit to Operate. We can say, however, that if all of these requirements are met in full, the Permit to Operate will be renewed.

I would like to thank you, Ron Frase, and Ed Kirkstead for your assistance and cooperation in this matter. I think that we have made significant progress toward satisfying the Agency that the plant can be operated in full compliance with all of the applicable requirements. If you have any questions, please do not hesitate to contact me.

Sincerely,

Dennis A. Bush
Unit Supervisor
Division of Air Pollution Control

DAB:cll

cc: ~~Don Frase, Gen Corp. - Diversitech General~~
Bob Hodanbosi, DAPC, Central Office

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