



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

OCT 20 1978

Mr. J. A. King
Coordinator, Special Projects
Firestone Plastics Company
Box 699
Firestone Boulevard
Pottstown, Pennsylvania 19464

RECEIVED

OCT 27 1978

J. A. KING

Re: Approval of Alternative Testing and Compliance
Methods - Pottstown, Pennsylvania Plant

Dear Mr. King:

As you know, the National Emission Standards for Hazardous Air Pollutants regulation for vinyl chloride (40 CFR Section 61.60 et seq.) requires that all subject plants follow certain testing procedures and install certain types of equipment. The regulation also allows a plant to request alternative or equivalent compliance and testing methods.

The Firestone Plastics Company ("Firestone") has requested that its Hills-McCanna Type K pump be considered equivalent to double mechanical seals. This is an acceptable alternative.

Firestone has also requested an alternative method for determining dispersion and suspension resin reactor opening losses. The method involves the use of a standard operating procedure to reduce vinyl chloride levels below the standard. The data submitted by Firestone show that this procedure is effective. Therefore, the request is approved. However, Firestone must continue to sample one reactor a week in each plant on a rotating basis such that each reactor is sampled on a regular basis. A record that prior to each reactor opening the standard procedure has been followed must also be kept. Where the standard procedure has not been followed, the reactor must be tested for compliance with the standard.

The Firestone proposal to sample dispersion resin from its continuous stripping system twice per unit, initially, and then once per shift is acceptable. The use of totalizing flow meters or tank level changes to determine the quantity of dispersion resin produced is acceptable.

The compositing of suspension resin samples from the batch strippers by resin type to test for residual vinyl chloride level is also acceptable. The use of material balance to determine a standard pounds per batch figure for polyvinyl chloride production is acceptable.

10/31/78 pc K.H.Garner
C.W.Engblom

pc: C. J. Kleinert 10/27/78
10/31/78 pc T.C.Walker

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