



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

cc
Brimble
Jackson
AMERICAN REVOLUTION BICENTENNIAL
1776-1976

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

JUN 1 1977

RECEIVED
JUN 6 1977
CHICAGO ILL 60604

Mr. H. E. Jewett, Plant Manager
The General Tire & Rubber Company
Chemical/Plastics Division
Post Office Box 68
Ashtabula, Ohio 44004

Dear Mr. Jewett:

On October 21, 1976, the U.S. Environmental Protection Agency (U.S. EPA) promulgated national emission standards for the hazardous air pollutant, vinyl chloride (40 CFR Part 61). The standard requires that the owner or operator of a polyvinyl chloride plant report, within ten days of its occurrence, any relief valve discharge [40 CFR Section 61.65(a)] or any manual vent valve discharge [40 CFR Section 61.64(a)(3)].

While several polyvinyl chloride plants have reported such emergency discharges to this office, no such emergency discharge reports have been received for the General Tire, Ashtabula, Ohio, plant. It is thus unclear to us whether the absence of such reports is due to the lack of any discharges, or to the requirement for such reports having been overlooked.

In order that we may assess what actions the Ashtabula plant has taken to avoid such emergency discharges, please furnish the following information for the suspension production area:

1. Age of facility
2. Size of reactors or polys (gallons)
3. Measures that have been employed to prevent emergency discharges. Such measures could include, but are not limited to, the following:

a. Computer control.

not reactors

b. Containment system for relief valve discharges from all pressurized equipment, with subsequent recovery.

no
c. Provision for poly manual vent valve discharges as a last resort.

vent to gas holder

~~to~~

to

GENC 004293

- ✓ d. Containment system for such manual vent valve discharges.
- ✓ e. Dual, independent probes for poly inside temperature, with alarm. ~~temperature, with alarm.~~
- ✓ f. Separate sources of instrument air for poly pressure and temperature controllers.
- ✓ g. A poly pressure alarm system.
- ✓ h. Dual metering of both vinyl chloride and water to prevent poly overcharging, with meter protection by an upstream filter.
- ✓ i. Thorough cleaning of each poly before every batch. [Describe method(s)].
- ✓ j. Automatic poly dumping to a blowdown tank upon pressure buildup, together with measures to insure poly bottom dump valve does not become plugged before the dump.
- ✓ k. Relief valves on rupture discs on all pressurized equipment, with a pressure-sensing device (describe) *(pressure gauge)* between disc and valve to detect disc leakage.
- l. Maintenance program for inspecting and replacing these rupture discs. State frequency of inspection and replacement. *3 weeks*
- ✓ m. If rupture discs with different pressure ratings are used, describe methods of preventing them from being interchanged (e.g., different diameters, different mounting hole positions). *different sizes*
- ✓ n. Shortstopping, or injection of a chemical reaction inhibitor, to the poly.
- ✓ o. Operator training (describe - e.g., spare foreman for on-going training, operator checklists that are reviewed by supervision).
- ✓ p. Measures to prevent freezing of cooling water (e.g., reversing cycle on cooling tower).

q. Refrigerated poly cooling water.

r. Adequate on-plant standby power source.

s. A backup electrical substation.

*Not Gas driven
elec
(main switchroom)*

*Dual elec switch
Dual elec feeder (main)*

In the event that you have overlooked submitting emergency discharge reports, please forward them with your answers to the above questions.

*to
plant*

You are hereby required under authority of Section 114 of the Clean Air Act (42 U.S.C. 1857c-9) to furnish the information requested in this letter. Pursuant to regulations appearing at 40 CFR Section 2.100 et seq. (41 F.R. 35902), you are entitled to assert, following the method in 40 CFR Section 2.203(b), a business confidentiality claim covering any part of the submitted information which is not emission data or necessary to determine emission data. Failure to assert such a claim makes the submitted information available to the public without further notice. Information subject to a business confidentiality claim may be available to the public only to the extent set forth in the above cited regulations.

*auto
switch*

Please submit the information requested in this letter to Mr. George Hurt, Chief, Compliance Section, Air Enforcement Branch, Enforcement Division, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604, no later than 15 days after the day this letter is received. Should you have any questions on the above matters, please contact Mr. Bruce Varner, Engineer, at (312) 353-2086, or Mr. Arthur Smith, Attorney, at (312) 353-2082.

Very truly yours,



David Kee, Acting Director
Enforcement Division

cc: Mr. Jack Wunderle, Director
Office of Air Pollution
Control
Ohio Environmental Protection
Agency