

November 16, 1976

Regional Administrator, Region D
U. S. Environmental Protection Agency
Dearborn
Chicago, Illinois 60607

Dear Sir:

General Tire is requesting two (2) equipment equivalencies under Section 61.66, Page 46567 of Part II, Part 61, Standard for Vinyl Chloride.

General is submitting for two (2) equivalent equipment and procedures along with attached waiver request in case the equivalencies are not acceptable.

General Tire believes their proposal will result in less emissions to the atmosphere over the long run due to reduced equipment opening for maintenance due to equipment failure.

General Tire also believes that upon implementation of the various requirements of the Standard, if a procedure or equipment equivalency is discovered that will result in less vinyl chloride emissions, it should be possible to submit an equivalent procedure to the EPA upon its discovery.

The waivers included in this memo in case the equivalency request is denied, will also be included in our master package on waivers which will be sent to you on or about December 5, 1976. This package will include all the process details and a discussion of existing control devices. Please note Equivalency #1 requires two waivers, one for compressors and one for vacuum pumps. Equivalency #2 requires only one waiver as it is only for compressors.

Thank you for your consideration.

Sincerely,

THE GENERAL TIRE & RUBBER COMPANY

H. E. Jewett
Plant Manager

HEJ/ikb

Encl: Equivalency #1 & #2

Waivers #4, #10, #11

GENC 004356