



Ron Frase

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

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REPLY TO THE ATTENTION OF
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Sandra J. Kemper, Manager
Permits and Compliance Section
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43216

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R. W. FRASE

Re: GenCorp Inc.
Ashtabula, Ohio
Permit No. OH 0002283
Public Noticed: August 27, 1985

Dear Ms. Kemper:

Region V has reviewed the draft permit and draft Director's Final Findings and Orders (F&Os) for the above-cited facility and has concluded that the following issues need to be resolved before the U.S. Environmental Protection Agency (U.S. EPA) can concur with the permit and F&Os:

1. Effluent Limitations For Vinyl Chloride

The final effluent limitation of 500 ug/l for vinyl chloride was derived by the Ohio Environmental Protection Agency (OEPA) based on the following assumptions:

- Raw wastewater is five times as strong as most PVC plants.
- Final promulgated effluent guidelines are expected to be raised from 50 ug/l to 100 ug/l for vinyl chloride.
- Effluent quality is linearly related to influent quality, thus, a value of 500 ug/l (5 X 100 ug/l) was derived.

These assumptions were based upon information submitted to the OEPA by GenCorp in a draft FDF variance request in anticipation of a final vinyl chloride effluent guideline limitation. However, a formal FDF variance cannot be considered until final effluent guidelines for this subcategory are promulgated.

Region V does not concur with the final effluent limitation (500 ug/l) for vinyl chloride. U.S. EPA proposed a limitation of 50 ug/l daily maximum for vinyl chloride on March 21, 1983 (48 FR 11828).

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OHIO EPA-N.E.D.O.

Based upon comments received and further analyses conducted, U.S. EPA published results of these analyses and several sets of regulatory options (July 17, 1985; 50 FR 29068-99). In two regulatory options, a vinyl chloride limitation of 25 ppb (monthly average) and 65 ppb (daily maximum) were presented. While the daily maximum value was increased slightly over the originally proposed value, a more restrictive monthly limit of 25 ppb was presented in the July 1984 Notice of Data Availability, contrary to the OEPA's expectation that the limit might be increased by a factor of two.

With respect to the FDF variance issue, Region V consulted with the U.S. EPA Industrial Technology Division in Washington, which is responsible for developing the categorical effluent guidelines. It is believed that the suspension polymerization process employed by GenCorp is not markedly different from other similar operations in the industry. The facility does produce only PVC and may generate more wastewater per reactor washout. Notwithstanding the above, the facility would not be considered that different. This plant was not sampled as part of the effluent guidelines development process because the plant was considered not to have BAT-level treatment in place. The absence of BAT-level treatment was most likely due to the elevated vinyl chloride limits contained in the expired NPDES permit (2 mg/l 30-day; 6 mg/l daily maximum) which offered no incentive to install improved wastewater treatment facilities. Written comments from the Industrial Technology Division are expected and will be forwarded when received. The company does not have a controlled completely mixed activated sludge biological treatment system which has been installed at other PVC facilities. That type of treatment preceded by rigorous steam stripping for vinyl chloride recovery is considered BAT for PVC plants. GenCorp's treatment consists of a series of lagoons with aeration provided in one lagoon. It is likely that the company would have to improve its steam stripping and install a bio-plant to achieve the BAT limits now under consideration.

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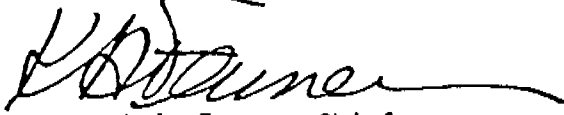
2. Effluent Limitations for BOD₅

The water quality basis for the effluent limitations for BOD₅ needs to be provided. In the absence of additional information, it is virtually impossible to determine whether the proposed effluent limitations for BOD₅ are stringent enough to prevent water quality violations for dissolved oxygen.

As discussed above, Region V does not concur with the final vinyl chloride limitation proposed in the public noticed draft permit. Additionally, unless adequate information can be provided to demonstrate that the BOD₅ limits are water quality-based, Region V cannot concur with these limits. The permit should either be modified to incorporate the presently proposed guideline limitations for vinyl chloride and BOD₅ limits that will be protective of Ohio's Water Quality Standards for dissolved oxygen, or the issuance of the permit should be held up pending further discussions with the permittee and the OEPA.

If you have any questions regarding this correspondence, please contact Dave Barna, at (216) 835-5200 or John Gierczak, at (312) 886-6109.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'K. Fenner', with a long horizontal flourish extending to the right.

Kenneth A. Fenner, Chief
Water Quality Branch

cc: Robert Phelps, OEPA

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