

NOV 5 1984



INTER-ORGANIZATION MEMO

TO: Akron
ATTENTION: H. S. Wheeler
FROM: H. E. Jewett
DATE: November 2, 1984
SUBJECT: Ashtabula Government
Compliance Status

*cc: Ashtabula copy sent to
return to the*

This information is provided so an assessment of the environmental status of Ashtabula can be made.

I. OSHA

◀ This area is in good condition. The engineering plan for OSHA Compliance is current and approved. ▶

Semi-annual physicals for OSHA Standard are current and personnel being laid off have been given exit physicals.

Any employees (ex-General) which may be rehired by new owner will have to be covered by semi-annual physicals if they have over 10 years of VCM exposure, and annual physicals if less than 10 years in a VCM/PVC operation.

The personnel TWA exposure testing for all workers is operational and in good condition equipment-wise.

II. EPA Air

1. The major problem in this area is the leak detection program. EPA is demanding an expanded procedure in this area which will require testing and response by supervision to leaks detected by the automatic detection equipment.

EPA will not issue permit P001 to Ashtabula or to the new owner until they demonstrate approximately 6 months of improved compliance to the new procedure. Ashtabula EPA staff is writing the new procedure and we believe this issue can be resolved.

2. A secondary issue in this area is the incinerator scrubber on the north incinerator which has failed for the second time. The first one (melted) burned due to a backup water system malfunction. The second one embrittled and cracked with a scorch hole in the lower inlet. It must be replaced/repared before the plant can operate. Cost \$12,300 for a RFP scrubber. We are investigating a carbon-steel epoxy-coated scrubber as a better alternate.

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3. Overview:

The EPA will not issue a new (P001) permit to GenCorp or a new owner until a 6 months operational compliance review and inspection is done by EPA.

III. EPA Water

This area presents the greatest concern and technical problems. The new proposed permit for water discharge is specifying a very low level for RVCM (Residual Vinyl Chloride Monomer). The batch stripping process used at Ashtabula for PVC slurry does not allow us to meet this spec. The capital cost to meet this spec would be excessive. Estimates range from \$120M to \$550M.

The other permit problems, lead testing and a flow monitor station to monitor flow when heavy rains occur could be implemented at a modest cost - testing \$1,500 per year and flow monitor \$14M, however we firmly believe they are not pertinent as the plant does not/did not use lead and the rain overflow occurs briefly once or twice per year and maintenance on the monitor station would be excessive.

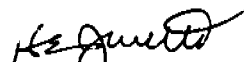
GenCorp is working with urgency to resolve the water permit issue with EPA. A hearing schedule has been set up but the review board prefers we resolve the issue with the Northeast Ohio EPA district and headquarters in Columbus rather than present it to the review board. We are presently working on this resolution.

IV. Local EPA - County Board

This agency has never received a complaint against GenCorp for odors, fumes, spills, etc.

V. Federal EPA, State EPA, & OSHA NOV's.

Currently GenCorp does not have any NOV's pending against the Ashtabula plant.


H. E. Jewett

HEJ/ikb

cc: H. Thompson

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