



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

DEC 22 2005

REPLY TO THE ATTENTION OF

(AE-17J)

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Gretchen Mansfield, Site EH&S Manager  
GE Plastics, Inc.  
1 Lexan Lane  
Mt. Vernon, Indiana

Re: Finding of Violation  
GE Plastics, Inc.  
Mt. Vernon, Indiana

Dear Ms. Mansfield:

The United States Environmental Protection Agency (U.S. EPA) is issuing the enclosed Finding of Violation (FOV) to GE Plastics, Inc. (you). We find that you are in violation of Section 112 of the Clean Air Act, 42 U.S.C. § 7412, at your Mt. Vernon, Indiana facility.

We have several enforcement options under Section 113(a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(3). These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action. The options we select may depend on, among other things, the length of time you take to achieve and demonstrate continuous compliance with the rules cited in the FOV.

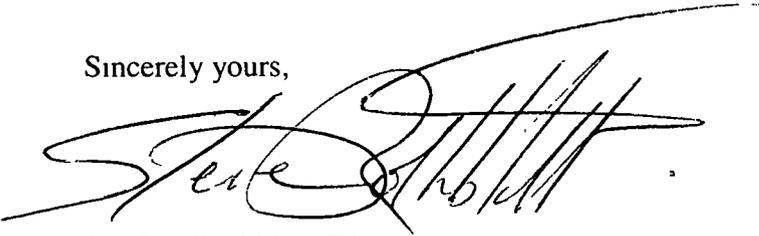
We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you the opportunity to present information on the specific findings of violation, the efforts you have taken to comply, and the steps you will take to prevent future violations.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The U.S. EPA contact in this matter is Constantinos Loukeris. You may call him at (312) 353-6198 to request a conference. You should make the request as soon as possible, but no later than

10 calendar days after you receive this letter. We should hold any conference within 30 calendar days of your receipt of this letter.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Steve Rothblatt". The signature is stylized with a large, sweeping initial "S" and "R".

Stephen Rothblatt, Director  
Air and Radiation Division

Enclosure

cc:

Derrick J. Ohning, Compliance Inspector  
Indiana Department of Environmental Management  
P.O. Box 128  
Petersburg, Indiana 47567

Raymond Schick, Senior Environmental Manager  
Indiana Department of Environmental Management  
100 N. Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015

**United States Environmental Protection Agency  
Region 5**

**IN THE MATTER OF:**

GE Plastics, Inc.	)	<b>FINDING OF VIOLATION</b>
1 Lexan Lane	)	
Mt. Vernon, Indiana	)	<b>EPA-5-06-IN-11</b>
	)	
Proceedings Pursuant to	)	
the Clean Air Act,	)	
42 U.S.C. §§ 7401 <u>et seq.</u>	)	

**FINDING OF VIOLATION**

The United States Environmental Protection Agency (U.S. EPA) finds that GE Plastics Inc. (GEP) is in violation of Section 112 of the Clean Air Act (the Act or CAA), 42 U.S.C. § 7412. Specifically, GEP is in violation of the National Emission Standards for Organic Hazardous Air Pollutants (Hazardous Organic NESHAP) for Equipment Leaks at 40 C.F.R. Part 63, Subpart H (Subpart H); the Hazardous Organic NESHAP from the Synthetic Organic Chemical at 40 C.F.R. Part 63 Subpart F, G, and I; and EPA Reference Method 21 at 40 C.F.R. Part 60, Appendix A as follows:

**Regulatory Authority**

1. Subparts F and H were proposed on December 31, 1992, and became final on April 22, 1994.
2. Subpart I, at 40 C.F.R. § 63.183(e), states that owners and operators of sources subject to Subpart I shall comply with the requirements of Subpart H.
3. Subpart F, at 40 C.F.R. § 63.102(a), states that owners and operators of sources subject to Subpart F shall comply with the requirements of Subpart H.
4. Subpart F, at 40 C.F.R. § 63.100(k)(3)(i), states that existing Group III chemical manufacturing process units, as designated in Table 1 of Subpart H, shall be in compliance with Subpart H no later than April 24, 1995.
5. Subpart F, at 40 C.F.R. § 63.101(b), defines a chemical manufacturing process unit as the equipment assembled and connected by pipes or ducts to process raw materials and to manufacture an intended product, and includes, in part, pumps, compressors, agitators,

pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, instrumentation systems, and control devices or systems.

6. Subpart F, at 40 C.F.R. § 63.100(k)(1)(ii), states that new sources that commence construction after August 26, 1996, shall be in compliance with subparts F, G, and H of Part 63 upon initial start-up, or by January 17, 1997, whichever is later.
7. Subpart F, at 40 C.F.R. § 63.100(b), states that the provisions of subparts F and H apply to chemical manufacturing process units that: a) manufacture as a primary product one or more of the chemicals listed in Table 1 of Subpart F, or one of the following chemicals tetrahydrobenzaldehyde or crotonaldehyde; b) use as a reactant or manufacture as a product, or co-product, one or more of the organic hazardous air pollutants (HAPs) listed in Table 2 of Subpart F; and c) are located at a plant site that is a major source as defined in Section 112(a) of the Act.
8. Subpart H, at 40 C.F.R. § 63.160(a), applies to pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, instrumentation systems, control devices, and closed-vent systems that are intended to operate in organic HAP service 300 hours or more during the calendar year within a source subject to the provisions of a specific subpart in 40 C.F.R. Part 63 that references Subpart H.
9. Subpart H, at 40 C.F.R. § 63.161, defines equipment in organic HAP service as equipment that either contains or contacts a fluid that is at least 5% by weight of total organic HAPs.
10. Subpart H, at 40 C.F.R. § 63.168(b)(1), requires the owner or operator of a source subject to Subpart H to monitor valves in gas/vapor and light liquid service by the method specified in Section 63.180(b) of Subpart H.
11. Subpart H, at 40 C.F.R. § 63.174(a)(1), requires the owner or operator of a process unit subject to Subpart H to monitor connectors in gas/vapor and light liquid service by the method specified in Section 63.180(b) of Subpart H.
12. Subpart H, at 40 C.F.R. § 63.161, defines a process unit as a chemical manufacturing process unit as defined in Subpart F of Part 63, a process subject to the provisions of Subpart I of Part 63, or a process subject to another subpart in 40 C.F.R. Part 63 that references Subpart H.
13. Subpart H, at 40 C.F.R. § 63.163(b)(1), requires the owner or operator of a process unit subject to Subpart H to monitor each pump in light liquid service monthly by the method specified in Section 63.180(b) of Subpart H.

14. Subpart H, at 40 C.F.R. § 63.173(a)(1), requires the owner or operator of a process unit subject to Subpart H to monitor each agitator in gas/vapor and light liquid service monthly by the method specified in Section 63.180(b) of Subpart H.
15. Subpart H, at 40 C.F.R. § 63.180(b)(1), requires each owner or operator of a source subject to Subpart H to comply with the monitoring procedures and requirements of Method 21, at 40 C.F.R. Part 60, Appendix A.
16. Method 21, at 40 C.F.R. Part 60, Appendix A, Section 8.3.1, requires the owner or operator of an affected source to slowly sample the interface of a component where leakage is indicated until the maximum meter reading is obtained.
17. Subpart H, at 40 C.F.R. § 63.168(a)(1)(i)(C), defines Phase III as beginning no later than 2½ years after the compliance date for each group of existing process units at existing sources subject to the provisions of Subparts F or I of Part 63.
18. Subpart H, at 40 C.F.R. § 63.167(a)(1), requires each open-ended valve or line subject to Subpart H to be equipped with a cap, blind flange, plug, or second valve.
19. Subpart H, at 40 C.F.R. § 63.161, defines an open-ended valve or line as any valve, except pressure relief valves, having one side of the valve seat in contact with process fluid and one side open to atmosphere, either directly or through open piping.
20. Subpart H, at 40 C.F.R. § 63.167(a)(2), requires the cap, blind flange, plug, or second valve to seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance and repair.
21. Subpart H, at 40 C.F.R. § 63.167(b), requires each open-ended valve or line subject to Subpart H and equipped with a second valve to be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.
22. Subpart H, at 40 C.F.R. § 63.166(a), requires each sampling connection system subject to Subpart H to be equipped with a closed-purge, closed-loop, or closed-vent system.
23. Subpart H, at 40 C.F.R. § 63.161, defines a sampling connection system as an assembly of equipment within a process unit used routinely during periods of representative operation to take samples of the process fluid.
24. Subpart H, at 40 C.F.R. § 63.161, defines a closed-purge, closed-loop, and closed-vent system as a system or combination of system and portable containers to capture purged liquids; an enclosed systems that returns process fluid to the process and is not vented to the atmosphere except through a closed-vent system; and a system that is not open to the atmosphere and that is composed of hard-piping, ductwork, connections, and, if

necessary, flow-inducing devices that transport gas or vapor from a piece or pieces of equipment to a control device or back into a process, respectively.

25. Subpart H, at 40 C.F.R. § 63.162(c), requires each piece of equipment in a process unit to which Subpart H applies to be identified such that it can be distinguished readily from equipment that is not subject to Subpart H.
26. Subpart H, at 40 C.F.R. § 63.163(c)(2), requires a first attempt at repair of a pump in light liquid service subject to Subpart H to be made no later than 5 calendar days after a leak is detected.
27. Subpart H, at 40 C.F.R. § 63.168(f)(2), requires a first attempt at repair of a valve in gas/vapor or light liquid service subject to Subpart H to be made no later than 5 calendar days after a leak is detected.
28. Subpart H, at 40 C.F.R. § 63.163(c)(1), requires a leaking pump in light liquid service subject to Subpart H to be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.
29. Subpart H, at 40 C.F.R. § 63.168(f)(1), requires a leaking valve in gas/vapor or light liquid service subject to Subpart H to be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.
30. Subpart H, at 40 C.F.R. § 63.168(e), requires the percent leaking valves at a process unit to be determined with the equation provided in this section.
31. Subpart H, at 40 C.F.R. § 63.174(i), requires the percent leaking connectors at a process unit to be determined with the equations provided in this section.
32. Subpart G, at 40 C.F.R. § 63.149(a), requires the owner or operator to comply with the provisions of Table 35 of this subpart, for each item of equipment meeting all criteria specified in paragraphs (b) through (d) and either paragraph (e)(1) or (e)(2) of this section.
33. Subpart G, at 40 C.F.R. § 63.149(e)(1), requires equipment that is a drain, drain hub, manhole, lift station, trench, pipe, or oil/water separator that conveys water with a total annual average concentration greater than or equal to 10,000 parts per million by weight (ppmw) of Table 9 compounds at any flowrate, or a total annual average concentration greater than or equal to 1,000 ppmw of Table 9 compounds at an annual average flow rate greater than or equal to 10 liters per minute; to comply with the provisions of Table 35 of the subpart.
34. Subpart G, at 40 C.F.R. § 63.144(b)(5)(iv), requires the total average concentration of

Table 9 compounds to be calculated by first summing the concentration of the individual compounds to obtain a hazardous air pollutants concentration for the sample.

35. Subpart G, C.F.R. § 63.144(b)(6), requires the owner or operator to make corrections to the annual average concentration or total annual average concentration when the concentration is determined downstream of the point of determination at a location where: two or more wastewater streams have been mixed; one or more wastewater streams have been treated; or, losses to the atmosphere have occurred.
36. Subpart G, Table 35, outlines the control requirements for items of equipment that meet the criteria for § 63.149 of Subpart G. For drains or drain hubs, (a) tightly fitting solid cover (TFSC); or (b) TFSC with a vent to either a process, or to a fuel gas system, or to a control device meeting the requirements of § 63.139(c); or (c) water seal with submerged discharge or barrier to protect discharge from wind.

### **Factual Background**

37. GEP owns and operates a chemical manufacturing plant site at 1 Lexan Lane, Mt. Vernon, Indiana (Mt. Vernon plant).
38. At the Mt. Vernon plant, since April 24, 1995, the Phenol and BPA process units have manufactured a Group I chemical, as listed in Table 1 of Subpart F, as a primary product [Phenol and Bisphenol A], and have used as a reactant or have manufactured as a product, or co-product, one or more of the organic HAPs listed in Table 2 of Subpart F [Cumene, Phenol, and Methyl Isobutyl Ketone] In addition, at the Mt. Vernon site, since April 22, 1994, the LEXAN Resin process units have manufactured a polymer/resin or other chemical products provided for in 40 C.F.R. §63.183(b) of Subpart I using Methylene Chloride. The Mt. Vernon plant also has been a major source, as defined in Section 112(a) of the Act, since before April 22, 1994. Therefore, the Phenol, three (3) BPA units, and three (3) LEXAN Resin units have been subject to Subpart F and I, and consequently, to the leak detection and repair (LDAR) provisions of Subpart H.
39. U.S. EPA conducted a partial inspection of the Mt. Vernon plant on August 1-5, 2005.
40. During the inspection, GEP provided U.S. EPA with LDAR monitoring data from its Fugitive Emissions Monitoring System (FEMS) database for the Phenol, BPA-3, LEXAN Resin, Phosgene, and LDF units at the Mt. Vernon plant from January 1994 through July 2005.
41. During the inspection, U.S. EPA conducted LDAR monitoring per EPA Reference Method 21 in the Phenol, LEXAN Resin 2, and BPA-3 units of the Mt. Vernon plant and obtained the leak rates shown in Tables A, B and C.

Table A: Monitoring Summary for the Phenol Process Unit

Component Type	Number of Components Monitored	Number of Leaks Identified	Leak Rate (%)
Valves	411	11	2.7*
Connectors	550	19	3.5
Pumps	31	2	6.5
Open Ended Lines (OELs)	19	-	-

\* Includes two (2) valves that were not confirmed by GEP

Table B: Monitoring Summary for the LEXAN Resin 2 Process Unit

Component Type	Number of Components Monitored	Number of Leaks Identified	Leak Rate (%)
Valves	66	0	0.0
Connectors	116	2	1.7
Pumps	20	0	0.0
OELs	2	-	-

Table C: Monitoring Summary for the BPA-3 Process Unit

Component Type	Number of Components Monitored	Number of Leaks Identified	Leak Rate (%)
Valves	43	0	0.0
Connectors	63	0	0.0
Pumps	7	0	0.0
OELs	4	-	-

42. Based on the FEMS data, Tables D, E, and F show the leak rates GEP obtained for valves and connectors in the Phenol, LEXAN Resin 2, and BPA-3 units at the Mt. Vernon plant from January 2001 through July 2005.

Table D: FEMS Data for Phenol Unit

Component Type	Period	Monitored	Leaking	Leak Rate
Valves	3 <sup>rd</sup> Quarter 2005	2582	0	0.00%
	2 <sup>nd</sup> Quarter 2005	2669	0	0.00%
	1 <sup>st</sup> Quarter 2005	2594	0	0.00%
	4 <sup>th</sup> Quarter 2004	2600	0	0.00%
	3 <sup>rd</sup> Quarter 2004	2971	0	0.00%
	4 <sup>th</sup> Quarter 2003	2953	0	0.00%
	3 <sup>rd</sup> Quarter 2003	2586	1	0.04%
	2 <sup>nd</sup> Quarter 2003	2660	0	0.00%
	1 <sup>st</sup> Quarter 2003	2591	0	0.00%

	4 <sup>th</sup> Quarter 2002	2618	0	0.00%
	3 <sup>rd</sup> Quarter 2002	2935	0	0.00%
	2 <sup>nd</sup> Quarter 2002	2470	0	0.00%
	1 <sup>st</sup> Quarter 2002	2578	0	0.00%
	4 <sup>th</sup> Quarter 2001	2962	0	0.00%
	3 <sup>rd</sup> Quarter 2001	2591	7	0.27%
	2 <sup>nd</sup> Quarter 2001	2628	7	0.27%
	1 <sup>st</sup> Quarter 2001	2553	0	0.00%
	4 <sup>th</sup> Quarter 2000	2533	9	0.36%
	3 <sup>rd</sup> Quarter 2000	2897	10	0.35%
	2 <sup>nd</sup> Quarter 2000	2537	5	0.20%
	1 <sup>st</sup> Quarter 2000	2531	4	0.16%
Connectors	2 <sup>nd</sup> Quarter 2005	3548	0	0.00%
	1 <sup>st</sup> Quarter 2005	4081	0	0.00%
	4 <sup>th</sup> Quarter 2004	36	0	0.00%
	3 <sup>rd</sup> Quarter 2004	329	0	0.00%
	2 <sup>nd</sup> Quarter 2004	24	0	0.00%
	4 <sup>th</sup> Quarter 2003	293	0	0.00%
	3 <sup>rd</sup> Quarter 2003	36	0	0.00%
	2 <sup>nd</sup> Quarter 2003	2896	0	0.00%
	1 <sup>st</sup> Quarter 2003	4757	0	0.00%
	4 <sup>th</sup> Quarter 2002	48	0	0.00%
	3 <sup>rd</sup> Quarter 2002	317	0	0.00%
	2 <sup>nd</sup> Quarter 2002	3663	0	0.00%
	1 <sup>st</sup> Quarter 2002	3957	0	0.00%
	4 <sup>th</sup> Quarter 2001	333	0	0.00%
	3 <sup>rd</sup> Quarter 2001	14	0	0.00%
	2 <sup>nd</sup> Quarter 2001	2707	7	0.26%
	1 <sup>st</sup> Quarter 2001	4767	5	0.10%
	4 <sup>th</sup> Quarter 2000	5	0	0.00%
	3 <sup>rd</sup> Quarter 2000	289	0	0.00%
	2 <sup>nd</sup> Quarter 2000	2732	3	0.11%
	1 <sup>st</sup> Quarter 2000	4555	3	0.07%

Table E. FEMS Data for LEXAN Resin 2

Component Type	Period	Monitored	Leaking	Leak Rate
Valves	3 <sup>rd</sup> Quarter 2005	1658	0	0.00%
	2 <sup>nd</sup> Quarter 2005	1658	0	0.00%
	1 <sup>st</sup> Quarter 2005	1658	0	0.00%
	4 <sup>th</sup> Quarter 2004	1902	0	0.00%
	3 <sup>rd</sup> Quarter 2004	1700	0	0.00%
	4 <sup>th</sup> Quarter 2003	1658	0	0.00%
	3 <sup>rd</sup> Quarter 2003	1660	2	0.12%
	2 <sup>nd</sup> Quarter 2003	1679	0	0.00%
	1 <sup>st</sup> Quarter 2003	1858	0	0.00%
	4 <sup>th</sup> Quarter 2002	1778	0	0.00%
	3 <sup>rd</sup> Quarter 2002	1668	0	0.00%
	2 <sup>nd</sup> Quarter 2002	1669	0	0.00%
	1 <sup>st</sup> Quarter 2002	1669	0	0.00%
	4 <sup>th</sup> Quarter 2001	1669	1	0.06%

	3 <sup>rd</sup> Quarter 2001	1594	1	0.06%
	2 <sup>nd</sup> Quarter 2001	1594	1	0.06%
	1 <sup>st</sup> Quarter 2001	1616	11	0.68%
	4 <sup>th</sup> Quarter 2000	1607	1	0.06%
	3 <sup>rd</sup> Quarter 2000	1888	2	0.11%
	2 <sup>nd</sup> Quarter 2000	1615	1	0.06%
	1 <sup>st</sup> Quarter 2000	1611	0	0.00%
Connectors	4 <sup>th</sup> Quarter 2004	7457	0	0.00%
	3 <sup>rd</sup> Quarter 2004	98	0	0.00%
	4 <sup>th</sup> Quarter 2003	2270	0	0.00%
	3 <sup>rd</sup> Quarter 2003	1312	0	0.00%
	2 <sup>nd</sup> Quarter 2003	582	1	0.00%
	1 <sup>st</sup> Quarter 2003	496	0	0.00%
	4 <sup>th</sup> Quarter 2002	5249	0	0.00%
	3 <sup>rd</sup> Quarter 2002	1821	0	0.00%
	4 <sup>th</sup> Quarter 2001	6597	6	0.00%
	3 <sup>rd</sup> Quarter 2001	261	0	0.00%
	2 <sup>nd</sup> Quarter 2001	603	7	0.26%
	4 <sup>th</sup> Quarter 2000	3876	8	0.00%
	3 <sup>rd</sup> Quarter 2000	1677	1	0.00%
	2 <sup>nd</sup> Quarter 2000	1843	5	0.11%
	1 <sup>st</sup> Quarter 2000	38	0	0.07%

Table F: FEMS Data for BPA-3 Unit

Component Type	Period	Monitored	Leaking	Leak Rate
Valves	3 <sup>rd</sup> Quarter 2005	280	0	0.00%
	2 <sup>nd</sup> Quarter 2005	280	0	0.00%
	1 <sup>st</sup> Quarter 2005	290	0	0.00%
	4 <sup>th</sup> Quarter 2004	280	0	0.00%
	3 <sup>rd</sup> Quarter 2004	280	0	0.00%
	4 <sup>th</sup> Quarter 2003	280	0	0.00%
	3 <sup>rd</sup> Quarter 2003	280	0	0.00%
	2 <sup>nd</sup> Quarter 2003	280	0	0.00%
	1 <sup>st</sup> Quarter 2003	290	0	0.00%
	4 <sup>th</sup> Quarter 2002	280	0	0.00%
	3 <sup>rd</sup> Quarter 2002	280	0	0.00%
	1 <sup>st</sup> Quarter 2002	290	0	0.00%
	4 <sup>th</sup> Quarter 2001	280	0	0.00%
	3 <sup>rd</sup> Quarter 2001	280	0	0.00%
	2 <sup>nd</sup> Quarter 2001	280	0	0.00%
	1 <sup>st</sup> Quarter 2001	297	0	0.00%
	4 <sup>th</sup> Quarter 2000	278	1	0.36%
	3 <sup>rd</sup> Quarter 2000	278	1	0.36%
	2 <sup>nd</sup> Quarter 2000	278	0	0.00%
	1 <sup>st</sup> Quarter 2000	288	0	0.00%
Connectors	1 <sup>st</sup> Quarter 2005	326	0	0.00%
	1 <sup>st</sup> Quarter 2003	326	0	0.00%
	1 <sup>st</sup> Quarter 2002	326	0	0.00%
	1 <sup>st</sup> Quarter 2001	339	0	0.00%
	1 <sup>st</sup> Quarter 2000	324	0	0.00%

43. A contractor for GEP, Furmanite America, Inc., conducted LDAR monitoring for the Mt. Vernon plant since at least January 2001 through July 2005.
44. According to the FEMS data, GEP's contractor monitored between 600 and 1000 components in one day on 55 separate occasions since January 2001.
45. According to the FEMS data, GEP's contractor monitored over 1000 components in one day on 15 separate occasions since January 2001.
46. During the inspection, U.S. EPA discovered sixteen (16) OELs in the Phenol unit without a cap, blind flange, plug, or second valve. These OELs were identified at the lines off of or near valves 104451, 120428, 31548, 31573, 34210, 61795, untagged valve off of R220A, untagged valve off of R220B, untagged valve off of R220C, untagged valve off of R220D, untagged valve off of R220E, untagged valve off of R220F, untagged valve off of P-420A, untagged valve off of P-420B, untagged valve off of P-540A, and Sampling Station #131.
47. During the inspection, U.S. EPA discovered one (1) line in the LEXAN Resin 2 unit without a cap, blind flange, plug, or second valve. This was the line off or near valve 96410.
48. During the inspection, U.S. EPA monitored three (3) plugged OELs in the Phenol unit, obtaining readings of 730 ppm, 5,600 ppm and 2,100 ppm respectively, for plugs near the tag numbered 120469, untagged but near tag series 4344\*, and untagged but near tag series 4327\*.
49. During the inspection, U.S. EPA monitored one (1) plugged OEL in the LEXAN Resin 2 unit, obtaining a reading of 1,000 ppm for the plug near tags number 100841.
50. During the inspection, U.S. EPA monitored four (4) plugged OELs in the Phenol unit, obtaining readings of 1,100 ppm, 3,600 ppm, 2,100 ppm, and 920 ppm respectively for plugs near tags numbered 25344, 25290, 25216, and 25226.
51. For the leaking OELs referenced in paragraphs 53 and 54 above, operations at the time of discovery by U.S. EPA did not require process fluid flow through the lines, and GEP was not conducting maintenance on the lines.
52. At the Mt. Vernon plant, GEP uses tags to identify components in organic HAP service subject to Subpart H.
53. At the Mt. Vernon plant, GEP counts valves that contain a stem and bonnet as two LDAR components in the program.
54. The Mt. Vernon plant has sampling connection systems in the Phenol, BPA-3, and

LEXAN Resin process units. The sampling connection systems are unique in comparison to each of the process units.

55. The Mt. Vernon plant has 545 drains in the Phenol Process Unit.
56. The Mt. Vernon plant's drains are broken up into six (6) sewer systems: 1) Oil Water Sewer; 2) Sanitary Sewer; 3) Phenolic Water Drain Sewer; 3) Phenol Sewer; 4) Cumene Hydroperoxide; 5) Wastewater Sewer; 6) Acid Sewer.
57. According to the FEMS data provided by GEP, the company failed to attempt to repair 10 leaking components subject to Subpart H within five days of discovery from August 2000 through July 2005, as shown in Table G.
58. According to the FEMS data provided by GEP, the company failed to repair 3 leaking components subject to Subpart H within fifteen days of discovery from August 2000 through July 2005, as shown in Table H.

**Table G: Leaks With No Attempt to Repair Within Five Days**

Area	Component Type	Component ID	Reading (ppm)	Date Monitored	Date of First Attempt (if any)
Phenol	Valve	52843	10,000	9/12/2000	9/27/2000
	Valve	34595	2,912	10/12/2000	10/27/2000
	Valve	43833	3,200	10/13/2000	10/19/2000
	Valve	49325	12,000	10/13/2000	10/19/2000
	Valve	61048	3,682	10/12/2000	10/20/2000
	Valve	61806	1,630	10/12/2000	10/19/2000
	Connector	30870	652	10/12/2000	10/19/2000
BPA-3	Valve	11784	447,400	10/3/2000	10/12/2000
LEXAN	Valve	93709	1,072	1/8/2001	1/23/2001
	Valve	124611	1,029	1/12/2001	Not Available
	Valve	130070	741	1/9/2001	1/24/2001

**Table H: Leaks Not Repaired Within Fifteen Days**

Area	Component Type	Component ID	Reading (ppm)	Date Monitored	Date of First Attempt (if any)
Phenol	Valve	51842	1,230	4/11/2001	Not Available
LEXAN	Valve	93709	1,072	1/8/2001	1/23/2001
	Valve	124611	1,029	1/12/2001	Not Available

### Violations

59. By the acts and omissions set forth below, GEP failed to comply with Subpart F at the Mt. Vernon plant. This is a violation of 40 C.F.R. § 63.102(a).
60. GEP failed to monitor per Method 21 equipment subject to Subpart H. This is a violation of 40 C.F.R. § 63.168(b)(1), 40 C.F.R. § 63.174(a)(1), 40 C.F.R. § 63.163(b)(1), 40

C.F.R. § 63.173(a)(1), 40 C.F.R. § 63.180(b)(1), and Method 21 at 40 C.F.R. Part 60, Appendix A, Section 8.3.1.

61. GEP failed to equip each OEL subject to Subpart H with a cap, blind flange, plug, or second valve. This is a violation of 40 C.F.R. § 63.167(a)(1).
62. GEP failed to seal properly the open end of each OEL subject to Subpart H. This is a violation of 40 C.F.R. § 63.167(a)(2).
63. GEP failed to equip each sampling connection system subject to Subpart H with a closed-purge, closed-loop, or closed-vent system. This is a violation of 40 C.F.R. § 63.166(a).
64. GEP failed to identify each piece of equipment subject to Subpart H such that it can be distinguished from equipment that is not subject to Subpart H. This is a violation of 40 C.F.R. § 63.162(c).
65. GEP failed to attempt to repair each leaking pump and valve subject to Subpart H within five days of when a leak was detected. This is a violation of 40 C.F.R. § 63.163(c)(2) and 40 C.F.R. § 63.168(f)(2).
66. GEP failed to repair each leaking pump and valve subject to Subpart H within fifteen days of when a leak was detected. This is a violation of 40 C.F.R. § 63.163(c)(1) and 40 C.F.R. § 63.168(f)(1).
67. GEP failed to properly equip all drains subject to the liquid streams in open systems within a chemical manufacturing process unit. This is a violation of 40 C.F.R. § 63.149(a), 40 C.F.R. § 63.149(e)(1), 40 C.F.R. § 63.144(b)(5)(iv), 40 C.F.R. § 63.149(b)(6), and 40 C.F.R. 63 Subpart G Table 35.
68. GEP failed to properly calculate the leak rates for valves and connectors in all process units subject to subpart H. This is a violation of 40 C.F.R. § 63.168(e) and 40 C.F.R. § 63.174(i).

12/22/2005

Date



Stephen Rothblatt, Director  
Air and Radiation Division

**CERTIFICATE OF MAILING**

I, Shanee Rucker, certify that I sent a Finding of Violation, No. EPA-5-06-IN-11 , by

Certified Mail, Return Receipt Requested, to:

Gretchen Mansfield, Site EH&S Manager  
GE Plastics, Inc.  
1 Lexan Lane  
Mt. Vernon, Indiana

I also certify that I sent copies of the Finding of Violation by first class mail to:

Derrick J. Ohning, Compliance Inspector  
Indiana Department of Environmental Management  
P.O. Box 128  
Petersburg, Indiana 47567

Raymond Schick, Senior Environmental Manager  
Indiana Department of Environmental Management  
100 N. Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015

on the 22 day of December, 2005.



Shanee Rucker, Administrative Program Assistant  
AECAS, (MI/WI)

CERTIFIED MAIL RECEIPT NUMBER: 7001 0320 0006 1447 8966