

Hooker Chemical

PLASTICS DIVISION

Firestone Blvd

P.O. Box 699

Pottstown, PA 19464

215 / 326-2000

July 15, 1981

Mr. T. Moore
Tenneco Chemicals, Inc.
P. O. Box 849
Pasadena, Texas 77501

Dear Tom:

Other than the specific questionnaires which accompanied your letter of June 1 and which will be submitted separately, we have other suggestions for the agenda for Hilton Head:

A. VCM Standard

1. We suggest a poll on Emergency Discharges.
 - a. Number of plants reporting all Emergency Relief Valve Discharges regardless of pounds of VCM emitted.
 - b. Number of plants not reporting minor discharges.
 - c. From b., what are definitions of minor discharges omitted?
 - d. Repeat the poll for Emergency Discharges other than those from relief valves.
2. We suggest a poll on Semi-Annual Reports.
 - a. Number of plants having had government inquiries on past performance as follows:
 - 1.) By telephone.
 - 2.) By call to meeting.
 - 3.) By notice of violation.
 - 4.) By other formal document--letter, 114 letter, citation or other.
 - b. Number of plants fined for excursions in reports.

OCC 5416

Hooker Chemical

PLASTICS DIVISION

Firestone Blvd

P.O. Box 699

Pottstown, PA 19464

215 / 326-2000

July 15, 1981

Mr. T. Moore
Tenneco Chemicals, Inc.
P. O. Box 849
Pasadena, Texas 77501

Dear Tom:

Other than the specific questionnaires which accompanied your letter of June 1 and which will be submitted separately, we have other suggestions for the agenda for Hilton Head:

A. VCM Standard

1. We suggest a poll on Emergency Discharges.
 - a. Number of plants reporting all Emergency Relief Valve Discharges regardless of pounds of VCM emitted.
 - b. Number of plants not reporting minor discharges.
 - c. From b., what are definitions of minor discharges omitted?
 - d. Repeat the poll for Emergency Discharges other than those from relief valves.
2. We suggest a poll on Semi-Annual Reports.
 - a. Number of plants having had government inquiries on past performance as follows:
 - 1.) By telephone.
 - 2.) By call to meeting.
 - 3.) By notice of violation.
 - 4.) By other formal document--letter, 114 letter, citation or other.
 - b. Number of plants fined for excursions in reports.

OCC 5416

July 15, 1981

A. VCM Standard - continued

3. We suggest a poll on carbon adsorbers:
 - a. Number of plants using these alone.
 - b. Number of plants using these as adjunct to other type control.
 - c. Number of plants using carbon adsorbers, but who are changing or will change to other type control.

B. Effluent Quality

1. We suggest a poll of VCM/Vinyl Acetate Copolymer producers.
 - a. Number of plants producing this copolymer.
 - b. Number discharging to POTWS. Of these, number removing hydrocarbons from effluent prior to entry into POTW and means of removal. Number preventing discharge of hydrocarbons into effluent.
 - c. Number discharging under NPDES Permits. Of these, means of removal of hydrocarbons. Number preventing discharge of hydrocarbons into effluent.

C. Safety

We suggest an up-date presentation on stress corrosion cracking.

We also suggest a presentation on engineering safeguards to prevent an operator's opening the wrong reactor.

Very truly yours,

J. A. King

J. A. King
Manager, Environmental Compliance

JAK:slp.

OCC 5417