



TOC P&M Environmental Affairs
(COMPANY)

INTEROFFICE COMMUNICATION

TO: Tenneco Polymers
FOR: Ron Neugold
FROM: R. D. Pruessner
RE: ENVIRONMENTAL REVIEW - BURLINGTON PLANT

DATE: April 29, 1983

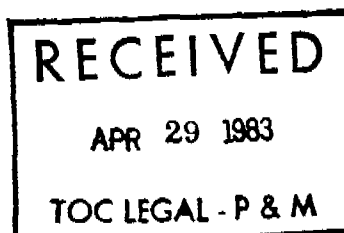
Your approval is requested for scheduling the Environmental Review of the Burlington Plant on June 28-30, 1983.

The proposed agenda and Environmental Review forms are attached. It is requested the forms be filled in prior to the arrival of the review team.


R. D. Pruessner

pm
Enclosure

cc: Pat Anderson
Guy Disch
Hal Hees
Jim Kachtick
Fred Kanzler
Jim Langford
Ralph Maynard
Al Smith
Roger Towe



TENO 238

AGENDA

ENVIRONMENTAL REVIEW

Tenneco Polymers - BURLINGTON PLANT

June 28-30, 1983

Tuesday, June 28

- 11:30 a.m. Depart Houston Intercontinental on Eastern 554.
- 4:11 p.m. Arrive Philadelphia airport. Obtain large Avis rent car and drive to Burlington, New Jersey.
- About
6:00 p.m. Check in Hilton on Highway 295 in Mount Laurel, New Jersey.
- 6:30 p.m. Supper for the Review Team and Polymer representatives at Charlie's Other Brother in Mt. Holly. Fred Kanzler will make reservations for five people from Houston and the Burlington plant staff.

Wednesday, June 29

- 8:00 a.m. Meet with Ron Neugold to conform final plans for Environmental Review.
- 8:15 a.m. Meet with Fred Kanzler and staff to go over the information contained in completed Environmental Review forms.
- 11:30 a.m. LUNCH
- 1:00 p.m. Meet with Fred Kanzler for plant tour.
- 4:00 p.m. Adjourn

AGENDA

ENVIRONMENTAL REVIEW

Tenneco Polymers - BURLINGTON PLANT

June 28-30, 1983

Thursday, June 30

- | | |
|------------|---|
| 8:00 a.m. | Visit with maintenance department representative to sight maintenance and calibration records for environmental equipment. |
| 9:00 a.m. | Review analytical procedures calibration, and records associated with vinyl chloride emissions. |
| 11:30 a.m. | LUNCH |
| 1:00 p.m. | Draft proposed conclusions of Environmental Review. |
| 2:00 p.m. | Meet with Ron Neugold and staff to review proposed findings and complete the final report. Provide copies of completed report to Ron Neugold, Fred Kanzler, Jim Langford, Jim Kachtick, Guy Disch, and Bob Pruessner. |
| 3:30 p.m. | Depart for Philadelphia airport. |
| 5:05 p.m. | Catch Eastern 551 for Houston. |
| 7:13 p.m. | Arrive Houston. |

**TENNECO OIL
P&M FACILITIES
ENVIRONMENTAL REVIEW**

**TENNECO POLYMERS - Burlington Plant
POLYVINYL CHLORIDE FACILITIES**

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

June 28-30, 1983

Name and address of facility:

Tenneco Polymers
Burlington Plant
P. O. Box 116
Burlington, New Jersey 08016

Affiliated with:

Tenneco Oil P&M

Operations Manager:

Ron Neugold	Plant Manager	(609) 386-9200
(Name)	(Title)	(Phone)

Environmental Representative:

Fred Kanzler	Environmental Coordinator	(609) 386-9200
(Name)	(Title)	(Phone)

Type of operation and/or principle products:

Polyvinyl Chloride

Review Team:

<u>Name</u>	<u>Title</u>	<u>Phone</u>
Bob Pruessner	Mgr. Environmental Affairs-TOC	(713) 757-3306
Roger Towe	Sr. Environmental Eng.-TOC	(713) 757-7685
Hal Hees	Attorney - TOC	(713) 757-2607
Pat Anderson	Mgr. Environmental Audits-TEN	(713) 757-3604
Jim Kachtick	Mgr. Environmental Sciences-TOC	(713) 479-3411

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

**TENNECO POLYMERS
ENVIRONMENTAL STAFFING**

(I)

Please show the reporting relationship between individuals directly responsible for environmental compliance and the senior manager associated with this facility. (Add blocks as necessary.)

Name	<u>Jim Langford</u>
Title	<u>Director of Operations</u>

Name	_____
Title	_____

Name	_____
Title	_____

Name	_____
Title	_____

Name	_____
Title	_____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

**TENNECO POLYMERS
ENVIRONMENTAL STAFFING**

(2)

Please list names and title of persons dedicating a significant portion of their time to environmental compliance. This should include those persons responsible for operating environmental control equipment, conducting laboratory environmental analysis, etc.

NAME _____ TITLE _____
Approximate percentage (%) of work time dedicated to environmental: _____
Brief description of environmental responsibility: _____

Name _____ TITLE _____
Approximate percentage (%) of work time dedicated to environmental: _____
Brief description of environmental responsibility: _____

NAME _____ TITLE _____
Approximate percentage (%) of work time dedicated to environmental: _____
Brief description of environmental responsibility: _____

NAME _____ TITLE _____
Approximate percentage (%) of work time dedicated to environmental: _____
Brief description of environmental responsibility: _____

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TENNECO OIL P&M
ENVIRONMENTAL REVIEW

TENNECO POLYMERS

WATER
(I)

NPDES Permit No.: _____ Date Issued: _____ Date Expires: _____

Other Water Discharge Permits: Date Issued: _____ Date Expires: _____

Discharge permit requirements:

Outfall Number _____ (Add additional sheets as necessary.)

	<u>Permitted</u>		<u>Typical Actual</u>		<u>No. of Self-Reporting Violations-Last 12 Mos.</u>
	<u>Avg</u>	<u>Max</u>	<u>Avg</u>	<u>Max</u>	
<u>Flow</u>	_____	_____	_____	_____	_____
<u>BOD</u>	_____	_____	_____	_____	_____
<u>Oil & Grease</u>	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

Type of Waste Water Treatment System: _____

Method by which sanitary waste water is treated: _____

Who is treating sanitary waste? _____

Sanitary Waste Water Permit No. _____

Issuing Agency: _____ Expiration Date: _____

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**WATER
(2)**

Date and significant findings of last regulatory inspection:
Please attach copy of regulatory inspection report.

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Do any discharge permits contain a compliance schedule?	_____	_____	_____
Is the facility meeting the compliance schedule?	_____	_____	_____
Primary flow measuring device properly installed?	_____	_____	_____
Calibration frequency adequate? (Date last calibration _____)	_____	_____	_____
Primary flow measuring device properly operated & maintained?	_____	_____	_____
Secondary instruments (totalizers, recorders, etc.) properly operated and maintained?	_____	_____	_____
Permittee sampling meets requirements and intent of permit?	_____	_____	_____
Details: _____			
Locations adequate for representative samples?	_____	_____	_____
Parameters and sampling frequency agree with permit?	_____	_____	_____
Permittee is using method of sample collection required by Permit? If NO, _____ Grab _____ Manual Composite	_____	_____	_____
_____ Auto composite frequency: _____			
Sample collection procedures are adequate?	_____	_____	_____
Samples refrigerated during compositing?	_____	_____	_____
Flow proportioned samples obtained where required by permit?	_____	_____	_____
Sample holding times prior to analyses in conformance with 40 CFR 136.3?	_____	_____	_____
Monitoring and analyses being performed more frequently than required by permit?	_____	_____	_____
If YES, results are reported in permittee's self-monitoring report?	_____	_____	_____
Permittee lab procedures meet the requirements and intent of permit?	_____	_____	_____
Details: _____			
EPA approved analytical testing procedures used?(40CFR 136.3)	_____	_____	_____
If alternate analytical procedures are used, proper approval has been obtained?	_____	_____	_____
Parameters other than those required by the permit are analyzed?	_____	_____	_____
Satisfactory calibration and maintenance of instruments and equipment?	_____	_____	_____
Quality control procedures used?	_____	_____	_____
Duplicate samples are analyzed? _____ % of time.	_____	_____	_____
Spiked samples are used? _____ % of time.	_____	_____	_____

TENNECO OIL P&M
ENVIRONMENTAL REVIEW

TENNECO POLYMERS

WATER
(3)

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Commercial laboratory used?	_____	_____	_____
Commercial laboratory state certified?	_____	_____	_____
Weeds cut and vegetation growth in ponds removed?	_____	_____	_____
Banks and dikes maintained? (Erosion, etc.)	_____	_____	_____
Any reports of groundwater contamination from pond? If YES, give details:	_____	_____	_____

Seepage reported?	_____	_____	_____
Adequate freeboard (<u>2 feet</u>) to prevent overflow?	_____	_____	_____
Effluent release is: _____Continuous _____Intermittent _____Seasonal			
What is the receiving stream?			

Is there a formal Spill Control Plan (SPCC)?	_____	_____	_____
Has the SPCC been approved by management?	_____	_____	_____

TENNECO OIL P&M
ENVIRONMENTAL REVIEW

TENNECO POLYMERS

WATER
(3-A)
(CONTRACT LAB)

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
LAB NAME: _____ _____			
Is lab state certified?	_____	_____	_____
Date of last certification test: _____			
Sample collection procedures are adequate?	_____	_____	_____
Samples refrigerated during delivery to laboratory?	_____	_____	_____
Chain of custody records maintained?	_____	_____	_____
Sample holding times prior to analyses in conformance with 40CFR136.3?	_____	_____	_____
Lab procedures meet the requirements and intent of permit?	_____	_____	_____
Details: _____			
EPA-approved analytical testing procedures used? (40CFR136.3)	_____	_____	_____
If alternate analytical procedures are used, proper approval has been obtained?	_____	_____	_____
Satisfactory calibration and maintenance of instruments and equipment?	_____	_____	_____
Quality control procedures used?	_____	_____	_____
Duplicate samples are analyzed _____ % of the time.	_____	_____	_____
Spiked samples are used _____ % of the time.	_____	_____	_____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**WATER
(4)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Is the SPCC certified by a registered engineer?	_____	_____	_____
Has the SPCC been reviewed and updated within the last 3 years?	_____	_____	_____
Have there been any reported spills the prior 12 months?	_____	_____	_____
How many? _____			
If more than two (2) reported spills within the last 12 months, has the SPCC been revised and certified by a registered engineer?	_____	_____	_____
Is a training program existing to instruct personnel in operation and maintenance of spill control equipment?	_____	_____	_____
Are briefings scheduled to insure adequate understanding of the SPCC plan by company personnel?	_____	_____	_____
Is this facility a "major facility" as defined in the New Jersey Water Pollution Control Regulations, i.e., N.J.A.C. 7:1E-1.3(k)?	_____	_____	_____
If so, has a Discharge Prevention, Containment or Countermeasure (DPCC) Plan and Discharge Cleanup and Removal (DCR) Plan been prepared in accordance with N.J.A.C. 7:1E-4.5 and 7:1E-4.21?	_____	_____	_____
Have the DPCC and DCR Plans been approved by the NJDEP, Division of Water Resources?	_____	_____	_____
Have the DPCC and DCR Plans been approved by management?	_____	_____	_____
Have the DPCC and DCR Plans been reviewed and evaluated in the last three years?	_____	_____	_____
Has the NJDEP, Division of Water Resources ever inspected this facility for compliance with the DPCC and DCR Plans?	_____	_____	_____

 If so, when? _____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

WATER

(5)

How is storm water treated?

What is the design basis for storm water treatment?

Do existing discharge permits have storm water requirements?

What are the requirements?

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**AIR
NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS)
(1)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
What type(s) of PVC resin is produced:			
Dispersion resin	_____	_____	_____
Latex resin	_____	_____	_____
Bulk resin	_____	_____	_____
Does this plant have a fixed vinyl chloride monitoring system in place to continuously monitor VCM emissions?	_____	_____	_____
Do exhaust gasses meet the less than 10ppm VCM limit?	_____	_____	_____
What sort of control devices are used to reduce VCM exhaust gases to 10ppm or less? _____			

How many emergency manual vent valve discharges to the atmosphere were reported in the last 12 months? _____			
Were they reported within the required time (10 days)?	_____	_____	_____
<u>FUGITIVE EMISSIONS FROM EQUIPMENT IN VCM SERVICE</u>			
Are loading and unloading lines in VCM service degassed thru a control system before opening?	_____	_____	_____
Are slip gauges used in the VCM loading/unloading operation?	_____	_____	_____
Are slip gauge emissions reduced via a control system?	_____	_____	_____
If controlled--what is the control mechanism? _____			

Are all pumps either sealless, have double seals or equivalent?	_____	_____	_____
a. Positive pressure maintained between seals?	_____	_____	_____
b. Double seal interspace vented to a control system?	_____	_____	_____
Are all compressors equipped with double seals or equivalent?	_____	_____	_____
a. Positive pressure maintained between seals?	_____	_____	_____
b. Double seal interspace vented to a control system?	_____	_____	_____
Are all agitators equipped with double seals or equivalent?	_____	_____	_____
a. Positive pressure maintained between seals?	_____	_____	_____
b. Double seal interspace vented to a control system?	_____	_____	_____
c. Other _____	_____	_____	_____

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

AIR

**NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS)
(2)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Are relief valves connected to a process line, recovery system, or equivalent?	_____	_____	_____
If not, are they equipped with rupture discs?	_____	_____	_____
When sampling, are sample containers purged into a closed process system?	_____	_____	_____
Are unused portions of samples (10% or more VCM by weight) returned to the process?	_____	_____	_____
Is the VCM content of equipment reduced as required before opening to atmosphere?	_____	_____	_____
Does this plant have a formal leak detection and elimination program?	_____	_____	_____
a. Has the program been approved by the EPA Administrator?	_____	_____	_____
b. What is the plant definition of a "leak"? _____			
Is the VCM content of "in process wastewater" reduced as required?	_____	_____	_____
Does this plant have Standard Operating Procedures incorporating the VCM fugitive emission requirements?	_____	_____	_____
Are emissions data reported in Semiannual Report as required?	_____	_____	_____
How many reported exceedances were there the last 12 months for:			
a. Residual VCM content of stripped PVC slurry? _____			
What percent is this of total reported values? _____			
b. Reactor opening emissions? _____			
What percent is this of total reported values? _____			
c. Incinerator VCM emissions greater than 10ppm? _____			
What percent of incinerator operating hours? _____			
Is record keeping performed as required?	_____	_____	_____
a. Are records kept two years?	_____	_____	_____
b. Are they destroyed after two years?	_____	_____	_____
When was last NESHAPS inspection? _____ (Please provide copy of report.)			

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**AIR
(I)**

List air construction permits or permit exemptions obtained in the last 12 months:

	<u>Description of Permit Unit</u>	<u>Permitting Agency</u>	<u>Control Device</u>	<u>Allowed Emissions</u>	<u>Date Issued</u>
1.	_____	_____	_____	_____	_____
2.	_____	_____	_____	_____	_____
3.	_____	_____	_____	_____	_____
4.	_____	_____	_____	_____	_____
5.	_____	_____	_____	_____	_____
6.	_____	_____	_____	_____	_____
7.	_____	_____	_____	_____	_____

List air operating permits presently in force:

	<u>Description of Permit Unit</u>	<u>Date Issued</u>	<u>Expiration Date</u>	<u>Allowed Emission</u>	<u>Monitoring Requirements</u>	<u>Reporting Requirements</u>
1.	_____	_____	_____	_____	_____	_____
2.	_____	_____	_____	_____	_____	_____
3.	_____	_____	_____	_____	_____	_____
4.	_____	_____	_____	_____	_____	_____
5.	_____	_____	_____	_____	_____	_____
6.	_____	_____	_____	_____	_____	_____
7.	_____	_____	_____	_____	_____	_____
8.	_____	_____	_____	_____	_____	_____
9.	_____	_____	_____	_____	_____	_____

TENNECO OIL P&M
ENVIRONMENTAL REVIEW

TENNECO POLYMERS

AIR
(2)

When was the last air regulatory inspection? _____.
Please provide a copy of last inspection report _____ (Date).

Describe any noted deficiencies and the corrective action taken:

	<u>DEFICIENCY</u>	<u>CORRECTIVE ACTION</u>
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____
6.	_____	_____

Is this facility now in compliance with Subchapter 16 of the New Jersey Regulations
(this subchapter addresses VOS)? _____

Comments: _____

If this facility now in compliance with Subchapter 17 of the New Jersey Regulations
(this subchapter addresses TVOS)? _____

Comments: _____

TENNECO OIL P&M
ENVIRONMENTAL REVIEW

TENNECO POLYMERS

AIR
(3)

When was the last air emissions inventory? _____
DATE

List reported emissions rates:	<u>Tons/Year</u>
1. <u>Hydrocarbons</u>	_____
2. <u>Sulfur Dioxide</u>	_____
3. <u>Nitrogen Oxides</u>	_____
4. <u>Carbon Monoxide</u>	_____
5. <u>Particulate</u>	_____
6. <u>Vinyl Chloride</u>	_____
7. _____	_____
8. _____	_____

What procedure is followed to report emission excursions to regulatory agencies?
Please attach a copy of existing written procedure.

Is this facility monitoring ambient air quality?

YES NO N/A

Is a quality assurance program used?
(Please provide quality assurance records.)

YES NO N/A

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**AIR
(4)**

What parameters are monitored?

Has air monitoring data shown exceedences of air standards?

☐ YES ☐ NO ☐ N/A

Is this facility in compliance with or on a schedule of compliance with all applicable emission limitations and standards under the Clean Air Act?

☐ YES ☐ NO ☐ N/A

Discussion if required:

Does this facility have procedures to insure leaded gasoline is not used in company vehicles designed for unleaded gasoline?

☐ YES ☐ NO ☐ N/A

If this facility dispenses more than 200,000 gallons of gasoline per year, does it have stage I vapor control system installed?

☐ YES ☐ NO ☐ N/A

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**SOLID WASTE DISPOSAL
(I)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Is this facility registered under the Resource Conservation and Recovery Act (RCRA)?	_____	_____	_____
Generator	_____	_____	_____
Storer	_____	_____	_____
Treater	_____	_____	_____
Disposer	_____	_____	_____
Transporter	_____	_____	_____

What is the registration number? _____

	<u>ON</u>	<u>OFF</u>
List any <u>hazardous waste</u> and the amount being generated and show if it is disposed of on or off-site.		
_____	_____	_____
_____	_____	_____

List any <u>solid waste</u> and the amount being generated and show if it is disposed of on or off-site.		
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**SOLID WASTE DISPOSAL
(2)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
If this facility is a storer, treater or disposer, is it in compliance with the interim standards?	_____	_____	_____
Are the following prepared:			
Written Waste Analysis Plan?	_____	_____	_____
Is the site secure to prevent unknowing entry or are "Danger-Unauthorized Personnel Keep Out" signs installed?	_____	_____	_____
Written inspection schedule on:			
(a) Monitoring equipment?	_____	_____	_____
(b) Security devices?	_____	_____	_____
(c) Operating and structural devices?	_____	_____	_____
Personnel training?	_____	_____	_____
"No Smoking" signs for ignitable or reactive waste?	_____	_____	_____
Preparedness and prevention?	_____	_____	_____
Contingency Plan?	_____	_____	_____
Arrangements with local authorities?	_____	_____	_____
Are manifests used with each off-site load of hazardous waste?	_____	_____	_____
Are <u>all</u> hazardous waste manifests accounted for?	_____	_____	_____
Is manifest record system properly maintained?	_____	_____	_____
Is an annual hazardous waste summary provided to the State? (Provide a copy.)	_____	_____	_____
Is hazardous waste held over 90 days?	_____	_____	_____
Have <u>any</u> drummed waste been held over 90 days?	_____	_____	_____
What is the present inventory of drummed waste? _____			
Number of drums			
Is each drum dated when hazardous wastes are placed in the drum?	_____	_____	_____
What is the present inventory of empty drums? _____			
Number of drums			

TENNECO OIL P&M
ENVIRONMENTAL REVIEW

TENNECO POLYMERS

SOLID WASTE DISPOSAL

(3)

How are empty drums disposed of?

Are any empty drums given (sold) to employees or neighbors?
Are drums emptied of purchased materials returned to the vendor
as part of the agreement to purchase the material?

YES NO N/A

What types of hazardous waste treatment are accomplished on site?

Solar Evaporation
Processing for Detoxification
Incineration
Neutralization
Landfarming
Fixation prior to burial
Recycling
Biological
Other _____

Has TOC provided closure costs of on-site treatment and
storage facilities?

What is estimated cost? _____ Who estimated cost? _____

Are ponds used in hazardous waste treatment?

Are ponds in natural clay?

Are ponds lined with clay?

How thick? _____

What freeboard is maintained in ponds? _____

What is expected 24-hour rainfall in a five-year period? _____

Are monitoring wells used?

How many wells are upgradient? _____

How many wells are downgradient? _____

How deep are the wells? _____

How often are they monitored? _____

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**SOLID WASTE DISPOSAL
(4)**

What are the wells monitored for?

1. _____
2. _____
3. _____
4. _____
5. _____

YES NO N/A

Are monitoring-well results reported to state?

Have reported (last 12 months) monitoring results indicated underground contamination potentially related to this facility's activity?

What is the depth of the shallowest aquifer currently used? _____

Does this facility operate water wells?

What depth? _____ How many? _____

List private drinking water wells near this facility.

Owner

Depth

1. _____
2. _____
3. _____
4. _____

List industrial/commercial water wells near this facility.

Owner

Depth

Water Use

1. _____
2. _____
3. _____
4. _____

List municipal or public water wells near this facility.

Owner

Depth

Water Use

1. _____
2. _____
3. _____
4. _____

12/8/82

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

**TENNECO POLYMERS
SOLID WASTE DISPOSAL
(5)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Do you receive hazardous waste from off-site?	_____	_____	_____
What types of hazardous waste disposal are accomplished on site?			
Sanitary Landfill	_____	_____	_____
Chemical Landfill	_____	_____	_____
Solar Evaporation	_____	_____	_____
Landfarming	_____	_____	_____
Deep Well	_____	_____	_____
NPDES Discharge after treatment	_____	_____	_____
Other _____	_____	_____	_____
What is the estimated useful life of on-site disposal? _____			

Has TOC provided for expected future closure costs of on-site disposal facilities?	_____	_____	_____
What is the estimated cost? _____			
Who estimated the cost? _____			
How has TOC provided for the expected cost? _____			

Has this facility been inspected by a regulatory agency in the last 12 months regarding solid waste disposal?	_____	_____	_____
What discrepancies did they note? _____			

Have these discrepancies been corrected?	_____	_____	_____

TENNECO OIL P&M
ENVIRONMENTAL REVIEW

TENNECO POLYMERS

SOLID WASTE DISPOSAL
(6)

OFF-SITE DISPOSAL

If off-site hazardous waste disposal is used:

What is the name of the facility?

Name

Permit Number

1. _____
2. _____
3. _____

Do you have a copy of their current RCRA permit?

Do you have a copy of their current state permit(s)?

Have you visited this facility in the last 12 months?

Did the evaluation confirm this site is satisfactory for disposal
of your facility's hazardous waste?

(If a written evaluation report was made, please attach.)

Are DOT approved containers and labeling used for off-site
delivery of hazardous waste?

Estimated annual cost of off-site disposal? _____

Has this off-site facility been inspected by a regulatory agency
in the last 12 months regarding solid waste disposal?

What discrepancies did they note? _____

Have these discrepancies been corrected?
(Provide a copy of last regulatory inspection.)

YES NO N/A

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**POLYCHLORINATED BIPHENYLS (PCB)
(1)**

As of July 2, 1978, did this facility contain in service,
stored for future use, or stored for disposal:

- | | <u>YES</u> | <u>NO</u> | <u>N/A</u> |
|---|------------|-----------|------------|
| A. 50 or more large high or low voltage PCB capacitors? | _____ | _____ | _____ |
| B. One (1) or more PCB transformers? | _____ | _____ | _____ |
| C. 45kgs (99.4 lbs) or more PCB chemical substances
or PCB mixtures? | _____ | _____ | _____ |

Does the facility contain other PCBs, PCB equipment (e.g.,
electromagnets, electric motors, hydraulic systems, heat
transfer systems, compressors), or containers of PCBs or
PCB mixtures?

An annual inventory of PCBs is required if the facility has
PCB equipment (equal to or greater than is shown in A,B,or C above).

Does this facility have an annual inventory of PCBs?
(Please make available copies of PCB inventory.)

Are annual PCB inventories retained for five (5) years?

Do annual reports contain:

- | | | | |
|--|-------|-------|-------|
| A. Date and source of PCB articles, chemicals, and
mixtures received? | _____ | _____ | _____ |
| B. Date and type of article, chemicals, and mixtures
removed from service? | _____ | _____ | _____ |
| C. Accounting of amount received, amount removed, and
amount remaining at facility? | _____ | _____ | _____ |

Are all transformers and capacitors containing PCBs labeled?

Are transformers not containing PCBs labeled "NO PCB"?

Is PCB containing equipment that is not in service properly
stored in a marked PCB storage area?

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**POLYCHLORINATED BIPHENYLS (PCB)
(2)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Does the PCB storage area meet the following requirements:			
A. Roof to prevent rain water from reaching PCB items?	_____	_____	_____
B. Spill containment to contain twice the internal volume of the largest PCB article?	_____	_____	_____
C. Containment area <u>not</u> have any drains, valves, expansion joints, sewer lines or other openings. Does storage facility meet these requirements?	_____	_____	_____
D. All articles marked with the date they are placed in storage?	_____	_____	_____
E. All articles in storage checked for leaks at least every <u>30 days</u> and records of checks maintained?	_____	_____	_____
Does this facility have a program to eliminate existing PCBs?	_____	_____	_____

Describe program.

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

**TENNECO POLYMERS
COMMUNITY RELATIONS**

(1)

How many complaints were received from neighbors or other interested parties the last 12 months? _____

What percent of the neighborhood complaints received relate to:

Air _____

Water _____

Noise _____

Spills _____

Solid Waste Disposal _____

Other _____

TOTAL

100%

What percent of the complaints investigated relate to this facility? _____

Describe briefly how complaints are handled and name individual(s) responsible for handling complaints. If written procedures exist, please attach a copy.

When is the senior line manager responsible for local operations informed of citizen complaints? _____

Who is responsible for reporting complaint information to the senior line manager? _____

Does this facility have an emergency contingency plan?

YES NO N/A

Has the emergency contingency plan been updated in the last 12 months?

YES NO N/A

(Please make available a copy of the emergency contingency plan for the Review Team.)

TEN0 265

12/8/82

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**COMMUNITY RELATIONS
(2)**

What individual is responsible to make timely reports of the occurrence of emergencies to TOC P&M Environmental Affairs Department (Houston)? _____

Briefly describe activities this facility has participated in the last 12 months to enhance community relations. Typical activities are providing speakers for civic clubs and other local organizations, participating in county (parish) fairs, supporting youth groups such as Little League, Scouting, etc., providing information to newspapers, radio or television.

SUMMARY

(1)

The following items represent commendable performance or innovative solutions to environmental regulatory requirements that may have applications in other TOC Facilities.

[illegible]

S U M M A R Y

TENNECO OIL P&M

ENVIRONMENTAL REVIEW

TENNECO POLYMERS - BURLINGTON PLANT

(2)

THE FOLLOWING ITEMS REQUIRE LOCAL OPERATIONS MANAGEMENT ATTENTION:

ITEM #	DESCRIPTION	SPECIFIC IMPROVEMENT NEEDED	DOES LOCAL MGMT AGREE	INDIVIDUAL RESPONSIBLE FOR COMPLETION OF CORRECTIVE ACTION	DATE FOR COMPLETION OF IMPROVEMENTS
TENO 268					

7/14/81

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**SUMMARY
(3)**

Unresolved questions raised as a result of the Environmental Review.

Question # _____

Responsible party: _____

Date for answer: _____

Answer:

Date answered: _____

