

File

TO: Tenneco Polymers

DATE: July 12, 1984

FOR: Ron Neugold

FROM: R. D. Towe

RE: ENVIRONMENTAL REVIEW - BURLINGTON PLANT - *Polymers*

Your approval is requested for scheduling the Environmental Review of the Burlington Plant on September 11-13, 1984.

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.

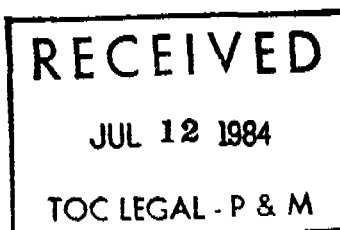
R. D. Towe

R. D. Towe

pm

Enclosure

cc: Pat Anderson
Russell Bowers
D. H. Carter
Walt Fogelsanger
Hal Hees
Jim Kachtick
Fred Kanzler
Ralph Maynard
Bob Pruessner
Al Smith
Lloyd Stewart



TEN0351

AGENDA

ENVIRONMENTAL REVIEW

Tenneco Polymers - BURLINGTON PLANT

September 11-13, 1984

Tuesday, September 11

- 11:15 a.m. Depart Houston Intercontinental on Continental 372.
- 3:00 p.m. Arrive Philadelphia airport. Obtain large Avis rent car and drive to Burlington, New Jersey.
- About 5:00 p.m. Check in Hilton on Highway 295 in Mount Laurel, New Jersey. *609-234-7300*
- 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 the Review Team from Houston and the Burlington plant staff.

Wednesday, September 12

- 8:00 a.m. Meet with Ron Neugold to confirm 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

September 11-13, 1984

Thursday, September 13

- | | |
|------------|---|
| 8:00 a.m. | Review wastewater treatment plant performance status. |
| 9:15 a.m. | Review groundwater monitoring program status. |
| 10:15 a.m. | Review overall closure plan for on-site landfill and future plans for handling the solid waste. |
| 11:15 a.m. | LUNCH (Please provide sandwiches in plant.) |
| 12:00 noon | Draft proposed conclusions of Environmental Review. |
| 1:00 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 Kachtick, Guy Disch, and Bob Pruessner. |
| 2:00 p.m. | Depart for Philadelphia airport. |
| 3:45 p.m. | Catch Continental 371 for Houston. |
| 6:04 p.m. | Arrive Houston. |

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

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

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

September 11-13, 1984

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
(Name)

Plant Manager
(Title)

(609) 386-9200
(Phone)

Environmental Representative:

Fred Kanzler
(Name)

Environmental Coordinator
(Title)

(609) 386-9200
(Phone)

Type of operation and/or principal products:

Polyvinyl Chloride

Review Team:

<u>Name</u>	<u>Title</u>	<u>Phone</u>
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
Lloyd Stewart	Mgr. Environmental Audits-TEN	(713) 757-4100
Walt Fogelsanger	Plant Engineer-Polymers	(201) 782-4011

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS - BURLINGTON PLANT

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 _____

Title Director of Operations

Name _____

Title _____

Name _____

Title _____

Name _____

Title _____

Name _____

Title _____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS - BURLINGTON PLANT

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: _____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS - BURLINGTON PLANT

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

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: _____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS - BURLINGTON PLANT

**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?	_____	_____	_____

FLOW AND pH

In matters relating to flow, do procedures used conform to the "water measurement manual" (U.S. Dept. of Interior, Bureau of Reclamation) or other procedures approved by the E.P.A?

Primary flow measuring device properly installed?

Primary flow measuring device properly operated and maintained?

Is primary flow measuring device calibrated?

(Last calibration date: _____)

Secondary instruments (totalizers, recorders, etc.) properly operated and maintained?

Are continuous pH recording instruments calibrated with pH buffer solutions? Frequency: _____

Are the date, time, and the name of the person who calibrated the continuous pH recording instrument recorded? In a book? _____
On the chart? _____

Are calibration and maintenance records kept for 3 years on pH and flow measurement equipment?

Are pH and flow measurement data kept for the required three-year period?

SAMPLE COLLECTION AND PRESERVATION

Permittee sampling meets requirements and intent of permit?

Details: _____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS - BURLINGTON PLANT

**WATER
(3)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Permittee is using method of sample collection required by permit? If not, explain method used and the frequency of sampling: _____	_____	_____	_____
Sampling locations adequate for representative samples?	_____	_____	_____
Parameters and sampling frequency agree with permit?	_____	_____	_____
Flow proportioned samples obtained where required by permit?	_____	_____	_____
Are composite samples refrigerated at 4°C <u>during</u> collection?	_____	_____	_____
Are grab samples refrigerated as soon as possible after collection?	_____	_____	_____
Are samples labeled as to location, composite or grab, date and time of collection, and sampler?	_____	_____	_____
Are samples collected in the authorized containers for each parameter?	_____	_____	_____
Are approved preservatives used for each parameter, when needed?	_____	_____	_____
When samples must be preserved, are they preserved at the time of collection?	_____	_____	_____
Are samples analyzed within required holding times?	_____	_____	_____
Is the laboratory refrigerator for sample storage kept at 4°C?	_____	_____	_____
When samples are not to be analyzed immediately in the lab, are they refrigerated at 4°C?	_____	_____	_____
Are approved cleaning procedures followed in the laboratory for sample containers that are to be reused?	_____	_____	_____
<u>LABORATORY METHODS</u>			
Are EPA approved analytical testing procedures used?(40CFR 136.3)	_____	_____	_____
If a different procedure is used, has written approval been received from the necessary regulatory agencies to use this alternate procedure?	_____	_____	_____
If <u>part</u> of an approved procedure is changed by you, has written approval been received from the necessary regulatory agencies for this change?	_____	_____	_____
Are monitoring and analyses being performed more frequently than required by permit? If YES, are results reported in permittee's self-monitoring report?	_____	_____	_____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS - BURLINGTON PLANT

**WATER
(4)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Are parameters other than those required by the permit analyzed?	_____	_____	_____
Are the methods used stated on the laboratory report sheet?	_____	_____	_____

LABORATORY QUALITY ASSURANCE AND QUALITY CONTROL

Commercial laboratory used? If so, name: _____

Commercial laboratory state certified? _____

Who is responsible for Laboratory Quality Assurance Program?

Are duplicate (precision) samples analyzed with each set of analyses? Frequency: _____	_____	_____	_____
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Are spiked (accuracy) samples analyzed with each set of analyses? Frequency: _____	_____	_____	_____
--	-------	-------	-------

Are precision control charts prepared and used?	_____	_____	_____
---	-------	-------	-------

Are accuracy control charts prepared and used?	_____	_____	_____
--	-------	-------	-------

Are intralaboratory quality control standards used for each permit parameter? Frequency: _____	_____	_____	_____
--	-------	-------	-------

Is satisfactory calibration and maintenance of laboratory instrument and equipment performed?	_____	_____	_____
---	-------	-------	-------

Are laboratory equipment calibrations and maintenance records kept for the required three-year period?	_____	_____	_____
--	-------	-------	-------

On analyses which require standards to be used in preparing calibration curves, are the curves prepared by using a blank and at least seven standards?	_____	_____	_____
--	-------	-------	-------

On analyses which require calibration curves or internal instrument calibration with standards, are blanks and standards analyzed with each set of samples in order to verify the calibration curve?	_____	_____	_____
--	-------	-------	-------

Are temperatures recorded on ovens(TSS) and incubators (BODs)? Frequency: _____	_____	_____	_____
---	-------	-------	-------

Are laboratory analytical balances checked using NBS weights?	_____	_____	_____
---	-------	-------	-------

Are glucose-glutamic acid standards analyzed with each set of samples analyzed for BODs?	_____	_____	_____
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Is Class A volumetric glassware used for permit-required analyses?	_____	_____	_____
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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS - BURLINGTON PLANT

**WATER
(5)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
<u>LABORATORY DATA REPORTING AND STORAGE</u>			
Are the following recorded on the laboratory report sheet:			
Sample location?	_____	_____	_____
Composite or grab?	_____	_____	_____
Date and time of collection?	_____	_____	_____
Sampler?	_____	_____	_____
Date and time analysis started?	_____	_____	_____
Analyst?	_____	_____	_____
Are sample results kept for the required three-year period?	_____	_____	_____
Are quality assurance and quality control records kept for the required three-year period?	_____	_____	_____
Weeds cut and vegetation growth in ponds removed?	_____	_____	_____
Banks and dikes maintained? (Erosion, etc.)	_____	_____	_____
Any reports of groundwater contamination from pond(s)?	_____	_____	_____
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? _____			

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS - BURLINGTON PLANT

**WATER
(6)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Is there a formal Spill Control Plan (SPCC)?	_____	_____	_____
Has the SPCC been approved by management?	_____	_____	_____
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? _____ Total amount of spill: _____			
 If more than 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? _____			
Results: _____			

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS - BURLINGTON PLANT

**WATER
(7)**

YES NO N/A

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 - BURLINGTON PLANT

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	_____	_____	_____
Suspension 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 relief valve discharges were reported in the last 12 months? _____			
Where did relief valve discharges go? ___ Flare ___ Atmosphere ___ Other			
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 _____	_____	_____	_____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS - BURLINGTON PLANT

**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.)			

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS - BURLINGTON PLANT

**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 - BURLINGTON PLANT

**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: _____

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

Comments: _____

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS - BURLINGTON PLANT

**AIR
(3)**

When was the last air emissions inventory? _____
DATE

List reported emissions rates: _____
Tons/Year

1. Hydrocarbons _____
2. Sulfur Dioxide _____
3. Nitrogen Oxides _____
4. Carbon Monoxide _____
5. Particulate _____
6. Vinyl Chloride _____
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

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS - BURLINGTON PLANT

**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

Who is responsible for gasoline health effects warnings?

Is gasoline health effects information posted in vehicle refueling areas?

YES NO N/A

12/8/82

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS - BURLINGTON PLANT

**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.	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
If this facility is a treater, storer, or disposer (TSD facility), does it have a final RCRA permit?	_____	_____	_____

Has this facility received its RCRA Part B application?	_____	_____	_____
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If yes, when is Part B application due? _____

Is Part B application being completed as per 40 CFR 264 & 270?	_____	_____	_____
--	-------	-------	-------

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS - BURLINGTON PLANT

**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?	_____	_____	_____
Has <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 - BURLINGTON PLANT

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? _____

Does this facility have an ongoing groundwater monitoring program? _____

If facility has a final RCRA permit, what phase of GW monitoring
exists at present? Detection___ Compliance___ Corrective Action___

If facility is still in interim status, is GW monitoring program
in compliance with the interim status requirements?

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TENNECO POLYMERS - BURLINGTON PLANT

**SOLID WASTE DISPOSAL
(4)**

How many monitoring wells are used? _____

How many wells are upgradient? _____

How many wells are downgradient? _____

How deep are the monitoring wells? _____

What are the wells monitored for? (40 CFR 265.92)

1. Set 1 Parameters: _____

2. Set 2 Parameters: _____

3. Set 3 Parameters: _____

4. Other: _____

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Have initial background concentrations been established for all of the parameters analyzed?	_____	_____	_____

Does this background information indicate any groundwater contamination?	_____	_____	_____
--	-------	-------	-------

If so, has a groundwater quality assessment program been established as per the interim status regulations?	_____	_____	_____
---	-------	-------	-------

What has been the total cost of the groundwater monitoring program? _____

What were the costs for the last 12 months? _____

Are monitoring-well results reported to state?	_____	_____	_____
--	-------	-------	-------

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

Do you receive hazardous waste from off-site?	_____	_____	_____
---	-------	-------	-------

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**SOLID WASTE DISPOSAL
(5)**

YES NO N/A

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.	_____	_____	_____

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?
(Provide a copy of last regulatory inspection.) _____

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**TENNECO OIL P&M
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**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.)

YES NO N/A

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? _____

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**UNDERGROUND STORAGE
(1)**

Does this facility have underground storage tanks?

YES NO N/A

Please tabulate information on underground storage including fuel tanks.

	<u>Tank Identification</u>	<u>Tank Volume</u>	<u>Material of Construction</u>	<u>Tank Age</u>	<u>Material Stored</u>
1.	_____	_____	_____	_____	_____
2.	_____	_____	_____	_____	_____
3.	_____	_____	_____	_____	_____
4.	_____	_____	_____	_____	_____
5.	_____	_____	_____	_____	_____
6.	_____	_____	_____	_____	_____
7.	_____	_____	_____	_____	_____
8.	_____	_____	_____	_____	_____
9.	_____	_____	_____	_____	_____
10.	_____	_____	_____	_____	_____

How often is stored product inventory reconciled? _____

What program is followed to insure early detection of potential leaks?

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**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?

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TENNECO POLYMERS - BURLINGTON PLANT

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 - BURLINGTON PLANT

COMMUNITY RELATIONS

(1)

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

Is this a decrease compared to the previous 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.)

**TENNECO OIL P&M
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TENNECO POLYMERS - BURLINGTON PLANT

**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.

TENNECO POLYMERS - BURLINGTON PLANT

(1)

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

[illegible]

**TENNECO OIL P&M
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S U M M A R Y
(2)

TENNECO POLYMERS - BURLINGTON PLANT

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

TEN0383

5/18/83

**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: _____

