

File



TOC P&M Environmental Affairs
(COMPANY)

INTEROFFICE COMMUNICATION

TO: Tenneco Polymers
FOR: Carl Stutts
FROM: R. D. Pruessner
RE: ENVIRONMENTAL REVIEW - PASADENA PLANT

DATE: December 28, 1983

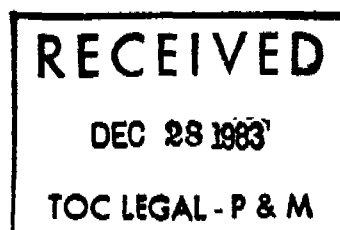
Your approval is requested for scheduling the Environmental Review of the Pasadena Plant and affiliated wastewater treatment facilities on February 14-16, 1984.

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. Pruessner

pm
Enclosure

cc: Pat Anderson
Charles Beresford
Lloyd Constant
Guy Disch
Jim Kachtick
Jim Langford
Ralph Maynard
Al Smith
Roger Towe



TENO 275

AGENDA

ENVIRONMENTAL REVIEW

TENNECO POLYMERS

February 14-16, 1984

TUESDAY - February 14

7:00 p.m. Supper for the Review Team and Polymer representatives at Dante's Italian Restaurant, 8103 Gulf Freeway.

WEDNESDAY - February 15

8:00 a.m. Meet with Carl Stutts to conform final plans for Environmental Review.

8:15 a.m. Meet with Jim Kachtick and staff to go over the information contained in completed Environmental Review forms.

11:30 a.m. LUNCH (Please bring in sandwiches.)

1:00 p.m. Meet with Jim Kachtick for plant tour.

4:00 p.m. Adjourn

THURSDAY - February 16

8:00 a.m. Visit with maintenance department representative to sight maintenance and calibration records for environmental equipment.

9:00 a.m. Visit environmental laboratory and sight required records on quality assurance, sample chain of custody, analytical procedures, etc.

11:00 a.m. Meet with Polymer representative to go over Dock portion of questionnaire.

11:30 a.m. LUNCH (Please bring in sandwiches.)

2:30 p.m. Meet with Carl Stutts and staff to review proposed findings and complete the final report. Provide copies of completed report to Carl Stutts, Jim Langford, Jim Kachtick, Guy Disch, and Bob Pruessner.

T E N N E C O O I L
P & M F A C I L I T I E S
E N V I R O N M E N T A L R E V I E W

T E N N E C O P O L Y M E R S - P A S A D E N A P L A N T
P O L Y V I N Y L C H L O R I D E F A C I L I T I E S

TENNECO OIL P&M
ENVIRONMENTAL REVIEW

February 14-16, 1984

Name and address of facility:

Tenneco Polymers
Pasadena Plant
4403 La Porte Road
P. O. Box 849
Pasadena, TX 77501-0849

Affiliated with:

Tenneco Oil P&M

Operations Manager:

<u>Carl Stutts</u> (Name)	<u>Plant Manager</u> (Title)	<u>(713) 479-3411</u> (Phone)
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Environmental Representative:

<u>Jim Kachtick</u> (Name)	<u>Mgr.-Environmental Sciences</u> (Title)	<u>(713) 479-3411</u> (Phone)
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Type of operation and/or principal products:

Polyvinyl Chloride

Review Team:

<u>Name</u>	<u>Title</u>	<u>Phone</u>
<u>Bob Pruessner</u>	<u>Mgr.Environmental Affairs-TOC</u>	<u>(713) 757-3306</u>
<u>Roger Towe</u>	<u>Sr.Environmental Eng.-TOC</u>	<u>(713) 757-7685</u>
<u>Charles Beresford</u>	<u>Attorney - TOC</u>	<u>(713) 757-8764</u>
<u>Pat Anderson</u>	<u>Mgr.Environmental Audits-TEN</u>	<u>(713) 757-3604</u>
<u>Lloyd Constant</u>	<u>Staff Chemist - Chalmette</u>	<u>(504) 279-2480</u>

**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.)

	Permitted Avg	Max	Typical Avg	Actual Max	No. of Self-Reporting Violations-Last 12 Mos.
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

**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

**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

**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

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?	_____	_____	_____
--	-------	-------	-------

Is Class A volumetric glassware used for permit-required analyses?	_____	_____	_____
--	-------	-------	-------

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**WATER
(5)**

LABORATORY DATA REPORTING AND STORAGE

YES NO N/A

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?

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(s)?

If YES, give details:

Seepage reported?

Adequate freeboard (2 feet) to prevent overflow?

Effluent release is:

_____ Continuous _____ Intermittent _____ Seasonal

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**WATER
(6)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
What is the receiving stream?			

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?	_____	_____	_____
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Are briefings scheduled to insure adequate understanding of the SPCC plan by company personnel?	_____	_____	_____
---	-------	-------	-------

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**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

DOCK OPERATIONS

(1)

YES NO N/A

Does this facility operate a ship or barge dock?

What materials were transferred across the dock the last 12 months?

Additional materials that may be transferred in the future.

Does the spill control plan include the dock facilities?

What is the volume of the spill containment for the transfer facility?

What emergency spill containment equipment (booms, absorbent, etc.) are owned and available at the facility?

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

DOCK OPERATIONS

(2)

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Have arrangements with other organizations been made for emergency spill cleanup support?	_____	_____	_____

Who? _____

Do any of the materials transferred or anticipated to be transferred meet the Coast Guard definition of "oil," i.e., oil of any kind or in any form, including but not limited to petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil?"

If the transferred materials fall within the Coast Guard definition of "oil," an operations manual meeting the requirements of Coast Guard Regulation (CFR 33 Part 154--Oil Pollution Regulations for Marine Oil Transfer Facilities) is required. Has an operations manual been prepared meeting these requirements?
(Please provide a copy of the manual.)

- (1) If an operations manual has been prepared, has it been submitted to the Coast Guard "Captain of the Port" (required no later than March 3, 1983)?
- (2) Has the Captain of the Port issued a "letter of adequacy"?
- (3) Have amendments to the dock operations manual been made since the issuance of the Coast Guard "letter of adequacy"?
- (4) Are copies of the dock operations manual available to dock operations personnel?
- (5) Has this facility designated "persons in charge of facility oil transfer operations" and advised the Captain of the Port of this designation in writing?
- (6) Are current (annual) hose pressure tests and inspection records available at this facility?

If the transferred materials do not fall within the Coast Guard definition of "oil" but do fall within the requirements of 33CFR126 --Handling of Explosives or Other Dangerous Cargoes Within or Contiguous to Waterfront Facilities--has a dock operations manual been prepared for this facility?

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

DOCK OPERATIONS

(3)

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
(1) If an operations manual has been prepared, are copies available to dock operations personnel?	_____	_____	_____
(2) Does the operations manual contain the following:			
A. Documentation that the dock operator is a qualified operator?	_____	_____	_____
B. Dates and results of the most recent cargo hose and piping hydrostatic tests?	_____	_____	_____
C. Cargo information cards listing the following:			
a. Cargo identification characteristics (appearance, odor, etc.)?	_____	_____	_____
b. Emergency procedures?	_____	_____	_____
c. Fire fighting procedures?	_____	_____	_____

**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	_____	_____	_____
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 _____	_____	_____	_____

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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.)			

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**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.	_____	_____

**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

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**AIR
(4)**

What parameters are monitored?

Has air monitoring data shown exceedances 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

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

	<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?	_____	_____	_____
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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**Solid Waste Disposal
(3)**

How are empty drums disposed of?

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
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?	_____	_____	_____
What types of hazardous waste <u>treatment</u> are accomplished <u>on site</u> ?			
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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**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? _____

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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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**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?

YES NO N/A

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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)

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
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 <u>marked</u> PCB storage area?	_____	_____	_____
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>without</u> 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.			

When are PCB's expected to be eliminated from this facility? _____

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HIGHLY VOLATILE LIQUID PIPELINE

(1)

Name of pipeline: _____

When was pipeline constructed? _____

What is pipe diameter? _____

Length of pipeline? _____

What products are transported? _____

Normal operating rate and pressure: _____

Maximum operating rate and pressure: _____

Date of latest hydrostatic test: _____

Do current DOT regulations require additional pressure testing? _____
YES NO N/A

How often are pipeline rights-of-way inspected? _____

Who conducts these inspections? _____

(Provide a copy of a typical inspection.)

How often are navigable waterway crossings inspected? _____

Are all line markers provided as required? _____

Do the markers contain the proper wording as required as well as
emergency phone numbers? _____

How many pump stations are on this pipeline? _____

What is the source of power?	Electric	Yes _____	No _____	N/A _____
	Gas	Yes _____	No _____	N/A _____
	Diesel	Yes _____	No _____	N/A _____

What provisions are made to shut down pumps in event of pipeline leak?

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HIGHLY VOLATILE LIQUID PIPELINE

(2)

Are herbicides used to control right-of-way vegetation growth?

YES NO N/A

If herbicides are used--what kind is used? _____

How applied? Aerial _____ Ground _____

Are licensed applicators used to apply herbicide?

YES NO N/A

Have adjacent land owners complained about herbicide problems?

YES NO N/A

If so, give brief description.

Is cathodic protection provided for the pipeline?

YES NO N/A

What type? _____

How often is cathodic protection current measured? _____

How often is cathodic protection pipeline to ground potential
measured? _____

(Please provide representative records of cathodic protection maintenance.)

How is the "Public Education" provision of 195.440 administered?

What material, if any, is discharged from the pipeline during
testing or cleaning? _____

How often? _____

Where? _____

What is final disposition of material? _____

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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.)

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**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.

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S U M M A R Y
(2)

THE FOLLOWING ITEMS REQUIRE LOCAL OPERATIONS MANAGEMENT ATTENTION:

<u>ITEM #</u>	<u>DESCRIPTION</u>	<u>SPECIFIC IMPROVEMENT NEEDED</u>	<u>DOES LOCAL MGMT AGREE</u>	<u>INDIVIDUAL RESPONSIBLE FOR COMPLETION OF CORRECTIVE ACTION</u>	<u>DATE FOR COMPLETION OF IMPROVEMENTS</u>

TEN0310

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**TENNECO OIL P&M
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**SUMMARY
(3)**

Unresolved questions raised as a result of the Environmental Review.

Question # _____

Responsible party: _____

Date for answer: _____

Answer:

Date answered: _____

