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CHEMICAL MANUFACTURERS ASSOCIATION

May 15, 1985

TO SELECTED EXECUTIVE CONTACTS OF CMA MEMBER COMPANIES

Dear Executive Contact:

As you are aware, a great deal of Congressional attention has been focused on the adequacy of existing regulations for toxic air emissions. In February, Congressman Henry A. Waxman requested information from many CMA members on releases to the atmosphere. Congressman Waxman's request was not coordinated through CMA, and the substance of the request was not clear. However, based on responses to his request, Congressman Waxman compiled a list of 196 "unregulated air toxins".

Recently, CMA received the attached request from Congressman John D. Dingell, Chairman, House Subcommittee on Oversight and Investigations, to obtain information from our members on monitoring and detection systems and emergency response systems. Chairman Dingell has requested CMA to select three specific areas and survey its members with plant facilities located in these areas. We have responded to Chairman Dingell that this survey will be coordinated by CMA and conducted in a timely manner. Cooperation in this survey has been endorsed by the CMA Executive Committee.

Today, we request your assistance in completing this project. An Environmental Management Committee Task Force has selected the following areas to survey:

- o New Orleans/Baton Rouge Corridor - includes the Parishes of Ascension, East Baton Rouge, Jefferson, Iberville, Livingstone, Orleans, Plaquemine, St. Bernard, St. Charles, St. James, St. John the Baptist, West Baton Rouge.
- o Philadelphia/Wilmington/South New Jersey - includes the Counties of Bucks, PA; Chester, PA; Delaware, PA; Montgomery, PA; Philadelphia, PA; Burlington, NJ; Camden, NJ; Gloucester, NJ; Mercer, NJ; Salem, NJ; and New Castle, DE.
- o Niagara Falls/Buffalo - includes the Counties of Erie and Niagara, NY.

CMA has prepared a questionnaire which will facilitate your response to Chairman Dingell's request. We have enclosed copies of the attached questionnaire to be forwarded to your plant facilities located in the three areas. Our information indicates that your company has the following number of plant facilities within each area:

New Orleans

1

Grissom

Philadelphia

2

Norrisdon

Niagara Falls

0

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Please notify CMA, (see contact below) if the information on plant facilities in these three areas is incorrect. We recognize that there will be additions and deletions to our plant list.

The questionnaire has been prepared to respond to the needs of Chairman Dingell and to be responsive to time constraints. Please forward your completed questionnaire by June 14 directly to:

Mr. William P. Gullledge
Chemical Manufacturers Association
2501 M Street, NW
Washington, D.C. 20037
(202) 887-1188

All the completed questionnaires will be forwarded directly to Chairman Dingell shortly thereafter.

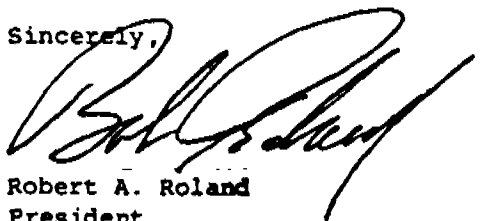
CMA has scheduled two workshops to assist corporate and/or plant personnel in completing the questionnaires:

- May 24-New Orleans Sheraton, 8:00 a.m. - 12:30 p.m.
- May 28-Cherry Hills Hyatt, NJ, 12:00 p.m. - 5:00 p.m.

Please contact Ms. Romy Pettersen at (202) 887-1183, as soon as possible, with the names of individuals who will be registering for these workshops. Persons responding to the survey should contact W. P. Gullledge with any technical questions.

CMA strongly believes that participation in this effort is vital to communicating to Congress the presence of chemical industry monitoring and detection systems and emergency response systems for hazardous air pollutants. A high response rate on this questionnaire is an essential element for CMA being able to effectively advocate on hazardous air pollutant issues before Congress. We appreciate your timely assistance in this very important effort.

Sincerely,



Robert A. Roland
President

cc: Environmental Contacts

BOR 014574

CMA QUESTIONNAIRE ON MONITORING
AND DETECTION SYSTEMS AND
EMERGENCY RESPONSE

(This page will be removed prior to submission to Congressman Dingell. The information given below will be used by CMA and/or its contractor, TRC Environmental Consultants, to contact individuals preparing a given response. Contact will be made as needed to clarify answers. A separate cover letter to be included in your response to Congressman Dingell may also be submitted, if desired.)

Name, Title and Phone Number of Key
Individual Responding to This Questionnaire

Company/Plant Name
and Address

CMA QUESTIONNAIRE ON MONITORING AND DETECTION
SYSTEMS AND EMERGENCY RESPONSE SYSTEMS

1. Company Name _____
2. Location (City, State, County) _____

PLEASE ANSWER ALL OF THE FOLLOWING QUESTIONS WITH REGARD TO SIC 2800 ONLY.

GENERAL FACILITIES INFORMATION

3. What are the major product lines of this facility according to the 2800 Series SIC codes listed below? (please check all that apply)

____ Alkalies and Chlorine
____ Industrial Gases
____ Inorganic Pigments
____ Industrial Inorganic Chemicals
____ Plastics Materials, Synthetic Resins and Nonvulcanizable Elastomers
____ Synthetic Rubber
____ Cellulosic Manmade Fibers
____ Synthetic Organic Fibers
____ Botanical Products
____ Medicinal Chemicals and Biological Products
____ Pharmaceutical Preparations
____ Soap and Other Detergents
____ Specialty Cleaning, Polishing, and Sanitation Preparations
____ Surface Active Agents, Finishing Agents
____ Perfumes, Cosmetics and Other Toilet Preparations
____ Paints, Varnishes, Lacquers, Enamels and Allied Products
____ Gum and Wood Chemicals
____ Cyclic Crudes, Cyclic Intermediates, Dyes and Organic Pigments
____ Industrial Organic Chemicals, Not Elsewhere Classified
____ Nitrogenous Fertilizers
____ Phosphatic Fertilizers
____ Fertilizers, Mixing Only
____ Pesticides and Agricultural Chemicals, Not Elsewhere Classified
____ Adhesives and Sealants
____ Explosives
____ Printing Ink
____ Carbon Black
____ Chemicals and Chemical Preparations, Not Elsewhere Classified

4. Approximately how many products are produced at this facility?

Number of Products _____

(A "process unit" is defined as components assembled to produce, as intermediate or final products one or more chemicals. A process unit should be able to operate independently if it is provided with sufficient feed or raw materials and storage facilities for the product.)

6. Please list all materials that are used at this facility in the manufacture of chemicals for commercial distribution. This would include raw materials, isolated intermediates and products. (Do not include un-isolated intermediates or research quantity materials not intended for commercial distribution.)

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BOR 014577

7. What is the approximate population within:

	<u>0</u>	<u>1-100</u>	<u>101-10000</u>	<u>1001-10000</u>	<u>10001-100000</u>	<u>Greater than 100000</u>
1/2 Mile	—	—	—	—	—	—
1 Mile	—	—	—	—	—	—
2 Miles	—	—	—	—	—	—
5 Miles	—	—	—	—	—	—

8. How many company employees work at this facility? ____

OPERATIONAL CONTROLS

9. In this facility, approximately how many of the following devices are used for operational control of process units, and material handling and storage?

	0	1-10	11-100	Quantity 101-1000	1001-10000	Over 10000
Vibration Monitoring	—	—	—	—	—	—
Corrosion Monitoring	—	—	—	—	—	—
Stress Monitoring	—	—	—	—	—	—
Temperature Sensors	—	—	—	—	—	—
Pressure Sensors	—	—	—	—	—	—
Flow Sensors	—	—	—	—	—	—
Level Indicators	—	—	—	—	—	—
pH Meters	—	—	—	—	—	—
Specific Gravity Indicators	—	—	—	—	—	—
Oxygen Detectors	—	—	—	—	—	—
Specific Gas Analyzers (e.g., chlorine, H ₂ S)	—	—	—	—	—	—
Gas Chromatographs	—	—	—	—	—	—
Oxidation-Reduction Potential Indicators	—	—	—	—	—	—
Moisture Detectors	—	—	—	—	—	—
Explosive Vapor Monitors	—	—	—	—	—	—

10. Which of the above devices would be used for prevention, early warning, or detection of potential or impending releases? Explain.

11. Are there other procedures/systems in use which would help prevent upset releases to the atmosphere? Please explain.

12. Please indicate how the outputs of the devices listed below are generally monitored. Indicate the approximate number of devices monitored by each method.

	<u>Local Indicator</u>	<u>Control Room Indicators</u>	<u>Chart Recorders</u>	<u>Directly Wired to Process Control System</u>
Vibration Monitoring	—	—	—	—
Corrosion Monitoring	—	—	—	—
Stress Monitoring	—	—	—	—
Temperature Sensors	—	—	—	—
Pressure Sensors	—	—	—	—
Flow Sensors	—	—	—	—
Level Indicators	—	—	—	—
pH Meters	—	—	—	—
Specific Gravity Indicators	—	—	—	—
Oxygen Detectors	—	—	—	—
Specific Gas Analyzers (e.g., chlorine, H ₂ S)	—	—	—	—
Gas Chromatographs	—	—	—	—
Oxidation-Reduction Potential Indicators	—	—	—	—
Moisture Detectors	—	—	—	—
Explosive Vapor Monitors	—	—	—	—

Other (explain): _____

13. Which of the following guidelines determine frequency of inspection and maintenance on these control devices?

	<u>Standard Operating Procedures</u>	<u>Product Quality Control</u>	<u>Malfunction Indicator</u>	<u>Prompts from Preventive Maintenance System</u>	<u>Safety Procedures</u>
Vibration Monitoring	—	—	—	—	—
Corrosion Monitoring	—	—	—	—	—
Stress Monitoring	—	—	—	—	—

Temperature Sensors	_____	_____	_____	_____	_____
Pressure Sensors	_____	_____	_____	_____	_____
Flow Sensors	_____	_____	_____	_____	_____
Level Indicators	_____	_____	_____	_____	_____
pH Meters	_____	_____	_____	_____	_____
Specific Gravity	_____	_____	_____	_____	_____
Indicators	_____	_____	_____	_____	_____
Oxygen Detectors	_____	_____	_____	_____	_____
Specific Gas Analyzers	_____	_____	_____	_____	_____
(e.g., chlorine, H ₂ S)	_____	_____	_____	_____	_____
Gas Chromatographs	_____	_____	_____	_____	_____
Oxidation-Reduction	_____	_____	_____	_____	_____
Potential Detectors	_____	_____	_____	_____	_____
Moisture Indicators	_____	_____	_____	_____	_____
Explosive Vapor Monitors	_____	_____	_____	_____	_____

Other (explain): _____

14. Is this facility subject to routine inspections or audits? If so, please discuss types of audits (e.g. environmental, industrial hygiene or safety), frequency and scope.

Please complete questions 15 through 23 for each process unit including related storage and handling. (Copy additional question sheets for each unit as required.)

EMISSIONS MONITORING AND DETECTION (ROUTINE AND ALLOWABLE)

15. Identification of Process Unit _____

16. Identify ambient chemical monitoring systems or devices used at this process unit.

Fixed Point, Continuous Monitoring _____

Displays Real-Time Concentration _____

Signals at Predetermined Concentration _____

Portable Gas Detectors _____

Detector Tubes _____

Personal Dosimeters (Digital Display or Alarm) _____

Industrial Hygiene Sampling Monitor _____

Grab Samples _____

Detection of Odors by Operating Personnel _____

Other (describe): _____

17. For the devices/systems listed above in Question 16, where are sensor and sampling points located?

	Within Process Unit Areas	Elsewhere on Plant Grounds	At Plant Boundary	Off Plant Property
Fixed Point Continuous Monitoring				
Portable Gas Detectors				
Detector Tubes				
Personal Dosimeters (Digital Display or Alarm)				
Industrial Hygiene Sampling Monitor				
Grab Samples				
Detection of Odors by Operating Personnel				

Other (describe) _____

Please explain sensor location rationale. _____

18. Identify any stack or vent monitor systems or devices used at this process unit.

Grab Samples
Fixed Point, Continuous Monitoring

Displays Real Time Concentration
Signals at Predetermined Concentration

Flame detectors (e.g. Flares)
Other (describe): _____

BOR 014582

19. What guidelines determine how often ambient and in-stack/vent monitoring devices are used?

	Standard Operating Procedure	Product Quality Control Procedures	OSHA/EPA/State Requirements	Labor Contracts	Insurance Requirements	At the Request of Inhouse Industrial Environmental Group	Process Safety
AMBIENT							
Fixed Point Continuous Monitors							
Portable Gas Detectors							
Detector Tubes							
Personal Dosimeters							
Industrial Hygiene Sampling Monitors							
Grab Samples							
Odor Monitoring							
Other							
IN-STACK/VENT							
Grab Samples							
Fixed Point Continuous Monitor							
Flame Detector (e.g., flare)							
Other							

20. What guidelines determine frequency of inspection and maintenance on ambient and in-stack devices?

	Standard Operating Procedure	Product Quality Control Procedure	OSHA/EPA/State Requirements	Malfunction Indicator	Prompts from Preventive Maintenance System	Manufacturers Recommendations
AMBIENT						
Fixed Point Continuous Monitors						
Portable Gas Detectors						
Detector Tubes						
Personal Dosimeters						
Industrial Hygiene Sampling Monitors						
Grab Samples						
Odor Monitoring						
Other						
IN-STACK/VENT						
Grab Samples						
Fixed Point Continuous Monitor						
Flame Detector (e.g., flare)						
Other						

21. Please list the specific chemicals or classes of compounds detected by ambient and in-stack systems.

Ambient

Chemicals

Grab Samples _____
Personal Dosimeters _____
Continuous Monitors _____
Portable Gas Detectors _____
Detector Tubes _____
Industrial Hygiene
Sampling Monitors _____
Detection of Odors _____
Other _____

In Stack/Vent

Grab Samples _____
Continuous Monitors _____
Flame Detectors _____
Other _____

22. How are routine emissions to the atmosphere determined for this process unit?

_____ Measured
_____ Calculated by:
_____ Material Balance
_____ EPA Emission Factors
_____ Process Design
_____ Engineering Estimates
_____ Other (describe): _____

Please comment on how often these are updated and how they are recorded.

23. How are routine emissions to the atmosphere determined for storage units?

_____	Measured
_____	Calculated by:
_____	Material Balance
_____	EPA Emission Factors
_____	Process Design
_____	Engineering Estimates
_____	Other (describe): _____

Please comment on how often these are updated and how they are recorded.

PERIMETER AND COMMUNITY MONITORING PROGRAMS

24. If appropriate, please describe additional monitoring programs, (perimeter, community, etc.) and the frequency of such monitoring.

25. Please indicate the meteorological parameters that are monitored at this facility.

	Unit Location	Plant Property	Off-Property Sites
Wind Direction	_____	_____	_____
Wind Speed	_____	_____	_____
Temperature	_____	_____	_____
Sigma Theta	_____	_____	_____
Delta Temperature	_____	_____	_____
Relative Humidity/ Dew Point	_____	_____	_____

NON-ROUTINE RELEASES AND EMERGENCY RESPONSE

26. For each of the following systems, please indicate the chemicals in use at this facility for which this type of monitoring system would provide an indication of an unintentional or non-routine release to the atmosphere.

Chemicals

On-Site Monitoring
By Operating Personnel (e.g.
visual, odor)

Personnel Monitors

In-Stack Monitors

Process Equipment Monitors

In-Process Area Monitors

Process Unit Perimeter Monitors

Plant Perimeter Monitors

Community Monitors

Comments

27. For each type of monitoring system described above, select one chemical and provide an explanation including the following:

Number of Sensors

Location of Sensors

Type of Recording System

Location of Alarms

Rationale for Selecting Monitoring System

Chemicals

On-Site Monitoring

By Operating Personnel (e.g.
visual, odor)

Personnel Monitors

In-Stack Monitors

Process Equipment Monitors

In-Process Area Monitors

Process Unit Perimeter Monitors

Plant Perimeter Monitors

Community Monitors

Comments _____

28. Is there an emergency response plan at this facility?

_____ Yes

_____ No

29. Please identify the title of the person(s) designated to contact public safety officials in the event of an emergency.

30. Should this person be unavailable on-site, who is on-call to respond, (title) _____

Comments _____

31. What is the estimated lag-time between detection of a release requiring emergency action and contacting public safety officials?

Comments _____

32. How often are plant emergency response procedures reviewed/revised?

- _____ Every 6 months
_____ 6 Months to 1 Year
_____ 1 to 2 Years
_____ 2 Years or more

33. Please identify agencies with which this facility coordinates its emergency response plans:

_____ Local Fire Department
_____ Local/County Police
_____ Local Civil Defense
_____ State Police
_____ Industry Mutual Aid Assn.
_____ Federal Emergency Management Agency (FEMA)
_____ Hospital Emergency Rooms
_____ Other (please explain) _____

34. Indicate the number of times per year this facility regularly participates in the following?

_____ Emergency Response Drills with Public Safety Personnel (e.g. fire department)
_____ Emergency Response Drills with Federal Agencies (e.g., Coast Guard)
_____ Emergency Response Drills with Mutual Aid Association
_____ Other (please explain) _____

35. What company resources are available to assist public safety officials in the event of an emergency?

_____ Personnel
_____ Equipment
_____ Technical Assistance to Evaluate Impact
_____ Communication Network
_____ Trained Emergency Response Team
_____ Other (please explain) _____

36. Please describe the emergency response procedures/systems employed at this facility (include key highlights of special features, e.g., automation, use of special equipment, dispersion modeling, training drills etc.)

37. Please describe your system, computerized or otherwise, for predicting the speed and direction of a releases.

Please indicate which of the following emission reporting requirements apply to your facility.

EMISSION REPORTING REQUIREMENTS

38. FEDERAL NEW SOURCE PERFORMANCE STANDARDS (NSPS)

- ☐ Fossil Fuel-Fired Steam Generators
- ☐ Incinerators
- ☐ Nitric Acid Plants
- ☐ Sulfuric Acid Plants
- ☐ Wet-Process Phosphoric Acid Plants
- ☐ Super Phosphoric Acid Plants
- ☐ Diammonium Phosphate Plants
- ☐ Triple Super Phosphate Plants
- ☐ Granular Triple Phosphate Storage Facilities
- ☐ Stationary Gas Turbines
- ☐ Lime Manufacturing Plants
- ☐ Ammonium Sulfate Manufacture
- ☐ Equipment Leaks in the Synthetic Organic Chemical Manufacturing Industry
- ☐ Synthetic Fiber Production Facilities
- ☐ Other _____

39. FEDERAL NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPs)

- ☐ Mercury
- ☐ Vinyl Chloride
- ☐ Equipment Leaks of Benzene
- ☐ Other _____

40. STATE EMISSION REPORTING REQUIREMENTS

(Please answer for the state where the facility is located.)

I. Delaware

- ☐ Report of discharge in absence of permit or in excess of permit conditions (§6028 of Delaware Environmental Protection Law)
- ☐ Report of excess emissions from facility required to install continuous monitoring system (Regulation No. XVII, §4.1; Regulation No. XX, § 1.2(3))
- ☐ Report of emission of potentially hazardous particulate matter (Regulation No. V, §7)
- ☐ Other _____

41. LOCAL EMISSION REPORTING REQUIREMENTS

Does the city, town, county or other local entity in which this facility is located have laws or regulations which require reporting of chemical emissions? _____

If so, please provide the following information as to each such requirement.

Data Reported _____

Responsible Agency _____

Frequency of Reporting _____

Penalties for Late, False, or No Report _____

42. EMISSION REPORTING REQUIREMENTS IN PERMITS AND SIP's

Please provide the following information for permit or State Implementation Plan (SIP) provisions which require reporting of chemical emissions by this facility.

Data Reported _____

Responsible Agency _____

Frequency of Reporting _____

Penalties for Late, False, or No Report _____

43. Please indicate, for the reporting requirements which apply to this facility, whether you believe these requirements are adequate, onerous, duplicative or otherwise unnecessary. Also suggest any possible improvements in these requirements.

NOTE:

Emission reporting is also required under the Comprehensive Environmental Response, Compensation and Liability Act (Superfund).

Section 103 requires reporting of any release of a hazardous substance in excess of the reportable quantity. Since this requirement applies to all facilities, CMA will address this requirement in its portion of the overall response to Congressman Dingell.

44. OTHER

If there are other issues in Congressman Dingell's letter you wish to address, please use the space below:
