



TOC P&M Environmental Affairs
(COMPANY)

INTEROFFICE COMMUNICATION

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

DATE: May 17, 1985

Your approval is requested for scheduling the Environmental Review of the Burlington Plant on July 23-25, 1985.

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

R. D. Pruessner

pm

Enclosure

pc: Charles Beresford
Russell Bowers
Walt Fogelsanger
Jim Kachtick
Fred Kanzler
Frank Koslosky
Ralph Maynard
Al Smith
Lloyd Stewart

RECEIVED

MAY 17 1985

TOC LEGAL - P & M

TEN0 426

AGENDA

**ENVIRONMENTAL REVIEW
Tenneco Polymers - BURLINGTON PLANT**

July 23-25, 1985

Tuesday, July 23

11:15 a.m. Depart Houston Intercontinental on Continental 372.

3:00 p.m. Arrive Philadelphia airport. Obtain large Avis car and drive to Burlington, New Jersey.

About

5:00 p.m. Check in Hilton on Highway 295 in Mount Laurel, New Jersey.

6:30 p.m. Supper for the Review Team and Polymers' representatives at the Village Inn, Route 541. Fred Kanzler will please make reservations for the Review Team (5 people) from Houston and the Burlington plant staff.

Wednesday, July 24

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

July 23-25, 1985

Thursday, July 25

- 8:00 a.m.** Review wastewater treatment plant performance status.
- 9:00 a.m.** Review groundwater monitoring program status.
- 10:00 a.m.** Review overall plan for future handling of solid waste and the dewatering facilities.
- 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, Frank Koslosky, Russell Bowers 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 Intercontinental.

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

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

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

July 23-25, 1985

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:

<u>Ron Neugold</u> (Name)	<u>Plant Manager</u> (Title)	<u>(609) 386-9200</u> (Phone)
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Environmental Representative:

<u>Fred Kanzler</u> (Name)	<u>Environmental Coordinator</u> (Title)	<u>(609) 386-9200</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>Charles Beresford</u>	<u>Attorney - TOC Legal</u>	<u>(713) 757-8764</u>
<u>Jim Kachtick</u>	<u>Mgr. Environmental Sciences-TOC</u>	<u>(713) 479-3411</u>
<u>Lloyd Stewart</u>	<u>Mgr. Environmental Audits-TEN</u>	<u>(713) 757-4100</u>
<u>Walt Fogelsanger</u>	<u>Plant Engineer-Polymers</u>	<u>(201) 782-4011</u>

5/15/85

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**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 H. R. Bowers

Title Vice President - Chemicals

Name Frank Koslosky

Title Director of Operations

Name _____

Title _____

Name _____

Title _____

Name _____

Title _____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS - BURLINGTON PLANT

ENVIRONMENTAL STAFFING

(2)

Please list name 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 analyses, etc.

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

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

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

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

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS - BURLINGTON PLANT

**WATER
(1)**

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?

How often? _____ 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?	_____	_____	_____

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**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: _____	_____	_____	_____
--	-------	-------	-------

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?	_____	_____	_____
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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.)	_____	_____	_____
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: _____

6/26/84

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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 device(s) 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.)			

4/25/83

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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: _____

**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 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 - BURLINGTON PLANT

SOLID WASTE DISPOSAL

(1)

	<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>
Is any hazardous waste disposed of in a landfill as free liquid? If so, were arrangements made for another type disposal of this waste after May 1985, since this practice then prohibited?	_____	_____	_____
_____	_____	_____	_____

Does this facility produce, distribute, or burn any fuel derived from hazardous waste? Discuss: _____	_____	_____	_____
_____	_____	_____	_____

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

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 is a TSD facility which does not yet have a final RCRA permit, 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 <u>uniform</u> manifests used with each off-site load of hazardous waste?	_____	_____	_____
Are <u>all</u> hazardous waste manifests accounted for?	_____	_____	_____
Starting 9/1/85, <u>generators</u> must certify on their manifests that they have a program in place to reduce the volume and/or quantity and toxicity of their hazardous waste. Does this facility have such a program?	_____	_____	_____
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?

	<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 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?

TEN0 448

6/26/84

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

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? (If so, please provide list of background concentrations.)	_____	_____	_____

Does this background information indicate any groundwater contamination? (Make data available.)	_____	_____	_____
---	-------	-------	-------

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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TENNECO POLYMERS - BURLINGTON PLANT

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.)

12/12/83

TEN0 450

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS - BURLINGTON PLANT

**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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TENNECO POLYMERS - BURLINGTON PLANT

**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?

**TENNECO OIL P&M
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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?

TEN0 453

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**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 -- FLEMINGTON PLANT

COMMUNITY RELATIONS/EMERGENCY PLANS
(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?

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Does this facility have an Emergency Contingency Plan? (If so, please make a copy available.)	---	---	---

Has the Emergency Contingency Plan been updated in the last 12 months?	---	---	---
--	-----	-----	-----

Does this facility have a system set up to make timely notification of the occurrence of emergencies to TOC P&M (Houston)?	---	---	---
--	-----	-----	-----

TENO 455

5/15/85

TENNECO OIL P&M
ENVIRONMENTAL REVIEW

TENNECO POLYMERS -- FLEMINGTON PLANT

COMMUNITY RELATIONS/EMERGENCY PLANS
(2)

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

With what local agencies has this facility discussed emergency procedures? (e.g. Sheriff's Department, Fire Department, etc.)

Which of these agencies have been given Material Safety Data Sheets (MSDSs) or hazardous substance information sheets to make them more knowledgeable about the facility's principal products?

List the principal products for which MSDSs or hazardous substance information sheets have been provided to local agencies:

Does this facility have a "neighbor warning" plan established, such as coordination with local sheriff or police, telephone calling system, etc.?

YES _____ NO _____ N/A _____

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.

5/10/85

TEN0 456

TENNECO POLYMERS - BURLINGTON PLANT

(1)

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

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

TEN0458

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: _____

