

TEG: JBL: ~~MMG~~: RF
XF: Done

TO: R. E. Lehmkuhl

FROM: T. G. Grumbles
DATE: December 6, 1985

Interoffice
Communication

SUBJ: ENVIRONMENTAL, SAFETY, AND HEALTH CONSIDERATIONS - KENTUCKY
COMPOUNDING PLANT

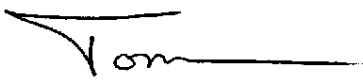
VISTA

Attached is a memo from Joe Ledvina regarding regulatory environmental concerns in acquiring and operating the subject plant. Since the plant last operated, several environmental regulatory changes have occurred, specifically in the RCRA hazardous waste management area. In particular, items 2,4,7, and 8 on the list would be impacted by the RCRA changes. For example if we needed to dispose of hazardous waste during a general site clean-up prior to operation, a generator I.D. number would probably be needed to allow acceptance of the waste at a disposal site. Please let me know if you would like to discuss these items.

In addition to those items listed in the attached memo, there would be safety and health concerns in operating the plant. They include those listed below.

1. OSHA General Industry Standards compliance. This would include general accident prevention programs, recordkeeping, electrical and machinery safety, etc.
2. Since the plant last operated, the OSHA Medical and Exposure Records Access Standard, Hazard Communication Standard, and Hearing Conservation Standard have been promulgated. Based on my knowledge of the plant's operation all of these standards would impact the plant.
3. Compliance with the OSHA Lead Standard would be a consideration if lead is to be handled. At a minimum, a base line lead exposure survey would be required to determine personnel lead exposures. The results of the survey would determine further compliance needs including medical surveillance, routine air sampling, personal protective equipment needs, and engineering controls.

Many of the items listed have been discussed with existing plant management by Rick Melling but not all questions have been answered to our satisfaction. Specifically past site history, as it relates to potential groundwater contamination sources and hazardous waste activities, should be reviewed in detail. We will be available to assist in evaluating the site or assuring regulatory compliance for plant operations in any way necessary.


Thomas G. Grumbles

ajo/8
Attachment
cc DAK, WLM

VVV 000017584

TO: T. G. Grumbles

FROM: J. C. Ledvina
DATE: December 2, 1985

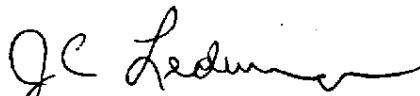
Interoffice
Communication

SUBJ: ENVIRONMENTAL CONSIDERATIONS - KENTUCKY COMPOUNDING PLANT

VISTA

Below are environmental items that need to be considered regarding the Kentucky Compounding Plant:

1. Arrangements with City for process wastewater and stormwater.
2. Estimate amount of hazardous waste and consider obtaining a RCRA EPA I.D. number. If I.D. number is obtained, need to have a contingency plan, do training, and contact local officials.
3. May need an air permit for VOC and/or boiler emissions. Best to discuss with State officials.
4. Does the site have any underground tanks?
5. Did the site ever use degreasing solvents to clean machinery? What happened to the solvents?
6. Does the plant have transformers or capacitors on the property? Who owns them? Do they contain PCBs?
7. Does the site have any old drums? What is in them?
8. Are there residues in the storage tanks? If so, an EPA I.D. number may be necessary before disposal of clean out material can take place.
9. Where are solid wastes going to be disposed of?


J. C. Ledvina

ajo/3

VVV 000017585