

TO: TGG

FROM: Frank G. Jeanson
DATE: November 13, 1991

SUBJ: ENVIRONMENTAL HIGHLIGHTS - 1991

I. Environmental Audits

A. Plants

1. Austin - Complete audit of all media; air, water, waste, etc.
2. Blane - Complete audit of all media; air, water, waste, etc.

B. Ex-Plant

1. Rhone Poulenc, Sedlia, MO - Audit with S&T toll processor of ethoxylates.
2. Royal Plastics, Toronto, Ontario, Canada - Audit with Conoco potential customer of pond resin.
3. Sun Polymers, St. Gabriel, LA - Audit with Conoco potential processor of pond resin.

C. Disposal Facilities

1. Laidlaw, Crowley, LA - Audit potential handler of haz. waste for LCCP.
2. Calgon, Pittsburg, PA - Audit potential recycler of waste for LCVCM.
3. Calgon, Hunnington, WV - Audit potential recycler of waste for LCVCM.
4. Safety Kleen, Louisville, KY - Audit potential handler of haz. waste for LCVCM.
5. CWM, Niagra Falls, NY - Audit disposal facility for Blane haz. waste.
6. Laidlaw, North Andover, MA - Audit haz. waste storage and transport terminal used by Blane.

7. Clean Harbors, Braintree, MA - Audit potential haz. waste storage and transport terminal for Blane.

8. Recovery Systems, Foxboro, MA - Audit recycler of waste oil used by Blane.

9. Hawk Plastics, Birmingham, AL - Audit potential recycler of by-product from Aberdeen.

II. Projects

A. Aberdeen Pond 2 Resin Recovery Project - Worked with Aberdeen plant obtaining customer, getting approval from Conoco, getting contracts put together.

B. Aberdeen Superfund Sites - Worked with plant, Conoco, and contractor (DERS) in completing Remedial Investigation, submitting report to the Miss. DEQ, working on follow up sampling program, and planning future work.

C. CMA 313 Reporting - Collected all plants 313 reports and sent in to CMA.

D. 313 Report Analysis - Put all of Vista's 313 report information together in a presentation format.

E. Industrial Toxics Project (33/50) - Attended EPA and CMA meeting, got input from plants on emissions reduction plans, and totaled emission reductions for total company.

F. Aberdeen Buried Drum Removal Project - Put together bid packet, evaluated 6 bids, worked with Conoco choosing contractor, and worked with legal putting together contract.

G. CMA Work Group - Member of RCRA Waste Classification Work Group.

H. Aberdeen Environmental Training - Participated in Environment training of engineering and management personnel.

I. Ex-Plant Audit Questionnaire - Worked with S&T revising their Ex-Plant Environmental Audit questionnaire.

J. CMA Waste Survey - Collected all of the plants completed forms and sent in to CMA. Also put out summary of 1989 vs. 1990 results.

K. CMA Pollution Prevention Code Self Analysis - Collected all of the plants completed forms and sent in to CMA. Also put out summary of 1989 vs. 1990 results.

L. LCCC Financial Assurance - Worked with Treasury, LCCC putting together financial assurance for closure of all TC haz. waste units.

M. Blane Underground Storage Tank Financial Assurance - Worked with Treasury putting together financial assurance documents for the fuel oil UST.

N. Vinyl Institute Initiator Bottle Recycle - Worked on committee to recycle initiator bottles on an industry wide basis. Also evaluated a bottle recycler for this project.

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JCL 1991 Highlights

Assisted Hammond in negotiations with the City of Hammond and Rhone-Poulenc regarding the Hammond wastewater permit. Helped convince the City that the Hammond Plant does not need a wastewater permit to discharge to Rhone-Poulenc.

Worked with the Aberdeen plant in negotiations with MSDEQ regarding the appropriate VCM unit risk factor to be used to evaluate fence line risk. Got DEQ to accept a more favorable factor which will avoid the need for emission reductions.

Assisted Aberdeen in negotiations with MSDEQ on a new wastewater discharge permit. Final permit was considerably less burdensome than the proposed version.

Lead a team to develop and submit Vinyl Institute comments on the Louisiana VCM air toxics limit. The Louisiana program was delayed approximately a year and the final limit has not been promulgated.

Participated in negotiations with EPA on the LCCC NPDES permit renewal. The EPA is issuing a compliance order that will allow sufficient time to implement VISION while temporarily not lowering permit limitations.

Did environmental training at Aberdeen on 6/13 and LCCP on 4/4-5.

Obtained Kosher certification for PTAU alcohols and glycerine.

Participated in contractor evaluation and selection for the Blane Phase II and III waste site remediation. Phase II is currently underway. The firm of CH2M-Hill was selected as the contractor.

Participated in negotiations and evaluation of alternatives for the Aberdeen groundwater, drum removal and resin reclaim project.

Analyzed the regulations and advised LCVCM regarding classification of several wastes streams as F024. The plant has installed an interim system to insure that F024 wastes are not sent to the wastewater treatment ponds.

Worked with LCLAB to analyze the impact of the Boiler and Industrial Furnace rule on ASO burning. The plant

decided to ship ASO off-site for destruction rather than permit the Hot Oil Heater as a RCRA facility.

Analyzed numerous provisions of the amended Clean Air Act and communicated the implications to plants and management.

Participated in 6 meetings with magazine editors to promote the environmental safety of LAS.

Held FDA training with the Lisle and Saddlebrook sales offices.

Lead the effort to support alcohol sales to Aristech by developing a SARA 313 delisting petition for DNOP. Radian was hired as the contractor and a draft petition has been written.

11/12/91

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TO: T. G. Grumbles

FROM: A. Clark

DATE: November 13, 1990

SUBJ: 1991 ACCOMPLISHMENTS

Per your request, here the major accomplishments in FY 1990 for the Product Safety Specialist position:

1. AC and AJO revised 5 material safety data sheets (MSDS) on the new form which includes expanded regulatory information. Twenty-four more are currently going through the approval process. Twenty new product MSDS's were generated. Forty-eight MSDS's had corrections made which caused reissue of those MSDS's. Sources for all MSDS data are being defined and documented for product liability concerns.
2. MJH participated in HM-126C Team with members of S&T to assure compliance with the Docket, Emergency Response Communication Standards.
3. AC reorganized HM-181 Team to continue developing compliance procedures for this Docket which will align the U.S. with international hazardous material transportation regulations.
4. AC led the DOT Team in conducting DOT Audits and Training at two plants, and two DOT Training sessions for S&T. Twenty plant personnel and 34 S&T personnel received training. Test scores from pre- to post-tests showed an average increase of 40% for all 4 classes.
5. AC responded to approximately 65 internal and external customer questions regarding MSDS's, TSCA, product constituents, regulatory status, etc.

Anne Clark *AC*

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