

6.2 Particulate Matter Emissions

Fiscal Year	Goal	Actual Performance
1998/99	<= 100 TPSI	80 TPSI
1999/00	<= 75 TPSI	80 TPSI (to date)
2000/01	<= 50 TPSI	
2001/02	<= 35 TPSI	
2002/03	<= 25 TPSI	

7.0 Revision History

Description of the Change	Revision
Revised procedure to conform to QSP-05	8/3/99

- 25 TPSI or less in FY02/03

5.2.5 The Environmental Incident objective and targets shall be achieved through implementation of the Corrective and Preventive Action procedure outlined in QSP-14.

5.2.6 Many steps have been taken by a subteam headed by the Resin Unit Manager to address particulate emissions. For a complete list of the action steps, refer to meeting minutes.

5.2.7 Corrective action shall be issued for each incident found to be a significant contributor to particulate emissions that occurs after May 1, 1999, as specified by the Aberdeen Plant Corrective and Preventive Action Procedure.

5.2.8 A Preventative action request may be issued by any person upon discovery of a reasonable opportunity to reduce particulate emissions.

6.0 Environmental Measures

6.1 Environmental Incidents

Incident Number	Date	Description
9798-1	7/2/97	NPDES DO violation outfall 001
9798-2	7/9/97	NPDES DO violation outfall 001
9798-3	7/23/97	NPDES DO violation outfall 001
9798-4	7/23/97	NPDES temperature violation outfall 001
9798-5	8/13/97	NPDES DO violation outfall 001
9798-6	8/20/97	NPDES temperature violation outfall 001
9798-7	8/20/97	NPDES DO violation outfall 001
9798-8	8/27/97	NPDES DO violation outfall 001
9798-9	10/29/97	NPDES BOD daily max violation outfall 001
9798-10	3/1/98	Wastewater bypass
9798-11	4/6/98	Wastewater bypass
9798-12	4/6/98	VCM release from railcar valve
9798-13	5/13/98	NPDES daily max ammonia violation outfall 001
9798-14	6/24/98	NPDES temperature violation outfall 001
9899-1	7/8/98	NPDES temperature violation outfall 001
9899-2	9/16/99	Wastewater bypass
9899-3	1/20/99	NPDES daily max ammonia violation outfall 001
9899-4	1/27/99	NPDES daily max ammonia violation outfall 001
9899-5	1/27/99	NPDES monthly average ammonia violation outfall 001
9899-6	1/30/99	VCM release from polishing strainer
9899-7	5/23/99	NESHAP 400 ppm daily average exceedence
9899-8	6/14/99	NESHAP 400 ppm daily average exceedence
9900-1	7/6/99	VCM release from sphere

- An environmental objective has been achieved.

4.3 The Management Review Committee or subteams organized for a specific task, shall establish programs for achieving environmental objectives and targets. Such programs shall be defined in this document.

4.4 The need to revise programs for achieving environmental objectives and targets shall be considered by the Management Review Committee or subteams organized for a specific task, whenever any of the following circumstances apply:

- An environmental target is not, or likely will not be, achieved.
- An action step is determined to be inadequate or unnecessary to achieve an environmental target.
- An environmental objective or target is revised.

4.5 Actual performance, relative to environmental objectives and targets, shall be recorded in section 6.0 of this procedure by the Environmental Department.

4.6 Attainment status of environmental objectives, targets and associated action steps shall be reviewed during Management Reviews.

4.7 The Environmental Manager shall communicate the attainment status of environmental objectives and targets quarterly to plant personnel by written and/or electronic communication.

5.0 Goals

5.1 Environmental Incidents Reduction

5.1.1 It is an objective of the Aberdeen plant to reduce the occurrence of Environmental Incidents by 90% relative to the baseline quantity established by paragraph 5.1.3 of this document.

5.1.2 This objective was selected in order to reduce environmental impacts attributable to the following environmental aspects:

- Hazardous substance releases to air, water and/or land from Aberdeen plant shipping containers
- Unpermitted hazardous air pollutant emissions to the air from on-site operations
- Unpermitted pollutant discharges to the Aberdeen POTW and James Creek
- Chemical emergency incidents at the Aberdeen plant
- Oil and hazardous substance discharges to the Aberdeen POTW and James Creek and land on-site
- Community anxiety about chemical emissions from the Aberdeen plant

5.1.3 The baseline quantity of Environmental Incidents is 35 incidents per year. This value is the number of such incidents during FY96/97.

5.1.4 Environmental Incident targets are as follows:

- 21 or less incidents in FY97/98
- 5 or less incidents in FY98/99

- 3 or less incidents in FY99/00
- 3 or less incidents in FY00/01
- 3 or less incidents in FY01/02

5.1.5 The Environmental Incident objective and targets shall be achieved through implementation of the Corrective and Preventive Action procedure outlined in QSP-14.

5.1.6 The following corrective and preventative actions have been taken to prevent recurrence of environmental incidents that occurred during the baseline period:

- Obtained NPDES permit modification to remove erroneous COD limitation.
- Maintain inventory of hydrogen peroxide to be used in the event of low dissolved oxygen content of effluent
- Installed filters and pit covers to reduce suspended solids in stormwater pit effluent.
- Reworked baghouses on storage silos to reduce suspended solids in stormwater effluent
- Established procedure to route centrate water through cooling towers to reduce effluent temperature
- Conducted study of firewater system and installed hardware to require manual selection of wastewater as firewater to eliminate unnecessary wastewater bypasses.
- Installed additional aeration to lower effluent ammonia concentrations.
- Removed process outfall from James Creek to Aberdeen POTW to reduce impact on James Creek

5.1.7 Corrective action shall be issued for each environmental incident that occurs after May 1, 1999, as specified by the Aberdeen Plant Corrective and Preventive Action Procedure, QSP-14.

5.1.8 Preventative action request may be issued by any person upon discovery of a condition that could potentially cause an environmental incident.

5.2 Particulate Matter Emission Reduction

5.2.1 It is an objective of the Aberdeen plant to reduce particulate emissions by 90% relative to the baseline quantity established by paragraph 5.2.3 of this document.

5.2.2 This objective was selected in order to reduce environmental impacts attributable to the following environmental aspects:

- Particulate Matter (PM) emissions to the air from on-site operations

5.2.3 The baseline quantity of particulate emissions is 250 total particles per sq. inch (TPSI) as found on the monitoring stands. Reductions in particulate emissions shall be determined relative to this baseline quantity.

5.2.4 Particulate Matter emissions reduction targets are as follows:

- 100 TPSI or less in FY98/99
- 75 TPSI or less in FY99/00
- 50 TPSI or less in FY00/01
- 35 TPSI or less in FY01/02

Approved by: Kenneth G. Ains
Environmental Manager

Date: 8/27/99

1.0 Purpose and Scope

This document establishes environmental objectives and targets for the Aberdeen plant, programs for achieving the objectives and targets, and procedures for establishing, reviewing and revising the objectives, targets and programs.

2.0 Responsibility

The Environmental Manager is responsible for reviewing and approving this procedure.

3.0 Definitions

Particulate Matter Emissions - The release (stack or fugitive) of solid particles from the process to the atmosphere. Of primary concern are visible particles (primarily PVC) that cause public nuisance.

Environmental Incident - An incident that meets any of the following criteria:

- A extremely hazardous substance release that is reportable under 40 CFR Part 355.
- Release of 5,000 pounds or more of a 112r flammable substance.
- An exceedance of an NPDES or Aberdeen City wastewater discharge permit limitation, or a failure to conduct discharge monitoring that is required by such permits.
- An exceedance of a Vinyl Chloride NESHAP limitation or standard.
- An event requiring evacuation or shelter-in-place of the community.
- Clean-up activity beyond fenceline.

4.0 Procedure for Establishment, Revision, and Review of Environmental Objectives, Targets and Associated Action Steps

4.1 The Management Review Committee shall establish environmental objectives and targets, giving consideration to legal and other requirements, significant environmental aspects, technical and economical feasibility and the views of interested parties. Such objectives and targets shall be consistent with the CVC SHE policy, and shall be defined in this document.

4.2 The need to revise environmental objectives and targets shall be considered by the Management Review Committee whenever any of the following circumstances apply:

- New or modified activities occur that substantially change the environmental impact of Aberdeen plant activities, products or services.
- The environmental impact of an environmental aspect is determined to be substantially different than previously determined.
- There is a substantial change in legal or other requirements, technical or economic feasibility, or the views of interested parties that relates to a significant environmental aspect or environmental objective.