

for LCCM (482)

TO: Distribution

FROM: E. R. Taylor
DATE: August 23, 1989

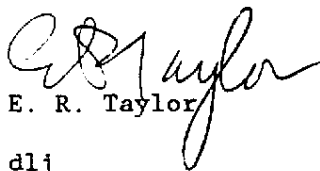
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SUBJ: STATUS ON THE 1987 VCM AUDIT ACTION STEPS

The last VCM Plant environmental audit was conducted in 1987. Attached is a brief summary of the action steps resulting from this audit. This information is being submitted for the general records and should serve as a basis for the next audit. Please note many of the responsible party individuals have changed from the original audit progress report.

Let me know if you have any questions.


E. R. Taylor

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Attachment

Distribution:

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VVV 000004056

ACTION STEPS FROM 1987 VCM PLANT ENVIRONMENTAL AUDIT

<u>PRIORITY ITEMS</u>	<u>STATUS</u>	<u>RESPONSIBLE PARTY</u>
1) Handling of coke, heavy ends, and exchanger bundle cleaning	Done-issued handling procedures	ERT/JGC
2) Minimization of incinerator bypasses	ON-GOING	WPB
3) Review of labelling, drum specifications for collecting and storing hazardous waste, and satellite storage practices	Done issued procedures, more work is required on satellite storage practices	Fibre Drum Team
4) Review of storage and disposal practices of used oil at the Ethylene Terminal	Done-used oil is sent to VCM	ERT/ALB
5) Review of land disposal ban for Halogenated Organic Compounds and its affects on plant disposal practices	ON-GOING	ERT
6) Retrofilled PCB-contaminated transformers are to be retested for PCBs for a 90 day period	Done-all transformers are tested	BF
7) Routine removal and proper handling procedures for sample bottles of chlorinated hydrocarbons	Done-part of lab procedures	ERT/PLF
8) Determination of any air emission rules apply to the Oxygen Clean Room vapor degreaser	Done-JCL memo	Houston
9) Develop a protocol for diesel storage tanks used by contractors to be in an area where spills can be controlled	Unwritten procedure to use earthen dikes	ERT/HOA
10) Determination on whether the Lab sump is subject to the underground tank requirements	No-is not subject	ERT/JCL
11) Louisiana annual fee system for underground storage applicability	Done	JRA
12) Sample of VCM is to be retested for PCBs	ON-GOING	PLF

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<u>PRIORITY ITEMS</u>	<u>STATUS</u>	<u>RESPONSIBLE PARTY</u>
13) VCM leaks detected visually should be incorporated into the leak detection repair program, added/deleted valves as a result of project work should be incorporated into the program	In progress	BJH/APR/SAC
14) Obsolete records to be discarded after consultation with Legal	No current time frame	SAR/ERT
15) Determined the regulatory status (PCB's) of the transformers at the Ethylene Terminal (GSU owns)	Complete-is not Vista's	ERT/BF
16) VCM sample return system needs to be installed before Nov. 88	Done	Plant Engineer
17) Determination and control of EDC losses to the sewer in Blocks I and II	Completed study by the EDC reduction team	EDC Reduction Team