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To: F. G. Jeanson

From: K. G. Akins
Date: August 21, 1992

Interoffice
Communication

Subject: **RESPONSIBLE CARE POLLUTION PREVENTION CODE
SELF-EVALUATION DOCUMENTATION**

VISTA

Below is the documentation to support Aberdeen's scoring on the Pollution Prevention Code self-evaluation.

1. Score is RI. No change from last year.
2. Score is RI. Methods of quantitative inventory of both hazardous and non-hazardous wastes include SARA 313 documentation, CMA waste survey, WRI, MDEQ waste minimization documentation, etc.
3. Score is PP. Actions include planned compliance testing in connections with the air permit, odor reporting system, feedback from the community advisory panel, and groundwater testing in connection with remediation.
4. Score is RI. Score based on work with community advisory panel, meetings with local governmental officials, and employee communications.
5. Score is RI. This was the first year we were required by the MDEQ to submit a waste minimization plan. Elements of the plan included, inventory of wastes, establishments of reduction priorities, goals and plans for waste reduction.
6. Score is RI. Wastes such as VCM emissions, empty lead bags, waste oil, and filter cake continue to be reduced. The Chief Process Engineer's Natural Team is working on eliminating/reducing hazardous wastes. We are now working with Conex to recycle wastes from certain customers.
7. Score is RI. Yearly SARA 313 reporting, WRI, CMA waste surveys, yearly updated

Waste Minimization Plans, and internal VCM emission monitoring all contribute to this score.

8. Score is RI. Monthly meetings of the community advisory panel continue and are well attended. Regular topics include environmental policies and practices at the plant and safety of operations.
9. Score is RI. Our policy continues to be that the design basis for new projects will be to reduce or cause no net increase in emissions. Good example of this is the plasticizer expansion that is being held up until we're sure wastewater effluent won't be affected.
10. Score is RI. Activities include participation in Aberdeen's Keep America Beautiful, Leadership Monroe's Aberdeen recycling program, recycle of scrap for customers, introduction of cadmium free compounds, and search for an alternative to lead stabilizers.
11. Score is PP. We continually assess current and past waste management practices. The drum remediation and Pond 2 reclamation are examples of past practices that were addressed. Before the projects were begun discussions were held with the community advisory panel and local government officials to hear their concerns.
12. Score is PP. Contractors used at the plant are supervised closely and trained on proper environmental procedures. All contractors used outside the plant must go through an environmental audit procedure before being approved for use. However, we have no definite review process once the initial audit is complete.
13. Score is EV. Until recent discovery of the VCM plume in the shallow groundwater, this area received little attention. Some improvement is expected from the remediation of this plume.
14. Score is RI. Sounds like this item was

written based on all the work we've done with Conoco, DERS, ENSR, NUS, MDEQ, and the EPA. Press releases, meetings with the community advisory panel and local government officials have kept them informed and allowed them to express concerns.

5.5 Score is IA. We have established dialogue with the public through the Community Advisory Panel, Exchange Club, Local Emergency Planning Committee, etc.

If you have any questions about the scores or documentation, please call me at extension 3637.



K. G. Akins
Senior Environmental Coordinator

c: RWS, JEN

POLLUTION PREVENTION CODE OF MANAGEMENT PRACTICES

Management Practices

Categories

NA EV DP IA PP RI

1. A clear commitment by senior management through policy, communications, and resources, to ongoing reductions, at each of the company's facilities, in releases to the air, water, and land and in the generation of wastes. Comments on Category NA: _____ _____ _____						X
2. A quantitative inventory at each facility of wastes generated and releases to the air, water and land, measured or estimated at the point of generation or release. Comments on Category NA: _____ _____ _____						X
3. Evaluation, sufficient to assist in establishing reduction priorities, of the potential impact of releases on the environment and the health and safety of employees and the public. Comments on Category NA: _____ _____ _____					X	
4. Education of, and dialogue with, employees and members of the public about the inventory, impact evaluation, risks to the community. Comments on Category NA: _____ _____ _____						X

Category NA - No action. If no action taken because the management practice is not applicable, please explain.

Category EV - Evaluating existing company practices against the Management Practice.

Category DP - Developing plan to implement Management Practice.

Category IA - Implementing action plan

Category PP - Management Practice in place.

Category RI - Reassessing Management Practice implementation.

		<u>Categories</u>					
		NA	EV	DP	IA	PP	RI
5.	Establishment of priorities, goals and plans for waste and release reduction, taking into account both community concerns and the potential health, safety, and environmental impacts as determined under Practices 3 and 4. Comments on Category NA: _____ _____ _____						X
6.	Ongoing reduction of wastes and releases, giving preference first to source reduction, second to recycle/reuse, and third to treatment. These techniques may be used separately or in combination with one another. Comments on Category NA: _____ _____ _____						X
7.	Measurement of progress at each facility in reducing the generation of wastes and in reducing releases to the air, water, and land, by updating the quantitative inventory at least annually. Comments on Category NA: _____ _____ _____						X
8.	Ongoing dialogue with employees and members of the public regarding waste and release information, progress in achieving reductions and future plans. This dialogue should be at a personal, face-to-face level, where possible, and should emphasize listening to others and discussing their concerns and ideas. Comments on Category NA: _____ _____ _____						X

Category NA - No action. If no action taken because the management practice is not applicable, please explain.
 Category EV - Evaluating existing company practices against the Management Practice.
 Category DP - Developing plan to implement Management Practice.
 Category IA - Implementing action plan
 Category PP - Management Practice in place.
 Category RI - Reassessing Management Practice implementation.

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<u>Categories</u>						
	NA	EV	DP	IA	PP	RI
9. Inclusion of waste and release prevention objectives in research, and in design of new or modified facilities, processes, and products. Comments on Category NA: _____ _____ _____						X
10. An ongoing program for promotion and support of waste and release reduction by others, which may, for example, include: a. Sharing of technical information and experience with customers and suppliers; b. Support of efforts to develop improved waste and release reduction techniques; c. Assisting in establishment of regional air monitoring networks. d. Participation in efforts to develop consensus approaches to the evaluation for environmental, health, and safety impacts of releases; e. Providing educational workshops and training materials; f. Assisting local governments and others in establishment of waste reduction programs benefitting the general public. Comments on Category NA: _____ _____ _____						X
11. Periodic evaluation of waste management practices associated with operations and equipment at each member company facility, taking into account community concerns and health, safety, and environmental impacts and implementation of ongoing improvements. Comments on Category NA: _____ _____ _____					X	

- Category NA - No action. If no action taken because the management practice is not applicable, please explain.
 Category EV - Evaluating existing company practices against the Management Practice.
 Category DP - Developing plan to implement Management Practice.
 Category IA - Implementing action plan
 Category PP - Management Practice in place.
 Category RI - Reassessing Management Practice implementation.

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	<u>Categories</u>					
	NA	EV	DP	IA	PP	RI
12. See Instructions below.						
13. Implementation of engineering and operating controls at each member company facility to improve prevention and early detection of releases that may contaminate groundwater. Comments on Category NA: _____ _____ _____		X				

Instructions for Practices 12, Contractor Review, and 14, Past Sites:

CMA recognizes that companies may implement Practices 12 and 14 on a company-wide or even corporation-wide basis rather than on a facility basis. Therefore, CMA asks companies to complete the Self-Evaluation Form using percentages that represent company-wide implementation for these two practices. In adding up the total percentages across all of the six categories, the number must equal 100%. Also, please use only whole numbers. For these two management practices the number of facilities used to calculate the percentage may exceed the number of facilities shown on page 1.

Companies may use any appropriate method to calculate these percentages. One caution, companies will want to carefully consider how this calculation is performed and use it on a yearly basis so that the data from year to year can be compared meaningfully.

	<u>Categories</u>					
	NA	EV	DP	IA	PP	RI
12. Implementation of a process for selecting, retaining, and reviewing contractors and toll manufacturers taking into account sound waste management practices that protect the environment and the health and safety of employees and the public. Comments on Category NA: _____ _____ _____					X	
14. Implementation of an ongoing program for addressing past operating and waste management practices and for working with others to resolve identified problems at each active or inactive facility owned by a member company, taking into account community concerns and health, safety, and environmental impacts. Comments on Category NA: _____ _____ _____						X

- Category NA - No action. If no action taken because the management practice is not applicable, please explain.
- Category EV - Evaluating existing company practices against the Management Practice.
- Category DP - Developing plan to implement Management Practice.
- Category IA - Implementing action plan
- Category PP - Management Practice in place.
- Category RI - Reassessing Management Practice implementation.