BFGoodrich **INTER-ORGANIZATION CORRESPONDENCE**

TO	FIELD POINT OR DEPT. & BLDG. NO.	DATE YOUR LETTER
Mike Marshall		
FROM	**FIELD POINT OR DEPT. & BLDG. NO.**	**DATE THIS LETTER**
Phil Donataccio		11/2/92

SUBJECT
Corporate E, H&S Audit Corrective Action Plan (Draft)

Attached is the Henry Plant reply to the 1992 Corrective Audit conducted August 10-14, 1992.

If you or your staff have any questions, please let us know.

Phil

Phil Donataccio

MM/PD9284

cc: G.E. Higby - without attachments*
J.D. Krumholz - without attachments*
M.E. Guyer - without attachments*
R.J. Grahek - without attachments*
K.J. Willings - without attachments*

* Attachments not sent due to "Confidentiality" requirements.

WC = —
RG = [redacted]

11/02/92

MM
WCH
KJW

Please review and forward your comments to me before Friday, Nov.6. I will then coordinate the "final" response with the plant. Thanks,

Bob Grahek

NGC 12548

BFG-4856-E M & D Printing Co., Henry, Ill. 61537

Company: BFGOODRICH
Facility: HENRY

Session: 1 06-10-92 Revision: 0 10-26-92
System: 1 MANAGEMENT OF CHANGE
Category: RECOMMENDATIONS Dwg#:

QUESTION	A	REMARKS	RECOMMENDATIONS	BY	COMMENTS
1. WWTP V-NOTCH WEIR WAS NOT CALIBRATED.	P		1. CALIBRATE	WJG	1. 11/92: THE V-NOTCH WEIR IS TO BE CHECKED IN ACCORDANCE WITH CHAPTER 6 OF THE EPS'S NPDES COMPLIANCE INSPECTION MANUAL. THIS WILL BE PERFORMED ON AN ANNUAL BASIS. A CALIBRATION CHECK WILL BE PERFORMED MONTHLY ON THE SECONDARY MEASURING DEVICES AND THE COMPUTER READOUT TO INSURE RELIABLE DATA. (SDJ,WJG) 12/1/92.
2. THE RADIATION SAFETY OFFICER HAS NOT BEEN TRAINED AND THE PERMIT HAS NOT BEEN UPDATED.	P		2. TRAIN OFFICER	DEG	2. 11/92: TRAINING HAS BEEN SCHEDULED FOR D.E.GIFFIN THE WEEK OF NOV 9TH TO ATTEND THE TN RADIATION SCHOOL. (DEG) 12/1/92
3. ENVIRONMENTAL PROJECT? (IMPACT) ASSESSMENTS WERE NOT COMPLETED.	C		3. PROVIDE ASSESSMENTS	DME	3. 11/92: ALL EA'S, AR'S, AND GPO'S NOW HAVE ENVIRONMENTAL IMPACT ASSESSMENTS INCLUDED TO INSURE THAT ENVIRONMENTAL CONCERNS ARE ADDRESSED. COMPLETE 9/1/92
4. SCAFFOLDING WAS NOT INSPECTED QUARTERLY.	C		4. INSPECT	DEG	4. A PM MAINTENANCE WORK ORDER HAS BEEN GENERATED TO INSPECT THE SCAFFOLDING ON A QUARTERLY BASIS. THE PLANT PRESENTLY AND IN THE PAST INSPECTS PRIOR TO EACH USE OF THE

WHEN UPDATE PERMIT?

Company: BFGOODRICH
Facility: HENRY

Session: 1 08-10-92 Revision: 0 10-26-92
System: 1 MANAGEMENT OF CHANGE
Category: RECOMMENDATIONS Dwg#:

QUESTION	A	REMARKS	RECOMMENDATIONS	BY	COMMENTS
					SCAFFOLDING WHICH IS MORE FREQUENT THAN QUARTERLY. (COMPLETE) 10/30/92.

Session: 1 08-10-92 Revision: 0 10-26-92
System: 2 RESPONSIBLE CARE
Category: RECOMMENDATIONS Dwg#:

QUESTION	A	REMARKS	RECOMMENDATIONS	BY	COMMENTS
1. THERE WAS NOT SUFFICIENT DOCUMENTATION SUPPORTING STAGE VI PROGRESS OF THE RESPONSIBLE CARE POLLUTION PREVENTION CODE.	P		1. PROVIDE AN UP-TO-DATE QUALITATIVE EMISSIONS INVENTORY.	DMK	1. 11/92: AN UP-TO-DATE POLLUTION PREVENTION CODE INVENTORY OF EMISSIONS HAS BEEN DEVELOPED. PRIORITIES FOR REDUCTION WILL BE MADE BASED ON POTENTIAL HEALTH AND SAFETY IMPACTS. (DMK) 3/1/93.
			2. EVALUATE POTENTIAL IMPACT OF RELEASES ON THE ENVIRONMENT AND THE HEALTH AND SAFETY OF EMPLOYEES AND THE COMMUNITY.	DMK	2. 11/92: AN EVALUATION OF THE POTENTIAL RELEASE ON THE ENVIRONMENT AND THE SAFETY OF EMPLOYEES AND THE COMMUNITY HAS BEEN PERFORMED. THIS WAS PERFORMED IN CONNECTION WITH THE REQUIREMENTS OF THE ILLINOIS CHEMICAL SAFETY ACT.
			3. ESTABLISH PRIORITIES TAKING INTO CONCERN POTENTIAL HEALTH AND SAFETY IMPACTS.	DMK	3. 11/92: ONCE THE PRIORITIES HAVE BEEN ESTABLISHED, MEETINGS WITH PLANT EMPLOYEES AND THE PUBLIC WILL BE HELD TO RECEIVE THEIR RECOMMENDATIONS. (DMK, PD) 6/1/93

Should list ~~off~~ what was done before and ask ourselves if anything warrants change.

Should get the whole PPC updated by 12-1-92 don't make more of this than need be,

Why don't they just say "The PPC Implementation Spreadsheet will be updated and submitted by 12-1-92"

NGC 12550

Company: BFGOODRICH
Facility: HENRY

Session: 1 06-10-92 Revision: 0 10-26-92
System: 2 RESPONSIBLE CARE
Category: RECOMMENDATIONS Dwg#:

QUESTION	A	REMARKS	RECOMMENDATIONS	BY	COMMENTS
			4. PROVIDE MEASUREMENT OF ON GOING REDUCTION PROGRESS.	DMK	4. SEE ABOVE Doesn't Make Sense!

Session: 1 06-10-92 Revision: 0 10-26-92
System: 3 SOLID AND HAZARDOUS WASTE MANAGEMENT
Category: RECOMMENDATIONS Dwg#:

QUESTION	A	REMARKS	RECOMMENDATIONS	BY	COMMENTS
1. HAZARD WASTE MANAGEMENT WAS DEFICIENT IN SEVERAL AREAS.	P	1. ALL SEVEN SATELLITE ACCUMULATION AREAS WERE NOT INSPECTED ON A WEEKLY BASIS. 2. DRUMS OF HAZARDOUS WASTE ON THE FLAMMABLE STORAGE PAD WERE NOT LABELED WITH THE WORDS "HAZARDOUS WASTE" OR THE ACCUMULATION DATE. 3. CONTAMINATED MATERIAL, CONTAINED IN DRUMS LOCATED ON THE FLAMMABLE STORAGE PAD, HAS NOT BEEN DETERMINED TO BE A HAZARDOUS OR NONHAZARDOUS WASTE. 4. ONE BULK CONTAINER OF WASTE WAS IDENTIFIED AS CONTAINING A HAZARDOUS WASTE BUT WAS NOT LABELED AND DID NOT HAVE AN ACCUMULATION DATE. 5. A DRUM OF HAZARDOUS WASTE IN THE LABORATORY	1. ADDRESS	DMK	1. 11/92: THE PLANT WASTE HANDLING PROCEDURES HAVE BEEN THOROUGHLY REVIEWED WITH RESPECT TO RCRA GUIDELINES, BFG POLICY AND GMP SINCE THE AUDIT AND CORRECTED ACCORDINGLY. 1) ALL SATELLITE ACCUMULATION AREAS ARE NOW INSPECTED WEEKLY BY AN S&E OPERATOR. THE PRODUCTION OPERATORS ARE RESPONSIBLE FOR MAINTAINING THE SATELLITE ACCUMULATION DRUMS IN ACCORDANCE WITH RCRA REGULATIONS. (COMPLETE) 9/1/92. 2)3)7) PROCEDURES HAVE BEEN ESTABLISHED AND TRAINING GIVEN TO INSURE THAT NO HAZARDOUS WASTE IS STORED ON THE FLAMMABLE STORAGE PAD. THE S&E OPERATORS ARE RESPONSIBLE FOR RECEIVING ALL HAZARDOUS WASTE FROM

Don't see any response to #3 here?

?

Need to align Remarks with Comments so the response can be understood!

NGC 12551

Company: BFGOODRICH
Facility: HENRY

Session: 1 08-10-92 Revision: 0 10-26-92
System: 3 SOLID AND HAZARDOUS WASTE MANAGEMENT
Category: RECOMMENDATIONS Dwgs:

QUESTION	A	REMARKS	RECOMMENDATIONS	BY	COMMENTS
		SATELLITE ACCUMULATION AREA WAS NOT CLOSED WITH A LID. 6. POTENTIALLY REUSABLE MATERIALS WERE STORED IN DRUMS LABELED "SCRAP" AND "WASTE" AT THE FLAMMABLE STORAGE PAD. Response ?			PRODUCTIONS OPERATIONS. (COMPLETE) 9/1/92 4) THE BOX IN QUESTION WAS LABELED THE SAME DAY AND WAS SHIPPED 8/21/92. THERE ARE INDICATIONS THAT THE MATERIAL PRESENTLY BEING DISPOSED OF IN THE CONTAINER IS NO LONGER HAZARDOUS SINCE THE MATERIAL WHICH MADE IT HAZARDOUS IS NOW SOLD AS OFF-GRADE PRODUCT. WE ARE IN THE PROCESS OF CHARACTERIZING THE WASTE. (DMK, SDJ) 12/1/93. 5) PROCEDURES AND CHECKS ARE IN PLACE TO INSURE THAT LIDS ARE CLOSD AT TIMES ON SATELLITE ACCUMULATION DRUMS EXCEPT WHEN BEING FILLED. (COMPLETE) 9/1/92.
? 2. WASTE OIL WAS SENT TO A FACILITY WHICH WAS NOT AUTHORIZED BY BFG.	C	7. THE FACILITY DISPOSED OF WASTE OIL AT AN OIL RECYCLING FACILITY THAT WAS NOT INCLUDED ON THE FACILITY'S LIST OF APPROVED TREATMENT, STORAGE AND DISPOSAL (TSD) FACILITIES.	2. CORRECT	DMK	2. 11/92: PERMISSION WAS RECEIVED FROM DIVISION ENVIRONMENTAL PRIOR TO SHIPPING THE USED OIL TO SAFETY KLEEN. (COMPLETE). who? When? Documentation?

NGC 12552

HAGE.006

Company: BFGOODRICH
Facility: HENRY

Session: 1 08-10-92 Revision: 0 10-26-92
System: 4 DRINKING WATER MANAGEMENT
Category: RECOMMENDATIONS Dwgs:

QUESTION	A	REMARKS	RECOMMENDATIONS	BY	COMMENTS
1. SAMPLING RESULTS WERE NOT REPORTED TO THE STATE WITHIN 30 DAYS.	P	How does this resolve issue?	1. RESOLVE	DMK	1. 11/92: THE ANALYTICAL REQUIREMENTS REQUIRED UNDER THE ILLINOIS PUBLIC HEALTH DEPARTMENT ARE BEING REVIEWED TO DETERMINE COMPLIANCE. (DMK) 12/31/92
2. THERE IS NO DOCUMENTATION THAT POTABLE WATER SYSTEM IS "LEAD FREE".	P		2. GENERATE DOCUMENTATION	DMK	2. 11/92: NO RECORDS ARE AVAILABLE TO DETERMINE IF "LEAD FREE" SOLDER AND FLUX HAS BEEN USED IN THE POTABLE WATER SYSTEM SINCE JUNE 19, 1986. A MONITORING PROCEDURE WILL BE ESTABLISHED FOR LEAD IN THE POTABLE WATER. NOTICE WILL BE POSTED FOR POSSIBLE LEAD CONTAMINATION IN DRINKING WATER. PROCEDURES WILL BE ESTABLISHED TO INSURE THAT "LEAD FREE" PIPES, SOLDER, AND FLUX ARE USED IN ALL FUTURE CHANGES TO THE DRINKING WATER SYSTEM. (DMK) 12/31/92.
3. THERE WAS NO NOTIFICATION POSTED INFORMING PERSONNEL OF THE LEAD CONTENT IN THE DRINKING WATER.	P		3. POST NOTIFICATION	DMK	3. SEE 2 ~~ABOVE~~
4. THE FACILITY HAS NOT DEMONSTRATED THAT THE WATER SYSTEM IS "LEAD FREE".	P		4. ADDRESS	DMK	4. SEE 2 ~~ABOVE~~
5. NON-POTABLE WATER SYSTEM IS NOT LABELED	P		5. LABEL	DMK	5. 11/92: A FLOW DIAGRAM OF THE

NGC 12553

Company: BFGOODRICH
Facility: HENRY

Session: 1 08-10-92 Revision: 0 10-26-92
System: 4 DRINKING WATER MANAGEMENT
Category: RECOMMENDATIONS Dwg#:

QUESTION	A	REMARKS	RECOMMENDATIONS	BY	COMMENTS
			Complete?		POTABLE WATER SYSTEM WILL BE DEVELOPED. APPROPRIATE LABELING WILL BE MADE TO PREVENT INADVERTENT CONSUMPTION OF NON-POTABLE WATER. (DMK) 8/31/93

ADD DATE OF WHEN DRAWING WILL BE COMPL

10 MONTHS SEEMS LIKE TOO LONG

SHOULD IT BE DONE SOONER

Session: 1 08-10-92 Revision: 0 10-26-92
System: 5 AIR QUALITY MANAGEMENT
Category: RECOMMENDATIONS Dwg#:

QUESTION	A	REMARKS	RECOMMENDATIONS	BY	COMMENTS
1. THERE ARE NO WRITTEN PROCEDURES FOR ENSURING AIR POLLUTION SOURCE COMPLIANCE.	P		1. ISSUE PROCEDURES Complete?	DMK	1. 11/92: ALL EXISTING WRITTEN PROCEDURES WILL BE CHECKED TO DETERMINE IF PROCEDURES ARE IN PLACE TO INSURE PROPER OPERATION OF THE POLLUTION CONTROL DEVICES. ALL AIR POLLUTION CONTROL DEVICES THAT ARE NOT INCLUDED IN WRITTEN PROCEDURES WILL HAVE A PROCEDURE ESTABLISHED TO INSURE PROPER OPERATION. RECORDS OF CONTROL DEVICE MAINTENANCE (WHERE APPLICABLE) WILL BE MAINTAINED. (MRG, JDK) 8/31/93

NGC 12554

Company: BFGOODRICH

Facility: HENRY

Session: 1 08-10-92 Revision: 0 10-26-92

System: 6 COMMUNITY-RIGHT-TO-KNOW

Category: RECOMMENDATIONS Dwg#:

QUESTION	A	REMARKS	RECOMMENDATIONS	BY	COMMENTS
1. THERE IS NO DOCUMENTATION THAT SARA 302 NOTIFICATION WAS SUBMITTED.	C		1. GENERATE DOCUMENTATION	DMK	1. 11/92: A COPY OF THE SARA 302 NOTIFICATION LETTER SUBMITTED TO THE SERC IS ON FILE IN THE ENVIRONMENTAL OFFICE. (COMPLETE) 5/6/87.

Session: 1 08-10-92 Revision: 0 10-26-92

System: 7 HAZARD COMMUNICATION

Category: RECOMMENDATIONS Dwg#:

QUESTION	A	REMARKS	RECOMMENDATIONS	BY	COMMENTS
1. BOXES OF PVC DISPERSION STRAININGS HAD TWO CONFLICTING HAZARD LABELS.	P	why cant this be corrected on ~~the spot~~ ?	1. CORRECT	DEG	1. THE GEON WAREHOUSE WILL BE AUDITED FOR NONCOMPLIANCE AND THE PACKAGING LABELING WILL BE CORRECTED. (MEC) 12/31/92.

What steps will be taken to make certain it does not happen again?

Session: 1 08-10-92 Revision: 0 10-26-92

System: 8 INDUSTRIAL HYGIENE MANAGEMENT

Category: RECOMMENDATIONS Dwg#:

QUESTION	A	REMARKS	RECOMMENDATIONS	BY	COMMENTS
1. APPROXIMATELY FIVE (5) PERCENT OF TWA EXPOSURE MONITORING RESULTS FOR VINYL CHLORIDE EXCEEDED THE PEL W/O RESPIRATORY PROTECTION	C		1. MAINTAIN FOLLOWUP PROGRAM DESIGNED TO ELIMINATE THE OVER EXPOSURE	DEG	1. PLANT CURRENTLY CONDUCTS BOARD OF INQUIRES WHENEVER AN INDIVIDUAL EXCEEDS A PEL WITHOUT RESPIRATORY EQUIPMENT. ACTION ITEMS ARE GENERATED AND FOLLOWED UP OCCURS AS PART OF OUR BOI PROGRAM. (CONTINUING & COMPLETE)
2. PROCEDURE FOR "YELLOW LIGHT" ALARM DOES NOT ENSURE EXPOSURES WILL BE LESS THAN THE PEL.	P		2. CORRECT	DEG	2. ALTERNATIVES ARE BEING INVESTIGATED TO INSURE THAT

NGC 12555

Company: BFGOODRICH
Facility: HENRY

Session: 1 05-10-92 Revision: 0 10-26-92
System: 5 INDUSTRIAL HYGIENE MANAGEMENT
Category: RECOMMENDATIONS Dwg#:

QUESTION	A	REMARKS	RECOMMENDATIONS	BY	COMMENTS
			Why So Long? If > 1 ppm, Resp. Protection must be worn, or leave area.		PERSONNEL ARE NOT EXPOSURED TO GREATER THAN THE PEL WITHOUT USE OF A RESPIRATOR WHILE PERFORMING WORK UNDER A YELLOW LIGHT. (MEC/RDM) 3/1/93.
3. THERE IS NOT A FORMAL HEAT STRESS PROGRAM.	P		3. ADDRESS	DEG	3. A PLANT SAFETY POLICY WILL BE ISSUED IDENTIFYING THE CURRENT TRAINING PROGRAM PLUS ADDITIONAL ADMINISTRATIVE AND EQUIPMENT CONTROLS. (DEG) 6/1/93.
4. DOCUMENTATION FOR INVESTIGATING STS'S WAS DISORGANIZED AND INCOMPLETE	P		4. ADDRESS	DEG	4. A PLANT PROCEDURE WILL BE ISSUED IDENTIFYING THE ADMINISTRATION OF STS'S AND HEARING RECORDABILITY. THE PROCEDURE WILL INCLUDE THE DOCUMENTATION REQUIREMENTS. (DEG) 12/31/92.
System: 9 Industrial Safety					
SEVERAL EXIT SIGNS WERE NOT ILLUMINATED.			COMPLETE EXIT SIGN PROGRAM	DEG	THE PRESENT PROGRAM TO REPLACE EXISTING EXIT SIGNS THAT DO NOT MEET THE ILLUMINATION REQUIREMENTS WILL BE COMPLETED ALONG WITH THE AUDITING OF EXIT SIGNS THAT ARE LOCATED ON THE DOORS. SIGNS THAT ARE NOT VISIBLE WHEN THE DOOR IS OPEN WILL BE RELOCATED. (DEG) 12/31/92.

NGC 12556

Company: BFGOODRICH
Facility: HENRY

Session: 1 08-10-92 Revision: 0 10-26-92
System: 6 INDUSTRIAL HYGIENE MANAGEMENT
Category: RECOMMENDATIONS Dwg#:

QUESTION	A	REMARKS	RECOMMENDATIONS	BY	COMMENTS
PALLETS IN PVC SACK AREA WERE BOWED.	C		ADDRESS	DEG	THE WOODEN PALLETS THAT WERE BOWING IN THIS APPLICATION HAVE BEEN TAKEN OUT OF SERVICE. IN ADDITION THE SUPER SACKS ARE BEING STACKED IN A MANNER SO THAT INDIVIDUALS ARE NOT PHYSICALLY EXPOSED TO A SECOND LEVEL OF BAGS. (COMPLETE) 8/14/92.
EYEWASH STATIONS WERE UNCLEAN.	P		ADDRESS	DEG	EACH PRODUCTION AREA WILL BE RESPONSIBLE FOR THE CLEANING OF EYEBATHS UNTIL THE PORCELEIN EYEBATHS CAN BE CHANGED OUT WITH MORE MODERN NON-BOWL DESIGNS. (MEG/JDE) 12/31/92.

NGC 12557