

1980
SUN COMPANY
ENVIRONMENTAL
COMPLIANCE
SURVEY

PLAINTIFF'S EXHIBIT

SUN-151

S (B) 00895

Questionnaire # 432

SUN COMPANY

1980

ENVIRONMENTAL

COMPLIANCE

SURVEY

S (B) 00896



OCTOBER, 1980

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APPROVED LIST OF SUBSIDIARY KEY CONTACTS

- **Oil and Gas Group**
 - Sunmark Exploration G. E. Moores
 - Sun Production A.R. Ballou
 - Sun Gas C. C. Jones
 - Sun Texas R. B. Freels

- **Marketing Group**
 - SPPC M. A. Buercklin
 - Sunmark Industries A. B. Chieffo
 - Sun International R. W. Brown

- **Energy Minerals Group**
 - Sunedco J. F. Williams
 - Elk River R. W. Ince/E. Bagley

- **Logistics Group**
 - Sun Pipeline R. E. McCloskey
 - Sun Terminals A. J. Clubb
 - Sun Transport Capt. J. Bates
 - Sun Carriers R. L. Veith

- **Commercial Group**
 - TOTE R. Griffith
 - Sperry-Sun K. McVey
 - SIS P. J. Coffey
 - Sun Distributors L. W. Cissone

- **SUN SHIP** R. Bible

BACKGROUND AND OBJECTIVES

Environmental laws and regulations are continually becoming more complex and comprehensive. Virtually every segment of Sun Company operations must comply with a number of evolving environmental regulatory programs.

Sun Company is concerned that compliance is also becoming more complex and costly. At the same time, both the government and the public want to know more about the compliance status of corporate operations. In fact, the EPA has a research program under development to license outside auditors to perform corporate environmental compliance audits.

Sun Company is undertaking this 1980 compliance program in order to develop a baseline for the environmental compliance of *all* company operations. The information developed by this program can be used for a number of benefits:

- Focus subsidiary and corporate management awareness.
- Validate Sun certifications to groups such as the Securities and Exchange Commission.
- Influence external government audit proposals.
- Recommend plans for future Sun compliance reviews.
- Leave in place a permanent data collection system for local and subsidiary use.

We encourage you to make a thorough and complete response to this questionnaire. The Environmental Survey Task Force will be reviewing your responses and contacting you to clarify any ambiguities. In addition, following standard auditing techniques, a sample of questionnaires will be verified with the respondent, to validate the accuracy of the basic information.

Please call your subsidiary key contact if you have any questions. The Key contact list appears on page i.

GENERAL INSTRUCTIONS

- Please review the entire questionnaire before completing.
- If this questionnaire is addressed to a *group* of facilities, the word "Facility" used throughout the questionnaire applies to the group.
- If a particular section does not apply to your facility or group of facilities, please mark the section *NA* (for not applicable) and proceed to the next section.
- In the final section, you will be asked to report the number of man hours required to complete this questionnaire so please keep a record of time spent.

GENERAL INSTRUCTIONS (cont.)

All items which require your response are on the *right hand* pages of this booklet with any instructions pertaining to those items on the facing, *left hand* page.

The questionnaire require three types of responses:

1. For responses which require words, please print legibly.
2. For responses which require a blank to be checked, please use an "X".
3. Where items call for a number as a response, give an approximate number unless the actual number is known to you or can be readily calculated. *If you use estimated, rather than recorded/established figures, indicate this with an "E" following the number.*

If any item does not provide sufficient space for a complete response, write "See Note" in the response space and present a complete response to key to the number of the questionnaire item.

Any pages used for response to this questionnaire that are not bound as part of the booklet should be identified with the Questionnaire Number and listed on the last page under "NOTES".

INSTRUCTIONS FOR
Section 1.0 — GENERAL INFORMATION

- 1.1 Give the name of the Sun Company subsidiary to which your facility or group of facilities belong.
- 1.2 If this questionnaire is addressed to a single facility, give the proper, corporately recognized name for your particular facility — not local, colloquial designations or nickname.

If it is addressed to a *group* of facilities, give the name of the *group* of facilities to which it applies.

- 1.4 If it is a single facility, give the actual borough or township (if any), county or parish, and state in which your facility is located. If it spans more than one such political unit, give the name of the one which is most commonly associated with the facility.

(For multiple locations, just list the state.)

- 1.5 Give street number, if any; P.O. Box number, if any, municipality, state and Zip code.

(Not applicable for multiple facilities.)

- 1.6 Write in the blank the number of the function which best represents the principal function of your facility.
- 1.7 Name the person who has the chief management authority at your facility (or group of facilities).
- 1.8 Name the person, *serving under the facility manager*, with the direct, overall responsibility for environmental matters or pollution control. If this person is the facility manager, write "same".

QUESTIONNAIRE

SUN COMPANY: 1980 ENVIRONMENTAL COMPLIANCE SURVEY

1.0 GENERAL INFORMATION

1.1 Subsidiary Name Sun Petroleum Products Co.

1.2 Facility Name Corpus Christi Refor Group

1.3 If this is a multiple facility, to how many discrete facilities does this questionnaire apply? _____

1.4 Facility Location Nueces, Tx.
Municipality, County, State

1.5 Mailing Address P.O. Box 2608
Corpus Christi, Tx. 78403

1.6 Principal Function of Facility 7

1. Petroleum Exploration
2. Petroleum Production
3. Petroleum Transport (Domestic Pipeline)
4. Petroleum Transport (Marine Fleet)
5. Truck or Rail Terminal
6. Marine Terminal
7. Refinery
8. Marketing Terminal
9. Bulk Plant
10. Service Station
11. Food Service
12. Mining
13. Instruments and Tool Manufacture
14. Electronic Information Service
15. Ship Building
16. Common Carrier Trucking
17. Industrial Products & Supplies Distr.
18. Ocean Transport
19. Other (Specify) _____

1.7 Facility Manager J. L. Laird

1.8 Person at Facility Responsible for Environmental Matters J. R. Kampfhenkel

1.9 Facility Telephone No. (512) 241-4811

S (B) 00903

INSTRUCTIONS

Section 1.10 Respond by supplying the number of full-time and part-time employees in each personnel classification listed. For

For persons serving in more than one capacity, consider only their primary function.

Give the estimated man-months per year which each classification spends on environmental matters (as an average estimated over the past three years). Please include the time commitments of personnel not located at this facility.

QUESTIONNAIRE

1.10 Environmental Manpower

(1) Personnel Classification	(2) (3) Number of Persons Assigned to Environmental Matters at this facility		(4) Estimated Total Man-Months/Year Assigned to Environ- mental Matters
	Full Time	Part Time	
(1) Engineers	<u>2</u>	<u>3</u>	<u>24.75</u>
(2) Attorneys	<u> </u>	<u> </u>	<u> </u>
(3) Chemists	<u> </u>	<u>1</u>	<u>2.4</u>
(4) Biologists	<u> </u>	<u> </u>	<u> </u>
(5) Other professionals	<u> </u>	<u>1</u>	<u>0.6</u>
(6) Technicians	<u>2</u>	<u> </u>	<u>24.0</u>
(7) Operators	<u>1</u>	<u>4</u>	<u>13.8</u>
(8) Clerks, secretaries	<u> </u>	<u>2</u>	<u>3.6</u>
(9) Outside consultants	<u> </u>	<u>4</u>	<u>1.0</u>
Totals	<u>5</u>	<u>15</u>	<u>70.15</u>

INSTRUCTIONS FOR

Section 2.0 — ENVIRONMENTAL REGULATORY AGENCY AFFAIRS

- 2.1 Indicate all permits issued by local, state, regional, or Federal agencies currently held by your facility in *air pollution, solid/hazardous waste, water/wastewater*, and other *general environmental* matters by listing each by permit type and title. In the columns to the right: give the name of the agency issuing each permit; the permit number; and the date (month/day/year) on which it will expire. Do not include Spill Prevention Control Countermeasure Plans (SPCC).

EXAMPLE

Permit Type	Permit Title	Issuing Agency	Permit Number	Permit Expiration Date (mo/day/yr)
Wastewater	NPDES	U.S. EPA	PA-0007920	11/30/80

- 2.2 Indicate all *air pollution, solid/hazardous waste, water/wastewater*, and other *general environmental* permits for which your facility has applied, but has not yet received, by listing each by permit type and title. In the columns to the right: give the name of the agency which is to issue each permit and the date (month/day/year) of your application for each permit.

Indicate whether the application was for new construction and/or modification.

QUESTIONNAIRE

2.0 ENVIRONMENTAL REGULATORY AGENCY AFFAIRS

2.1 List all *Existing* Environmentally Related *Permits* Issued by Local, State, Regional, and Federal Agencies

(1)	(2)	(3)	(4)	(5)
Permit Type	Permit Title	Issuing Agency	Permit Number	Permit Expiration Date mo./day/yr.
waste water	TDWR	TDWR	00531	7-1-82
Air Pollution	Operating	TACB	R-43	
"	"	"	R-44	
"	"	"	R-37	
"	"	"	R-797	
"	"	"	R-1420	
"	"	"	R-4678	
"	Construction	"	C-3623	
"	"	"	C-5966	

Operating U.S.EPA PSD-TX-56

2.2 List all Environmentally Related *Permits Pending* from Local, State, Regional, and Federal Agencies

(1)	(2)	(3)	(4)	(5)	
Permit Type	Permit Title	Issuing Agency	Application Date (mo./day/yr.)	Is Application for new Construction and/or Modification?	
				Yes	No
Wastewater	NPDES	U.S.EPA	9-26-80		X

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INSTRUCTIONS

Section 2.3 Indicate *inspections by and/or visitations from* local, state, regional, or Federal environmental regulatory agencies, listing the purpose, date, agency responsible for each visit, and follow-up actions, if any. Note that for scheduled, periodic visits, you should give the frequency of such visits, e.g., monthly, quarterly, yearly, etc., rather than the date (month/year).

EXAMPLE:

<u>Purpose</u>	<u>Visiting Regulatory Agency</u>	<u>Frequency or Date (mo/yr) of Visits</u>	<u>Follow-up Action by Agency</u>
Review of Watewater Treatment Operations	PA DER	Quarterly	None
Stack Inspection	EPA-Region III	8/79	Request complete emission inventory

QUESTIONNAIRE

2.3 List all Facility Inspections and Visitations by Local, State, Regional, and Federal Environmental Regulatory Agencies Personnel— since July, 1977.

(1)	(2)	(3)	(4)
Purpose	Visiting Regulatory Agency	Frequency or Date (mo./yr.) of Visits	Follow-up Action by Agency
Air Pollution Inspection	U.S. EPA	1/9-10/80	None
"	TACB	10/30/80	"
Wastewater and Solid Waste	TDWR	12/3-4/80	"
"	TDWR	12/4-5/79	"
Air Pollution Inspection	TACB	10/16/79	"
Waste water and Solid Waste	TDWR	9/25-26/79	"
"	"	5/22/79	"
"	"	1/17/79	"
"	"	6/26/78	"
"	"	3/9/78	"
"	"	2/28/78	"
"	U.S. EPA	8/24/78	"
Air Pollution Inspection	TACB	10/27/78	"
Waste water and Solid Waste	TDWR	10/18-19/77	"

" " " " 7/21/77
 Air Pollution Inspection TACB 10/24/77

INSTRUCTIONS FOR
Section 3.0 — AIR EMISSIONS

Section 3.1 applies to *SINGLE* facilities *ONLY* such as *Refineries, Marketing Terminals, and Natural Gas Plants.*

- 3.1 Indicate those emissions which are relevant to your facility and the classification into which they fall.

The emission types are:

TSP — Total Suspended Particulates

SO_x — Sulphur Oxides

NO_x — Nitrogen Oxides

O_x — Photchemical Oxidants (ozone)

CO_x — Carbon Monoxide

QUESTIONNAIRE

3.0 AIR EMISSIONS

3.1 Air Quality Status

Classification		Emission Types				
		TSP	SO _x	NO _x	O _x	CO
(1)	Does Not Meet Primary Standards				X	
(2)	Does Not Meet Secondary Standards					
(3)	Cannot be Classified					
(4)	Better Than National Standards	X	X			
(5)	Cannot Be Classified Or Better Than National Standards					
		(1)	(2)	(3)	(4)	(5)

3.2 Have you completed a facility emission survey or inventory?

☒ Yes ☐ No

If so, give the date. 07 [mo] 16 [yr]

3.2.1 Do you operate any continous stack monitoring devices at this facility?

☒ Yes ☐ No

3.2.1 If you do operate stack monitors, is all of this equipment included in a statistically based quality control maintenance program?

☒ Yes ☐ No

INSTRUCTIONS

Section 3.3 Indicate any of the units, processes, or operations which are present at your facility. If you have checked any of these items, complete relevant items in Section 3.4. *IF NOT*, Proceed to Section 4.0.

3.3.8 Fugitive Hydrocarbon Emissions refer to volatile organic compounds which are emitted from pumping and piping systems (see Item 3.4.8).

Note the third digit in the Section Number for Sections 3.3 and 3.4 correspond: e.g., Items **3.3.1** and **3.4.1** both refer to Boilers and Heaters.

QUESTIONNAIRE

3.3 Index of Air Emissions Sources

- 3.3.1 Boilers and heaters [X]
- 3.3.2 Process units and Incinerators with stacks..... [X]
- 3.3.3 Stationary internal combustion/turbine engines..... [X]
- 3.3.4 Emergency Flares..... [X]
- 3.3.5 Above ground petroleum storage tank [X]
- 3.3.6 Bulk loading/unloading of volatile
organic compounds (VOC) [X]
- 3.3.7 Oil/Water Gravity Separator [X]
- 3.3.8 Fugitive Hydrocarbon Emissions [X]
- 3.3.9 Underground petroleum product storage tanks []
- 3.3.10 Degreasing operation using solvent spraying or dipping ... []

INSTRUCTIONS

Section 3.4.1 Complete this section only if you have previously checked item #3.3.1 on page 6-Q.

TSP — Total Suspended Particulates

SO_x — Sulphur Oxides

CO — Carbon Monoxide

NO_x — Nitrogen Oxides

QUESTIONNAIRE

3.4 Description of Sources

3.4.1 Boilers and Heaters (with stacks)

1. How many boilers and heaters are at this facility?

49

2. Is anyone at your facility familiar with the State Implementation Plan (SIP) requirements pertaining to this source category of air emissions?

☒ Yes [] No

3. Check the emissions regulated by the SIP requirements.

TSP

☒

SO_x

[]

CO

[]

Opacity

☒

NO_x

[]

None

[]

4. Have there been any significant excursions, exceedences, or discrepancies from SIP regulations or permit parameters in this particular category?

[] Yes ☒ No

5. How many heaters and boilers have been tested since July, 1977?

Emission Test
TSP - SO_x

1

6. How many fuel burning sources are greater than 100 million BTUs/hr.?

1

7. Is the aggregate of all fuel burning sources greater than 250 million BTUs/hr.?

☒ Yes [] No

INSTRUCTIONS

Section 3.4.2 and 3.4.3 Complete these sections only if you have previously checked items # 3.3.2 or 3.3.3 on page 6-Q.

TSP — Total Suspended Particulates

SO_x — Sulphur Oxides

NO_x — Nitrogen Oxides

HC — Hydrocarbons

QUESTIONNAIRE

3.4.2 Process Units and Incinerators With Stacks

1. How many such units are at this facility? 22
2. Are you familiar with the State Implementation Plan (SIP) requirements pertaining to this source category of air emissions? ☒ Yes ☐ No
3. Check the emissions regulated by the SIP requirements.
TSP ☐ SO_x ☐ CO ☐
Opacity ☐ NO_x ☐ None ☒
4. Have there been any significant excursions, exceedences, or discrepancies from SIP regulations or permit parameters in this particular category? ☐ Yes ☒ No
5. How many units have been tested since July 1977? 7

3.4.3 Stationary Internal Combustion/Turbine Engines

1. How many such units are at this facility? 7
2. Are you familiar with the State Implementation Plan (SIP) requirements pertaining to this source category of air emissions? ☒ Yes ☐ No
3. Check the emissions regulated by the SIP requirements.
TSP ☐ SO_x ☐ Opacity ☐
HC ☐ NO_x ☐ None ☒
4. Have there been any significant excursions, exceedences, or discrepancies from SIP regulations or permit parameters in this particular category? ☐ Yes ☒ No
5. How many units have been tested since July 1977? 0
6. How many engines are there in each of the following horsepower ranges?
0 - 400 HP 7
401 - 1000 HP _____
1001 - 2000 HP _____
greater than 2000 HP _____

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INSTRUCTIONS

Complete these sections only if you have previously checked the air emission source in Section 3.3.4 or 3.3.5

Section 3.4.4 SO_x — Sulphur Oxides

HC — Hydrocarbons

VOC is generally defined as having a vapor pressure greater than 1.5 psia. Check this for consistency with standards in your state, and use whatever pressure your state uses.

QUESTIONNAIRE

3.4.4 Emergency Flares

1. How many emergency flares are at this facility? 4
2. Are you familiar with the State Implementation Plan (SIP) requirements pertaining to this source category of air emissions? ☒ Yes ☐ No
3. What emissions are regulated by the SIP requirements?
SO_x ☐ Opacity ☒
HC ☐ None ☐
4. Have there been any significant excursions, exceedences, or discrepancies from SIP regulations or permit parameters in this particular category? ☐ Yes ☒ No

3.4.5 Above Ground Petroleum Product Storage Tanks

1. How many tanks, other than crude tanks, storing volatile organic compounds (VOC) have a capacity of more than 40,000 gallons? 51
2. Are you familiar with the State Implementation Plan (SIP) for such tanks? ☒ Yes ☐ No
3. How many crude tanks have a capacity:
1,000 to 10,000 barrels 0
greater than 10,000 barrels 2
4. Are you familiar with the State Implementation Plan (SIP) for such crude tanks? ☒ Yes ☐ No
5. Does your SIP, as of 1 July 1980, require the installation of secondary seals, or equivalent vapor recovery devices? ☒ Yes ☐ No
6. Have there been any significant excursions, exceedences, or discrepancies from SIP regulations or permit parameters in this

INSTRUCTIONS

Complete these sections only if you have previously checked the air emission source in Section ~~3.6.6~~ or ~~3.6.7~~.

3.3.6 3.3.7

Section 3.4.6 This item refers to VOC as defined in your state (s).

3.4.7 This refers to oil/water gravity separators which are *open to the atmosphere* prior to control, such as API separators.

QUESTIONNAIRE

3.4.6 Bulk Loading/Unloading of Volatile Organic Compounds (VOC)

- | 1. Type of Loading/
Unloading Operation | Materials
Handled |
|---|----------------------|
| [☒] Truck | <u>Ref. 43-Q</u> (1) |
| [☒] RR tank car | <u>-</u> (2) |
| [☒] Barge | <u>-</u> (3) |
| [☒] Ship | <u>-</u> (4) |
2. Are you familiar with SIP requirements for [☒] Yes [☐] No
this type of operation?
3. Does the SIP, as of 1 July 1980, require [☒] Yes [☐] No
vapor controls for such operations (other
than controls of fugitive emissions from
pumping/piping of petroleum)?
4. Have there been any significant excursions [☐] Yes [☒] No
exceedences, or discrepancies from SIP
regulations or permit parameters in this
particular category?

3.4.7 Oil/Water Gravity Separators

1. How many such separators do you have at
your facility? 3
2. How many receive more than 200 gallons
per day of hydrocarbons? 3
3. Are you familiar with the SIP requirements
for these separators? [☒] Yes [☐] No
4. Does the SIP, as of 1 July 1980, require
covering of these separators or equivalent
measure? [☒] Yes [☐] No
5. Have there been any significant excursions,
exceedences, or discrepancies from SIP
regulations or permit parameters in this
particular category? [☐] Yes [☒] No

INSTRUCTIONS

Section 3.4.8 Complete this section only if you have previously checked the air emission source in Section 3.3.8.

QUESTIONNAIRE

3.4.8 Fugitive Hydrocarbon Emissions

1. Estimate the approximate number of units at your facility in each of the following categories.

Category of Unit	Approximate # of Units	
Valves	<u>84,000</u>	(1)
Compressor seals	<u>80</u>	(2)
Pump seals	<u>905</u>	(3)
Flanges	<u>168,000</u>	(4)
Drains	<u>1015</u>	(5)
Relief valves	<u>200</u>	(6)
Sight glasses	<u>250</u>	(7)
Hatches	<u>162</u>	(8)

2. Are you familiar with SIP requirements for controlling fugitive hydrocarbon emissions from valves, compressors, pumps, flanges, etc? ☒ Yes ☐ No
3. Does the SIP, as of 1 July 1980, require specific control measures for such fugitive hydrocarbon emissions? ☒ Yes ☐ No

INSTRUCTIONS

Complete these sections only if you have previously checked the air emission source in Section 3.3.9 or 3.3.10.

Section 3.4.10 — *Do not* include maintenance operations.

QUESTIONNAIRE

3.4.9 Underground Petroleum Storage Tanks

1. How many underground tanks does your facility have with capacities greater than 2000 gallons? None
2. Are you familiar with the SIP Stage I requirements for controlling emissions from underground storage tanks? [] Yes [] No
3. Does the SIP, as of July 1980, require vapor recovery measures for this type of facility? [] Yes [] No
4. Have there been any significant excursions, exceedences, or discrepancies from SIP regulations or permit parameters in this particular category? [] Yes [] No

3.4.10 Degreasing Operation

1. Are you familiar with SIP requirements for controlling emissions from this type of operation? [] Yes [] No
2. Does the SIP, as of July 1980, require specific control measures for this type of operation? [] Yes [] No
3. Have there been any significant excursions, exceedences, or discrepancies from SIP regulations or permit parameters in this particular category? [] Yes [] No

INSTRUCTIONS

Section 3.5.1 *Indicate whether your facility has been subject to any official actions, such as those listed , for violations of air quality regulations. If this questionnaire applies to a multiple facility, indicate which specific facility(ies) was (were) involved.*

If an official action was taken other than one of those listed, specify under "Other". Indicate date (month/year) of official action.

Indicate if any of the penalties listed were imposed. If a fine was imposed, list the amount. If other penalties were imposed, specify under "Other".

Indicate the current status of the violation source.

If additional space is required, Xerox a blank copy of the table, complete it, and attach it to the back cover of the questionnaire.

QUESTIONNAIRE

3.5 Environmental Regulatory Agency Actions

3.5.1 Air Quality Violations

Name of Facility (for multiple facilities only)	Type of Violation	Official Action					Date mo. yr.	Agency	Penalty Imposed					Status of Violation		
		Notice of Violation	Administrative Order	Civil Action	Criminal Action	Other*			Fine (list amount)	Operation Halted	Facility Closed	Other*	Corrected	Uncorrected	Other*	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
	None															

INSTRUCTIONS FOR Section 4.0 - SOLID/HAZARDOUS WASTE

4.1 Waste Generation and Characteristics

Indicate any solid/hazardous waste types generated at your facility including those disposed of both on-site and off-site.

If you generate a waste not listed, enter it by name under "Other" in the waste type column:

If you discard any commercial chemicals, check for their inclusion on the EPA list (on the following pages) of acute hazardous and toxic wastes. List substances by their EPA Hazardous Waste Number.

For each waste generated, in the column headed "Generation Rate", indicate under "Amount" the number of tons, barrels, gallons, generated *per year*. Under the "Units/Year", use "T" to indicate *tons*, "B" for *barrels*, "G" for *gallons*, and "D" for *drums*.

Be sure to include periodically generated wastes, such as tank bottoms, and estimate a yearly amount as an average over two or more years.

Under the heading "Characteristics" indicate whether a waste is a liquid, semi-solid, or a solid.

For all waste types, except drilling mud, garbage/refuse, and the discarded commercial chemicals, evaluate their hazardousness or non-hazardousness in regard to *ignitability, corrosivity, ~~reactivity~~ reactivity*, and *EP toxicity* by entering the correct number listed below.

1. Determined hazardous based on testing.
2. Determined non-hazardous based on testing.
3. Assumed hazardous based on judgment.
4. Assumed non-hazardous based on judgment.
5. Unknown

QUESTIONNAIRE

4.0 SOLID/HAZARDOUS WASTE

4.1 Waste Generation

I.D. Number	Waste Types	Generation Rate		Characteristics						
		Amount	Units/Year	Physical Form			Ignitability	Corrosivity	Reactivity + Radioactivity	EP Toxicity
				Liquid	Semi-Solid	Solid				
1	Spent Catalysts	940,000	lbs.			X	2	2	2	2
2	Spent Clays	200,000	lbs.			X	2	2	2	2
3	Leaded Tank Bottoms	75,000	lbs.		X		3	3	3	3
4	Unleaded Tank Bottoms	146,000	lbs.		X					
5	Dissolved Air Flotation Float	6,820,000	lbs.		X		2	2	2	1
6	Heat Exchanger Bundle Cleaning Sludge	9,000,000	lbs.	X		X	2	2	2	2
7	API Separator Sludge	7,800,000	lbs.		X		2	2	2	2
8	Stop Oil Emulsion Solids	140,000	lbs.		X					
9	Wastewater Treatment Plant Sludge	29,000	lbs.		X		2	2	2	2
10	Septic Tank Solids									
11	Water Treatment Plant Sludge									
12	Garbage/Refuse	456,000	lbs.			X				
13	Crank Case Oil									
14	Spent Solvents									
15	Dredge Spoil									
16	Drilling Mud									
17	Tailings									
18	Assorted Lab Wastes									
19	Industrial Painting Residues									
	Discarded Commercial Chemicals (specify from EPA list)									
20										
21										
22										
23										
24										
25										
26										
27										
28										
29										
30										
	Other (specify)									
31										
32										
33										
34										
35										

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100	1000	1001	1002	1003	1004	1005	1006	1007	1008	1009	1010	1011	1012	1013	1014	1015	1016	1017	1018	1019	1020	1021	1022	1023	1024	1025	1026	1027	1028	1029	1030	1031	1032	1033	1034	1035	1036	1037	1038	1039	1040	1041	1042	1043	1044	1045	1046	1047	1048	1049	1050	1051	1052	1053	1054	1055	1056	1057	1058	1059	1060	1061	1062	1063	1064	1065	1066	1067	1068	1069	1070	1071	1072	1073	1074	1075	1076	1077	1078	1079	1080	1081	1082	1083	1084	1085	1086	1087	1088	1089	1090	1091	1092	1093	1094	1095	1096	1097	1098	1099	1100	1101	1102	1103	1104	1105	1106	1107	1108	1109	1110	1111	1112	1113	1114	1115	1116	1117	1118	1119	1120	1121	1122	1123	1124	1125	1126	1127	1128	1129	1130	1131	1132	1133	1134	1135	1136	1137	1138	1139	1140	1141	1142	1143	1144	1145	1146	1147	1148	1149	1150	1151	1152	1153	1154	1155	1156	1157	1158	1159	1160	1161	1162	1163	1164	1165	1166	1167	1168	1169	1170	1171	1172	1173	1174	1175	1176	1177	1178	1179	1180	1181	1182	1183	1184	1185	1186	1187	1188	1189	1190	1191	1192	1193	1194	1195	1196	1197	1198	1199	1200	1201	1202	1203	1204	1205	1206	1207	1208	1209	1210	1211	1212	1213	1214	1215	1216	1217	1218	1219	1220	1221	1222	1223	1224	1225	1226	1227	1228	1229	1230	1231	1232	1233	1234	1235	1236	1237	1238	1239	1240	1241	1242	1243	1244	1245	1246	1247	1248	1249	1250	1251	1252	1253	1254	1255	1256	1257	1258	1259	1260	1261	1262	1263	1264	1265	1266	1267	1268	1269	1270	1271	1272	1273	1274	1275	1276	1277	1278	1279	1280	1281	1282	1283	1284	1285	1286	1287	1288	1289	1290	1291	1292	1293	1294	1295	1296	1297	1298	1299	1300	1301	1302	1303	1304	1305	1306	1307	1308	1309	1310	1311	1312	1313	1314	1315	1316	1317	1318	1319	1320	1321	1322	1323	1324	1325	1326	1327	1328	1329	1330	1331	1332	1333	1334	1335	1336	1337	1338	1339	1340	1341	1342	1343	1344	1345	1346	1347	1348	1349	1350	1351	1352	1353	1354	1355	1356	1357	1358	1359	1360	1361	1362	1363	1364	1365	1366	1367	1368	1369	1370	1371	1372	1373	1374	1375	1376	1377	1378	1379	1380	1381	1382	1383	1384	1385	1386	1387	1388	1389	1390	1391	1392	1393	1394	1395	1396	1397	1398	1399	1400	1401	1402	1403	1404	1405	1406	1407	1408	1409	1410	1411	1412	1413	1414	1415	1416	1417	1418	1419	1420	1421	1422	1423	1424	1425	1426	1427	1428	1429	1430	1431	1432	1433	1434	1435	1436	1437	1438	1439	1440	1441	1442	1443	1444	1445	1446	1447	1448	1449	1450	1451	1452	1453	1454	1455	1456	1457	1458	1459	1460	1461	1462	1463	1464	1465	1466	1467	1468	1469	1470	1471	1472	1473	1474	1475	1476	1477	1478	1479	1480	1481	1482	1483	1484	1485	1486	1487	1488	1489	1490	1491	1492	1493	1494	1495	1496	1497	1498	1499	1500	1501	1502	1503	1504	1505	1506	1507	1508	1509	1510	1511	1512	1513	1514	1515	1516	1517	1518	1519	1520	1521	1522	1523	1524	1525	1526	1527	1528	1529	1530	1531	1532	1533	1534	1535	1536	1537	1538	1539	1540	1541	1542	1543	1544	1545	1546	1547	1548	1549	1550	1551	1552	1553	1554	1555	1556	1557	1558	1559	1560	1561	1562	1563	1564	1565	1566	1567	1568	1569	1570	1571	1572	1573	1574	1575	1576	1577	1578	1579	1580	1581	1582	1583	1584	1585	1586	1587	1588	1589	1590	1591	1592	1593	1594	1595	1596	1597	1598	1599	1600	1601	1602	1603	1604	1605	1606	1607	1608	1609	1610	1611	1612	1613	1614	1615	1616	1617	1618	1619	1620	1621	1622	1623	1624	1625	1626	1627	1628	1629	1630	1631	1632	1633	1634	1635	1636	1637	1638	1639	1640	1641	1642	1643	1644	1645	1646	1647	1648	1649	1650	1651	1652	1653	1654	1655	1656	1657	1658	1659	1660	1661	1662	1663	1664	1665	1666	1667	1668	1669	1670	1671	1672	1673	1674	1675	1676	1677	1678	1679	1680	1681	1682	1683	1684	1685	1686	1687	1688	1689	1690	1691	1692	1693	1694	1695	1696	1697	1698	1699	1700	1701	1702	1703	1704	1705	1706	1707	1708	1709	1710	1711	1712	1713	1714	1715	1716	1717	1718	1719	1720	1721	1722	1723	1724	1725	1726	1727	1728	1729	1730	1731	1732	1733	1734	1735	1736	1737	1738	1739	1740	1741	1742	1743	1744	1745	1746	1747	1748	1749	1750	1751	1752	1753	1754	1755	1756	1757	1758	1759	1760	1761	1762	1763	1764	1765	1766	1767	1768	1769	1770	1771	1772	1773	1774	1775	1776	1777	1778	1779	1780	1781	1782	1783	1784	1785	1786	1787	1788	1789	1790	1791	1792	1793	1794	1795	1796	1797	1798	1799	1800	1801	1802	1803	1804	1805	1806	1807	1808	1809	1810	1811	1812	1813	1814	1815	1816	1817	1818	1819	1820	1821	1822	1823	1824	1825	1826	1827	1828	1829	1830	1831	1832	1833	1834	1835	1836	1837	1838	1839	1840	1841	1842	1843	1844	1845	1846	1847	1848	1849	1850	1851	1852	1853	1854	1855	1856	1857	1858	1859	1860	1861	1862	1863	1864	1865	1866	1867	1868	1869	1870	1871	1872	1873	1874	1875	1876	1877	1878	1879	1880	1881	1882	1883	1884	1885	1886	1887	1888	1889	1890	1891	1892	1893	1894	1895	1896	1897	1898	1899	1900	1901	1902	1903	1904	1905	1906	1907	1908	1909	1910	1911	1912	1913	1914	1915	1916	1917	1918	1919	1920	1921	1922	1923	1924	1925	1926	1927	1928	1929	1930	1931	1932	1933	1934	1935	1936	1937	1938	1939	1940	1941	1942	1943	1944	1945	1946	1947	1948	1949	1950	1951	1952	1953	1954	1955	1956	1957	1958	1959	1960	1961	1962	1963	1964	1965	1966	1967	1968	1969	1970	1971	1972	1973	1974	1975	1976	1977	1978	1979	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	1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THIONEX see P050 THIOPHENIT see P071 Thiosemicarbazide Thiosulfonate see P050 Thuram THOMPSON'S WOOD FIX see P080 TIOVEL see P050 Trichloromethane TWIN LIGHT RAT AWAY see P001 USAF RH-8 see P089 USAF EK-4890 see P002 Vanadic acid ammonium salt Vanadium pentoxide VIOFOTOX see P071 WANADU see P120 WARCOUMIN see P001 WARFARIN SODIUM see P001 WARFICIDE see P001 WOFOTOX see P072 YANOCK see P057 YASOKNOCK see P058 ZIRARIN see P082 P121 Zinc cyanide P122 Zinc phosphide (R T) ZOOCCUMARIN see P001	U063 Dibenz(a,h)anthracene U064 Dibenz(a,h)anthracene see U063 U065 Dibenz(a,h)anthracene U066 1,2-Dibromo-3-chloropropane U067 1,2-Dibromopropane U068 Dibromomethane U069 Di-n-butyl phthalate U070 1,2-Dichlorobenzene U071 1,3-Dichlorobenzene U072 1,4-Dichlorobenzene U073 2,3-Dichlorobenzene U074 1,4-Dichloro-2-butene U075 2,3-Dichloro-4,4'-diaminobiphenyl see U073 U076 Dichlorodifluoromethane U077 1,1-Dichloroethane U078 1,2-Dichloroethane U079 1,2-Trans-dichloroethylene U080 Dichloromethane U081 Dichloromethylbenzene see U017 U082 2,4-Dichlorophenol U083 2,6-Dichlorophenol U084 1,3-Dichloropropane U085 Diisopropylamine (I T) U086 1,2-Diethylamine U087 0,0-Diethyl-S-methyl ester of phosphorodithioic acid U088 Dimethyl phthalate U089 Diethylstilbestrol U090 Dihydrostilbene U091 3,3-Dimethoxybenzidine U092 Dimethylamine (I) U093 p-Dimethylaminobenzene U094 7,12-Dimethylbenz(a)anthracene U095 3,3'-Dimethylbenzidine U096 alpha,alpha-Dimethylbenzylhydroperoxide (R) U097 Dimethylcarbamoyl chloride U098 1,1-Dimethylhydrazine U099 1,2-Dimethylhydrazine U100 Dimethylhydrazine U101 2,4-Dimethylphenol U102 Dimethyl phthalate U103 Dimethyl sulfate U104 2,4-Dimethylphenol U105 2,4-Dimethylbenzene U106 2,6-Dimethylbenzene U107 Di-n-octyl phthalate U108 1,4-Dioxane U109 1,2-Diphenylhydrazine U110 Dipropylamine (I) U111 Di-n-propylhydrazine EBOC see U114 1,4-Epoxybutane see U213 U112 Ethyl acetate (I) U113 Ethyl acrylate (I) U114 Ethylenedibis(hydroxymethyl) ether U115 Ethylene oxide (I T) U116 Ethylene thioether U117 Ethyl ether (I T) U118 Ethylmethacrylate U119 Ethyl methanesulfonate Ethylenes see U003 Framaster T23P see U235 U120 Fluoranthene U121 Fluoranthene U122 Formaldehyde U123 Formic acid (C, T) U124 Furan (I) U125 Furfural (I) U126 Glycidyl ether U127 Hexachlorobenzene U128 Hexachlorocyclopentadiene U129 Hexachlorocyclohexane U130 Hexachlorocyclopentadiene U131 Hexachlorophene U132 Hexachlorophene U133 Hydrazine (R T) U134 Hydrofluoric acid (C, T) U135 Hydrogen sulfide Hydroxybenzene see U188 U136 Hydroxydimethyl arsine oxide 4,4'-(Imidocarbonyl)bis(N,N-dimethylamine) see U014 U137 Indeno(1,2,3-cd)pyrene U138 Iodomethane U139 Iron Dextran U140 Isobutyl alcohol U141 Isobutylene U142 Kerosene U143 Lead acetate U144 Lead acetate U145 Lead phosphate U146 Lead subacetate U147 Maleic anhydride U148 Maleic hydrazide U149 Malononitrile MEK Peroxide see U160 Methanol	Methyl acetate see U115 Methyl chloroacetate Methyl chloroform see U226 U157 3-Methylchlorobenzene Methyl chloroformate see U156 U158 4,4-Methylene-bis(2-chloroaniline) U159 Methyl ethyl ketone (MEK) (I T) U160 Methyl ethyl ketone peroxide (R) Methyl iodide see U138 U161 Methyl isobutyl ketone U162 Methyl methacrylate (R T) U163 N-Methyl-N-nitro-N-nitrosoguanidine U164 Methylthiourea Methylenes see U010 U165 Naphthalene U166 1,4-Naphthoquinone U167 1-Naphthylamine U168 2-Naphthylamine Naphthalene (I T) Naphthalene see U169 U170 4-Naphthol U171 2-Naphthol (I) U172 N-Nitrosodimethylamine U173 N-Nitrosodimethylamine U174 N-Nitrosodimethylamine U175 N-Nitrosodimethylamine U176 N-Nitrosodimethylamine U177 N-Nitrosodimethylamine U178 N-Nitrosodimethylamine U179 N-Nitrosodimethylamine U180 N-Nitrosodimethylamine U181 5-Nitro-2-iodoaniline U182 Paraldehyde PCMB see U185 U183 Pentachlorobenzene U184 Pentachlorobenzene U185 Pentachlorobenzene U186 1,3-Pentadiene (I) Perc see U210 Perchloroethylene see U210 Phenacetin Phenol U188 Phosphorous sulfide (R) U189 Phthalic anhydride U190 Picric acid U191 Picric acid U192 Picric acid U193 1,3-Propylene sulfone U194 n-Propylamine (I) U195 Pyridine U196 Quinoline U197 Quinoline U200 Reserpine U201 Reserpine U202 Saccharin U203 Salicylic acid U204 Selenium acid U205 Selenium sulfide (H T) U206 Silver see U233 Serpentinolite 2,4,5-T see U237 U207 1,2,4,5-Tetrachlorobenzene U208 1,1,1,2-Tetrachloroethane U209 1,1,2,2-Tetrachloroethane U210 Tetrachloroethene Tetrachloroethylene see U210 Tetrachloroethane U211 Tetrachloroethane U212 2,3,4,6-Tetrachlorophenol U213 Tetrahydrofuran (I) U214 Thallium (I) acetate U215 Thallium (I) carbonate U216 Thallium (I) chloride U217 Thallium (I) nitrate U218 Thioacetamide U219 Thiourea U220 Toluene U221 Toluene U222 o-Toluidine hydrochloride U223 Toluene disocyanate U224 Toxaphene 2,4,5-TP see U233 U225 Trichloromethane U226 1,1,1-Trichloroethane U227 1,1,2-Trichloroethane U228 Trichloroethene Trichloroethylene see U228 U229 Trichlorofluoromethane U230 2,4,5-Trichlorophenol U231 2,4,6-Trichlorophenol U232 2,4,5-Trichlorophenoxyacetic acid U233 2,4,5-Trichlorophenoxypropionic acid, alpha, alpha, trichlorobenzene TRI-CLENE see U228 U234 Trichlorobenzene (R T) U235 Tris(2,3-dibromopropyl) phosphite U236 Trypan blue U237 Ureic mustard U238 Urethane Vinyl chloride see U042 Vinylidene chloride see U078 Xylene
--	--	--

The Agency included those trade names of which it was aware an omission of a trade name does not imply that the omitted material is not hazardous. The material is hazardous if it is listed under its generic name.

INSTRUCTIONS

For each waste type generated in Section 4.1, complete accompanying information in the matrix of Section 4.2.

Section 4.2 Indicate those wastes generated at your facility which are stored on-site for more than 90 days.

Indicate those wastes generated at your facility which receive treatment prior to final disposal, the location of treatment (on-site or off-site), and the method of treatment.

Indicate the location (on-site or off-site) and the method of final disposal. If the method of *disposal* is not listed, please mark the "Other" column and specify at the bottom of that page: for example, Sun Company reclamation of waste #13, crank-case oil.

For any company owned operation, whether on-site or off-site, check the appropriate column under Company Ownership. If not company owned leave blank.

4.2

Waste Storage, Treatment, and Disposal

I.D. Number	Waste Types	Stored On-Site More Than 90 Days	Treatment Prior to Final Disposal					Final Disposal							Company Ownership		
			Location		Method			Location		Method					Transportation	Treatment	
			On-Site	Off-Site	Thermal (Incineration)	Physical	Chemical	On-Site	Off-Site	Landfill	Land Farming	Pits, Ponds and Lagoons	Deep Well	Other (Specify Below)			
1	Spent Catalyst							X		X	X					X	X
2	Spent Clays							X		X						X	X
3	Leaded Tank Bottoms							X	X		X					X	X
4	Unleaded Tank Bottoms							X	X		X					X	X
5	Dissolved Air Flotation Float							X			X						X
6	Heat Exchanger Bundle Cleaning Sludge							X	X		X			X			X
7	API Separator Sludge							X	X		X			X			X
8	Slop Oil Emulsion Solids							X	X		X			X			X
	Wastewater Treatment Plant Sludge							X			X					X	X
10	Septic Tank Solids																
11	Water Treatment Plant Sludge																
12	Garbage/Refuse								X	X							
13	Crank Case Oil																
14	Spent Solvents																
15	Drédge Spoil																
16	Drilling Mud																
17	Tailings																
18	Assorted Lab Wastes																
19	Industrial Painting Residues																
	Discarded Commercial Chemicals (specify from EPA list)																
20																	
21																	
22																	
23																	
24																	
25																	
26																	
27																	
28																	
29																	
30																	
	Other (specify)																
31																	
32																	
33																	
34																	
35																	

S (B) 00933

(1)

(2) (3) (4) (5) (6) (7) (8) (9) (10) (11) (12) (13) (14) (15) (16)

INSTRUCTIONS

Section 4.2.2 If your facility uses or has, at anytime in the past, used a storage or disposal facility, provide the information required regarding such facilities. Indicate the type of such a facility or facilities.

Section 4.2.2 If your facility uses or has, at any time in the past, used a storage disposal facility, provide the information required regarding such facilities. Indicate the type of such a facility or facilities.

Give its (their) size in appropriate units: i.e., acres, gallons, etc.

List the first and last calendar years during which it was used. If it is still active, write "Current" in the "Last Year" column.

List the types of wastes for which it was primarily used. (Use the identification numbers from Item 4.1 representing waste types.)

Describe briefly any security measures currently in effect to prevent unauthorized access: i.e., fencing, 24-hour patrolling, locking, etc.

Indicate whether ground water has been, or is currently being, monitored.

QUESTIONNAIRE

4.2.2

Active and Inactive Company-Utilized Waste Facilities

Type of Facility	Size	Location		Calendar Years When Used		Primary Wastes Involved	Security Measures to Prevent Unauthorized Access	Any Previous or Current Ground Water Monitoring		
		on-site	Off-site	First Year	Last Year			yes	no	
X	12,600,000 gal.	X		1953	Present	Refinery waste water	Fenced, Guard		X	
	17 Acres	X		1976	Present	API Sep. Sludge leached TK Btms	Fenced Guard	X		
X	2 Acres	X		1950	1977	Refinery and Drilling wastes	Fenced, locked Signs		X	
	17,000 cu. yds	X		1953	1978	Spent Catalyst	Fenced Guard		X	
	2,700,000 gal.	X		1953	Present	Lime Clay Catalyst	Fenced Guard		X	

(2) (3) (4) (5) (6) (7) (8) (9) (10) (11) (12)

NO INSTRUCTIONS NECESSARY

S (B) 00936

QUESTIONNAIRE

4.3 Regulatory Agency Requirements

- 4.3.1 Did you receive guidelines from your parent organization explaining the RCRA requirements for notifying EPA of hazardous waste activities? ☒ Yes ☐ No
- 4.3.2 Were you required to file EPA Form 8700-12 (2-80) "Notification of Hazardous Waste Activity"? ☒ Yes ☐ No ☐ Unknown
- 4.3.3 If so, did you file the form with EPA by August 18, 1980? ☒ Yes ☐ No
- 4.3.4 If so, have you received an EPA ID Number ☒ as proof that EPA received the form by August 18, 1980? ☒ Yes ☐ No
- 4.3.5 If you are responding for multiple facilities, how many such notifications were filed? _____

* EPA I.D. No. WAS RECEIVED PRIOR TO FILING OF EPA FORM 8700-12 (2-80). NO CONFIRMATION OF RECEIPT OF FORM RECEIVED FROM EPA TO DATE.

INSTRUCTIONS

Section 4.3.6 *Indicate whether your facility has been subject to any official actions, such as those listed, for violations of hazardous waste regulations. If this questionnaire applies to a multiple facility, indicate which specific facility(ies) was(were) involved.*

If an official action was taken other than one of those listed, specify under "Other".

Indicate date (month/year) of official action.

Indicate if any of the penalties listed were imposed. If a fine was imposed, list the amount. If other penalties were imposed, specify under "Other".

Indicate the current status of the violation source.

If additional space is required, Xerox a blank copy of the table, complete it, and attach it to the back cover of the questionnaire.

QUESTIONNAIRE

4.3.6 Hazardous Waste Violations

Name of Facility (for multiple facilities only)	Type of Violation	Official Action					Date mo. yr.	Agency	Penalty Imposed					Status of Violation		
		Notice of Violation	Administrative Order	Civil Action	Criminal Action	Other*			None	Fine (list amount)	Operation Halted	Facility Closed	Other*	Corrected	Uncorrected	Other*
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
	None															

*Other**

INSTRUCTIONS

Section 4.4 This section is to be completed for *service stations ONLY*. If you do not have the information requested, respond with your best estimate.

If you use estimated, rather than recorded/established figures, indicate this with "E" following the number.

QUESTIONNAIRE

4.4 For Service Stations Only

4.4.1 How many service stations in the area covered by this questionnaire have service bays which perform engine oil changes? _____

4.4.2 How many such service stations generate more than 300 gallons of used crankcase oil per month? _____

4.4.3 For stations which generate less than 300 gallons per month, how many have a used crankcase oil storage capacity greater than 300 gallons? _____

4.4.4 How many such service stations disposed of their used crankcase oil via:

Reclaimer/recycler _____

Road oiler _____

Other _____

S (B) 00941

**INSTRUCTIONS FOR
Section 5.0 - Wastewater Discharge**

- 5.1** *Indicate in the first row those types of wastewater discharged from your facility. For each type of wastewater so checked, provide the other information in terms of the number of outfalls.*

Definitions:

Outfall - any discernible, confined, and discrete conveyance, including, but not limited to, any pipe, ditch, channel, tunnel, conduit, well, or discrete fissure from which any fluid may be discharged. That is, an outfall is not limited to just a pipe or flume.

Primary treatment - sedimentation to remove gross solids, oil/water separation.

Secondary treatment - biological treatment to reduce organic loads.

Advanced treatment - processes beyond secondary treatment designed to remove organic and inorganic solids.

Waters of the United States - any stream, river, ocean, lake, mud flat, sand flat, wetland, slough, prairie pothole, wet meadow, playa lake, or natural pond.

Land application - spreading or spraying on the surface of the land where the intent is infiltration through the soil and/or evapotranspiration.

Non-point runoff - sheet flow where the wastewater leaves your facility (mark this row with an "X", if appropriate, because number of outfalls is inappropriate).

QUESTIONNAIRE

5.0 WASTEWATER DISCHARGE

5.1 Type of Wastewater	(1) Process Wastewater	(2) Produced* Water	(3) Sanitary Wastewater	(4) Cooling Water	(5) Boiler Blowdown	(6) Ballast Water	(7) Stormwater
Check if generated at your facility	X		X	X	X	X	X
Total number of discrete outfalls	1		0	1	1	1	4
Total number of outfalls receiving:							
No treatment	0			0	0	0	3
Primary treatment	1			1	1	1	1
Secondary treatment	1			1	1	1	1
Advanced treatment							
Total number of outfalls by method of disposal							
Point source to a surface water of the United States	1			1	1	1	4
Publically owned treatment works			1				
Publically owned stormwater conveyance system							
Land application							
Well							
Total number of outfalls monitored at least quarterly and reported to state/federal agency	1			1	1	1	1
Total number of outfalls covered by NPDES permit (issued or pending)	1			1	1	1	4
Total number of outfalls covered by state permit (issued or pending)	1			1	1	1	4

S (B) 00943

* From oil and gas exploration and production operations.

This Refinery has a total of 4 discrete outfalls
 Columns 1, 4, 5, 6, 7 are included in one outfall

NO INSTRUCTIONS NECESSARY

S (B) 00944

QUESTIONNAIRE

5.1.1 Of the storm water outfalls, how many contain dry weather flow?

0

5.1.2 How many of the storm water outfalls containing dry weather flow are monitored at least quarterly with results reported to EPA or a state agency?

5.2 Analytical Laboratory Control

5.2.1 Do you use your own *in-house* laboratory for analyzing wastewater effluent samples? ☒ Yes ☐ No

5.2.2 IF SO, when was the last time wastewater effluent samples were split for analysis by an independent laboratory?

12 - 80
Month Year

5.2.3 If samples were split for analysis by an independent laboratory, were the results compatible with those from your in-house analysis? ☒ Yes ☐ No

5.2.4 If you use *outside laboratory* facilities for wastewater effluent sample analysis, do you split samples? ☒ Yes ☐ No

5.2.5 Do you retain all sampling and analytical records for a minimum of three years? ☒ Yes ☐ No

5.2.6 Do you operate any continuous on-line wastewater monitoring equipment? ☒ Yes ☐ No

5.2.7 If so, is all of this monitoring equipment included in a statistically-based quality control maintenance program? ☒ Yes ☐ No

INSTRUCTIONS

Section 5.3.1 *Under each year listed, give the total number of Wastewater Discharge Permit Exceedences* for each wastewater parameter listed. Indicate "0" (zero) if there were none for a given parameter/year. Leave a blank space for any parameter not monitored.*

EXAMPLE:

Wastewater Parameter	Number of Wastewater Discharge Permit Exceedences for Each Year			
	1977	1978	1979	1980
BOD	<u>0</u>	<u>0</u>	<u>2</u>	<u>1</u>
COD	<u> </u>	<u> </u>	<u>4</u>	<u>2</u>
TOC	<u> </u>	<u> </u>	<u> </u>	<u> </u>

* Exceedences - Occasions when concentrations of parameters established by NPDES Permit or other regulation are exceeded or surpassed.

QUESTIONNAIRE

5.3 Regulatory Agency Actions

5.3.1

Number of Wastewater Discharge Permit Exceedences for Each Year

Wastewater Parameter	1977	1978	1979	1980	TOTALS
(1) BOD	<u>2</u>	<u>5</u>	<u>1</u>	<u>8</u>	<u>16</u>
(2) COD	<u>1</u>	<u>3</u>	<u>0</u>	<u>3</u>	<u>7</u>
(3) TOC	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
(4) TSS	<u>9</u>	<u>8</u>	<u>0</u>	<u>2</u>	<u>19</u>
(5) Oil and Grease	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
(6) Ammonia	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
(7) pH	<u>0</u>	<u>4</u>	<u>1</u>	<u>0</u>	<u>5</u>
(8) Sulfide	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
(9) Hexavalent Chromium	<u>5</u>	<u>2</u>	<u>0</u>	<u>0</u>	<u>7</u>
(10) Total Chromium	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
(11) Lead	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
(12) Zinc	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Other					
(13) <u>Phenol</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>0</u>	<u>6</u>
(14) _____	_____	_____	_____	_____	_____
(15) _____	_____	_____	_____	_____	_____
TOTALS	<u>18</u> (1)	<u>24</u> (2)	<u>5</u> (3)	<u>13</u> (4)	<u>60</u> (5)

5.3.2 Does your facility have an existing compliance schedule for wastewater discharge written into your NPDES or state permit? [] Yes [☒] No

INSTRUCTIONS

Section 5.3.4 *Indicate whether your facility has been subject to any official actions, such as those listed, for violations of wastewater discharge regulations. If this questionnaire applies to a multiple facility, indicate which specific facility(ies) was(were) involved.*

If an official action was taken other than one of those listed, specify under "Other".

If any of the penalties listed were imposed, so indicate it. If a fine was imposed, list the amount. If other penalties were imposed, specify under "Other".

Indicate the current status of the violation source.

If additional space is required, Xerox and complete as many copies of the form as needed.

QUESTIONNAIRE

5.3.4 Wastewater Discharge Violations

Name of Facility (for multiple facilities only)	Type of Violation	Official Action				Date mo. yr.	Agency	Penalty Imposed				Status of Violation				
		Notice of Violation	Administrative Order	Civil Action	Criminal Action			Other*	Corrected	Uncorrected	Other*					
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
	Daily maximum NPDES Permit	✓	✓				6 8 8 11 75	US EPA	✓	✓	✓	✓	✓	✓	✓	✓
	"	✓	✓				1 4 9 76		✓	✓	✓					
	"	✓	✓				4 19 77		✓	✓	✓					
	"	✓	✓				10 78		✓	✓	✓					
	"	✓	✓				2 12 79		✓	✓	✓					
	"	✓	✓				2 80		✓	✓	✓					
	"	✓	✓				3 4 7 10 80		✓	✓	✓					

INSTRUCTIONS FOR
Section 6.0 — DRINKING WATER QUALITY AND GROUND WATER
PROTECTION — UNDERGROUND INJECTION CONTROL
(UIC)

Section 6.1

If this questionnaire is addressed to a single facility or single source, respond in the spaces between the double horizontal lines. If it is addressed to a multiple facility or a single facility with more than one source, list the separate facilities or sources in the right hand column and respond for each one.

● **Source**

6.1.1 If the source of your facility's drinking water is a municipal water supply system (or private company or authority serving customers other than your facility), indicate this as a "Public Water Supply". If the source is a well, spring, or surface water (lake) on a property owned or controlled by your facility, or if you buy bottled water for facility personnel use, so indicate.

● **Treatment**

6.1.2 If you have indicated a private well, spring, or surface water as your facility's drinking water source, indicate the type (s) of treatment to which the water is subject. Or, if you use a public water supply and you subject it to further treatment, so indicate. (If bottled water is used, Items 6.1.2 and 6.1.3 do not apply.)

● **Monitoring**

6.1.3 If you monitor your water supply, whether public or private, indicate the parameters for which it is monitored. Blanks in all four spaces will indicate "no monitoring". List any additional monitoring parameters by source at the bottom of the page.

● **Size**

6.1.4 Indicate the average number of persons served by this supply for at least 60 days out of the year.

QUESTIONNAIRE

6.0 DRINKING WATER QUALITY AND GROUND WATER PROTECTION — UNDERGROUND INJECTION CONTROL (UIC)

			Single Facility or source	Multiple Facilities or Sources (list)																	
6.1.4	Size	Number of Persons Served	535																		
6.1.3	Monitoring Parameters	Other (specify)																			
		Turbidity																			
		Nitrate																			
		Coliform Bacteria																			
6.1.2	Treatment	Disinfection																			
		Filtration																			
		Coagulation/ Flocculation																			
		None																			
6.1.1	Source	Private	Bottled Water																		
			Surface Water																		
			Spring																		
			Well																		
			Public Water Supply	X																	
					(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	10	11	13	14	15			

S (B) 00951

NO INSTRUCTIONS NECESSARY

S (B) 00952

QUESTIONNAIRE

6.1.5 If the drinking water supply for your facility is from *either* a *public* or a *private* source (other than bottled water):

Do you report results of monitoring to U.S. EPA or the state agency responsible for this activity?

[] Yes [X] No

6.1.6 If the drinking water supply for your facility is from *either* a *public* or a *private* source (other than bottled water):

Do you provide bulk amounts of water to individuals or companies outside the Sun Company organization?

[X] Yes [] No

INSTRUCTIONS

6.2.3 to 6.2.6 *On page 26-Q indicate the total number of wells at your facility in each Class.*

Class II and Class III Wells are subdivided into categories based on types of use. Give the subtotals of Class II and Class III Wells in each category.

Background and Definitions

EPA's consolidated permit regulations (published in the Federal Register on 19 May 1980) cover a Federal-state system of controls designed to insure that well injection practices do not endanger drinking water sources.

*"Underground injection" or "well injection" means the subsurface emplacement of fluids through a bored, drilled, or driven well; or through a dug well, where the depth of the well

driven well; or through a dug well, where the depth of the dug well is greater than the largest surface dimension.

Injection wells are divided into Classes I to V as defined below.

Class I wells inject hazardous waste *beneath* the lowermost formation containing, within one-quarter mile of the well bore, an underground source of drinking water.

Class II wells are used for injections in conjunction with the production or underground storage of petroleum or natural gas.

Class III wells are used for the injection of fluids for the extraction of minerals or energy.

Class IV wells either: discharge hazardous waste directly *into* underground sources of drinking water, or discharge hazardous waste *above* underground sources of drinking water.

Class V wells are all injection wells which do not fit Class I to IV definitions.

QUESTIONNAIRE

6.2 Underground Injection* Control (UIC)

6.2.1 Do you have any underground injection wells at your facility?

[] Yes [] No

IF NOT, proceed to Section 6.3

6.2.2 *IF SO*, what is the total number of all underground injection wells at your facility?

UIC WELL CLASSIFICATION

		NO. OF WELLS IN CTGY.	TOTAL NO. OF WELLS IN CLASS	
6.2.3	Class I Wells.....			(1)
6.2.4	Class II Wells			
	Used for the injection of produced water or other fluids which are:			
	(Category 1) brought to the surface in connection with conventional oil or natural gas production.....			(2)
	(Category 2) used to enhance recovery of oil or natural gas			(3)
	(Category 3) liquid hydrocarbons for storage			(4)
	Total wells in Class II			(5)
6.2.5	Class III Wells			
	Used for the injection of fluids for the extraction of minerals or energy:			
	(Category 1) mining of sulfur by the Frasch process ...			(6)
	(Category 2) solution mining of minerals			(7)
	(Category 3) in situ combustion of fossil fuel			(8)
	(Category 4) recovery of geothermal energy			(9)
	Total wells in Class III.....			(10)
6.2.6	Class IV Wells			(11)
6.2.7	Class V Wells			
	All injection wells not in Classes I—IV.....			(12)

NO INSTRUCTIONS NECESSARY

S (B) 00956

QUESTIONNAIRE

6.3 Ground Water Protection and Monitoring

6.3.1 Monitoring System

1. Does your facility have ground water monitoring wells?

[☒] Yes [] No

[IF NOT, proceed to Section 6.3.2]

2. IF SO, how many monitoring wells?

3

3. Are the locations of these wells shown on a map maintained at the facility?

[☒] Yes [] No

4. Do you have well construction details relative to the following?

— Total depth [☒] Yes [] No
— Length of casing [☒] Yes [] No
— Diameter of casing [☒] Yes [] No
— Screened or slotted interval [☒] Yes [] No

6.3.2 Is information on record at your facility with regard to the following parameters of the ground water flow system at your facility?

1. Type and sequence of subsurface deposits [☒] Yes [] No
2. Depth to ground water [☒] Yes [] No
3. Fluctuation of water table [] Yes [☒] No
4. Direction of ground water flow [☒] Yes [] No
5. Point of discharge [] Yes [☒] No
6. Use (s) of ground water within ¼ mile of the facility [☒] Yes [] No
7. Direction to point of use [☒] Yes [] No

NO INSTRUCTIONS NECESSARY

S (B) 00958

6.3.3 Monitoring Results

1. Have monitoring wells been sampled?

☒ Yes ☐ No

IF NOT, proceed to Section 7.0

2. IF SO, give the date of the latest sampling

09 80
Month Year

3. If sampling is done periodically, indicate the frequency:

yearly X
quarterly _____
monthly _____
other (specify) _____

4. Was a laboratory analysis of samples conducted by a qualified professional?

☒ Yes ☐ No

5. Have the sampling data been reported to a regulatory agency?

☐ Yes ☒ No

6. Has any professional person experienced in hydrogeology and/or water quality interpretation reviewed these data?

☐ Yes ☒ No

7. Have sampling data results indicated a significant deterioration of water quality?

☐ Yes ☒ No

INSTRUCTIONS FOR

Section 7.0 — POLYCHLORINATED BIPHENYLS (PCBs)

Section 7.1.3 *Supply the required number for transformers or the matrix provided. Transformers without testing data or manufacturer's specifications regarding PCB concentrations should be entered under "Unknown".*

BACKGROUND ON EPA PCB REGULATIONS

On 31 May 1979, the U.S. EPA published in the Federal Register (44FR31514) the Final Ban Rule for PCBs which applies to any substance, mixture or item with 50 ppm or greater PCB. PCB Waste oil is forbidden from being used as a sealant, coating, or dust control agent.

The Final Rule says that EPA can grant exemptions from the PCB manufacturing/importation ban effective 2 July 1979—or from the PCB processing/distribution in commerce prohibition effective 1 July 1979.

In general, anyone wanting an exemption must petition EPA for it. An exemption, valid for only one year, must be granted annually through a formal rulemaking. In some instances, individuals may not have to seek separate exemptions when the Agency grants "class" exemptions for some processing and distribution in commerce bans.

The 31 May 1979 Federal Register, Section 750.31 (a), lists and describes the categories that may file class exemption petitions. If your activity is not listed in Section 750.31 (a), you must file a petition on an individual basis.

The Ban Rule says that EPA can grant exemptions, known as authorizations, to enable the continued manufacturing, processing, distribution in commerce, or use of PCBs in a non-totally enclosed manner after 2 July 1979.

EPA may propose and grant an authorization without a specific request from those who will benefit from the authorization. Also, the authorization can be valid for any time period that EPA finds appropriate.

The following non-totally enclosed PCB activities have already been authorized by EPA (beside each, is the Rule section to refer to for details):

- servicing PCB Transformers and PCB-Contaminated Transformers (Section 761.31 (a));
- use in and servicing of Railroad Transformers (Section 761.31 (b));
- use in and servicing of Mining Equipment (Section 761.31 (c));
- use in Heat Transfer Systems (Section 761.31 (d));
- use in Hydraulic Systems (Section 761.31 (e));
- use in Natural Gas Pipeline Compressors (Section 761.31 (i));

QUESTIONNAIRE

7.0 POLYCHLORINATED BIPHENYLS (PCBs)

7.0.1 Are you familiar with servicing, storage, disposal, and record keeping requirements established in EPA's May 31, 1979 Final Ban Rule for PCBs?

[☒] Yes [☐] No

If not, please re-read the background discussion on page 29-l.

7.1 Transformers

7.1.1 Do you have any facility-owned transformers in active service or stored on-site?

[☒] Yes [☐] No

[IF NOT, proceed to Section 7.2.]

7.1.2 IF SO, have you conducted, or are you presently conducting a survey of your facility's transformers?

[☒] Yes [☐] No

7.1.3

Transformers with PCB Concentration of:	Total No. of Transformers	No. Labeled	No. in Active Service	No. in Storage or Inactive	Maximum Length of Time Stored
>500 ppm	<u>18</u>	<u>18</u>	<u>16</u>	<u>2</u>	<u>9 years</u>
50-500 ppm	<u>8</u>	<u>8</u>	<u>8</u>	<u> </u>	<u> </u>
<50 ppm	<u>35</u>	<u> </u>	<u>35</u>	<u> </u>	<u> </u>
Unknown Concentration	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
	(1)	(2)	(3)	(4)	(5)

INSTRUCTIONS

7.2.2 Enter the appropriate numbers for capacitors on the matrix provided.

QUESTIONNAIRE

7.2 Capacitors

7.2.1 Have you conducted, or are you presently conducting a survey of your facility's capacitors?

[X] Yes [] No

2.2

size

Capacitors with PCB Concentration of:	Total Number of Capacitors	Number Labeled	No. with < 3 lbs. Dielectric fluid	No. with > 3 lbs. dielectric fluid	No. in Active Service	No. in Storage of Inactive	Maximum Length of Time Stored
>500 ppm	<u>40</u>	<u>40</u>		<u>40</u>		<u>40</u>	<u>2 years</u>
50-500 ppm							
< 50 ppm	<u>32</u>			<u>32</u>	<u>32</u>		
Unknown Concentration							
	(1)	(2)	(3)	(4)	(5)	(6)	(7)

INSTRUCTIONS

Section 7.3 The hydraulic fluid in such equipment as compressors, cherry pickers, etc. may contain PCBs.

S (B) 00964

QUESTIONNAIRE

7.3 Other Equipment

7.3.1 Other than transformers and capacitors, are you aware of any other types of equipment at your facility which contain PCBs?

[] Yes [X] No

7.3.2 *IF SO*, list such items below, give the total number of each type of equipment, and the concentration of PCBs (in ppm) they contain.

Type of Equipment	Number	Concentration PCB (ppm)
(1) _____	_____	_____
(2) _____	_____	_____
(3) _____	_____	_____
(4) _____	_____	_____
(5) _____	_____	_____
(6) _____	_____	_____
(1)	(2)	(3)

**INSTRUCTIONS FOR
Section 8.0 — ASBESTOS**

Definitions:

- * *Asbestos* means actinolite, amosite, anthophyllite, chrysotile, crocidolite, tremolite. "Friable asbestos material" means any material that contains more than one percent (1%) asbestos by weight and that can be crumbled, pulverized, or reduced to powder, when dry, by hand.
- ** *Renovation* means the removing or stripping of friable asbestos materials used on any pipe, duct, boiler, tank, reactor, turbine, furnace, or structural member.

From:

Environmental Protection Agency Regulations on National Emission Standards for Hazardous Air Pollutants (40 CFR 61; 38 FR 8820, April 6, 1973; Amended as shown in Code of Federal Regulations, Volume 40, Revised as of July 1, 1978; 43 FR 47692, October 16, 1978; 44 FR 7714, February 7, 1979; 44 FR 55174, September 25, 1979; 44 FR 65399, November 13, 1979)

QUESTIONNAIRE

8.0 ASBESTOS*

8.1 Are you familiar with EPA's regulations on National Emission Standards for Asbestos, a hazardous air pollutant?

☒ Yes ☐ No

8.2 Do you have asbestos at your facility?

☒ Yes ☐ No

8.3 Have you renovated** any equipment involving asbestos in the past year?

☒ Yes ☐ No

8.4 Do you plan to renovate any equipment in the next year?

☒ Yes ☐ No

8.5 Are you familiar with EPA's required written notice of intention to renovate such equipment?

☒ Yes ☐ No

8.6 Do you have an on-site active or inactive facility in which asbestos-containing material is being or has been deposited?

☐ Yes ☒ No

8.7 Are you familiar with the EPA regulations which apply to owners of such facility, e.g. do you have a chain link fence around such a facility?

☒ Yes ☐ No

8.8 Are you in compliance with these regulations?

☒ Yes ☐ No ☐ Unknown

NO INSTRUCTIONS NECESSARY

S (B) 00968

QUESTIONNAIRE

8.9 Are you familiar with the EPA criteria for an acceptable asbestos disposal facility?

[☒] Yes [] No

8.10 Have you disposed of any asbestos-containing material in such a facility since July 1977?

[☒] Yes [] No [] Unknown

8.11 Have you disposed of any asbestos-containing material in a *non-complying* facility since July 1979?

[] Yes [☒] No

INSTRUCTIONS FOR

Section 9.0 — SPILL REPORTING AND PREVENTION PLANNING

Section 9.1.2 For each reportable spill of oil or hazardous waste to waters of the United States at your facility since July 1977, supply, in the space provided: a brief description including the type and quantity of material spilled, the date of the spill, cause of the spill, and remedial measures taken.

EXAMPLE:

9.1.2 Reportable Oil or Hazardous Material Spills to Water of the U.S. since July 1977. [Give the required information on spills under the headings indicated below.]

<u>Spill Description</u>	<u>Date</u>	<u>Cause</u>	<u>Remedial Measures</u>
Fuel oil	06/17/79	Forklift ruptured drum	Time Off

9.0 SPILL REPORTING AND PREVENTION PLANNING

9.1 Reporting

9.1.1 Who and/or what is the title of the job function(s) at your facility responsible for reporting spills to the regulatory agencies:

J. R. Kampfenkel Chief Environmental Engineer
Name Title

9.1.2 Reportable oil or Hazardous Material Spills to kWater of the U.S. since July 1977.

(Give the required information on spills under the headings indicated below.)

	Spill Description	Date (mo./day/yr.)	Cause	Remedial Measures
(1)	Crude Oil	11-5-77	Dock Hose Leak	Replaced Hose & Chain
(2)	Sursol 100	11-7-77	Line leak	Repaired leak & Chain
(3)	Slop Oil	1-22-78	Sewer Vent	Repaired & Chain
(4)	Gas Oil	4-30-78	Boom Support Leak	New Seal & Chain
(5)	Fuel Oil	4-17-78	Pipe Rusted Out	Repaired & Chain
(6)	Crude Oil	5-18-78	Trash under Valve Seat	Repaired Valve
(7)	Crude Oil	7-6-78	Relief Valve	-
(8)	Crude Oil	5-15-79	Hose leak	Blind Hose
(9)	Gas Oil	6-11-79	Relief Valve	Repaired Valve
	Lt. Cycle Oil	6-19-79	FLANGE GASKET	REPLACED GASKET
(10)	Lt. Cycle Oil	4-17-80	Relief Valve	-
	#2 Fuel Oil	7-8-80	-	-
	Natural Gasoline	9-11-80	Line Leak	Repaired leak
	Lt Cycle Oil	11-12-80	Inexperienced Dockman	Disciplined
	Gas Oil	12-3-80	Leaking Boot on Line	Replaced Boot Clean-u

NO INSTRUCTIONS NECESSARY

S (B) 00972

QUESTIONNAIRE

9.2 Non-transportation Related Planning

9.2.1 Do you have a Spill Prevention Control and Countermeasure (SPCC) Plan in your files?

☒ Yes ☐ No

9.2.2 IF NOT, is there an internal letter documenting that you do not need an SPCC Plan?

☐ Yes ☐ No

9.2.3 IF SO, when was the SPCC last up-dated?

05 / 80
mo yr

9.2.4 Was the SPCC Plan certified by a licensed professional engineer?

☒ Yes ☐ No

9.2.5 Have any significant changes in your facility's operations occurred since the last modification/up-date of the SPCC Plan?

☐ Yes ☒ No

INSTRUCTIONS

Background

9.3 On January 31, 1981, the Coast Guard issued revised regulations for "Oil Pollution Prevention-Vessels and Marine Oil Transfer Facilities" (33 CFR Parts 154, 155, and 156).

§ 154.300 (a) requires that "The facility operator of each facility to which this part applies shall submit, with the letter of intent, an operations manual."

§ 154.325 (a) states that "The letter of adequacy is a letter, from the COTP to the facility operator certifying that the operations manual meets the requirements of this part."

§ 155.720 requires "... procedures that meet the requirements of this part and Part 156."

§ 155.740 states that the procedures mentioned above, "...must be available for inspection by the COTP or OCMI..."

§ 155.820 and § 156.150 require that records be maintained

QUESTIONNAIRE

9.3 Transportation Related Planning

9.3.1 For Facilities

- (1) Does your facility require an operation manual according to 33 CFR, Part 154?

☒ Yes ☐ No ☐ Unknown

- (2) IF SO, does your facility have one?

☒ Yes ☐ No ☐ Unknown

- (3) Does your facility require a letter of adequacy according to Section 154.325?

☒ Yes ☐ No ☐ Unknown

- (4) IF SO, does your facility have one?

☐ Yes ☒ No ☐ Unknown

9.3.2 For Vessels

- (1) Do you require procedures according to Section 155.720?

☐ Yes ☐ No ☐ Unknown

- (2) IF SO, are they properly available as required in Section 155.740?

☐ Yes ☐ No ☐ Unknown

- (3) Are your records complete and up-to-date according to Section 155.820 and Section 156.150?

☐ Yes ☐ No ☐ Unknown

NO INSTRUCTIONS NECESSARY

S (B) 00976

QUESTIONNAIRE

10.0 SURFACE MINING CONTROL AND RECLAMATION ACT (SMCRA)

N/A

10.1 Is this an underground _____ or surface _____ mine?

10.2 Does your facility operate in a state that has submitted a program to obtain primacy to implement SMCRA?

☐ Yes ☐ No

10.3 Has this state obtained final approval to implement SMCRA?

☐ Yes ☐ No

10.4 Has your facility filed a SMCRA permit application by August 3, 1980?

☐ Yes ☐ No

10.5 If not, what is the basis for claiming exemption from SMCRA?

10.6 Does your permit application include a plan for the protection of water during operation and reclamation?

☐ Yes ☐ No

10.7 Does your permit application include a plan for protection of vegetation and wildlife during operation and reclamation?

☐ Yes ☐ No

10.8 Do you foresee any problems in obtaining a final SMCRA permit?

☐ Yes ☐ No

10.9 If so, please explain _____

NO INSTRUCTIONS NECESSARY

S (B) 00978

QUESTIONNAIRE

11.0 TOXIC SUBSTANCES CONTROL ACT (TSCA): Section 8(e)

11.1 Are you the individual responsible for implementing TSCA Section 8(e) at your facility?

[] Yes [X] No

11.2 If not, have you consulted the appropriate knowledgeable persons before completing Section 11?

[X] Yes [] No

11.3 Are you familiar with the provisions of Section 8(e) of the Toxic Substance Control Act which requires any person who is manufacturing, processing, or distributing chemicals, and obtains information of any substantial risk of injury to health or the environment by said chemical substance or mixture, to report this information to EPA?

[X] Yes [] No

11.4 Are you familiar with what is meant by "substantial risk to health or the environment:" i.e., what type of injury to health or the environment is to be reported?

[X] Yes [] No

11.5 Describe the mechanism in place in your facility for reporting such "substantial risk" information to EPA through Sun Company personnel: Information sent to Sun Co. Regional Medical Rep. in Dallas, Tx.

11.6 To whom, outside of Sun Company, may an employee report such "substantial risk" information? EPA - Region VI Dallas, Tx.
Dr. Byron Niebrugge who reviews and reports to Sun Co. TSCA Committee

11.7 Have there been any such internal or external reports made at your facility?

[] Yes [X] No

11.8 If so, how many? _____

11.9 Please explain the disposition of these reports: _____

S (B) 00979

NO INSTRUCTIONS NECESSARY

S (B) 00980

QUESTIONNAIRE

12.0 MISCELLANEOUS FEDERAL LAWS AND REGULATIONS

12.1 Corps of Engineer Permits for Dredge and Fill Projects

1. Are you familiar with Clean Water Act Section 404 provisions for Dredge and Fill Permits?

[] Yes [X] No

2. Have you ever applied for a Dredge and Fill permit for this facility?

[] Yes [] No

3. How many permits have been granted? _____

4. How many permits have been denied? _____

5. If any permits have been denied, please explain _____

12.2 Coastal Zone Management Act

1. Does your facility operate in a state with a designated coastal zone?

[X] Yes [] No

2. Does this state have a fully approved Coastal Zone Management Plan?

[] Yes [X] No

3. Are you familiar with the provisions of this Coastal Zone Management Plan in terms of how it might affect the operational expansion of your facility?

[] Yes [] No

4. Has this Coastal Zone Management Plan affected your expansion/modernization planning?

[] Yes [] No

5. If so, please explain _____

NO INSTRUCTIONS NECESSARY

S (B) 00982

12.3 Endangered Species Act

1. Has your facility's expansion/modernization been impeded by the Endangered Species Act?

[] Yes [X] No

2. If so, please explain _____

12.4 Antiquities Act of 1906

1. Has your facility been impacted by this Act?

[X] Yes [] No

2. If so, please explain Certain areas of the refinery
have been found to contain old bones and
other artifacts

12.5 Deepwater Ports Act

1. Has your facility or related transportation services been affected by this law?

[] Yes [X] No

12.6 Marine Protection, Research, and Sanctuaries Act

1. Does your facility now engage in any ocean disposal activities?

[] Yes [X] No

2. Have any of your dredge and fill activities been affected by this law?

[] Yes [X] No

3. If so, please explain _____

INSTRUCTIONS FOR
Section 13.0 — ENVIRONMENTAL PROGRAM EVALUATION

Sections 13.0 calls for subjective judgments and valuations. Your opinions, perceptions and priorities are required input.

QUESTIONNAIRE

13.0 ENVIRONMENTAL PROGRAM EVALUATION

13.1 List in descending order of importance your three most significant environmental problems.

1. Solid Waste - Unavailability of off-site treatment and disposal facilities for Hazardous wastes
2. Solid Waste - Availability of approved technology for treatment and disposal of Hazardous wastes
3. Method of implementing fugitive emissions program

13.2 Rate the significance of the following factors in solving the problems you have identified above or in improving general compliance.

[Check one column for each factor.]

Factor		Insignificant	Contributing	Important	Critical
(1)	Additional personnel			X	
(2)	Training of personnel at your facility			X	
(3)	Additional information on regulatory matters			X	
(4)	Capital improvements			X	
(5)	Additional laboratory and/or engineering support			X	
(6)	Operating improvements			X	
(7)	Maintenance improvements			X	
(8)	Local management awareness			X	
(9)	Greater legal support			X	

INSTRUCTIONS FOR
Section 14.0 — QUESTIONNAIRE FEEDBACK

Please give the name and title of the person responsible for completing this questionnaire and the date of its completion. The responsible person (Questionnaire Respondent) is to sign in the space provided.

QUESTIONNAIRE

14.0 QUESTIONNAIRE FEEDBACK

14.1 Approximately how many man-hours were required to complete this questionnaire? 30

14.2 What suggestion can you make for improving this questionnaire?

Improve Clarity of questions

14.3 Do you feel that there were any benefits to your facility to be derived from completing this questionnaire?

☒ Yes ☐ No

IF SO, what were they?

Record Evaluation
Management Awareness

Questionnaire Respondent:

J. H. Alston
G. Myers

Name

J. H. Alston
G. Myers

Signature

Title

12-19-80

Date

(514) 241-4811

Telephone Number

Reviewed
12-19-80

INSTRUCTIONS

NOTES

- Use these pages (43-Q and 44-Q) for completing responses for which there was insufficient room in the body of the questionnaire.
- Number your responses to correspond to the question being answered.
- Attach additional completed matrix tables to the back cover of this questionnaire; include your Questionnaire Number from the front cover on each page.

QUESTIONNAIRE

NOTES

pg. 10-Q

Materials Handled

Truck

SS-250
SS-245
SS-170
SS-290
SS-280
Gasoline

Propane-Propylene
Kerosene
Diesel
Propane
Butane
Iso-butane

R-R Tank Cars

Cumene
Cresylic Acid
O-xylene
Benzene
Propane-Propylene
Coke
Pseudocumene
Toluene
SS-145

SS-100
SS-250
SS-245
SS-177
SS-290
SS-280
Hydrofluoric Acid
Sodium Hydroxide

Barge and Ship

Gas Oil
SS-100
Naphtha
Styrene
SS-145
Xylene
#2 Fuel Oil
Gasoline

Benzene
Toluene
Cumene
Pseudocumene
JP-4
Crude

QUESTIONNAIRE

NOTES

S (B) 00990

Please list and attach all additional pages here.

Page No.

No. of Copies

S (B) 00991

OFFICE CORRESPONDENCE

SUBJECT: HAZARDOUS CHEMICALS HANDBOOK
DATE: January 31, 1979
OFFICE: Corpus Christi Refinery - Loss Control Department
FROM: M. K. Powell
TO: All Supervisors

It has come to my attention that there are several copies still around of a red, one-inch, 3-ring binder entitled "Hazardous Chemicals Handbook". This book apparently was put together in the early 1960's and lists the hazardous properties, preventative measures, and first aid treatment for many chemicals found in the refinery.

The information presented in the Handbook was excellent information at the time that it was published. We have learned a great deal about the toxicity and industrial hygiene of these chemicals since that time. As a result, much of the information in the Handbook based upon what we know now is misleading and sometimes even wrong.

For example, benzene is no longer thought to cause an employee to "laugh, shout, curse, or sing" as an indication of overexposure.

Rather than trying to update and republish this handbook, please destroy all copies. We will be issuing Material Safety Data Sheet notebooks in the near future. These notebooks will provide this type information based upon current knowledge.

M. K. Powell

MKP/vp

S (B) 00992