

PLANT ENVIRONMENTAL ASSESSMENTS

A program of environmental assessments and audits of all plant sites will be maintained in order to assure regulatory compliance and the protection of the surrounding environment.

PROGRAM

1. Environmental assessment documents (information such as local air and water quality, relationships with regulatory agencies, and the effects of our presence on the surrounding environment) will be prepared for each operating location. Documentation of subsequent changes or additions to assessment contents will be filed with assessments at the plant site so that an update can readily be prepared should the need arise. Executive summary sections reflecting long-range plans and highlighting key environmental issues will be updated annually.
2. Compliance audits for large and environmentally sensitive sites will be conducted on a three-year maximum cycle with other sites to be audited at least every five years. Audit follow up plans will be reviewed annually.
3. Groundwater assessments will be performed for all locations with annual reviews to address priority concerns.
4. Each location shall maintain a groundwater protection plan to include inspection, testing and maintenance of facilities with the potential of contaminating groundwater (i.e.; sewers, process lines, sumps, tanks, loading/unloading areas, etc.)

New or replacement facility designs (including sewers and lines) should consider aboveground and/or double containment, improved materials of construction and/or cathodic protection to provide improved assurance against groundwater contamination.

The above groundwater protection plans and designs shall be commensurate with the risk posed by the specific situation.

STATUS/OBSERVATIONS

Environmental Assessments

- Initial environmental assessments have been completed at essentially all worldwide sites, certainly at all major sites. Many of the resulting manuals exceeded the three year update target of the previous guideline language, though local records continue to provide up-to-date status.

Compliance Audits

- The audit program is essentially on schedule for U.S. locations, with some plants having completed the third audit cycle since inception of the program. Follow-up status on recommendations are variously reviewed on an annual or semi-annual basis.
- Auditing of ex-U.S. plants, except Europe/Africa, is just now beginning to fall behind schedule, as audit responsibilities were not reassigned subsequent to the corporate reorganization. This is being addressed.

Groundwater Assessments

- All plants have completed initial groundwater assessments. The last major effort on update of these assessments was completed in late 1984. Priority projects and plant corrective action situations have had subsequent reviews. Most groundwater protection plans were put in place by the July 1, 1985 target date. However, some plans have not yet been written and many are in the process of achieving full implementation.

(Revised and Approved: Environmental, Safety & Health Committee June 25, 1987.)

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