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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 and transmitted as information to Environmental Managers.
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 semi-annually.
3. Groundwater assessments will be maintained for all major locations and for lesser sites with known groundwater issues. The assessment status and plans will be updated in the second quarter of each year.
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.). The groundwater protection plans and designs shall be commensurate with the risk posed by the specific situation.
5. New, replacement or expansion 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. New, replacement or expanded surface impoundments for wastewater treatment or storage will be approved by the ESH Committee on an exception basis.
6. New storage tanks for materials that could potentially cause contamination will be provided with impervious secondary containment (dikes, liners, vaults, double wall, etc.) unless a clear showing is made on a tank-by-tank basis during project reviews that vessel contents (e.g. dilute wastewaters) or setting (e.g. in-battery containment, other adequate containment systems) do not warrant such containment. Existing storage tanks will be addressed and reviewed through normal environmental audits.

(Revised and Approved by Environmental, Safety and Health Committee April 25, 1989.)

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