



TO: TOC P&M  
FOR: Route List  
FROM: R. D. Pruessner  
RE: ENVIRONMENTAL AND HEALTH EFFECTS ALLEGATIONS

DATE: September 27, 1983

On August 22, 1983, EPA issued its final rule concerning "recordkeeping and reporting of allegations of adverse reactions from a certain substance or mixture" (see Attachment I). This rule is issued under the authority of Section 8(c) of TSCA and will become effective on November 21, 1983.

The rule requires certain companies to set up a record-keeping system for significant adverse reactions to health or the environment alleged to have been caused by a substance or mixture. All chemical manufacturers and processors included in the Standard Industrial Classification codes 28 (Chemicals and Allied Products) or 2911 (Petroleum Refining) are subject to the rule and must begin keeping records of these type allegations. It has been determined that the following TOPM operations are subject to the rule:

- Chalmette Refinery
- Gas Processing (La Porte/Mont Belvieu only)
- Marketing (gasoline, fuel oil, special products, etc.)
- Petro-Tex Chemical Corp.
- Polymers (Burlington, Flemington, Pasadena Plants)

EPA defines significant adverse reactions to be "reactions that may indicate a substantial impairment of normal activities or long-lasting or irreversible damage to health or the environment." Some examples are given on page 38181 of Attachment I. Known human effects that are commonly recognized are exempt from this recordkeeping requirement.

Both written and oral allegations are subject to the rule. The following procedure should be used in handling allegations:

1. If anyone (employee, customer, neighbor or other) presents you with a written allegation, you must:
  - a. Assure him or her that the allegation will be handled in accordance with legal requirements and company policy.
  - b. Forward the written allegation to TOPM Manager of Environmental Affairs via appropriate facility management.
2. If anyone, as above, makes a verbal allegation to you, then you must:
  - a. Listen courteously and assure that person of company concern.
  - b. State that your instructions are to request that the allegation be put into writing and submitted to you for action.
  - c. Make no other comment.

TOPM TSCA 8(c) ALLEGATION RECORD

1. Name and address of plant site receiving allegation: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
2. Date allegation received: \_\_\_\_\_
3. Name of person alleging: \_\_\_\_\_  
Age: \_\_\_\_\_ Sex: \_\_\_\_\_
4. Description of person alleging: (e.g. company employee, plant neighbor, etc.): \_\_\_\_\_  
\_\_\_\_\_
5. The implicated substance or event leading to allegation: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
6. Summary of allegation (attach a copy of allegation): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(continued)

7. If applicable, description of the health effects (including how became known and route of exposure, if explained in allegation): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
8. If applicable, description of the environmental effects (including identification of affected plant or animal species or contaminated portion of the environment):  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
9. If any further investigation, give results of that investigation: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NOTE: If any other record or report relating to the allegation (e.g. OSHA Form 101) is required, then a copy of that record or report must be attached.

Signature of person filling out this form: \_\_\_\_\_

**FORWARD REPORT TO:**  
Tenneco Oil P&M  
Manager of Environmental Affairs  
P. O. Box 2511/T2231A  
Houston, TX 77001  
9/23/83