New File for
BP Polymers Plant

TO: J. R. Ball

FROM: T. G. Grumbles, J. C. Ledvina, W. L. McClain
DATE: December 15, 1986

Interoffice Communication

SUBJ: ENVIRONMENTAL AND HEALTH ASSESSMENT OF BPPP MANSFIELD, MA SITE

VISTA

DATE OF ASSESSMENT: December 10-11, 1986

ASSESSMENT TEAM: T. G. Grumbles
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W. L. McClain

CONCLUSIONS AND RECOMMENDATIONS:

1. No health or environmental issue was identified that could be considered a deal killer.

2. BP should retain the Lagoon property east of N. Main Street and grant Vista an easement for the wastewater line or close out the lagoon and well-house at their expense.

3. The contaminated rail spur area should be cleaned up, backfilled and the rail line replaced at BP expense.

4. Waste in the Blanex Building and west of the warehouse should be removed at BP expense.

5. Obsolete equipment and waste on the south end of the property should be removed at BP expense.

6. Three obsolete transformers south of the Maintenance Building should be removed and properly disposed of at BP expense.

GENERAL OBSERVATIONS:

A. Environmental

1. The plant holds a permit to discharge waste water and an air emission registration. Transfer of both will be necessary. No problem is anticipated in doing this.

2. The plant is currently a Small Quantity Generator (SQG) of hazardous waste. Hazardous waste rules at this time have a minimal impact on the facility. They hold a RCRA I.D. number which will need to be transferred to Vista.

3. Four of the six electrical transformers on site are PCB-contaminated with levels between 50 and 100 ppm PCB's. No regulatory problem exists. However, at Vista plants we have chosen to reduce PCB levels to below 50 ppm in transformers and may want to consider a similar strategy at Mansfield.

4. The plant has a system to rework and sell all scrap, samples, lead bags, and baghouse dust. The concept is good but the end use of these materials should be reviewed to assure minimal risk to Vista.

5. BP had a contractor, ChemCycle; obtain samples of soil and water from excavations in several areas of the plant. Samples were run on a GC/MS looking for organics. In general, phthalates were found in very low concentrations except in the rail spur area. Removal of contaminated soil is warranted in this area.

6. ChemCycle's preliminary findings are that the lagoon contains approximately 4" of sludge. The sludge was sampled and analyzed as part of the ChemCycle work. Low levels of cadmium and lead were found in the sludge. Results are pending as to whether the sludge is hazardous but most likely, it is not. ChemCycle is expected to provide BP options and costs to close out the lagoon. The lagoon dimensions are 150' long x 80' wide x 4' deep.

7. The rail spur area contains approximately 200ft^3 (per BP) of plasticizer-contaminated soil. The rails and ties have been removed from the area to facilitate access to the contaminated soil.

8. Three houses (duplexes) are immediately across the street from Building 8, the main processing building. Four other homes are very close to the plant. There have been noise complaints in the past. To our knowledge, there have been no odor or dust complaints.

9. Industrial activity began at the Plant around 1914. Hercules ran a facility that used formaldehyde and pine tar for a number of years. Blane started PVC compound activities in 1964.

10. The plant had six underground storage tanks until recently. Three were removed and two were emptied, filled with dirt, and left in the ground. The remaining undergrand tank (25,000 gal.) is in No. 6 fuel oil service. It must be leak tested annually.

11. Sewerage is currently handled in a crude septic system, however a city sewer interceptor is planned in the area in the future and should be used by the plant when available.

B. Health and Safety

1. The industrial hygiene programs at the plant will need some improvement. Historical lead and noise monitoring data indicate potential overexposures. Clayton Environmental Consultants recently did an in-depth

industrial hygiene survey and the results are to be available by the end of this month. A review of this report should indicate the compliance status and sampling needs for the plant.

2. Some expenditures will be necessary to upgrade the plant locker/shower room areas, and the lunch room in building 8. Lead dust contamination has been found in the lunch room.

3. Observations indicate a possible need to improve ventilation and material handling practices for hazardous compound additives such as lead. Further review of recent air sampling is necessary to determine the extent of these improvements.

4. A review of the OSHA Form 200 logs indicate that most reportable incidents are from muscle pulls, cuts, slips, and back strains. Further review of the accident statistics and investigation reports should be done to better determine causes and areas for improvement.

5. BP currently labels their compound bags and gaylords with the OSHA VCM warning and additional warnings related to compound additives such as lead and plasticizers. This is contrary to Vista's practices and needs to be reviewed for consistency.

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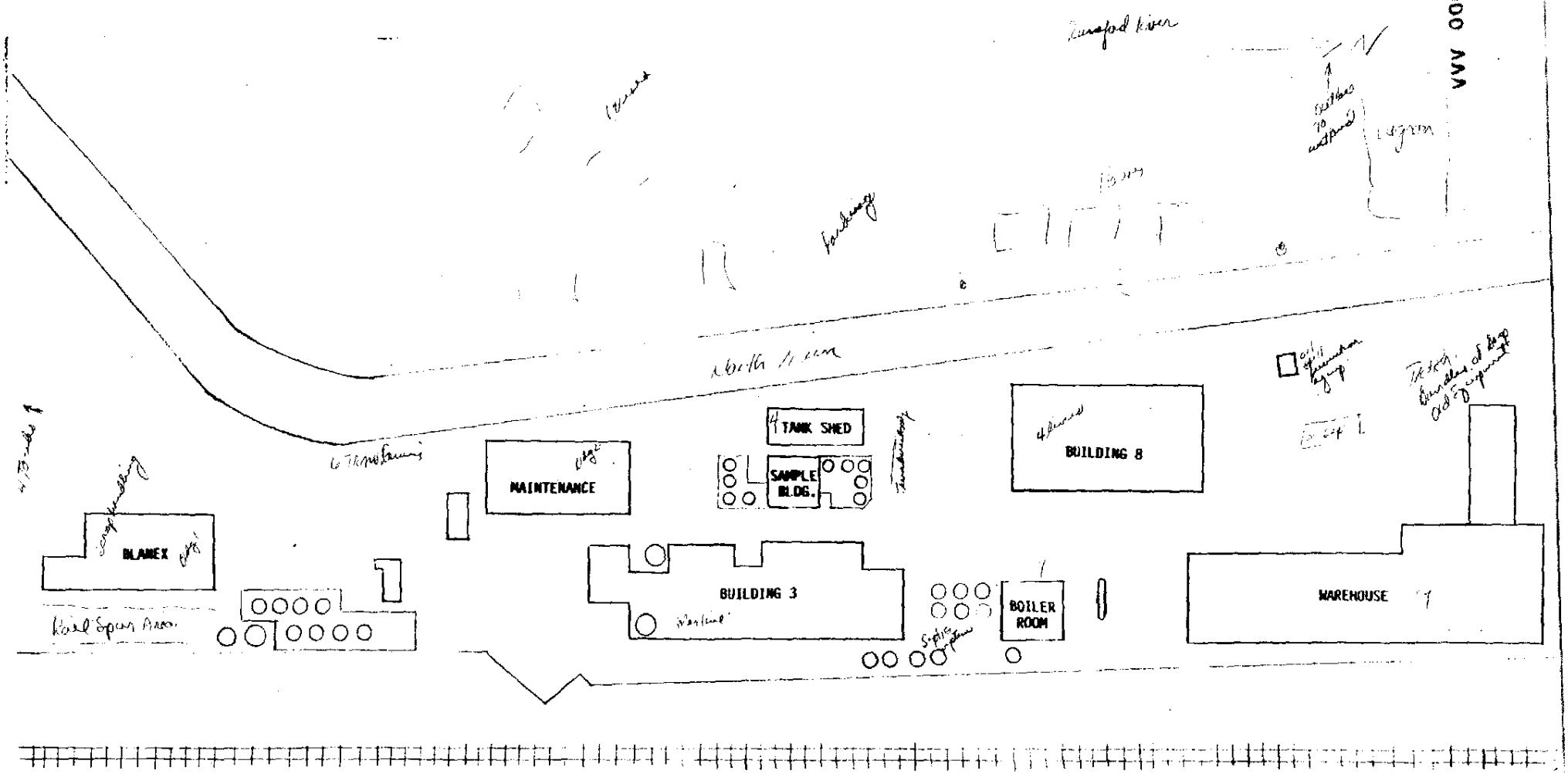
cc GGD, HRF, RES, DAK



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