

File

TO: Tenneco Polymers
FOR: Dan Carter
FROM: R. D. Pruessner
RE: ENVIRONMENTAL REVIEW - PASADENA PLANT

DATE: January 2, 1985

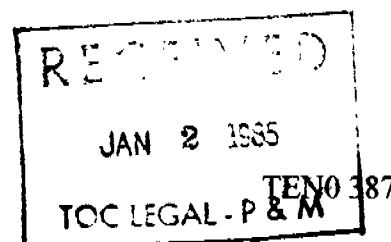
Your approval is requested for scheduling the Environmental Review of the Pasadena Plant and affiliated wastewater treatment facilities on February 26-28, 1985.

The proposed agenda and Environmental Review forms are attached. It is requested the forms be filled in prior to the arrival of the review team.

R. D. Pruessner
R. D. Pruessner

pm
Enclosure

cc: Charles Beresford
Russell Bowers
Jim Kachtick
Emile LeRouge
Ralph Maynard
Al Smith
Lloyd Stewart
Roger Towe



TENNECO OIL P&M
ENVIRONMENTAL REVIEW

February 26-28, 1985

Name and address of facility:

Tenneco Polymers
Pasadena Plant
4403 La Porte Road
P. O. B x 849
Pasadena, TX 77501-0849

Affiliated with:

Tenneco Oil P&M

Operations Manager:

Daniel H. Carter
(Name)

Plant Manager
(Title)

(713) 479-3411
(Phone)

Environmental Representative:

Jim Kachtick
(Name)

Mgr.-Environmental Sciences
(Title)

(713) 479-3411
(Phone)

Type of operation and/or principal products:

Polyvinyl Chloride

Review Team:

Name

Title

Phone

Bob Pruessner

Mgr.Environmental Affairs-TOC

(713) 757-3306

Roger Towe

Sr.Environmental Eng.-TOC

(713) 757-7685

Charles Beresford

Attorney - TOC

(713) 757-8764

Emile LeRouge

Environmental Supervisor-TOC

(504) 579-2274

1/2/85

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AGENDA

ENVIRONMENTAL REVIEW

Tenneco Polymers - PASADENA PLANT

February 26-28, 1985

TUESDAY - February 26

7:00 p.m. Supper for the Review Team and Polymer representatives at Brady's Landing, 8505 Cypress, Houston, Texas.

WEDNESDAY - February 27

8:00 a.m. Meet with Dan Carter to conform final plans for Environmental Review.

8:15 a.m. Meet with Jim Kachtick and staff to go over the information contained in completed Environmental Review forms.

11:30 a.m. LUNCH (Please bring in sandwiches.)

1:00 p.m. Meet with Jim Kachtick for plant tour.

4:00 p.m. Adjourn

THURSDAY - February 28

8:00 a.m. Visit with maintenance department representative to sight maintenance and calibration records for environmental equipment.

9:00 a.m. Visit environmental laboratory and sight required records on quality assurance, sample chain of custody, analytical procedures, etc.

11:00 a.m. Meet with Polymer representative to go over Dock portion of questionnaire.

11:30 a.m. LUNCH (Please bring in sandwiches.)

2:30 p.m. Meet with Dan Carter and staff to review proposed findings and complete the final report. Provide copies of completed report to Russell Bowers, Dan Carter Jim Kachtick, and Bob Pruessner.

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**TENNECO OIL
P&M FACILITIES
ENVIRONMENTAL REVIEW**

**TENNECO POLYMERS - PASADENA PLANT
POLYVINYL CHLORIDE FACILITIES**

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

**TENNECO POLYMERS
ENVIRONMENTAL STAFFING**

(I)

Please show the reporting relationship between individuals directly responsible for environmental compliance and the senior manager associated with this facility. (Add blocks as necessary.)

Name	<u>Russell Bowers</u>
Title	<u>Vice President--Chemicals</u>

Name	_____
Title	_____

Name	_____
Title	_____

Name	_____
Title	_____

Name	_____
Title	_____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

**TENNECO POLYMERS
ENVIRONMENTAL STAFFING
(2)**

Please list name and title of persons dedicating a significant portion of their time to environmental compliance. This should include those persons responsible for operating environmental control equipment, conducting laboratory environmental analyses, etc.

NAME _____ TITLE _____
Approximate percentage (%) of work time dedicated to environmental: _____

Brief description of environmental responsibility: _____

Name _____ TITLE _____
Approximate percentage (%) of work time dedicated to environmental: _____

Brief description of environmental responsibility: _____

NAME _____ TITLE _____
Approximate percentage (%) of work time dedicated to environmental: _____

Brief description of environmental responsibility: _____

NAME _____ TITLE _____
Approximate percentage (%) of work time dedicated to environmental: _____

Brief description of environmental responsibility: _____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**WATER
(I)**

NPDES Permit No.:

Date Issued:

Date Expires:

Other Water Discharge Permits:

Date Issued:

Date Expires:

Discharge permit requirements:

Outfall Number _____ (Add additional sheets as necessary.)

	<u>Permitted</u>		<u>Typical Actual</u>		<u>No. of Self-Reporting Violations-Last 12 Mos.</u>
	<u>Avg</u>	<u>Max</u>	<u>Avg</u>	<u>Max</u>	
<u>Flow</u>	_____	_____	_____	_____	_____
<u>BOD</u>	_____	_____	_____	_____	_____
<u>Oil & Grease</u>	_____	_____	_____	_____	_____
<u>COD</u>	_____	_____	_____	_____	_____
<u>TSS</u>	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

Type of Waste Water Treatment System: _____

Method by which sanitary waste water is treated: _____

Who is treating sanitary waste? _____

Sanitary Waste Water Permit No. _____

Issuing Agency: _____ Expiration Date: _____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**WATER
(2)**

Date and significant findings of last regulatory inspection:
Please attach copy of regulatory inspection report.

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Do any discharge permits contain a compliance schedule?	_____	_____	_____
Is the facility meeting the compliance schedule?	_____	_____	_____

FLOW AND pH

In matters relating to flow, do procedures used conform to the "water measurement manual" (U.S. Dept. of Interior, Bureau of Reclamation) or other procedures approved by the E.P.A?

Primary flow measuring device properly installed?	_____	_____	_____
Primary flow measuring device properly operated and maintained?	_____	_____	_____
Is primary flow measuring device calibrated?	_____	_____	_____
How often? _____ (Last calibration date: _____)	_____	_____	_____

Secondary instruments (totalizers, recorders, etc.) properly operated and maintained?	_____	_____	_____
---	-------	-------	-------

Are continuous pH recording instruments calibrated with pH buffer solutions? Frequency: _____	_____	_____	_____
---	-------	-------	-------

Are the date, time, and the name of the person who calibrated the continuous pH recording instrument recorded? In a book? _____ On the chart? _____	_____	_____	_____
--	-------	-------	-------

Are calibration and maintenance records kept for 3 years on pH and flow measurement equipment?	_____	_____	_____
--	-------	-------	-------

Are pH and flow measurement data kept for the required three-year period?	_____	_____	_____
---	-------	-------	-------

SAMPLE COLLECTION AND PRESERVATION

Permittee sampling meets requirements and intent of permit?	_____	_____	_____
---	-------	-------	-------

Details: _____

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**WATER
(3)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Permittee is using method of sample collection required by permit? If not, explain method used and the frequency of sampling: _____	_____	_____	_____
Sampling locations adequate for representative samples?	_____	_____	_____
Parameters and sampling frequency agree with permit?	_____	_____	_____
Flow proportioned samples obtained where required by permit?	_____	_____	_____
Are composite samples refrigerated at 4°C <u>during</u> collection?	_____	_____	_____
Are grab samples refrigerated as soon as possible after collection?	_____	_____	_____
Are samples labeled as to location, composite or grab, date and time of collection, and sampler?	_____	_____	_____
Are samples collected in the authorized containers for each parameter?	_____	_____	_____
Are approved preservatives used for each parameter, when needed?	_____	_____	_____
When samples must be preserved, are they preserved at the time of collection?	_____	_____	_____
Are samples analyzed within required holding times?	_____	_____	_____
Is the laboratory refrigerator for sample storage kept at 4°C?	_____	_____	_____
When samples are not to be analyzed immediately in the lab, are they refrigerated at 4°C?	_____	_____	_____
Are approved cleaning procedures followed in the laboratory for sample containers that are to be reused?	_____	_____	_____
<u>LABORATORY METHODS</u>			
Are EPA approved analytical testing procedures used?(40CFR 136.3)	_____	_____	_____
If a different procedure is used, has written approval been received from the necessary regulatory agencies to use this alternate procedure?	_____	_____	_____
If <u>part</u> of an approved procedure is changed by you, has written approval been received from the necessary regulatory agencies for this change?	_____	_____	_____
Are monitoring and analyses being performed more frequently than required by permit? If YES, are results reported in permittee's self-monitoring report?	_____	_____	_____

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

WATER

(4)

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Are parameters other than those required by the permit analyzed?	_____	_____	_____
Are the methods used stated on the laboratory report sheet?	_____	_____	_____

LABORATORY QUALITY ASSURANCE AND QUALITY CONTROL

Who is responsible for Laboratory Quality Assurance Program?

Are duplicate (precision) samples analyzed with each set of analyses? Frequency: _____	_____	_____	_____
--	-------	-------	-------

Are spiked (accuracy) samples analyzed with each set of analyses? Frequency: _____	_____	_____	_____
--	-------	-------	-------

Are precision control charts prepared and used?	_____	_____	_____
---	-------	-------	-------

Are accuracy control charts prepared and used?	_____	_____	_____
--	-------	-------	-------

Are intralaboratory quality control standards used for each permit parameter? Frequency: _____	_____	_____	_____
--	-------	-------	-------

Is satisfactory calibration and maintenance of laboratory instrument and equipment performed?	_____	_____	_____
---	-------	-------	-------

Are laboratory equipment calibrations and maintenance records kept for the required three-year period?	_____	_____	_____
--	-------	-------	-------

On analyses which require standards to be used in preparing calibration curves, are the curves prepared by using a blank and at least seven standards?	_____	_____	_____
--	-------	-------	-------

On analyses which require calibration curves or internal instrument calibration with standards, are blanks and standards analyzed with each set of samples in order to verify the calibration curve?	_____	_____	_____
--	-------	-------	-------

Are temperatures recorded on ovens(TSS) and incubators (BODs)? Frequency: _____	_____	_____	_____
---	-------	-------	-------

Are laboratory analytical balances checked using NBS weights?	_____	_____	_____
---	-------	-------	-------

Are glucose-glutamic acid standards analyzed with each set of samples analyzed for BODs?	_____	_____	_____
--	-------	-------	-------

Is Class A volumetric glassware used for permit-required analyses?	_____	_____	_____
--	-------	-------	-------

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**WATER
(5)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
<u>LABORATORY DATA REPORTING AND STORAGE</u>			
Are the following recorded on the laboratory report sheet:			
Sample location?	_____	_____	_____
Composite or grab?	_____	_____	_____
Date and time of collection?	_____	_____	_____
Sampler?	_____	_____	_____
Date and time analysis started?	_____	_____	_____
Analyst?	_____	_____	_____
Are sample results kept for the required three-year period?	_____	_____	_____
Are quality assurance and quality control records kept for the required three-year period?	_____	_____	_____
Commercial laboratory used?	_____	_____	_____
Commercial laboratory state certified?	_____	_____	_____
Weeds cut and vegetation growth in ponds removed?	_____	_____	_____
Banks and dikes maintained? (Erosion, etc.)	_____	_____	_____
Any reports of groundwater contamination from pond(s)?	_____	_____	_____
If YES, give details:			

Seepage reported?	_____	_____	_____
Adequate freeboard (<u>2 feet</u>) to prevent overflow?	_____	_____	_____
Effluent release is:			
_____Continuous	_____Intermittent	_____Seasonal	

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**TENNECO OIL P&M
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TENNECO POLYMERS

**WATER
(6)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
What is the receiving stream?			

Is there a formal Spill Control Plan (SPCC)?	_____	_____	_____
Has the SPCC been approved by management?	_____	_____	_____
Is the SPCC certified by a registered engineer?	_____	_____	_____
Has the SPCC been reviewed and updated within the last 3 years?	_____	_____	_____
Have there been any reported spills the prior 12 months?	_____	_____	_____
How many? _____ Total amount of spill: _____			
If more than 2 reported spills within the last 12 months, has the SPCC been revised and certified by a registered engineer?	_____	_____	_____
Is a training program existing to instruct personnel in operation and maintenance of spill control equipment?	_____	_____	_____
Are briefings scheduled to insure adequate understanding of the SPCC plan by company personnel?	_____	_____	_____

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**WATER
(7)**

YES NO N/A

How is storm water treated?

What is the design basis for storm water treatment?

Do existing discharge permits have storm water requirements?
What are the requirements?

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

DOCK OPERATIONS

(1)

YES NO N/A

Does this facility operate a ship or barge dock?

What materials were transferred across the dock the last 12 months?

Additional materials that may be transferred in the future.

Does the spill control plan include the dock facilities?

What is the volume of the spill containment for the transfer facility?

What emergency spill containment equipment (booms, absorbent, etc.) are owned and available at the facility?

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

DOCK OPERATIONS

(2)

Have arrangements with other organizations been made for emergency spill cleanup support?

YES NO N/A

Who? _____

Do any of the materials transferred or anticipated to be transferred meet the Coast Guard definition of "oil," i.e., oil of any kind or in any form, including but not limited to petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil?"

If the transferred materials fall within the Coast Guard definition of "oil," an operations manual meeting the requirements of Coast Guard Regulation (CFR 33 Part 154--Oil Pollution Regulations for Marine Oil Transfer Facilities) is required. Has an operations manual been prepared meeting these requirements?
(Please provide a copy of the manual.)

- (1) If an operations manual has been prepared, has it been submitted to the Coast Guard "Captain of the Port" (required no later than March 3, 1983)?
- (2) Has the Captain of the Port issued a "letter of adequacy"?
- (3) Have amendments to the dock operations manual been made since the issuance of the Coast Guard "letter of adequacy"?
- (4) Are copies of the dock operations manual available to dock operations personnel?
- (5) Has this facility designated "persons in charge of facility oil transfer operations" and advised the Captain of the Port of this designation in writing?
- (6) Are current (annual) hose pressure tests and inspection records available at this facility?

If the transferred materials do not fall within the Coast Guard definition of "oil" but do fall within the requirements of 33CFR126 --Handling of Explosives or Other Dangerous Cargoes Within or Contiguous to Waterfront Facilities--has a dock operations manual been prepared for this facility?

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

DOCK OPERATIONS

(3)

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
(1) If an operations manual has been prepared, are copies available to dock operations personnel?	_____	_____	_____
(2) Does the operations manual contain the following:			
A. Documentation that the dock operator is a qualified operator?	_____	_____	_____
B. Dates and results of the most recent cargo hose and piping hydrostatic tests?	_____	_____	_____
C. Cargo information cards listing the following:			
a. Cargo identification characteristics (appearance, odor, etc.)?	_____	_____	_____
b. Emergency procedures?	_____	_____	_____
c. Fire fighting procedures?	_____	_____	_____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**AIR
NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS)
(1)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
What type(s) of PVC resin is produced:			
Dispersion resin	_____	_____	_____
Suspension resin	_____	_____	_____
Bulk resin	_____	_____	_____
Does this plant have a fixed vinyl chloride monitoring system in place to continuously monitor VCM emissions?	_____	_____	_____
Do exhaust gasses meet the less than 10ppm VCM limit?	_____	_____	_____
What sort of control devices are used to reduce VCM exhaust gases to 10ppm or less? _____			

How many relief valve discharges were reported in the last 12 months? _____			
Where did relief valve discharges go? ___ Flare ___ Atmosphere ___ Other			
Were they reported within the required time (10 days)?	_____	_____	_____
<u>FUGITIVE EMISSIONS FROM EQUIPMENT IN VCM SERVICE</u>			
Are loading and unloading lines in VCM service degassed thru a control system before opening?	_____	_____	_____
Are slip gauges used in the VCM loading/unloading operation?	_____	_____	_____
Are slip gauge emissions reduced via a control system?	_____	_____	_____
If controlled--what is the control mechanism? _____			

Are all pumps either sealless, have double seals or equivalent?	_____	_____	_____
a. Positive pressure maintained between seals?	_____	_____	_____
b. Double seal interspace vented to a control system?	_____	_____	_____
Are all compressors equipped with double seals or equivalent?	_____	_____	_____
a. Positive pressure maintained between seals?	_____	_____	_____
b. Double seal interspace vented to a control system?	_____	_____	_____
Are all agitators equipped with double seals or equivalent?	_____	_____	_____
a. Positive pressure maintained between seals?	_____	_____	_____
b. Double seal interspace vented to a control system?	_____	_____	_____
c. Other _____	_____	_____	_____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**AIR
NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS)
(2)**

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Are relief valves connected to a process line, recovery system, or equivalent?	_____	_____	_____
If not, are they equipped with rupture discs?	_____	_____	_____
When sampling, are sample containers purged into a closed process system?	_____	_____	_____
Are unused portions of samples (10% or more VCM by weight) returned to the process?	_____	_____	_____
Is the VCM content of equipment reduced as required before opening to atmosphere?	_____	_____	_____
Does this plant have a formal leak detection and elimination program?	_____	_____	_____
a. Has the program been approved by the EPA Administrator?	_____	_____	_____
b. What is the plant definition of a "leak"? _____	_____	_____	_____
Is the VCM content of "in process wastewater" reduced as required?	_____	_____	_____
Does this plant have Standard Operating Procedures incorporating the VCM fugitive emission requirements?	_____	_____	_____
Are emissions data reported in Semiannual Report as required?	_____	_____	_____
How many reported exceedances were there the last 12 months for:			
a. Residual VCM content of stripped PVC slurry? _____			
What percent is this of total reported values? _____			
b. Reactor opening emissions? _____			
What percent is this of total reported values? _____			
c. Incinerator VCM emissions greater than 10ppm? _____			
What percent of incinerator operating hours? _____			
Is record keeping performed as required?	_____	_____	_____
a. Are records kept two years?	_____	_____	_____
b. Are they destroyed after two years?	_____	_____	_____
When was last NESHAPS inspection? _____			
(Please provide copy of report.) _____			

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**AIR
(I)**

List air construction permits or permit exemptions obtained in the last 12 months:

	<u>Description of Permit Unit</u>	<u>Permitting Agency</u>	<u>Control Device</u>	<u>Allowed Emissions</u>	<u>Date Issued</u>
1.	_____	_____	_____	_____	_____
2.	_____	_____	_____	_____	_____
3.	_____	_____	_____	_____	_____
4.	_____	_____	_____	_____	_____
5.	_____	_____	_____	_____	_____
6.	_____	_____	_____	_____	_____
7.	_____	_____	_____	_____	_____

List air operating permits presently in force:

	<u>Description of Permit Unit</u>	<u>Date Issued</u>	<u>Expiration Date</u>	<u>Allowed Emission</u>	<u>Monitoring Requirements</u>	<u>Reporting Requirements</u>
1.	_____	_____	_____	_____	_____	_____
2.	_____	_____	_____	_____	_____	_____
3.	_____	_____	_____	_____	_____	_____
4.	_____	_____	_____	_____	_____	_____
5.	_____	_____	_____	_____	_____	_____
6.	_____	_____	_____	_____	_____	_____
7.	_____	_____	_____	_____	_____	_____
8.	_____	_____	_____	_____	_____	_____
9.	_____	_____	_____	_____	_____	_____

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**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**AIR
(2)**

When was the last air regulatory inspection? _____.
Please provide a copy of last inspection report. (Date)

Describe any noted deficiencies and the corrective action taken:

	<u>DEFICIENCY</u>	<u>CORRECTIVE ACTION</u>
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____
6.	_____	_____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**AIR
(3)**

When was the last air emissions inventory? _____
DATE

List reported emissions rates: Tons/Year

1. Hydrocarbons
2. Sulfur Dioxide
3. Nitrogen Oxides
4. Carbon Monoxide
5. Particulate
6. Vinyl Chloride
7. _____
8. _____

What procedure is followed to report emission excursions to regulatory agencies?
Please attach a copy of existing written procedure.

Is this facility monitoring ambient air quality?

YES NO N/A

Is a quality assurance program used?
(Please provide quality assurance records.)

YES NO N/A

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**AIR
(4)**

What parameters are monitored?

Has air monitoring data shown exceedances of air standards?

☐ YES ☐ NO ☐ N/A

Is this facility in compliance with or on a schedule of compliance with all applicable emission limitations and standards under the Clean Air Act?

☐ YES ☐ NO ☐ N/A

Discussion if required:

Does this facility have procedures to insure leaded gasoline is not used in company vehicles designed for unleaded gasoline?

☐ YES ☐ NO ☐ N/A

If this facility dispenses more than 200,000 gallons of gasoline per year, does it have Stage I vapor control system installed?

☐ YES ☐ NO ☐ N/A

Who is responsible for gasoline health effects warnings?

Is gasoline health effects information posted in vehicle refueling areas?

☐ YES ☐ NO ☐ N/A

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

SOLID WASTE DISPOSAL

(1)

Is this facility registered under the Resource Conservation
and Recovery Act (RCRA)?

YES NO N/A

Generator

Storer

Treater

Disposer

Transporter

What is the registration number? _____

List any hazardous waste and the amount being generated and
show if it is disposed of on or off-site.

ON OFF

List any solid waste and the amount being generated and show
if it is disposed of on or off-site.

YES NO N/A

Is any hazardous waste disposed of in a landfill as free liquid?
If so, have arrangements been made for another type disposal
of this waste after May 1985, since this practice will then be
prohibited?

Does this facility produce, distribute, or burn any fuel derived
from hazardous waste? Discuss: _____

If this facility is a treater, storer, or disposer (TSD facility),
does it have a final RCRA permit?

Has this facility received its RCRA Part B application?

If yes, when is Part B application due? _____

Is Part B application being completed as per 40 CFR 264 & 270? _____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

SOLID WASTE DISPOSAL

(2)

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
If this is a TSD facility which does not yet have a final RCRA permit, is it in compliance with the interim standards?	_____	_____	_____
Are the following prepared:			
Written Waste Analysis Plan?	_____	_____	_____
Is the site secure to prevent unknowing entry or are "Danger-Unauthorized Personnel Keep Out" signs installed?	_____	_____	_____
Written inspection schedule on:	_____	_____	_____
(a) Monitoring equipment?	_____	_____	_____
(b) Security devices?	_____	_____	_____
(c) Operating and structural devices?	_____	_____	_____
Personnel training?	_____	_____	_____
"No Smoking" signs for ignitable or reactive waste?	_____	_____	_____
Preparedness and prevention?	_____	_____	_____
Contingency Plan?	_____	_____	_____
Arrangements with local authorities?	_____	_____	_____
Are <u>uniform</u> manifests used with each off-site load of hazardous waste?	_____	_____	_____
Are <u>all</u> hazardous waste manifests accounted for?	_____	_____	_____
Starting 9/1/85, <u>generators</u> must certify on their manifests that they have a program in place to reduce the volume and/or quantity and toxicity of their hazardous waste. Does this facility have such a program?	_____	_____	_____
Is manifest record system properly maintained?	_____	_____	_____
Is an annual hazardous waste summary provided to the State? (Provide a copy.)	_____	_____	_____
Is hazardous waste held over 90 days?	_____	_____	_____
Has <u>any</u> drummed waste been held over 90 days?	_____	_____	_____
What is the present inventory of drummed waste? _____			
Number of drums			
Is each drum dated when hazardous wastes are placed in the drum?	_____	_____	_____
What is the present inventory of empty drums? _____			
Number of drums			

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**Solid Waste Disposal
(3)**

How are empty drums disposed of?

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Are any empty drums given (sold) to employees or neighbors?	_____	_____	_____
Are drums emptied of purchased materials returned to the vendor as part of the agreement to purchase the material?	_____	_____	_____
What types of hazardous waste <u>treatment</u> are accomplished <u>on site</u> ?			
Solar Evaporation	_____	_____	_____
Processing for Detoxification	_____	_____	_____
Incineration	_____	_____	_____
Neutralization	_____	_____	_____
Landfarming	_____	_____	_____
Fixation prior to burial	_____	_____	_____
Recycling	_____	_____	_____
Biological	_____	_____	_____
Other _____	_____	_____	_____
Has TOC provided closure costs of on-site treatment and storage facilities?	_____	_____	_____
What is estimated cost? _____ Who estimated cost? _____			
Are ponds used in hazardous waste treatment?	_____	_____	_____
Are ponds in natural clay?	_____	_____	_____
Are ponds lined with clay?	_____	_____	_____
How thick? _____			
What freeboard is maintained in ponds? _____			
What is expected 24-hour rainfall in a five-year period? _____			
Does this facility have an ongoing groundwater monitoring program?	_____	_____	_____
If facility has a final RCRA permit, what phase of GW monitoring exists at present? Detection___ Compliance___ Corrective Action___			
If facility is still in interim status, is GW monitoring program in compliance with the interim status requirements?	_____	_____	_____

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Solid Waste Disposal
(4)

How many monitoring wells are used? _____

How many wells are upgradient? _____

How many wells are downgradient? _____

How deep are the monitoring wells? _____

What are the wells monitored for? (40 CFR 265.92)

1. Set 1 Parameters: _____

2. Set 2 Parameters: _____

3. Set 3 Parameters: _____

4. Other: _____

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Have initial background concentrations been established for all of the parameters analyzed?	_____	_____	_____

Does this background information indicate any groundwater contamination?	_____	_____	_____
--	-------	-------	-------

If so, has a groundwater quality assessment program been established as per the interim status regulations?	_____	_____	_____
---	-------	-------	-------

What has been the total cost of the groundwater monitoring program? _____

What were the costs for the last 12 months? _____

Are monitoring-well results reported to state?	_____	_____	_____
--	-------	-------	-------

What is the depth of the shallowest aquifer currently used? _____

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**Solid Waste Disposal
(5)**

YES NO N/A

Does this facility operate water wells?

What depth? _____ How many? _____

List private drinking water wells near this facility.

	Owner	Depth
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____

List industrial/commercial water wells near this facility.

	Owner	Depth	Water Use
1.	_____	_____	_____
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____

List municipal or public water wells near this facility.

	Owner	Depth	Water Use
1.	_____	_____	_____
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____

Has this facility been inspected by a regulatory agency in the last 12 months regarding solid waste disposal?

What discrepancies did they note? _____

Have these discrepancies been corrected?
(Provide a copy of last regulatory inspection.)

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**Solid Waste Disposal
(6)**

OFF-SITE DISPOSAL

If off-site hazardous waste disposal is used:

What is the name of the facility?

Name

Permit Number

1. _____
2. _____
3. _____

Do you have a copy of their current RCRA permit?

Do you have a copy of their current state permit(s)?

Have you visited this facility in the last 12 months?

Did the evaluation confirm this site is satisfactory for disposal
of your facility's hazardous waste?

(If a written evaluation report was made, please attach.)

Are DOT approved containers and labeling used for off-site
delivery of hazardous waste?

Estimated annual cost of off-site disposal? _____

Has this off-site facility been inspected by a regulatory agency
in the last 12 months regarding solid waste disposal?

What discrepancies did they note? _____

Have these discrepancies been corrected?

YES NO N/A

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UNDERGROUND STORAGE

(1)

Does this facility have underground storage tanks?

YES NO N/A

Please tabulate information on underground storage including fuel tanks.

	<u>Tank Identification</u>	<u>Tank Volume</u>	<u>Material of Construction</u>	<u>Tank Age</u>	<u>Material Stored</u>
1.	_____	_____	_____	_____	_____
2.	_____	_____	_____	_____	_____
3.	_____	_____	_____	_____	_____
4.	_____	_____	_____	_____	_____
5.	_____	_____	_____	_____	_____
6.	_____	_____	_____	_____	_____
7.	_____	_____	_____	_____	_____
8.	_____	_____	_____	_____	_____
9.	_____	_____	_____	_____	_____
10.	_____	_____	_____	_____	_____

How often is stored product inventory reconciled? _____

What program is followed to insure early detection of potential leaks?

**TENNECO OIL P&M
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**POLYCHLORINATED BIPHENYLS (PCB)
(1)**

YES NO N/A

As of July 2, 1978, did this facility contain in service,
stored for future use, or stored for disposal:

A. 50 or more large high or low voltage PCB capacitors?

B. One (1) or more PCB transformers?

C. 45kgs (99.4 lbs) or more PCB chemical substances
or PCB mixtures?

Does the facility contain other PCBs, PCB equipment (e.g.,
electromagnets, electric motors, hydraulic systems, heat
transfer systems, compressors), or containers of PCBs or
PCB mixtures?

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ENVIRONMENTAL REVIEW

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HIGHLY VOLATILE LIQUID PIPELINE

(1)

Name of pipeline: _____

When was pipeline constructed? _____

What is pipe diameter? _____

Length of pipeline? _____

What products are transported? _____

Normal operating rate and pressure: _____

Maximum operating rate and pressure: _____

Date of latest hydrostatic test: _____

Do current DOT regulations require additional pressure testing? _____
YES NO N/A

How often are pipeline rights-of-way inspected? _____

Who conducts these inspections? _____

(Provide a copy of a typical inspection.)

How often are navigable waterway crossings inspected? _____

Are all line markers provided as required? _____

Do the markers contain the proper wording as required as well as
emergency phone numbers? _____

How many pump stations are on this pipeline? _____

What is the source of power?	Electric	Yes _____	No _____	N/A _____
------------------------------	----------	-----------	----------	-----------

	Gas	Yes _____	No _____	N/A _____
--	-----	-----------	----------	-----------

	Diesel	Yes _____	No _____	N/A _____
--	--------	-----------	----------	-----------

What provisions are made to shut down pumps in event of pipeline leak?

TENNECO POLYMERS
HIGHLY VOLATILE LIQUID PIPELINE
(2)

YES NO N/A

	YES	NO	N/A
--	-----	----	-----

	YES	NO	N/A
--	-----	----	-----

	YES	NO	N/A
--	-----	----	-----

How often is cathodic protection pipeline to ground potential measured?

What is final disposition of material? _____

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

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COMMUNITY RELATIONS

(1)

How many complaints were received from neighbors or other interested parties the last 12 months? _____

Is this a decrease compared to the previous 12 months? _____

What percent of the neighborhood complaints received relate to:

Air _____

Water _____

Noise _____

Spills _____

Solid Waste Disposal _____

Other _____

TOTAL

100%

What percent of the complaints investigated relate to this facility? _____

Describe briefly how complaints are handled and name individual(s) responsible for handling complaints. If written procedures exist, please attach a copy.

When is the senior line manager responsible for local operations informed of citizen complaints? _____

Who is responsible for reporting complaint information to the senior line manager? _____

Does this facility have an Emergency Contingency Plan?

YES NO N/A

Has the Emergency Contingency Plan been updated in the last 12 months?

YES NO N/A

(Please make available a copy of the Emergency Contingency Plan for the Review Team.)

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

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COMMUNITY RELATIONS

(2)

What individual is responsible to make timely reports of the occurrence of emergencies to TOC P&M Environmental Affairs Department (Houston)? _____

Briefly describe activities this facility has participated in the last 12 months to enhance community relations. Typical activities are providing speakers for civic clubs and other local organizations, participating in county (parish) fairs, supporting youth groups such as Little League, Scouting, etc., providing information to newspapers, radio or television.

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

S U M M A R Y
(2)

THE FOLLOWING ITEMS REQUIRE LOCAL OPERATIONS MANAGEMENT ATTENTION:

ITEM #	DESCRIPTION	SPECIFIC IMPROVEMENT NEEDED	DOES LOCAL MGMT AGREE	INDIVIDUAL RESPONSIBLE FOR COMPLETION OF CORRECTIVE ACTION	DATE FOR COMPLETION OF IMPROVEMENTS

TENO 422

8/16/83

**TENNECO OIL P&M
ENVIRONMENTAL REVIEW**

TENNECO POLYMERS

**SUMMARY
(3)**

Unresolved questions raised as a result of the Environmental Review.

Question # _____

Responsible party: _____

Date for answer: _____

Answer:

Date answered: _____

