

**UNIROYAL CHEMICAL ENVIRONMENTAL MANAGEMENT MANUAL  
GASTONIA PLANT  
REVISION DATE: MAY 1, 2000**

**UNIROYAL CHEMICAL COMPANY  
(CROMPTON CORP.)  
GASTONIA PLANT  
214 WEST RUBY AVENUE  
GASTONIA, N.C. 28054**

**ENVIRONMENTAL MANAGEMENT MANUAL**

**REVISION DATE: MAY 1, 2000  
REPLACES: FEBRUARY 1, 2000**

**APPROVED BY:**

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**R.I. MARIONNEAUX, FACTORY MANAGER**

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**R.J. LAK, OPERATIONS MANAGER**

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**FRED H. LEE, PRODUCTION SUPT.**

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**J.W. ROBINSON, TECH. SUPT.**

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**J.M. EDSEL, QUALITY CONTROL MANAGER**

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**COPY CONTROL**

MASTER COPY

TECHNICAL SUPERINTENDENT

CONTROLLED COPY

OPERATIONS MANAGER

CONTROLLED COPY

PRODUCTION SUPERINTENDENT

CONTROLLED COPY

QUALITY MANAGEMENT INSTITUTE

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**CHANGE CONTROL**

<b>DATE OF CHANGE</b>	<b>MODIFIED SECTION</b>	<b>CHANGE MADE</b>	<b>BY:</b>
5/25/99	4.3.4	ADDED 4.3.4.5	RJL
5/25/99	4.4.1.1	DELETED/MOVE E TO D	RJL
5/25/99	4.4.1.2	REVISED 4.4.1.2	RJL
	4.4.1.3 ADDED	CHANGED 4.4.1.2 to 4.4.1.3	RJL
5/25/99	4.4.2.2	ADDED G.	RJL
5/25/99	4.4.2.3	ADDED D	RJL
5/25/99	4.4.5.1 ; D	ADDED REFERENCE TO WSP #14	RJL
5/25/99	4.6	REVISED ENTIRE SECTION	RJL
6/15/99	4.3.2.4	ADDED SECTION 4.3.2.4	JWR
2/1/00	ENVIRONMENTAL POLICY		RIM
5/1/00	NAME CHANGE		JWR

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## **SCOPE AND FIELD**

THIS MANUAL DEFINES THE PRINCIPAL REQUIREMENTS OF THE ENVIRONMENTAL MANAGEMENT SYSTEM OF THE GASTONIA, NORTH CAROLINA PLANT OF UNIROYAL CHEMICAL CO. IT'S PURPOSE IS TO BRIEFLY DESCRIBE THE ELEMENTS OF OUR SYSTEMS WHICH DEMONSTRATE COMPLIANCE TO ISO-14001 STANDARDS AND TO LIST APPROPRIATE REFERENCES. THE COMPLETE DESCRIPTIONS OF THESE ENVIRONMENTAL SYSTEMS ARE FOUND IN THE CONTROLLED DOCUMENTS WHICH ARE REFERENCED IN THE MANUAL.

THIS DOCUMENT IS APPLICABLE TO THE ENTIRE ORGANIZATION OF GASTONIA, N.C.

## **LOCATION**

THE GASTONIA PLANT, A 12 ACRE SITE, IS SITUATED IN A RESIDENTIAL NEIGHBORHOOD, WITH HOMES DIRECTLY ADJACENT TO THE EAST AND WEST FENCE LINES. TO THE NORTH OF THE PLANT, DIRECTLY ADJACENT TO THE FENCE LINE, IS CATAWBA CREEK, A TRIBUTARY OF THE CATAWBA RIVER. THE CATAWBA RIVER FEEDS LAKE WYLIE, A MAJOR RECREATIONAL USAGE LAKE. MUNICIPALITIES DOWNSTREAM OF LAKE WYLIE, ON THE CATAWBA RIVER, UTILIZE THE RIVER AS THEIR DRINKING WATER SUPPLY.

ACCESS TO THE FACILITY IS VIA A TWO-LANE STREET, LINED WITH HOMES, AND SEVERAL BLOCKS FROM A MAIN THOROUGHFARE.

## **MANUFACTURED PRODUCTS**

THIS FACILITY MANUFACTURES THE FOLLOWING PRODUCTS: URETHANE PREPOLYMERS, URETHANE CURATIVES, GROWTH RETARDANTS, MITICIDES, HERBICIDE, FUNGICIDES, DISPERSANTS, AND FABRICATED PRODUCTS (DRUM COVERS & RUBBER LABELS).

## **ENVIRONMENTAL POLICY**

THE ENVIRONMENTAL POLICY FOR THE UNIROYAL CHEMICAL GASTONIA PLANT IS AVAILABLE TO THE PUBLIC ON REQUEST. IT IS DISPLAYED IN THE LOBBY OF THE PLANT.

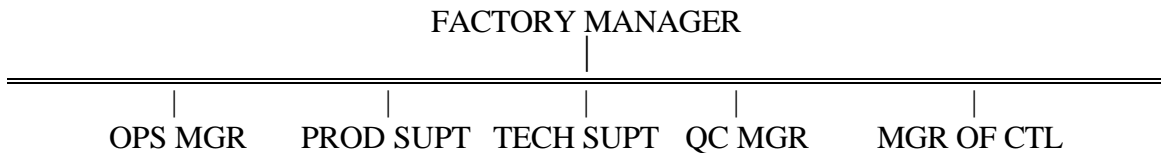
## **ENVIRONMENTAL POLICY**

**UNIROYAL CHEMICAL, GASTONIA PLANT WILL:**

1. PRODUCE, STORE, TRANSPORT, USE, AND DISPOSE OF CHEMICALS IN A MANNER THAT PROTECTS THE ENVIRONMENT AS WELL AS THE HEALTH AND SAFETY OF THE WORK FORCE AND THE PUBLIC.
2. COMPLY WITH ALL THE LAWS, REGULATIONS, AND STANDARDS APPLICABLE TO OUR PRODUCTS, PROCESSES AND WASTES.
3. ACTIVELY PURSUE REDUCTIONS OF THE GENERATION OF WASTE AND THE DISCHARGE OF CONTAMINANTS INTO THE ENVIRONMENT.
4. COMMIT TO CONTINUAL IMPROVEMENT BY SETTING AND REVIEWING OBJECTIVES AND TARGETS.
5. UNDERTAKE SCHEDULED ENVIRONMENTAL ASSESSMENTS OF THE GASTONIA PLANT.
6. ENTRUST EACH MANAGER/SUPERVISOR WITH THE RESPONSIBILITY FOR THE ENVIRONMENTAL PERFORMANCE OF HIS/HER AREA.
7. CONTINUE TRAINING OF PLANT PERSONNEL ON THE ASPECTS OF ENVIRONMENTAL RESPONSIBILITY.
8. COMMUNICATE THIS POLICY TO ALL EMPLOYEES AND TO THE PUBLIC.

**R.I. MARIONNEAUX  
FACTORY MANAGER**

## ORGANIZATIONAL CHART



### MANAGEMENT RESPONSIBILITIES

THE FACTORY MANAGER HAS TOTAL RESPONSIBILITY FOR OPERATION OF THIS FACILITY, INCLUDING ALL ENVIRONMENTAL ASPECTS. THE FACTORY MANAGER'S STAFF WILL BE THE ENVIRONMENTAL STEERING COMMITTEE. THIS COMMITTEE WILL CONDUCT OR SUPERVISE ANNUAL INTERNAL AUDITS TO THE ISO 14001 STANDARD. THIS COMMITTEE WILL ALSO MEET AT LEAST SEMI-ANNUALLY TO REVIEW AND EVALUATE THE ENVIRONMENTAL PROGRAMS. THE RESULTS WILL BE REPORTED TO THE FACTORY MANAGER. THE TECHNICAL SUPERINTENDENT HAS BEEN APPOINTED THE MANAGEMENT REPRESENTATIVE.

OPERATIONS MANAGER- ASSURES NEW PRODUCTS AND NEW PROCESSES ARE ENVIRONMENTALLY SOUND (AS WELL AS IMPROVEMENTS ON OLD PROCESSES). HANDLES LEGAL ASPECTS OF ENVIRONMENTAL PROGRAMS. HE HANDLES THE URETHANE DEPARTMENT OPERATIONS.

PRODUCTION SUPERINTENDENT- ASSURES PRODUCTION AND MAINTENANCE UNITS FOLLOW ALL LEGAL AND PLANT REGULATIONS TO ELIMINATE OR REDUCE ADVERSE ENVIRONMENTAL IMPACTS AND TO SEARCH FOR WAYS TO IMPROVE BENEFICIAL IMPACTS. THE PRODUCTION SUPERINTENDENT ALSO IS RESPONSIBLE FOR TRAINING, UTILIZING THE PLANT TRAINING COORDINATOR. HE HANDLES THE CROP PROTECTION DEPARTMENT AND POLYWET DEPARTMENT OPERATIONS.

QUALITY CONTROL MANAGER- MANAGES THE ANALYTICAL ASPECTS OF THE ENVIRONMENTAL IMPACTS. THIS MANAGER IS RESPONSIBLE FOR THE ENVIRONMENTAL ASPECTS RELATING TO THE QUALITY CONTROL LABORATORY.

MANAGER OF CONTROL- PURSUES AVENUES TO ASSURE PURCHASING OF MATERIALS WHICH CAUSE AS LITTLE ADVERSE IMPACT ON THE ENVIRONMENT AS POSSIBLE. ALSO, AS FAR AS POSSIBLE, USES ALL VENDORS WHICH SUPPLY ENVIRONMENTALLY SOUND SUPPLIES.

TECHNICAL SUPERINTENDENT – PREPARE AND MONITOR ISO-14001 MANUAL. ASSISTS ALL IN DEVELOPMENT OF ENVIRONMENTAL ASPECTS. ALSO HANDLES DISPOSAL OF SOLID WASTE. IS THE MANAGEMENT REPRESENTATIVE. CONTROLS ENVIRONMENTAL DOCUMENTS, INCLUDING ENVIRONMENTAL ASPECTS.

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**4.3 PLANNING**

4.3.1 ENVIRONMENTAL ASPECTS

- 4.3.1.1 SIGNIFICANT ENVIRONMENTAL ASPECTS ARE DETERMINED ACCORDING TO WSP#38.
- 4.3.1.2 THERE WILL BE A RECORD OF DETERMINATION AND THE SIGNIFICANT ENVIRONMENTAL ASPECTS RELATING TO EACH DEPARTMENT KEPT IN THAT DEPARTMENT AS WELL AS IN THE TECHNICAL SUPERINTENDENT'S OFFICE.
- 4.3.1.3 THE PRODUCTION SUPERINTENDENT WILL KEEP COPIES OF ALL ACTIVITIES RELATING TO SIGNIFICANT ENVIRONMENTAL ASPECTS. (WSP #18, WSP #38). THIS INFORMATION WILL BE FILED IN THE TRAINING CENTER.
- 4.3.1.4 THE STEERING COMMITTEE DURING THEIR SEMI-ANNUAL, SPECIAL, AND/OR MONTHLY SAFETY/QUALITY COMMITTEE MEETINGS WILL KEEP THE IDENTIFICATION OF THE SIGNIFICANT ENVIRONMENTAL ASPECTS UP TO DATE. WSP #10, WSP#34.

4.3.2 LEGAL AND OTHER REQUIREMENTS

- 4.3.2.1 IT IS THE RESPONSIBILITY OF THE OPERATIONS MANAGER TO KEEP ABREAST OF ALL LEGAL AND COMPANY REQUIREMENTS RELATING TO THE ENVIRONMENT.
  - A. WSP # 44
  - B. COMMUNICATES TO THE AFFECTED PARTIES
  - C. DETERMINE THE NEED FOR AND APPLIES FOR PERMITS.
- 4.3.2.2 THE OPERATIONS MANAGER WILL KEEP ALL DOCUMENTS CONCERNING THE LEGAL ASPECTS RELATING TO THE ENVIRONMENT, WITH THE EXCEPTION OF RCRA INFORMATION. THE TECH. SUPT. WILL KEEP RCRA DOCUMENTS. (WSP# 18)
- 4.3.2.3 THE FOLLOWING SPECIFIC LEGAL REQUIREMENTS HAVE BEEN IDENTIFIED FOR THE PLANT (WSP #44):
  - A. STATE NPDES
  - B. RCRA (ADMINISTERED BY THE STATE)
  - C. OSHA (ADMINISTERED BY THE STATE)
  - D. CLEAN AIR ACT (ADMINISTERED BY THE STATE)
  - D. FIFRA (PERMITS HANDLED BY CORPORATE)
  - E. WASTE WATER (CITY)
  - F. EPA
  - G. DOT (WSP #16) HAZARDOUS MATERIALS TRAINING MANUAL

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4.3.3 OBJECTIVES AND TARGETS

- 4.3.3.1 ENVIRONMENTAL OBJECTIVES AND TARGETS WILL BE ESTABLISHED BY THE STEERING COMMITTEE. THESE DOCUMENTED OBJECTIVES WILL BE KEPT BY THE TECHNICAL SUPERINTENDENT.
  - A. WSP # 42

4.3.4 ENVIRONMENTAL MANAGEMENT PROGRAM

- 4.3.4.1 WASTE MANAGEMENT (SOP # 1)
  - A. WASTE REDUCTION.
    - 1. A POLLUTION AND WASTE REDUCTION PROGRAM HAS BEEN WRITTEN. (WSP # 39).
- 4.3.4.2 AIR POLLUTANTS
  - A. POLLUTION REDUCTION
    - 1. A POLLUTION AND WASTE REDUCTION PROGRAM HAS BEEN WRITTEN (WSP # 39)
  - B. LEGAL REQUIREMENTS
    - 1. LOCAL
    - 2. STATE
    - 3. NATIONAL
- 4.3.4.3 SPCC
  - A. THERE IS AN SPCC PROGRAM THIS PROGRAM IS CONTROLLED BY THE OPERATIONS MANAGER. (WSP#33)
  - B. TRAINING RECORDS
    - 1. TRAINING RECORD WILL BE KEPT BY THE TRAINER
- 4.3.4.4 OBJECTIVES AND TARGETS
  - A. WSP #42
- 4.3.4.5 MANAGEMENT OF CHANGE
  - A. WSP #34

**NOTE:** ENVIRONMENTAL MANAGEMENT PROGRAMS WILL BE UPDATED WHEN CHANGES IN THE OPERATIONS OF THE PLANT CHANGE.

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**4.4 IMPLEMENTATION AND OPERATION**

4.4.1 STRUCTURE AND RESPONSIBILITY

4.4.1.1 ENVIRONMENTAL STEERING COMMITTEE

- A. ENSURES THAT ENVIRONMENTAL MANAGEMENT SYSTEMS REQUIREMENTS ARE ESTABLISHED, IMPLEMENTED AND MAINTAINED.
- B. SHALL INSTRUCT THE DEPARTMENT SUPERVISORS TO INSTRUCT AND DIRECT OPERATORS IN THE RELEVANT DEPARTMENT ON THEIR DUTIES TO MEET OBJECTIVES AND TARGETS.
- C. ALL EMPLOYEES WILL BE MADE AWARE OF THE REQUIREMENTS OF THE ENVIRONMENTAL MANAGEMENT SYSTEM AND THE RESPONSIBILITIES OF EACH PERSON INVOLVED IN ENVIRONMENTAL ACTIVITY. THIS WILL BE DONE DURING MONTHLY SAFETY/QUALITY MEETINGS.
- D. IDENTIFIES REQUIRED RESOURCES

4.4.1.2 MANAGEMENT REPRESENTATIVE

- A. THE TECHNICAL SUPERINTENDENT IS THE MANAGEMENT REPRESENTATIVE.
- B. RESPONSIBLE FOR ENSURING THE EMS IS ESTABLISHED, IMPLEMENTED AND MAINTAINED AS PER ISO 14001.
- C. REPORTS ON THE EMS PERFORMANCE TO TOP MANAGEMENT FOR REVIEW AND AS A BASIS FOR IMPROVEMENT.

4.4.1.3 FACTORY MANAGER

- A. APPROVES RESOURCES TO SUPPORT THE EMS.

4.4.2 TRAINING, AWARENESS & COMPETENCE

4.4.2.1 TRAINING COORDINATOR

- A. IDENTIFY TRAINING NEEDS
  - 1. TRAINING PROGRAM IS LOCATED IN THE TRAINING CENTER
- B. TRAIN PERSONNEL WHOSE JOB FUNCTION MAY CREATE A SIGNIFICANT IMPACT ON THE ENVIRONMENT. (WSP # 41)
  - B.1 OPERATORS
  - B.2 RECEIVERS
- C. CONTROL RECORDS (WSP#18)
- D. IS RESPONSIBLE FOR LEGAL, REFRESHER, NEW HIRE, JOB TRANSFER TRAINING.

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4.4.2.2 EMPLOYEES

- A. CONFORMANCE WITH ENVIRONMENTAL MANAGEMENT SYSTEM
- B. SIGNIFICANT ENVIRONMENTAL IMPACTS
- C. THEIR ROLES AND RESPONSIBILITY- INCLUDES EMERGENCY RESPONSE POTENTIAL
- D. CONSEQUENCES OF DEPARTURE FROM SPECIFIED PROCEDURES
- E. PERSONNEL PERFORMING TASK WHICH CAN CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS WILL BE TESTED TO HELP INSURE THEIR COMPETENCE.
- F. ENVIRONMENTAL OBJECTIVES ARE A PART OF THE ANNUAL EMPLOYEE OBJECTIVES AND EVALUATION.
- G. TRAINING SCHEDULED IN ACCORDANCE WITH TRAINING PROGRAM MANUAL..

4.4.2.3 OUTSIDE CONTRACTORS

- A. RECEIVE GENERAL ORIENTATION
- B. ARE SUPPLIED CONTRACTOR'S MANUAL
- C. CONTRACTOR'S ARE HELD TO THE SAME STANDARD AS UNIROYAL CHEMICAL'S EMPLOYEES
- D. RECEIVE MINIMUM OF BI-ANNUAL TRAINING

4.4.3 COMMUNICATIONS

4.4.3.1 OPERATIONS MANAGER AND PRODUCTION SUPT. WILL:

- A. ESTABLISH AND MAINTAIN PROCEDURES FOR INTERNAL COMMUNICATIONS. THIS WILL BE DONE VERBALLY DURING DAILY SUPERVISOR MEETINGS AND SPECIAL MEETINGS. WRITTEN COMMUNICATION INCLUDES BULLETIN BOARDS, NEWSLETTER, SPECIAL REPORTS.
- B. RECEIVE, DOCUMENT AND RESPOND TO COMMUNICATION FROM EXTERNAL PARTIES REGARDING ENVIRONMENTAL ASPECTS (THIS INCLUDES REGULATING AGENCIES).
- C. PROVIDE COMMUNICATIONS REGARDING SIGNIFICANT ENVIRONMENTAL ASPECTS.

4.4.3.2 THE FACTORY MANAGER IS RESPONSIBLE FOR APPROPRIATE COMMUNICATION TO LEGAL AUTHORITIES AND TO THE MEDIA AS NEEDED.

- A. WSP # 2

4.4.4 ENVIRONMENTAL MANAGEMENT SYSTEM DOCUMENTATION

4.4.4.1 THE TECHNICAL SUPERINTENDENT WILL:

- A. MAINTAIN ENVIRONMENTAL MANAGEMENT MANUAL
- B. THIS MANUAL IS REVIEWED ANNUALLY. (WSP # 14)

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4.4.5 DOCUMENT CONTROL (WSP#18)

- 4.4.5.1 TECHNICAL SUPERINTENDENT IS RESPONSIBLE FOR MAINTAINING WSP #18
- A. LOCATION (COPIES ARE LOCATED IN STAFF AND SUPERVISOR'S OFFICES)
  - B. REVIEWED AND/OR REVISED/AUTHORIZED
  - C. CURRENT VERSIONS OF RELEVANT DOCUMENTS ARE AVAILABLE
  - D. OBSOLETE DOCUMENTS ARE DESTROYED WITH 2 EXCEPTIONS. (Q A MANUAL AND THE EMS MANUAL) WSP #14
  - E. ANY OBSOLETE DOCUMENTS RETAINED ARE SUITABLY IDENTIFIED. THEY ARE KEPT IN THE TECHNICAL SUPERINTENDENT'S OFFICE FOR 5 YEARS THEN DESTROYED.

4.4.6 OPERATIONAL CONTROL

- 4.4.6.1 IDENTIFICATION OF OPERATIONS AND ACTIVITIES ASSOCIATED WITH SIGNIFICANT ENVIRONMENTAL ASPECTS, OBJECTIVES, AND TARGETS. (WSP # 41)
- A. MAINTAIN DOCUMENTED PROCEDURES
  - B. INCLUDE OPERATING PROCEDURES
  - C. INCLUDE GOODS AND SERVICES
  - D. COMMUNICATION WITH SUPPLIERS AND CONTRACTORS
  - E. DISTRIBUTION (WSP # 16)
  - F. PREVENTATIVE MAINTENANCE (WSP # 23) (SOP#30)

4.4.7 EMERGENCY PREPAREDNESS AND RESPONSE

- 4.4.7.1 SOP #25, EMERGENCY PROCEDURE FOR HAZARDOUS RELEASE
- 4.4.7.2 WSP #28, EMERGENCY AND DISASTER PLAN

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**4.5 CHECKING & CORRECTIVE ACTION**

4.5.1. MONITORING AND MEASUREMENT

A. SOP # 30

4.5.1.1 MONITORING EQUIPMENT MUST BE CALIBRATED-DOCUMENTED  
(WSP # 7)

4.5.1.2 DOCUMENTED PROCEDURE FOR EVALUATING COMPLIANCE  
WITH REGULATORY REPORTING – PERMIT SUMMARY

4.5.1.3 REPORTING TO CORPORATE OFFICE  
ENVIRONMENTAL REPORTS ARE SUBMITTED ON REQUEST.

4.5.1.4 A LIST OF REGULATORY REPORTS RELATING TO THE  
ENVIRONMENT IS LOCATED IN THE PLANT ENGINEER'S OFFICE.  
THE REPORTING IS THE RESPONSIBILITY OF THE OPERATIONS  
MANAGER.

4.5.1.5 RECORDS OF ENVIRONMENTAL INSPECTIONS ARE IN THE  
ENGINEER'S OFFICE AND FOR RCRA, IN THE TECHNICAL  
SUPERINTENDENT'S OFFICE.

4.5.2 NON-CONFORMANCE & CORRECTIVE & PREVENTIVE ACTION

4.5.2.1 DOCUMENTED PROCEDURE-INCLUDED IN WSP# 38 & 43.

4.5.3 RECORDS

4.5.3.1 MAINTAIN PROCEDURE FOR CONTROLLING DOCUMENTS WSP#18

4.5.4 ENVIRONMENTAL MANAGEMENT SYSTEM AUDIT

4.5.4.1 DOCUMENTED PROCEDURE (WSP#43)

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**4.6 MANAGEMENT REVIEW**

4.6.1 SEMI-ANNUAL REVIEW BY THE FACTORY MANAGER'S STAFF AS THE ENVIRONMENTAL STEERING COMMITTEE.

4.6.1.1 MANAGEMENT REPRESENTATIVE SHALL BE RESPONSIBLE FOR COLLECTING INFORMATION REQUIRED TO CONDUCT THE REVIEW.

4.6.1.2 REVIEW OF EMS

- A. ENVIRONMENTAL OBJECTIVES, TARGETS AND PERFORMANCE
- B. FINDINGS OF THE EMS AUDITS
- C. EVALUATION OF ITS EFFECTIVENESS
- D. EVALUATION OF THE SUITABILITY OF THE ENVIRONMENTAL POLICY AND THE NEED FOR CHANGES IN LIGHT OF:
  - CHANGING LEGISLATION
  - CHANGING EXPECTATIONS AND REQUIREMENTS OF INTERESTED PARTIES
  - CHANGES IN PRODUCTS OR ACTIVITIES
  - ADVANCES IN SCIENCE OR TECHNOLOGY
  - LESSONS LEARNED FROM ENVIRONMENTAL INCIDENTS
  - MARKETING PREFERENCES
  - REPORTING AND COMMUNICATION

4.6.2 DOCUMENTED REPORT TO FACTORY MANAGER

4.6.2.1 FILED IN TECHNICAL SUPERINTENDENT'S OFFICE