



Baker Petrolite

12645 West Airport Blvd.
Sugar Land, TX 77478 USA
Tel 281-275-7345
Fax 281-275-7385
Web site: www.bakerhughes.com/bapt

September 29, 2000

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

Halina E. Caravello
Director
Health, Safety, Environmental
Quality & Regulatory Affairs

Subject: Performance Track Application

Dear Sir/Madam:

I am pleased to submit the Performance Track Application for the Gulf Coast Blend Plant of Baker Petrolite Incorporated in Rayne, Louisiana. This facility has dedicated employees that are committed to continual improvement and embody the tenants of this program. We are pleased to be considered for this program. Should you have any questions or require additional information, please feel free to contact me at (281) 275-7345.

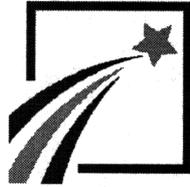
Sincerely,

A handwritten signature in cursive script that reads "Halina E. Caravello".

Halina E. Caravello

xc: R. Brice
D. Durham
R. Harris
D. Kuykendal

A06-6016



***National
Environmental
Achievement Track***

Application Form

Baker Petrolite- Rayne Blend Plant

Name of facility

BAKER HUGHES / Baker Petrolite Corporation

Name of parent company (if any)

135 Industrial Drive

Street address (continued)

Rayne, Louisiana, 70578

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Randy Harris/Halina Caravello

Plant Manager/Dir. HSE/Q&RA

800-321-5977 / 800-231-3606

Fax 337-334-2668 / (281)275-7385

E-mail Randy.Harris@BakerPetrolite.com/Halina.Caravello@BakerPetrolite.com

Section A

Tell us about your facility.

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

1 What do you do or make at your facility?

The Rayne Blend Facility produces and distributes oilfield production chemicals to the Gulf Coast area. Intermediate products received from Baker Petrolite manufacturing facilities are blended with raw materials to make finished products. Our activities also include repackaging and relabeling operations, as well as storage of products for the local markets. The specialty chemicals we make help crude oil producers bring oil to the surface and transport it through pipelines by preventing problems such as scale, emulsification, bacteria fouling and paraffin plugging. We also provide water clarifiers which enhance discharge water quality and prevent pollution, as well as corrosion inhibitors which minimize corrosion in pipelines, wells and facilities. Controlling corrosion is a key factor in preventing leaks and resulting environmental contamination.

SIC

5169

NAICS

42269

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

3 Does your company meet the Small Business Administration definition of a small business for your sector?

Yes No

4 How many employees (full-time equivalents) currently work at your facility?

- Fewer than 50
 50-99
 100-499
 500-1,000
 More than 1,000

Section A, continued

5 Does your facility have an EPA ID number(s)?

Yes No

If yes, list in the right-hand column.

LAD000778324

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

See checklist

7 Check the appropriate box in the right-hand column.

I've listed the requirements above.

I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Our facility is a relatively small operation, with only about 25 full-time employees. Our dedicated employees strive everyday to operating our facility as safely as possible, for our employees, our neighbors, the community, and the environment. We have worked very hard to achieve ISO 9001 accreditation, and at the beginning of this year, we became to ISO 14001. We strive to go beyond mere compliance by following the principles of Responsible Care. For the last two years, we have also received the Blend Plant Environmental Excellence award. This award is bestowed on the Baker Petrolite Blend Plant which receives the highest score on the internal BPC HSE compliance audit. We have numerous programs in place which are designed to minimize our impact on the environment. These programs include self-inspection, maintenance, employee training and development, emergency response plans and HAZMAT teams, community outreach activities and education, and participation in the Acadia Parish LEPC. Our commitment to operating our facility as safely as possible has paid off, since we

haven't had a reportable release or emergency since we've been located here, which has been fifteen years.

Section B

Tell us about your EMS.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

- a.* Environmental policy Yes
- b.* Planning Yes
- c.* Implementation and operation Yes
- d.* Checking and corrective action Yes
- e.* Management review Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? Yes

3 Did this cycle include both an EMS and a compliance audit? Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? Yes

If yes, what method of EMS assessment did you use?

Self-assessment

GEMI

Other

CEMP

Third-party assessment

ISO 14001 Certification

Other

Section C

Tell us about your past achievements and future commitments.

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Accidental release - Vulnerability and potential for release of Acrolein (an RMP chemical)	9 (miles) for Worst Case Scenario	miles	.66 (miles) for Alternate Case Scenario	miles
<p>i. How is the current level an improvement over the previous level?</p> <p>We previously minimized the likelihood of a release by conscientiously following the tenets of PSM, Process Safety Management. This included all aspects of PSM, from self-inspections and audits, to design and engineering aspects and safeguards, to training, standardized procedures, management of change, and more.</p>				
<p>ii. How did you achieve this improvement?</p> <p>Even though not required by any regulation, we installed a state of the art emergency response system to protect our community in the event of a release. This emergency response system guards the acrolein storage area, and includes a containment wall, chemical detectors, an alarm and communication system, a deluge system, plus foam and neutralizer which would deactivate or minimize any release. We have also enhanced our communication with our industrial and residential neighbors, in addition to the local fire department and LEPC. As a result of our community outreach efforts, we responded to the concerns of our industrial neighbors by providing them with emergency communication radios to use in the unlikely event of a release.</p>				

First aspect you've selected

- a. What is the aspect? Solid Waste - Non-Hazardous
- b. Is this aspect identified as significant in your EMS? Yes No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|--|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 21.2 tons/ 100,000 lbs of production
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of units of production or output | (Quantity/Units) |
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|--|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 18 tons/100,000 lbs of production, or a 15% reduction in 3 years
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of units of production or output | (Quantity/Units) |
- e. How will you achieve this improvement? Continued adherence to our waste minimization plan principles and the addition of new recycling options is already underway. We are on track for achievement of this goal, and with the continued dedication of plant employees to our recycling programs, we may even exceed our own expectations.

Second aspect you've selected

- a. What is the aspect? Solid Waste -Hazardous
- b. Is this aspect identified as significant in your EMS? Yes No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|--|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 418 gals/100,000 lbs of production
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of units of production or output | (Quantity/Units) |

Third aspect you've selected

- a. What is the aspect? Emission of VOCs (Volatile Organic Contaminants)
- b. Is this aspect identified as significant in your EMS? Yes No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|---------------------------|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 6 TPY
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|--|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 5.1 TPY over the next
three years
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
- e. How will you achieve this improvement? Installation of scrubbers for two solvent based blending vessels. Capital expenditure funds will be requested to purchase these scrubbers for the facility, and thereby minimize our impact on air quality from VOC emissions.

Fourth aspect you've selected

- a. What is the aspect? Prevention of accidental releases onsite (reportable)
- b. Is this aspect identified as significant in your EMS? Yes No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|-----------------------|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 0
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|-----------------------|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 0
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |

e. How will you achieve this improvement?

This goal will be achieved through:

Continued regulatory compliance.

Maintenance and improvement of employee training programs.

Continued self-inspection, internal audits, and maintenance programs.

Near miss reporting , and corrective actions.

Safety suggestions for improvement.

Awareness of Responsible Care initiatives - goal of no impact on the environment.

Employee motivation and incentive programs.

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

1. Open house - public meeting
2. Quarterly community outreach / Responsible Care activities
3. Personal communication with local businesses

2 How do you inform community members of important matters that affect them?

Same as above

3 How will you make the Achievement Track Annual Performance Report available to the public?

- Website www.bakerhughes.com
- Newspaper
- Open Houses
- Other

4 Are there any ongoing citizen suits against your facility? Yes No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	Rayne Volunteer Fire Department	Lee Hebert, Fire Chief	337-334-2345
<i>State/Local Regulator</i>	LEPC	John Quebodeaux	337-783-4357
<i>Other community/local reference</i>	Crowley American Legion Hospital	Gary Lacaze	337-783-3222

Section E

Application and Participation Statement.

On behalf of Baker Petrolite Corporation's
[my facility],

certify that

I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;

I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;

My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;

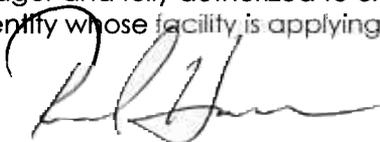
My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;

Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date



Printed Name/Title Randy Harris / Plant Manager

Facility Name Baker Petrolite

Facility Street Address 135 Industrial Drive, Rayne, LA. 70578

Facility ID Numbers LAD000778324

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

National Environmental Achievement Track

Environmental Requirements Checklist

The following *Checklist* is provided to assist facilities in answering *Section A, Tell us about your facility, " Question 6.* The *Checklist* is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The *Checklist* is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility. .

If you use this *Checklist* and choose to submit it with your application, fill in your facility information below and enclose the completed *Checklist* with your application (see instructions).

Facility Name: Gulf Coast Blend Plant

Facility Location: 135 Industrial Drive, Rayne, LA 70578

Facility ID Number(s): LA D000778324
(attach additional sheets if necessary)

Air Pollution Regulations

Check All
That Apply

- | | | |
|-----|--|-------------------------------------|
| 1. | National Emission Standards for Hazardous Air Pollutants (40 CFR 61) | <input type="checkbox"/> |
| 2. | Permits and Registration of Air Pollution Sources | <input checked="" type="checkbox"/> |
| 3. | General Emission Standards, Prohibitions and Restrictions | <input checked="" type="checkbox"/> |
| 4. | Control of Incinerators | <input type="checkbox"/> |
| 5. | Process Industry Emission Standards | <input type="checkbox"/> |
| 6. | Control of Fuel Burning Equipment | <input checked="" type="checkbox"/> |
| 7. | Control of VOCs | <input type="checkbox"/> |
| 8. | Sampling, Testing and Reporting | <input type="checkbox"/> |
| 9. | Visible Emissions Standards | <input checked="" type="checkbox"/> |
| 10. | Control of Fugitive Dust | <input checked="" type="checkbox"/> |
| 11. | Toxic Air Pollutants Control | <input type="checkbox"/> |
| 12. | Vehicle Emissions Inspections and Testing | <input type="checkbox"/> |

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)

- | | | |
|-----|-------------------------|-------------------------------------|
| 13. | <u>State Air Permit</u> | <input checked="" type="checkbox"/> |
| 14. | <u></u> | <input type="checkbox"/> |

Hazardous Waste Management Regulations

- Identification and Listing of Hazardous Waste (40 CFR 261)
- Characteristic Waste
- Listed Waste
- 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - Manifesting
 - Pre-transport requirements
 - Record keeping/reporting
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - Transfer facility requirements
 - Manifest system and record-keeping
 - Hazardous waste discharges
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - General facility standards
 - Preparedness and prevention
 - Contingency plan and emergency procedures
 - Manifest system, Record keeping and reporting
 - Groundwater protection
 - Financial requirements
 - Use and management of containers
 - Tanks
 - Waste piles
 - Land treatment
 - Incinerators
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265)
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
Administered Permit Program (Part B) (40 CFR 270)

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (*identify*)

- 8. _____
- 9. _____

Hazardous Materials Management

- Control of Pollution by Oil and Hazardous Substances (33 CFR 153)
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
- 5. Community Right-to-Know Regulations (40 CFR 350-372)

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (*identify*)

6. _____
7. _____

Solid Waste Management

Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)

2. Permit Requirements for Solid Waste Disposal Facilities
3. Installation of Systems of Refuse Disposal
4. Solid Waste Storage and Removal Requirements
5. Disposal Requirements for Special Wastes

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (*identify*)

6. State Solid Waste Registrations
7. _____

Water Pollution Control Requirements

2. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
3. Designation of Hazardous Substances (40 CFR 116)
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
4. NPDES Permit Requirements (40 CFR 122)
5. Toxic Pollutant Effluent Standards (40 CFR 129)
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
10. Water Quality Standards
11. Effluent Limitations for Direct Dischargers
12. Permit Monitoring/Reporting Requirements
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
14. Collection, Handling, Processing of Sewage Sludge
15. Oil Discharge Containment, Control and Cleanup
16. Standards Applicable to Indirect Discharges (Pretreatment)

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

17. Stormwater Discharge Permits
18. _____

Drinking Water Regulations

- Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146)
2. National Primary Drinking Water Standards (40 CFR 141)
3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)
4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
5. Underground Injection Control Requirements
6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above (identify)

7. _____
8. _____

Toxic Substances

- Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704)
2. Import and Export of Chemicals (40 CFR 707)
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)
4. Chemical Information Rules (40 CFR 712)
5. Health and Safety Data Reporting (40 CFR 716)
6. Pre-Manufacture Notifications (40 CFR 720)
7. PCB Distribution Use, Storage and Disposal (40 CFR 761)
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

10. Adverse effects reporting
- _____

Pesticide Regulations

- 1. FIFRA Pesticide Use Classification (40 CFR 162)
- 2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165)
- 3. Certification of Pesticide Applications (40 CFR 171)
- 4. Pesticide Licensing Requirements
- 5. Labeling of Pesticides
- 6. Pesticide Sales, Permits, Records, Application and Disposal Requirements
- 7. Disposal of Pesticide Containers
- 8. Restricted Use and Prohibited Pesticides

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

- 9. State registration of pesticides
- 10. _____

Environmental Clean-Up, Restoration, Corrective Action

Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)

- _____
- _____

2. RCRA Corrective Action (identify)

- _____
- _____

Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above (identify)

- 3. _____
- 4. _____