



A09-0036 10/2/01

***National
Environmental
Achievement Track***

Application Form

Rohm and Haas - La Mirada Plant

Name of facility

Rohm and Haas Company

Name of parent company (if any)

14445 Alondra Boulevard

Street address

Street address (continued)

La Mirada, CA 90638

City/State/Zip code

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

Name Helen M. Celeketic

Title Environmental Manager

Phone 714-228-4748

Fax 714-228-4790

E-mail helen_m_celeketic@rohmmaas.com

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.

Section A

Tell us about your facility.

1 What do you do or make at your facility?

Acrylic and vinyl acrylic emulsion polymers

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.

SIC
2821

NAICS
325211

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

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

Yes No

If yes, list in the right-hand column.

RCRIS/EPA Facility ID: CAD983638479
TRIS: 90638RHMHS14445
RMP: 100000088086

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.

Checklist is attached

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?

Since 1992 when Rohm and Haas purchased this facility, several significant environmental improvements have been made. Rohm and Haas elected to cease operation of the SBR (styrene-butadiene resin) process, resulting in significant hazardous waste reductions (both liquid styrene as well as butadiene vapor) and minimization of potential hazardous off-site consequences. Also, Rohm and Haas removed 100 non-compliant USTs from service and installed 5 compliant USTs.

Rohm and Haas La Mirada has an open-door policy and is an active and respected member of the community. We participate in the La Mirada Business Education Task Force, United Way Campaign, Teacher Shadowing, Jr Achievement, Chamber of Commerce, Disaster Preparedness Steering Committee and Red Cross.

We maintain a leadership role in the South East Region CAER Association and participate in Community Education events. We participate in the annual Disaster Drill and invite the Boy Scouts and local response agencies to utilize our facility during these events, as well.

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 Responsible Care ®

Third-party assessment

ISO 14001 Certification

Other Corporate Audit

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
Reduction in total solid waste	2230	tons	260	tons
<p>i. How is the current level an improvement over the previous level?</p> <p>Over the past seven years, the Rohm and Haas La Mirada plant has focused on methods for improving product yield, decreasing process waste and recovering product from waste water. These efforts have resulted in a total reduction in solid waste of 94%, while doubling production levels. During the 1998 - 2000 time frame, total solid waste was reduced by 88%.</p>				
<p>ii. How did you achieve this improvement?</p> <p>The Rohm and Haas La Mirada plant replaced a coagulation/flocculation process for removal of polymer solids from waste water that was responsible for generating thousands of tons of non-hazardous waste each year with an ultrafiltration process that allowed the recovery of good product from this waste water. Additionally, waste resulting from the production process was minimized through modification of the methodology for cleaning process vessels with caustic to allow multiple use of the caustic. Later, piping was installed to allow for the transfer of this multiple-use caustic to the water treatment area for use in replacing fresh caustic that had to be added to water treatment in order for the ultrafiltration process to operate optimally.</p>				
<p>NOTE: The product derived from the ultrafiltration water treatment process has been approved by the State of California for application to the ground for dust control, resulting in reduced particulate matter pollution.</p>				

Second 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
Reduction in Hazardous Solid Waste	156	tons	69	tons
<p>i. How is the current level an improvement over the previous level?</p> <p>Over the past seven years, the Rohm and Haas La Mirada plant has focused on methods for reducing the amount of hazardous waste generated and disposed by the facility. These efforts have resulted in a total reduction in hazardous solid waste of 94%, while maintaining production levels. During the 1998 - 2000 time frame, total solid waste was reduced by 56%.</p>				
<p>ii. How did you achieve this improvement?</p> <p>The Rohm and Haas La Mirada plant assembled a team to assess methods for decreasing the amount of hazardous waste generated by the facility. Since waste caustic was the largest waste stream, the team focused on this stream. The first step was to modify the methodology the facility utilized for cleaning process vessels with caustic to allow the caustic to be used for multiple cleaning cycles prior to disposal. Secondly, piping was installed to allow for the transfer of this multiple-use caustic to the water treatment area for use in replacing fresh caustic that had to be added to water treatment in order for the ultrafiltration process to operate optimally.</p>				

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect? Total Energy Use

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.

Option A:
Absolute value

Option B:
In terms of units of production or output

(Quantity/Units)

374 BTU/lb. product
(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.

- Option A:
Absolute value (Quantity/Units)
- Option B:
In terms of units of production or output 337 BTU / lb product (Quantity/Units)

e. How will you achieve this improvement?

To reduce total energy consumption by 10%, the facility will:

- optimize operation of air compressors;
- institute a weekend shutdown procedure;
- implement a training program to teach employees to turn off unnecessary lighting;
- conduct a corporate/consultant energy assessment to identify further energy savings;
- balance steam load within the facility; and
- balance cooling water system.

Second aspect you've selected

a. What is the aspect?

Total Water Use

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.

- Option A:
Absolute value (Quantity/Units)
- Option B:
In terms of units of production or output 0.221 gal / lb product (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.

- Option A:
Absolute value (Quantity/Units)
- Option B:
In terms of units of production or output 0.208 gal / lb product (Quantity/Units)

e. How will you achieve this improvement?

To reduce total water usage by 6%, the facility will:

- modify the method for water-cleaning of process vessels;
- initiate employee training for general conservation of water; and
- dedicate product transfer lines to the truck rack for bulk loading, minimizing flush water.

Third aspect you've selected

- a. What is the aspect? Total Hazardous Solid Waste
- 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.
- Option A: Absolute value 69 tons (Quantity/Units)
- 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.
- Option A: Absolute value 55 tons (Quantity/Units)
- Option B: In terms of units of production or output (Quantity/Units)
- e. How will you achieve this improvement? To achieve this 20% reduction in total hazardous solid waste, the facility will:
-research technology to improve process vessel condenser efficiency.

Fourth aspect you've selected

- a. What is the aspect? Emissions of NOx
- 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.
- Option A: Absolute value 2.11 tons (Quantity/Units)
- 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.
- Option A: Absolute value 1.90 tons (Quantity/Units)
- Option B: In terms of units of production or output (Quantity/Units)
- e. How will you achieve this improvement? To achieve a 10% reduction in the amount of NOx emissions, the plant will modify equipment operation to reduce natural gas consumption by:
-optimizing make-up air flow to thermal oxidizer; and
-decreasing set pressures on back-up boilers.

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?

Face-to-face dialogue with the community is accomplished via local CAER group participation (CAER booths), Public Outreach sessions, and involvement with Chamber of Commerce and with Business and Neighborhood Watch groups. Fenceline neighbors have been personally contacted and provided with business cards for those individuals that the neighbor can contact for direct communication. This facility maintains an open-door policy with the neighborhood and plant tours are held several times annually. The City of La Mirada officials and staff have toured the facility to allow them to become more familiar with our operations.

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

The Rohm and Haas La Mirada plant has a community outreach program to educate responders, government officials, the media, other businesses, and community members. Outreach activities include participation in CAER, hosting plant tours and on-site training for local emergency response personnel, participation in civic events, public RMP meetings and informational brochures.

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

- Website [www.](#)
- Newspaper
- Open Houses
- Other

The Achievement Track Annual Performance Report will be distributed at various community outreach events in which our local CAER group participates.

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>	La Mirada City Council	Susan Tripp	562-943-0131
<i>State/Local Regulator</i>	La Mirada City Hall	Andrea Travis	562-943-0131
<i>Other community/local reference</i>	Red Cross - Rio Hondo Chapter	Julie Van Dooren	562-945-3944

Section E

Application and Participation Statement.

On behalf of Rohm and Haas - La Mirada Plant
[my facility],

I 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 William H. Borden, Plant Manager

Facility Name Rohm and Haas - La Mirada Plant

Facility Street Address 14445 Alondra Boulevard
La Mirada, CA 90638

Facility ID Numbers RCRIS/EPA Facility ID: CAD983638479
TRIS: 90638RHMHS14445
RMP: 10000088086

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 Rohm and Haas - La Mirada Plant
Facility Location: 14445 Alondra Boulevard, La Mirada, CA 90638
Facility ID Number(s): RCRIS/EPA Facility ID: CAD983638479
(attach additional sheets if necessary) TRIS: 90638RHMHS14445
RMP: 100000088086

Air Pollution Regulations

Check All
That Apply

- | | |
|---|-------------------------------------|
| 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61) | <input checked="" 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 checked="" 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 checked="" type="checkbox"/> |
| 8. Sampling, Testing and Reporting | <input checked="" type="checkbox"/> |
| 9. Visible Emissions Standards | <input type="checkbox"/> |
| 10. Control of Fugitive Dust | <input type="checkbox"/> |
| 11. Toxic Air Pollutants Control | <input checked="" 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. Risk Management Plan | <input checked="" type="checkbox"/> |
| 14. South Coast Air Quality Management District regulations | <input checked="" type="checkbox"/> |

Hazardous Waste Management Regulations

- | | |
|---|-------------------------------------|
| 1. Identification and Listing of Hazardous Waste (40 CFR 261) | |
| - Characteristic Waste | <input checked="" type="checkbox"/> |
| - Listed Waste | <input checked="" type="checkbox"/> |
| 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262) | |
| - Manifesting | <input checked="" type="checkbox"/> |
| - Pre-transport requirements | <input checked="" type="checkbox"/> |
| - Record keeping/reporting | <input checked="" type="checkbox"/> |

- 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)
- 7. Administered Permit Program (Part B) (40 CFR 270)

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

- 8. California Code of Regulations Title 22
- 9.

Hazardous Materials Management

- 1. 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. California Hazardous Materials Business Plan - CCR Title 19
- 7. California Accidental Release Prevention Program - CCR Title 19

Solid Waste Management

- 1. 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.
- 7.

Water Pollution Control Requirements

- 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
- 2. 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. Los Angeles County Sanitation District Wastewater Ordinance
- 18.

Drinking Water Regulations

- 1. 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

- 1. 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.
- 11.

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.
- 10.

Environmental Clean-Up, Restoration, Corrective Action

- 1. 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. Previous owner has liability for remediation.
- 4.

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