KERR-McGEE CHEMICAL LLC
KERR-McGEE CENTER · OKLAHOMA CITY, OKLAHOMA 73125

September 15, 2000

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

Re: National Achievement Track Applications For Six Wood Preserving Facilities, Kerr-McGee Chemical LLC, Forest Products Division

Dear Reviewer:

Kerr-McGee Chemical LLC, Forest Products Division is pleased to submit six individual applications for EPA's Achievement Track for our creosote wood preserving facilities. Each of these facilities has achieved ISO 9002 and 14001 certification by a third party registrar. Each of these facility subscribes to the American Chemical Council's Responsible Care Program®. All have achieved OSHA STAR status.

Pollution prevention activities instituted by these facilities are not new programs. This is demonstrated by the progress that each facility has made as outlined in the summary tab of the application. We have been pursuing pollution prevention for well over a decade and our results demonstrate our commitment.

Of special note is our progress in reducing the quantity of hazardous waste. Although we have not always demonstrated progress from year to year, the trend is definitely toward less hazardous wasted generated per unit of production. We have re-dedicated ourselves to reduce the quantity of hazardous waste generated by 75% in the next three years.

Should you or any member of the review team have any questions, please telephone me at (405) 270- 2394 or email me at nbock@kmg.com.

Sincerely,

KERR-McGEE CHEMICAL LLC
FOREST PRODUCTS DIVISION

Nick Bock

Nick Bock
Manager, Regulatory Compliance and Environmental Affairs

Cc: All FPD Plants
J. L. Sanders

FOREST PRODUCTS

National Environmental Achievement Track Application
Pollution Prevention History
Kerr-McGee Chemical, Forest Products Division

VOC's Used In Performance Track Application						
From Form R - Point Source VOC (Pounds Per 1000 CUFT Production)						
Reporting Year	Total Point Sources (Creosote Releases lbs/yr.) Reported					
	Columbus, MS	Indianapolis, IN	Madison, IL	Springfield, MO	Texarkana, TX	The Dalles, OR
1994	4.76	6.60	3.86	2.25	4.52	5.54
1995	4.83	7.07	4.18	2.18	3.80	3.88
1996	1.46	3.45	4.06	1.78	3.11	0.89
1997	1.11	2.48	3.87	1.24	2.47	0.90
1998	0.94	1.82	1.76	1.76	1.95	1.21
1999	0.90	1.66	1.40	0.67	1.28	0.72
2002 Target	0.76	1.41	1.19	0.57	0.64	0.61

Hazardous Waste Used In Performance Track Application						
Without Remediation Waste (Pounds HW/ Thousand Cuft Prod.)						
Year	Columbus, MS	Indianapolis, IN	Madison, IL	Springfield, MO	Texarkana, TX	The Dalles, OR
1994	19	120	117	19	89	62
1995	211	91	80	22	20	119
1996	24	161	95	7	23	67
1997	46	13	178	16	13	18
1998	12	201	55	7	27	96
1999	33	7	10	8	15	16
2002 Target	8	2	2	2	4	4

Wastewater Used In Performance Track Application						
Wastewater (Pounds O&G/Thousand Cuft) From Form R						
Year	Columbus, MS	Indianapolis, IN	Madison, IL	Springfield, MO	Texarkana, TX	The Dalles, OR
1994	0.33	0.41	0.29	0.53	0.15	0.09
1995	0.25	0.19	0.50	0.47	0.08	0.07
1996	0.48	0.39	1.80	0.61	0.04	0.00
1997	0.21	0.64	0.84	0.84	0.03	0.02
1998	0.21	0.83	0.63	1.05	0.02	0.01
1999	0.25	0.72	0.32	0.95	0.02	0.01
2002 Target	0.21	0.61	0.27	0.80	0.02	0.01

Retort Doors Used In Performance Track Application						
Retort Doors (Pounds-HAP/thousand Cuft production)						
Year	Columbus, MS	Indianapolis, IN	Madison, IL	Springfield, MO	Texarkana, TX	The Dalles, OR
1994	0.35	0.29	0.30	0.33	0.20	0.35
1995	0.35	0.29	0.30	0.33	0.20	0.35
1996	0.34	0.38	0.23	0.25	0.14	0.25
1997	0.25	0.21	0.30	0.23	0.14	0.25
1998	0.23	0.18	0.29	0.23	0.05	0.25
1999	0.24	0.19	0.20	0.20	0.09	0.20
2002 Target	0.20	0.16	0.17	0.17	0.08	0.17

National Environmental Achievement Track

Application Form

Kerr-McGee Chemical LLC, Columbus, Mississippi
Name of facility

Kerr-McGee Corporation
Name of parent company (if any)

2300 14th Avenue North
Street address

Street address (continued)

Columbus, Mississippi 39701
City/State/Zip code

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

Name Nick Bock

Title Mgr. Env. Affairs & Reg. Compliance

Phone 405/270-2394

Fax 405/270-2420

E-mail nbock@kmg.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?

Creosote preserved wood for railroads; cross ties switch ties, crossings, bridges, utility poles & piling

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
2491

NAICS

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)?

If yes, list in the right-hand column.

☒ Yes ☐ No

MSD990866329

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 Attached Check List

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?

ISO 9002 Certified Facility
ISO 14001 Certified Facility
OSHA STAR Certified Facility
American Chemical Council-
Responsible Care Program ®

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 Combined ISO 9002/14001 Mgmt System

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
Emissions of VOCs	0.94	lbs VOC/1000 FT3 Production	0.90	lbs VOC/1000 FT3 Production

i. How is the current level an improvement over the previous level?

Decrease in emissions per production unit.

See performance since 1994 in "Summary Tab"

ii. How did you achieve this improvement?

Vessel Closure

Vapor Balancing

Installed control devices 1995/1996

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
Hazard Solid Waste	12	lbs HW/1000 FT3 Production	33	lbs HW/1000 FT3 Production

i. How is the current level an improvement over the previous level?

Reduced quantity of production hazardous waste. Due to a spill, hazardous waste generation increased in 1999 over that of 1998.

See performance since 1994 in "Summary Tab"

ii. How did you achieve this improvement?

Reduced spills/Source separation/recycle/employee training/employee Quality Action Teams

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? Emissions of VOCs (Point Sources)

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 0.90 lbs VOC's/1000 FT3 Production (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 — 0.76 lbs VOC's/1000 FT3 Production (Quantity/Units)

e. How will you achieve this improvement?

Maximize Control Device Performance

Evaluate New Control Technology

Reduced Door Cycle Time

See performance since 1994 in "Summary Tab"

Second aspect you've selected

a. What is the aspect?

Production Hazard Solid Waste Reduction

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 — 33 lbs HW/1000 FT3 Production (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 — 8 lbs HW/1000 FT3 Production (Quantity/Units)

e. How will you achieve this improvement?

Eliminate Spills/Promote Source Separation

Promote recycling

Reduced Storage Yard Drippage

Employee Training

Employee Quality Action Teams

See performance since 1994 in "Summary Tab"

Third aspect you've selected

a. What is the aspect?	Discharges of Toxics to Water
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 — 0.25 lbs. O&G/1000 FT3 Production (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 — 0.21 lbs O&G/1000 FT3 Production (Quantity/Units)
e. How will you achieve this improvement?	Optimize wastewater treatment system Promote Source Separation Employee Training Employee Quality Action Teams

See performance since 1994 in "Summary Tab"

Fourth aspect you've selected

a. What is the aspect?	Emissions of Toxics from Doors (HAPs)
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 — 0.24 lbs HAP/1000 FT3 Produciton (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 — 0.20 lbs HAP/1000 FT3 Produciton (Quantity/Units)
e. How will you achieve this improvement?	Reduce Door Cycle Time Evaluate Creosote Formulation Employee Training Employee Quality Action Teams

See performance since 1994 in "Summary Tab"

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?

One Open House Per Year

Attend LEPC Meetings

Respond to neighbor complaints

Meet neighbors through open houses

Discuss with local regulators

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

One Open House Per Year

Attend LEPC Meetings

Respond to neighbor complaints

Meet neighbors

Seek news coverage while performing community service

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

☐ Website www.

☒ Newspaper

☒ Open Houses

☒ Other

Trade Association

LEPC Presentation

4 Are there any ongoing citizen suits against your facility?

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

☐ Yes ☒ No

Environmental contamination litigation is pending in Mississippi which alleges that the plaintiffs have suffered property damage and personal injuries that the contend were caused by former and current operations of industrial facilities in Columbus. One of the facilities alleged to have caused contamination is the Kerr-McGee Chemical wood-treating plant which has been in continuous operation since 1928.

5 List references below

	Organization	*Name*	*Phone number*
Representative of a Community/ Citizen Group	United Way , Lowndes County	Jan Ballard	662-328-0943
State/Local Regulator	Mississippi Office of Pollution Control P.O. Box 10385 Jackson, MS 39289	Bruce Ferguson	601-9615171
Trade Association	American Wood Preservers Institute	Scott R. Ramminger, President	703-204-0500
Other community/local reference	Columbus/Lowndes Economic Development Association	Roger Bell	662-328-6331

Section E

Application and Participation Statement

On behalf of Kerr-McGee Chemical LLC, Columbus, MS [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	Nick Bock 9/12/00
Printed Name/Title	Nick Bock/Mgr. Env. Affairs & Reg. Compliance
Facility Name	Kerr-McGee Chemical LLC, Columbus, MS
Facility Street Address	2300 14th Avenue North, Columbus, MS 39701
Facility ID Numbers	MSD990866329

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	Kerr-McGee Chemical LLC, Madison, IL
Facility Location:	# 2 Washington Avenue
Facility ID Number(s): ***(attach additional sheets if necessary)***	ILD020367561

Air Pollution Regulations	Check All That Apply
1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)	☒
2. Permits and Registration of Air Pollution Sources	☒
3. General Emission Standards, Prohibitions and Restrictions	☒
4. Control of Incinerators	☐
5. Process Industry Emission Standards	☐
6. Control of Fuel Burning Equipment	☒
7. Control of VOCs	☒
8. Sampling, Testing and Reporting	☐
9. Visible Emissions Standards	☒
10. Control of Fugitive Dust	☒
11. Toxic Air Pollutants Control	☒
12. Vehicle Emissions Inspections and Testing	☐
Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)	
13.	☐
14.	☐

Hazardous Waste Management Regulations	
1. 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) ☐
7. 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

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. ☐
7. ☐

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. ☐
18. ☐

Drinking Water Regulations

1. Underground Injection and Control Regulations, Crieria 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. 40 CFR 370.41 Tier Two Reporting ☒
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)
Gorundwater corrective action under the auspices of State and Federal permits ☒

☐

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

3. ☐
4. ☐

DNV Certification, Inc.

DET NORSKE VERITAS

ENVIRONMENTAL MANAGEMENT SYSTEM CERTIFICATE

Certificate No. 99-HOU-AE-1337-01 Rev. 1

This is to certify that the Environmental Management System

of

KERR-McGEE CHEMICAL LLC

FOREST PRODUCTS DIVISION

at

2300 14th Avenue North, Columbus, MS 39701 USA

Has been found to conform to Environmental Management System Standard:

ISO 14001, 1996

This Certificate is valid for the following scope:

THE ENVIRONMENTAL MANAGEMENT SYSTEM OF KERR-MCGEE CHEMICAL LLC, FOREST PRODUCTS DIVISION LOCATED IN COLUMBUS, MS ASSOCIATED WITH THE MANUFACTURE OF TREATED RAILROAD CROSS TIES, SWITCH TIES AND TIMBERS

Place and date:

Houston, Texas; 30 March 2000

This certificate is valid until:

03 February 2002

Initial Certification Date:

03 February 1999

for the Accredited Unit:
DET NORSKE VERITAS CERTIFICATION, INC.
Houston, TX USA

Rudy Frueboes
Management Representative
DNV Certification, Inc.

Norman Kinsey
Lead Auditor

Lack of fulfillment of conditions as set out in the Appendix may render this certificate invalid.

DNV Certification, Inc.

DET NORSKE VERITAS QUALITY SYSTEM CERTIFICATE

Certificate No. 97-HOU-AQ-1337 Rev. 2

This is to certify that the Quality System
of

KERR-McGEE CHEMICAL LLC

FOREST PRODUCTS DIVISION

at

2300 14th Avenue North, Columbus, MS 39701 USA

Has been found to conform to Quality Standard:

ISO 9002, 1994

This Certificate is valid for the following products/service ranges:

THE MANUFACTURE OF TREATED RAILROAD CROSS-TIES, SWITCH-TIES AND TIMBERS

Place and date:

Houston, Texas; 30 March 2000

This certificate is valid until:

03 February 2002

ANSI★RAB EMS QMS ACCREDITED

Initial Certification Date:

06 March 1997

for the Accredited Unit:
DET NORSKE VERITAS CERTIFICATION, INC.
Houston, TX USA

Rudy Frueboes
Management Representative
DNV Certification, Inc.

Norman Kinsey
Lead Auditor

Lack of fulfillment of conditions as set out in the Appendix may render this certificate invalid.

The United States Department of Labor

Occupational Safety and Health Administration

This is to certify that

Kerr McGee *located at* Columbus, Mississippi

Company Name *Location of Worksite*

meets the requirements for the Voluntary Protection Program

STAR

and participation is hereby approved on October 8, 1998

Date

Charles N Jeffress

Assistant Secretary of Labor