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Pointe Mouillee State Game Area

RFD #2

Rockwood, Michigan 48173

March 19, 1976

Robert Pearson  
Howard Zar  
Enforcement Division  
U.S. E.P.A. - Region 5  
Chicago, Illinois

Gentlemen:

In response to a request from U.S. EPA a Facilities Inspection was made by the writer, Mr. Brian Reicks and Mr. Richard Powers, all of the Michigan Department of Natural Resources, Bureau of Water Management, of facilities named:

Westinghouse Apparatus Repair  
19050 Allen Road  
Trenton, Michigan 48183

The inspection was done on February 25, 1976. Our Westinghouse contact was Mr. Robert Wilson, Plant Superintendent, Trenton.

Physically the plant is a single story building with high bays suitable for movement of large transformers or power generating equipment. Offices occupy the front of the building. Delivery of bulk materials occur at the rear of the plant as does delivery of tankers of non-PCB dielectric fluids.

Trade name of the PCB used at this plant is "Inerteen". In reply to the 308 letter the following usages were noted:

|                 |       |       |       |
|-----------------|-------|-------|-------|
|                 | 1973  | 1974  | 1975  |
| Inerteen 100-42 | ---   | 2400# | 2400# |
| " 34201 cm      | 2400# | ---   | ---   |

Mr. Wilson stated that his facility does little work on PCB type equipment. Recalling only one job done within the past year. One PCB type of transformer was in the repair area although not being worked on. There was no evidence of leakage from this transformer. Five 55 gallon drums of unused Inerteen were stored in the oil storage room. Used Inerteen is shipped back to Monsanto in St. Louis, Missouri. No used Inerteen was being stored at the time of our inspection.



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Enforcement Division  
U.S. EPA - Region 5

March 16, 1976

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Inerteen is shipped to the Trenton plant by common carrier. Shipment is in 55 gallon drums. Handling of these materials is similar to other drummed fluids, namely, on pallets by hand or fork lift truck. Drum storage is in an oil storage room in which non-PCB fluids are also stored. Inerteen is moved to a use area as needed. Normal storage is in sealed 55 gallon drums. Inerteen is transferred by use of manually operated barrel pumps or upsetting the drum and using a drum tap or spigot. No separate transfer equipment for Inerteen was observed. Solids contaminated by Inerteen, such as gloves, rags, and oil absorbent are thrown away with normal trash. Used Inerteen is stored in drums and returned to Monsanto Company by common carrier.

The general appearance of the shop area was very good. Drip pans are used under all equipment being repaired. No oil was seen on the floor or walls with the exception of the oil storage room which has some oil on the floor. Safety equipment is available to employees and company has a positive attitude regarding handling of hazardous materials. The company is willing to implement any necessary PCB program, however, nothing extensive has been done since only a very few jobs accepted at the facility have been with Inerteen dielectric.

Sanitary sewage from the plant is discharged to Wayne County - Trenton WWT. With the exception of an open floor drain near a drinking fountain no floor drains were seen in the work areas. A stagnant drainage ditch runs along the back of the plant, within the plant's fence, however it does not flow off their property. Blueprints of the sewers serving the plant are available.

PCB's used in the plant were in repair work of transformers, although the repair of capacitors or other PCB containing equipment is within the technical capability of the plant. Capacitor impregnation or flood filling processes are not done with Inerteen. Should a vacuum test be required on an Inerteen transformer the standard vacuum pumps would be used. These pumps do not have a vapor condenser. Cooling water and pump oil from them is not monitored, and is disposed of in normal manner, i.e., sanitary sewer and waste hauler, respectively. Filtering equipment and filter aid have not been used for Inerteen. The company does not operate an oil separator or oil skimmer.

In bidding on jobs, including PCB's filled equipment, the company has three alternatives when dealing with customers (1) the job was not accepted because it is out of date, repair facility is at capacity, or other monetary reason (2) after inspection of equipment in the repair shop it may be deemed "not repairable" and returned to customer intact or (3) deemed not repairable and sold to a scrap dealer. PCB fluids would be removed prior to sale to scrap dealer. The defective equipment would be stored in a drip pan until disposed of.

The facility apparently does not have a SPCC plan. A Michigan Pollution Incident Prevention Plan aimed at Inerteen has been requested from the plant.

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U.S. EPA - Region 5

March 18, 1976

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Three samples to be analyzed for PCB were taken as follows.

- (1) large outside, non-PCB, bulk tank containing dielectric fluid
- (2) oil saturated "oil absorbent granules" from the floor of the oil storage room
- (3) water sample from stagnant ditch at the rear of plant.

The results of the analyses were available on March 17, 1976, and as follows:

|                                 |                     |
|---------------------------------|---------------------|
| (1) Bulk Storage Tank           | < 1.0 mg/l - 1242   |
| (non-PCB transformer oil)       | 1.9 mg/l - 1254     |
|                                 | < 1.0 mg/l - 1260   |
| (2) Granular Oil Absorbent      | 88,000 ug/l - 1242  |
|                                 | 55,000 ug/l - 1254  |
|                                 | < 1.0 mg/l - 1260   |
| (3) Stagnant Ditch behind plant | 165,000 ug/l - 1242 |
| (water sample)                  | 190,000 ug/l - 1254 |
|                                 | < 1.0 mg/l - 1260   |

The company has been notified of the results and necessity for a cleanup of the area.

A letter was sent to this facility on March 12, 1976, outlining our recommendations and requirements for a PCB program. The letter was a formal request that a PIPP plan be filed. The company will cooperate with us regarding PCB's, however, since the dollar volume of PCB repair work is low, it would be more likely that they refuse the business and eliminate PCB's from their inventory.

Very truly yours,

WATER RESOURCES COMMISSION

*Stan Novak*

Stan Novak  
Sanitary Engineer

SN:gm

cc: John Bohunsky  
Robert Buckley  
EPA - Ohio District Office  
Richard Powers

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