Pittsburgh, PA
From 1556 Westinghouse Building
WN 272-3367
Date May 21, 1991
Subject Environmental Affairs Audit
Draft Report, Repair Services Division
Mobile, AL

To MOBILE, AL RSD
J. Tucker, Plant Manager

cc: w/attachment:
Mobile, AL RSD - G. McWain
Cherrington Center RSD - J. A. Pesavento
Cherrington Center RSD - L. G. Rudolph
1574 Westinghouse Building - C. W. Bickerstaff
1557 Westinghouse Building - J. W. Fisch
1560 Westinghouse Building - M. Grotefend
1558 Westinghouse Building - B. A. Kerns
1570 Westinghouse Building - P. Palmieri
1572 Westinghouse Building - R. J. Wengrzyn
1554 Westinghouse Building - R. K. Smith
2178 Westinghouse Building - W. D. Wall
2100 Westinghouse Building - R. E. Wills

Attached for your review and comment is a copy of the audit summary and draft report on the environmental, safety and industrial hygiene audit conducted at the Mobile facility on May 1 and 2, 1991.

I would appreciate receiving any comments on this draft by June 8, 1991. If your review will require additional time, please let me know. If the draft will be revised significantly as a result of comments received, you will be given the opportunity to review the amended version before it is formally issued.

Please note that after closer review, some additional items were added to your report. Specifically these include, not providing training and medical approval for employees using dust respirators and the issue regarding TSCA 8(c) and 8(e). Also, as your facility will be regulated under the new stormwater permitting rule, one issue was expanded to include containment and cover for your outside raw material storage area to minimize future stormwater permitting requirements. Also, the one item regarding controlling the inventory of combustible paints was dropped from the report as it is more appropriately classified as a local attention item.

MAY 22 1991

Environmental Affairs will be in contact with you to discuss the status of corrective activities and the development of your action plan.

Please contact me at (412) 642-3367 if there are any questions.

Susan R. Saunders

Susan R. Saunders
Senior Project Engineer
Environmental Control and Auditing
Environmental Affairs

enclosure/srs 57-10

DRAFT 5/21/91

AUDIT SUMMARY
May 1 - 2, 1991

Electrical Products and Services
Repair Services Division
Mobile, Alabama

I. Background

- This facility was originally constructed in 1981.
- Prior to 1981 the site was undeveloped.
- The building is owned by Westinghouse.
- The facility is located at 3400 Meador Drive, Mobile, AL 36607-1107.
- Plant consists of approximately 22,350 square feet of manufacturing space and 2,520 square feet of office space.
- Current employment is at 26 hourly and 6 salary.
- Facility operates two shifts per day five days per week. About 30 percent of work occurs in the field.

II. Current Operations

The facility repairs and refurbishes motor and turbine components. The facility performs welding, painting, bead blasting, alkaline steam cleaning, and small babbitting.

III. Environmental Areas

A. Air Pollution Control

- Current air emission point sources which are exempt consist of:
  - Two steam cleaning booths
  - Two curing ovens, natural gas fired
  - Two burnout ovens, natural gas fired
  - One blasting booth
  - One painting booth
  - Varnish dip tank
  - VPI vent
  - Armature stripping booth

- Current fugitive exempt emission sources consist of:
  - One parts washer
  - Fumes from welding
  - Babbitting operation
  - Solder pot operation
  - Glove bead blast unit
  - Miscellaneous grinding operations

B. <u>Water Pollution Control</u>

- All wastewater is discharged to a local POTW, the City of Mobile
- There are sanitary and steam cleaning discharges.
- The facility had submitted a wastewater questionnaire in 1988 and has been inspected by the authority. The facility has received a verbal report that it is a Class II discharger and is in compliance.
- The facility stores approximately 12 drums of oil and petroleum products.

C. <u>Solid and Hazardous Waste Management</u>

- Facility is currently operating as a small quantity generator, EPA ID number: ALD078980059.
- Waste generated includes waste oil, waste steam cleaning sludge, parts washer, blasting residue, and burnout oven ash.
- Scrap metals are sold. Scrap babbitt lead is sold to Goldin Industries.
- General trash is hauled by Waste Management
- Safety Kleen parts washing service is used.
- The facility uses the rag service Dixie Supply.

D. <u>SARA Title III</u>

- The varnish dip tank contains a solvent-less varnish. Not applicable.

E. <u>Underground Storage Tanks</u>

- The facility removed an underground storage tank in October 1990. The job was performed by the WEGS Baton Rouge office.

F. <u>PCB Management</u>

- The facility presently does not accept any oil filled equipment without Westinghouse analysis results demonstrating that it contains less than 2 ppm of PCBs. Samples are routinely sent to the ESD lab in Pittsburgh.

G. <u>Asbestos</u>

- The facility has had the insulation in the burnout ovens replaced recently.

IV. <u>Safety and Industrial Hygiene Areas</u>

A. <u>General OSHA Compliance</u>

- 1990: 4 recordable injuries.
- 1991 to date: 0 recordable injuries.

B. Fire Protection

- Facility has fire extinguishers.

C. Emergency Response Planning

- The facility had an emergency response / evacuation plan. Employees had received emergency response training.

D. Medical

- A first aid kit is stocked by ZEE medical. Many employees are trained in first aid and CPR.

E. Hazard Communication

- The facility has a written program, MSDSs and training.

F. Other Programs

- Respiratory Protection: There is a site specific written respiratory program. Plant and field crews occasionally require the use of respirators. Employees have received medical approval to wear respirators and training.
- Hearing Conservation: No testing is done.
- Facility has a Quality Safety Committee and a Quality Housekeeping Committee. Housekeeping and safety inspections are performed.

DRAFT 5/21/91

WESTINGHOUSE ELECTRIC CORPORATION
ENVIRONMENTAL AFFAIRS AUDIT REPORT

Electrical Products and Services
Repair Services Division
Mobile, Alabama

I. Background

A. Purpose

The audit was performed as a part of a series of audits conducted at selected locations by the Environmental Affairs Audit Program to provide the management of Westinghouse with verification that the environmental, safety and industrial hygiene programs are conducted in compliance with federal, state, and local laws, that they conform to Westinghouse policy and procedures, and that systems are in place to provide for continued compliance.

B. Review Scope

The audit scope was limited to the conduct of the Mobile facility's environmental, safety and industrial hygiene programs during the period January 1, 1990 to May 2, 1991.

C. Conduct of the Review

The audit was conducted May 1 through May 2, 1991 by S. R. Saunders and R. J. Wengrzyn of Environmental Affairs.

D. Report Scope

The purpose of this report is to communicate all deficiencies noted in the course of the audit which, in our opinion, may have substantial significance to management. Other less significant deficiencies have been discussed with plant representatives. All deficiencies are documented in the audit working papers.

Findings related to regulatory standards are based on our understanding of the standards and their application to the Mobile facility during the review period.

II. Verification - Regulatory Standards

A. Findings

On the basis of our audit, we believe that the environmental, safety and industrial hygiene programs at the location comply with federal, state, and local regulations except as follows:

B. Exceptions

1. The facility had not updated their EPA form 8700-12, the Notification of Hazardous waste activity form to include D039, D018, (Safety Kleen Solvent), D008 (lead in burnout oven ash), and F008 (silver plating waste) as required by Alabama Regulation Chapter 14-3-.01(3)(b).

2. The facility did not have documentation to verify that the removal of the underground storage tank by the WEGS operation in Baton Rouge during October 1990 had been in accordance with Alabama regulations. Specifically:
   a. Documentation of 30 day notice prior to removal
   b. Closure sampling results demonstrating that there was no contamination.
   c. A closure report that should have been filed with the State.
   d. Payment of the $165 tank fee for 1990.

3. The following issues were noted regarding the emergency response plan:
   a. The plan did not have procedures to account for employees.
   b. The plan did not describe the role and names of personnel who are licensed in first aid and CPR.
   c. The locations of fire alarms, fire extinguishers, and CO_2 extinguishing system were not posted.
   d. The facility did not have an agreement with an emergency response contractor for responding in the event of a spill.

4. The facility had not addressed air monitoring, training, and recordkeeping as required in the lead standard, 29 CFR 1910.1025, for the lead babbitting and solder pot operations. Copies of Appendices A and B of the above standard had not been given to employees.

5. The following issues were noted regarding cranes:
   a. Load ratings were not marked on both sides of the beams of all cranes.
   b. The facility had not addressed all of the deficiencies noted in the April 1991 crane inspection.

6. The following issues regarding respiratory protection were noted:
   a. The facility had not provided training and medical approval for employees who wear dust respirators.
   b. The facility had used non-NIOSH approved 3M dust respirators.

completed 6/2/91

7. The following miscellaneous safety and industrial hygiene issues were noted:
   a. Guards were not positioned correctly or missing at the grinding wheels babbitt area and solder pot area and for the lead skimmer in the solder pot area. A guard rail chain was not in place in the forklift loading mezzanine area.
   b. The facility had not provided training for operators of powered industrial trucks.
   c. The facility had not labeled the forklift battery charging area with a "No Smoking" sign.
   d. Flammable liquids were stored in close proximity to the battery charging station and an eye wash station was not in the immediate area.
   e. The site had not updated the MSDS inventory with current data sheets. Specifically, data sheets were dated prior to 1985 when OSHA expanded the requirements.
   f. The facility had not provided training to employees on the proper use of fire extinguishers.
   g. The facility had not provided training on confined space entry permits.
   h. The facility had incorrectly recorded four recordable injury cases as first aid cases on the OSHA 200 log. The last five years of records should be reviewed and corrected if necessary.

III. Verification - Westinghouse Policy and Procedures

A. Findings

The audit did not reveal any significant departure from the provisions of Westinghouse policy or procedures, with the exception of findings noted in Section II and as follows:

B. Exceptions

1. The site had not informed employees of the corporate directive for recording alleged adverse reactions to chemicals (TSCA 8(c)) and reporting substantial risks to health and the environment (TSCA 8 (e)).

IV. Control System Observations

A. Findings

Our audit did not reveal any significant deficiencies in plant control systems to provide for continued compliance with regulations and/or Westinghouse policy and procedures, with the exception of findings noted in Sections II, III, and as follows:

B. Observations

1. As the facility will be regulated under the new stormwater permitting rule, the following issues were noted:
   a. The facility must divert blowdown and oil drips from the compressor away from soil and stormwater discharge. The oil residues must be collected and properly disposed. The oily soil must be cleaned up and disposed in accordance with regulations.
   b. The facility should provide containment and cover for the raw material storage area in order to minimize future stormwater permitting requirements.

2. The facility must develop a program to maintain and change filters and dust tray for the glove bead blaster.

3. The facility must verify that the insulation in the burnout ovens is not asbestos.

Pittsburgh, PA
1556 Westinghouse Building
272-3367
May 21, 1991
Environmental Affairs Audit
Draft Report, Engineering Services Division
Mobile, AL

MOBILE, AL ESD
B. McFarland

cc: w/attachment:
Birmingham, AL ESD - J. Murphy
Tampa, FL ESD - T. McDaniel
Cherrington Center ESD - N. Yaroshuk
Columbia, MD ESD - J. Fitzberger
1574 Westinghouse Building - C. W. Bickerstaff
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Attached for your review and comment is a copy of the audit summary and draft report on the environmental, safety and industrial hygiene audit conducted at the Mobile facility on April 29 and 30, 1991.

I would appreciate receiving any comments on this draft by June 8, 1991. If your review will require additional time, please let me know. If the draft will be revised significantly as a result of comments received, you will be given the opportunity to review the amended version before it is formally issued.

Please note that after closer review, one of the local attention items regarding the TSCA 8(c) and 8(e) was inserted into this draft report. Environmental Affairs will be in contact with you to discuss the status of corrective activities and the development of your action plan.

Please contact me at (412) 642-3367 if there are any questions.

Susan R Saunders

Susan R. Saunders
Senior Project Engineer
Environmental Control and Auditing
Environmental Affairs

enclosure
srs 56-10

MAY 22 1991

DRAFT 5/21/91

AUDIT SUMMARY
April 29 - 30, 1991

Environmental Systems Group
Engineering Services Division
Mobile, Alabama

I. Background

- ESD has leased the property at 1125 Corporate Drive, Mobile, AL since 1982.
- 4,500 square feet of shop and office area is utilized by ESD.
- Current employment is 2 hourly and 7 salary employees.
- Majority of operations is conducted in the field, with remaining facility working 5 days per week, one shift per day.

II. Current Operations

The facility repairs electrical switchgear and does field repair. The facility performs site testing, bead blasting, painting, and degreasing. This operations office is a satellite of the Birmingham office. This office primarily services utility operations, paper mills, petrochemical plants and power plants. Many customers mandate and provide subcontractor safety training for ESD personnel.

III. Environmental Areas

A. Air Pollution Control

Exempt air emissions consist of:
- Paint spray booth
- Bead blasting operation
- Small parts degreasing

B. Water Pollution Control

- The facility discharges only sanitary waste.
- Minimal quantities of oil and petroleum products are stored on site.

C. Solid and Hazardous Waste Management

- The facility is registered as a large quantity generator status, EPA ID No ALD153904347.
- Hazardous wastes consist of bead blast dust. The facility collects empty aerosol cans and rags.
- Municipal trash is hauled by Waste Management.

D. SARA Title III

- Currently not subject to any sections.

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E. Underground Storage Tanks

- None.

F. PCB Management

- Facility does not receive any PCB equipment on site. Personnel are be certified in PCB operations for field work. All PCB waste generated in the field is disposed by on site pick up by Aptus or Chemical Waste Management.

G. Emergency Response Planning

- The facility will operate at the "Operations Level" of emergency response. Personnel have received 8 hours of training.
- The facility has an emergency response plan with routes of egress and contingency procedures.

IV. Safety and Industrial Hygiene Areas

A. General OSHA Compliance

- The facility has never had an OSHA inspection.
- The injury and illness incident rates for 1988-90 were 0, 2 and 0, respectively.
- The facility does not currently have a safety committee.

B. Hazard Communication

- The facility has a written hazard communication program, accessible inventories of MSDSs, employee training, and labeling of containers. Employees received initial hazard communication training. All employees certified in PCB operations receive annual hazard communication training.

C. Medical

- The facility has a comprehensive first-aid kit, first aid training and personnel licensed in CPR. A local physician is utilized for pre-employment physical exams.
- All employees receive pre-employment medical exams.

D. Asbestos

- There are no structural asbestos-containing materials within the building.

E. Hearing Conservation Program

- Baseline audiograms are obtained as part of the pre-employment physical.

F. <u>Respiratory Protection Program</u>

- The facility had a written program, employees receive training, fit-testing and written medical approval on an annual basis.

G. <u>Fire Protection</u>

- The fire safety systems include fire extinguishers.

H. <u>Other Programs</u>

- The plant does not have an established Safety Observer Program.
- There are training programs for first aid/CPR, lifting, electrical safety and fork trucks.
- There are also lockout/tagout and confined space entry programs which are used primarily in field operations.

WESTINGHOUSE ELECTRIC CORPORATION
ENVIRONMENTAL AFFAIRS AUDIT REPORT

Environmental Systems Group
Engineering Services Division
Mobile, Alabama

I. Background

A. Purpose

The audit was performed as a part of a series of audits conducted at selected locations by the Environmental Affairs Audit Program to provide the management of Westinghouse with verification that the environmental, safety and industrial hygiene programs are conducted in compliance with federal, state, and local laws, that they conform to Westinghouse policy and procedures, and that systems are in place to provide for continued compliance.

B. Review Scope

The audit scope was limited to the conduct of the Mobile environmental, safety and industrial hygiene programs during the period January 1, 1990 to April 30, 1991.

C. Conduct of the Review

The audit was conducted April 29 through 30, 1991 by S. R. Saunders and R. J. Wengrzyn of Environmental Affairs.

D. Report Scope

The purpose of this report is to communicate all deficiencies noted in the course of the audit which, in our opinion, may have substantial significance to management. Other less significant deficiencies have been discussed with plant representatives. All deficiencies are documented in the audit working papers.

Findings related to regulatory standards are based on our understanding of the standards and their application to the Mobile facility during the review period.

II. Verification - Regulatory Standards

A. Findings

On the basis of our audit, we believe that the environmental, safety and industrial hygiene programs at the location comply with federal, state, and local regulations except as follows:

B. Exceptions

1. The facility had not updated their EPA notification form as required by Alabama Regulation Chapter 14-3-.01(3)(b) to reflect the following:
   a. That the facility is a small quantity generator and not a large quantity generator.
   b. The form must include D039, D018, D006, D003, and D001 waste codes.

2. The following issues were noted regarding respiratory protection:
   a. An employee with a chronic respiratory condition had been issued a negative pressure respirator without written physician approval. (29 CFR 1910.134(b)(10))
   b. The facility utilized non-NIOSH approved dust respirators. (29 CFR 1910.134(c))

3. The following miscellaneous safety and industrial hygiene issues were noted:
   a. The facility had not provided and documented training on the safe operation and use of their motorized hand truck as per 29 CFR 1910.178(l).
   b. The site had not provided initial copies of material safety data sheets (MSDSs) and container labels to the scrap dealer as per 29 CFR 1910.1200 (f) and (g).

4. The facility utilized an improper D.O.T. shipping name and improper D.O.T. identification number for a 2/21/91 hazardous waste manifest. (49 CFR 172.101)

III. Verification - Westinghouse Policy and Procedures

A. Findings

The audit did not reveal any significant departure from the provisions of Westinghouse policy or procedures, with the exception of findings noted in Section II and as follows:

B. Exceptions

1. The site had not informed employees of the corporate directive for recording alleged adverse reactions to chemicals (TSCA 8(c)) and reporting substantial risks to health and the environment (TSCA 8 (e)).

IV. Control System Observations

A. Findings

Our audit did not reveal any significant deficiencies in plant control systems to provide for continued compliance with regulations and/or Westinghouse policy and procedures, with the exception of findings noted in Sections II and III.