

COMPOSITE STRUCTURES DIVISION
801 ROYAL OAKS DRIVE
MONROVIA, CALIFORNIA 91016

TO: Karen Waechter
FROM: Greg Emanuelson *GE*
SUBJECT: ALCOA CORPORATE AUDIT RESPONSES (MAY 4-6, 1994)
DATE: July 29, 1994

Enclosed you will find a copy of Composite Structures Divisions (CSD) responses to the ALCOA Corporate Audit that was performed by your team on May 4-6, 1994.

On or before August 22, 1994, please review this "DRAFT" information and make any comments or corrections that you see that would assist Composite Structures Division in identifying, isolating and resolving a possible problem at the facility site.

If you have any questions after reviewing this data, please contact Adele Laikin or myself at extension 3250 or 3237 respectively.

John Hendricks - New location manager

RECEIVED
AUG 2 1994
Ans'd

*Post
Aug
1994*

Crocker

Dennis Krocker - Vice President
of General Manager

Oct 4 →

cc:

3 Maryville wensday
noon to 4:15 PM

Delta 6:35 am → 7:22 423

11:40 flight 12:27 423 Delta

5:20 6:11 1246 Delta

wensday OS
Thursday

Durham H. H. H.

Travel Reimbursement

VMX

General @ Maryville 12:00

Construction -- exclusions

Shoe →

Georgia: PPE
Maryville: Group 04, 05, 06, 07, 08, 09, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000

Restrictions

**** CONFIDENTIAL ****

The following situation and recommendation is a brief description of a potentially complex set of conditions. Readers who are not aware of the total situation should refrain from drawing conclusions.

**Environmental Review
Composite Structures Division
May 4 - 6, 1994**

**-- AIR --
Special Situation**

Rule 1124 Compliant Materials Management

Auditee Response and Action Plan:

COMPOSITE STRUCTURES DIVISION
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D. ACTION ITEM:

Rule 1124 Compliant Materials Management

RECOMMENDATIONS:

Develop and maintain a substance documentation file detailing how the VOC content of each paint, primer and mixture was derived and calculated. MSDS and VOC calculations are to be formally requested using the purchase order system.

*Remove
or identify
as for action
plan*

PERSON RESPONSIBLE FOR ACTION ITEM:

Joel Feder (or designee) to get information ESH Department to maintain document files (3 weeks of temporary set up assistance required initially)

*This does
not address how VOC
content change
when coatings
are mixed
or thinner
primers are added*

ESTIMATED COMPLETION DATE:

Start date: July 5, 1994

Completion: November 15, 1994

ESTIMATED COSTS:

\$500. for temporary assistance. Only labor hours will then be utilized to request and maintain a VOC log on calculations (40 hrs./yr).

Remove

COMMENTS:

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**Environmental Review
Composite Structures Division
May 4 - 6, 1994**

**~ AIR ~
Special Situation**

Current Alternative Emissions Control Plan (AECPP) Status

Auditee Response and Action Plan:

long term strategy for complying w/ current
& future emissions projections.

C60699 0197

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801 ROYAL OAKS DRIVE
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C. ACTION ITEM:

Alternate Emissions Control Plan (AECp) Status

RECOMMENDATIONS:

1. Stop using more than 9 pounds/day in AECp paint booths.
2. Implement Rule 1610 "car scrapping program".
3. Void out AECp plan once Rule 1610 is in place.
4. Assemble and implement a Paint Booth Operational and Management Plan for compliance with the SCAQMD permit conditions.

PERSON RESPONSIBLE FOR ACTION ITEM:

1. Tom Blecka and CSD painters are to monitor compliance with 9#/day VOC limit. *who will periodically monitor to ensure compliance*
2. ESH department will continue to implement Rule 1610 program. *(?) Do you understand this.*
3. AECp plan will be voided out by ESH department once the Rule 1610 *(?)* plan is in effect.
4. Frank Soldo, Tom Blecka and Mike Gigliotti (or designee) are the responsible individuals to review and assemble a Paint Booth Operational and Management Plan that is in compliance with SCAQMD permit conditions of 9#/day VOC. *with assistance from env. about about VOC calc. do they know how for mixture*

ESTIMATED COMPLETION DATE:

1. 9#/day limit compliance has been implemented as of June 1, 1994 (completed).
2. Short term, the rule 1610 plan will be available for emissions usage by August 25, 1994. Long term, the plan will be reviewed and modified until December 23, 1999. *Don't know what this means need permit to issue credits*
3. Upon implementation of rule 1610 (August 25, 1994) the AECp plan will be removed as a permit at the same time. *can only be done by agency and approve plan before it can be used*

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4. The Operational and Management of the (2) AECP plan paint booths will have to be implemented quickly on a day to day basis until the rule 1610 plan is in effect.

Start August 30, 1994 and completion October 30, 1994.

4 1/2 months of non-compliance!

ESTIMATED COSTS:

1. The 9#/day limit has no costs involved in implementation.
2. Emissions from rule 1610 have already been paid for and no additional costs will be incurred except minor labor costs (25 hrs.).
3. No additional costs will be seen for the elimination of AECP plan (5 hrs.).
4. Only labor hours will be used to review and implement an Paint Booth Operational and Management Plan (40 hrs.).

COMMENTS:

Need agency approval
new permit.

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**Environmental Review
Composite Structures Division
May 4 - 6, 1994**

**-- AIR --
Special Situation**

Permitted VOC and Emissions Limits

Auditee Response and Action Plan:

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B. ACTION ITEM:

SCAQMD Permit VOC Usage and Emission Limits

RECOMMENDATIONS:

1. Clear up SCAQMD permit conditions on limits of VOCs.
2. Stop using methylene chloride as a clean-up solvent in the paint booths.
3. Stop using over 40 pounds of 111 trichloroethane (TCA) per day in vapor degreaser, building B-1 main process line.
4. Track all TCA usages.
5. Review operational needs and ability to schedule and manage spray booth operations within the permit conditions.

PERSON RESPONSIBLE FOR ACTION ITEM:

1. The ESH department will schedule a second meeting with the SCAQMD to review and modify the permit conditions for the CSD facility VOC limits (Consultant may be required) *legal*.
2. The area supervisors (T.B., S.G., R.P.) are responsible for keeping methylene chloride out of paint/primer booths. *what about other air toxics How will this be periodically checked*
3. John Navan is to assign a Liaison Engineer a high priority task to identify and get approved a substitute paint, primer, and adhesive primer clean-up solvent and gun cleaner that is acceptable to SCAQMD regulations (to replace existing M-114M). *(?)*
4. The Department supervisor (Steve Gaudesi) and the Maintenance Supervisor (Dale Cortner) to insure that only (40) pounds of TCA is used daily and report any additional usages to ESH department. No additional material is to be added for any reason.
5. The ESH department will be responsible for the care and storage of the documents for a two year period. *(?) may want to extend this item 5 is not part of the finding*
6. John Balicki and Steve Gaudesi in conjunction with Mike Gigliotti is to review the operational requirements of CSD and assemble a plan to manage the spray paint booths daily VOC requirements within the permit conditions. *~ Total VOC not just spray booths*

C60699 0201

- what procedures will be implemented to ensure 26#/day VOC limit is not exceeded per permit D42605
- TCA replacement
- Permitting strategy

Remove or if what is listed as part of action plan identify as such... this was not an recommendation

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Did this letter
indicate 54 or 27
gallon limit?

7. Richard Stewart is to publish an internal memo to the manufacturing Supervisors defining the TCA limits, paint booth limits and the consequences and responsibilities of exceeding permit conditions (completed).

How can we do this when permits will
not be received until end of 94

ESTIMATED COMPLETION DATE:

1. The ESH department will initiate a meeting with the SCAQMD in August 29, 1994 with a estimated completion of the permit conditions limits of January 1, 1995.
2. The department supervisors are to eliminate the usage of methylene chloride (M-114M) from the paint booths by September 20, 1994 and use other acceptable materials in the interim until a new clean-up solvent can be identified that works better (by April 30, 1995).
3. Liaison Engineer is to start the identification of a new gun cleaning solvent by August 30, 1994 with an estimated acceptance of a new clean-up solvent being identified and implemented by April 30, 1995.
4. As of June 1, 1994, only 40# of TCA will be used per day within the vapor degreaser.
5. The ESH department will have an archival system for the storage of old files set up by December 30, 1995.
6. The Vapor Degreaser Operational Management Plan drafts will be available for review by CSD management by December 15, 1994 and be finalized by April 1, 1995.
7. Richard Stewart memo on TCA usage and VOC paint limits is to be published by June 15, 1994 (completed).

Why so
long

What will
be used in
mean time

should have started immediately

What's this?

ESTIMATED COSTS:

1. Establishing VOC limits in the paint booths will only require labor hours unless a consultant is contracted to resolve permit issues, which will then cost \$2,500 (80 hrs.).
2. No major costs differences will be incurred. M114M costs will diminish as usage goes down and new solvent costs will increase as usage goes up.

Dont
need costs

should be stopped
immediately

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3. Minor costs will be involved in the identification of a new solvent that would be acceptable to the SCAQMD and the prime contractor. These costs would be in the form of labor hours for the Liaison Engineer and minor costs for additional testing of the material at CSD (120 hrs.).
4. An unknown costs would be incurred when the limit of 40# of TCA is enforced. This would be in the form of more hand wiping of the parts instead of vapor degreasing. This can be off-set by eliminating the parts that do not require degreasing by specification, alkaline cleaning, and switching to Brulin 815GD (Boeing). *hand wiping with what?*
5. Minor costs would be seen by the additional storage of documents within the ESH department. Costs would be in the form of filing cabinets and floor space (\$75).
6. The vapor degreaser operational management plan would not cost a lot, only in the one time labor hours that it would take to assemble the plan (180 hrs.)
7. No additional financial costs would be required to write and publish a memo by Richard Stewart (5 hrs.)

this

COMMENTS:

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**Environmental Review
Composite Structures Division
May 4 - 6, 1994**

**-- AIR --
Special Situation**

SCAQMD Rule 109 Recordkeeping Requirements

Auditee Response and Action Plan:

- Internal verification system to ensure records are kept and reviewed on a regular basis to ensure compliance
- Review of recordkeeping requirements in rule 109 & other applicable SCAQMD rules

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MONROVIA, CALIFORNIA 91016

II. ISSUE: AIR EMISSIONS

A. ACTION ITEM:

SCAQMD Rule 109 Record keeping Requirements

1. Solvent clean-up or wash-up quantities are not tracked or recorded.
2. Keep all records for two years.
3. Comply with all parameters on permit conditions (recordkeeping, usage, materials, PM programs...).

RECOMMENDATIONS:

1. Start to track solvent clean-up and wash-up materials used in the paint, primer and adhesive booths per Rule 109 including paints, primers and adhesive primes.
2. Keep all records (TCA) for (2) years minimum. — why only TCA?
3. Review conditions and parameters on all permits for compliance.
4. Buy a computer based system for VOC compliance (1 in a new paint mix cage).
5. Implement a PM program for permitted equipment. (2) Is this part of this finding?

PERSON RESPONSIBLE FOR ACTION ITEM:

1. Tom Blecka for the (5) paint/primer booths in Building B-2, D & E for record keeping. Steve Gaudesi for (2) adhesive primer booths in Building B-1 for record keeping. Ron Padilla for (1) adhesive primer booth in Building "U" for record keeping.
2. ESH Department will be responsible for maintaining the paint records for a minimum of two years. — what's the record retention policy based on
3. The ESH Department will review all permit conditions for compliance to SCAQMD parameters.
4. Lee Kemble will be responsible for the maintaining and Preventative Maintenance (PM) of the paint, primer, adhesive booths, scrubbers and all other permitted equipment. is this part of this finding?
5. Adele Laikin will buy the computer software program (completed).

→ this does not address how voc will be tracked

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6. Lee Kemble to assemble a paint mix cage (fence & power). (?) *What's the purpose*
7. All supervisors will report on the daily solvent usage.

ESTIMATED COMPLETION DATE:

1. The documentation of solvent clean-up and wash-up quantities will be started by October 30, 1994 in all coating booths and continues from now on including facility wide documentation by September 1, 1994. *all areas not just booths*
What about outside booths?
2. Record retention for two years is currently being done in 90% of the facility and 100% as of October 30, 1994. *why so long ---- Not for items listed*
3. Review of all permit conditions will start as of October 30, 1994 and be completed by January 30, 1995. *why so long ----*
4. PM programs will be evaluated and a draft program assembled by December 1, 1994 with a formal PM program completed by June 1, 1995. Implementation of PM program is estimated for February 7, 1995. *why so long for implementation*
5. VOC software program to be bought by June 30, (completed) and be operational by August 28, 1994. *How will software be used*
6. Paint mix room is estimated to start by September 15, 1994 and be completed by December 30, 1994. *will ~~all~~ how will this address VOC record keeping issue*

ESTIMATED COSTS:

- Five costs for 14 kemble (SD) 11/6*
1. Documentation of solvent usage will only be minor labor costs (3 hrs/yr).
 2. Retention of documents only requires minor labor and minor storage facilities (5 hrs/yr, \$70 - equipment).
 3. Review of permit conditions will require (12) hours of labor.
 4. PM programs could cost \$35,000 in software and (80) manhours to review.
 5. \$752. for (1) computer system.
 6. \$4,000 for paint mix room.

COMMENTS:

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**-- AIR --
Special Situation**

Preventative Maintenance Program

Auditee Response and Action Plan:

C60699 0207

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~~E ACTION ITEM:~~

~~Other SCAQMD Permit Conditions (Preventative Maintenance)~~

~~RECOMMENDATIONS:~~

Develop a formal PM Program

Obtain "old" permit applications

PERSON RESPONSIBLE FOR ACTION ITEM:

Lee Kemble will be responsible for the maintaining and Preventative Maintenance (PM) of the paint, primer, adhesive booths, scrubbers and all other permitted equipment.

ESH department to review the SCAQMD archives and obtain permit application copies.

ESTIMATED COMPLETION DATE:

PM programs will be evaluated and a draft program assembled by December 1, 1994 with a formal PM program completed by February 1, 1995.

should be continuous
~~Implementation of PM program is estimated for February 7, 1995.~~

Obtain permit copies by November 15, 1994

ESTIMATED COSTS:

PM programs could cost \$35,000 in software and (80) manhours to review.

\$2,000.00 for the permit copies (+40 hrs.).

COMMENTS:

- Evaluation of condition of all control equipment and development of plans to repair/upgrade to meet conditions described in permit applications
- Development of baseline set of information so we know what limit/efficiencies we must conform with
- commit to replacement¹² of deficient scrubbers by
- *end of Q4*
plans to address green path

C60699 0208

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**-- AIR --
Special Situation**

Evaluation of Reporting Requirements

Auditee Response and Action Plan:

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G. ACTION ITEM:

Evaluation of Reporting Requirements

(Self reporting of exceeding SCAQMD, ~~Sanitation, EPA, RWQCB permit~~
limits)

*Situation
→ only addresses air issues
(since we've had so many
recent eruptions)*

RECOMMENDATIONS:

Contact ALCOA legal Department and Environmental Control
Department for review and assistance.

PERSON RESPONSIBLE FOR ACTION ITEM:

Dave Rittichier to evaluate issue. — *would suggest someone other than
BU president be responsible for
this.*

ESTIMATED COMPLETION DATE:

Issue pending.

ESTIMATED COSTS:

eliminate { No significant costs involved by inquiring (est. 4 hrs.).

COMMENTS:

*But will take more than
4 hours since each report conformence
issue will have to be reviewed*

*Does not address development of a clear procedure
and policy for self reporting of emissions limit
exceedences and Breakdowns. or clarification
with the agency*

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Composite Structures Division
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**-- AIR --
Special Situation**

Ozone Depleting Chemical Management

Auditee Response and Action Plan:

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MONROVIA, CALIFORNIA 91016

I. ACTION ITEM:

Chlorofluorocarbons (CFC's), Ozone Depleting Chemicals

~~RECOMMENDATIONS:~~

- Regulatory standard not ALCOA standard*
1. Audit CFC Contractors for compliance with ~~ALCOA~~ standard.
 2. Revise purchase orders to include CFC servicing to be in accordance with SCAQMD and EPA regulations.
 3. Update files to include documentation that previous work was in accordance with regulations.

PERSON RESPONSIBLE FOR ACTION ITEM:

1. The auditing of CFC contractors operations and facilities will be done by the ESH department.
2. Joel Feder (or designee) will revise purchase order wording to include compliance with SCAQMD and EPA regulations. *→ should be specific*
3. Lee Kemble to contact his contractors to update the files on the compliance of past contractors with the regulations (certificates, notifications, training, permits...).

ESTIMATED COMPLETION DATE:

1. Auditing of contractors will start on January 15, 1995 and be completed by March 15, 1995. (
2. Revision of Purchase Orders will be started by November 30, 1994 and be completed by February 30, 1995.
3. Existing and past contractor compliance and recordkeeping will be started by June 15, 1994 to verify past projects compliance and documentation and be completed by October 30, 1994 (est. 54 hrs.).

Does not address development of a record keeping system to ensure required records are maintained

ESTIMATED COSTS:

Remove

There are no significant costs associated with any of the (3) items mentioned above, only labor hours.

COMMENTS:

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**-- AIR --
Special Situation**

Asbestos Management Plan

Auditee Response and Action Plan:

C60699 0213

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H. ACTION ITEM:

Upgrade of Existing CSD Asbestos Compliance Plan

RECOMMENDATIONS:

{ CSD has received an updated version of the ALCOA Asbestos Plan and
CSD will revise the current plan to reflect the newly revised ALCOA
standards. *alcoa standard is not newly revised!*

PERSON RESPONSIBLE FOR ACTION ITEM:

Greg Emanuelson

ESTIMATED COMPLETION DATE:

Start Date: October 15, 1994.

Completion Date: December 15, 1994

ESTIMATED COSTS:

Minor costs involved in the revision (est. 10 hrs.).

COMMENTS:

- periodic inspection of ACM,
- does not address obtaining copies of record (for renovation and removal).
- Work Deposal manifests

Inter-Office Communication

From: Adele Laikin

To: John Gay

Date: January 4, 1994

Subject: *HAZARDOUS WASTE DISPOSED OF FOR THE MONTH OF DECEMBER*

The total amount of Hazardous Waste manifested and disposed of the month of December 1993 is 23,853 pounds (liquid and solid) and was transported by The Patterson Group to Norris Environmental Services and by Rollins Chem-Pak to Rollins/Deer Park, Texas. Chemical Waste Management transported to Chem. Waste OSCO Facility.

<u>Manifest No.</u>	<u>Description</u>	<u>Amount</u>	<u>Disposed</u>
93306875	Acid Brick	750#	Chem Waste
*93306875	Acid (Sulfuric) Dirt	250#	Chem Waste
93167863	Ferric Chloride	8,340#	Norris Environmental
*93167863	Mixed Acids	2,793#	Norris Environmental
93187185	Asbestos (building "C")	20#	BKK Landfill
*00197398	Flammable Solids	4,400#	Rollins, Tx.
*00197398	Paint Sludge	3,600#	Rollins, Tx.
*93361709	Lab Pack	200#	Rollins (OPC)
*93361709	Grease	500#	Rollins (OPC)
*93361709	Solvents	1,000#	Rollins (OPC)
*93361709	Oil Absorbent	2,000#	Rollins (OPC)
		Total: 23,853#	

Total Effluent Excursion = 0

* = Waste Accumulated From 10/1/93 to 12/30/93


Adele Laikin

cc: R. Stewart
D. Rodriguez



ALCOA
COMPOSITES

C60699 0216

Composite Structures
Division of ALCOA COMPOSITES
Monrovia, California

OUTSET - 93

DATE	MANIFEST NUMBER	90 DAY REC'D	TRANSPORT COMPANY	HANDLING CODE	DISPOSAL COMPANY	HAZARDOUS MATERIAL	GALLONS	POUNDS	CAL. /	TRANSPORT COSTS	DISPOSAL TOTAL COSTS	FEDERAL EPA /	PROFILE NUMBER
-7	97839	M	CUSTOM		ROLLINS	PETROL/SOLV	1350	13500		370	4,239	D1	MO-55839-30
-7	97839	M	CUSTOM		ROLLINS	PAINT SLUDG	800	8000				D1	MO-55841-13
-7	97839	M	CUSTOM		ROLLINS	PAINT SLUDG	400	4000				D1	MO-55841-13
-7	90942882	M	CUSTOM		ROLLINS	111-TRI/DIC	5400	54000		370	4,239	P2	OP-12119-35
-7	90942882	M	CUSTOM		ROLLINS	ASBESTOS	40	400				D1	OP-12174-51
-7	90942882	M	CUSTOM		ROLLINS	OIL/COOLANT	8500	85000				D1	OP-12178-36
-7	90942882	M	CUSTOM		ROLLINS	OIL/METHANO	300	3000				D1	OP-14133-36
-7	90942882	M	CUSTOM		ROLLINS	OIL SORBANT	750	7500		370	4,239	D1	OP-13274-30
-7	92311670	M	PATTERSON		NORRIS	HYDRO/ACID	2000	20000		390	2,720	D2, D7	EO108100003
-8	92311669	M	PATTERSON		NORRIS	HYDRO/ACID	2000	20000		390	2,720	D2, D7	EO108100003
-11	92311675	M	PATTERSON		NORRIS	HYDRO/ACID	2000	20000		360	2,720	D2, D7	EO108100003
-11	92311674	M	PATTERSON		NORRIS	HYDRO/ACID	2000	20000		360	2,720	D2, D7	EO108100003
-11	92311679	M	PATTERSON		CHAM WASTE	FILTER CAKE	15	150			2,012	AK 1331	AK 1331
-12	92311679	M	PATTERSON		NORRIS	CORR./LIQ.	2000	20000		300	2,720	D2, D7	EO108100003
-11	92311732	M	PATTERSON		NORRIS	CORR./LIQ.	2000	20000		300	2,720	D2, D7	EO108100003
-11	92311732	M	PATTERSON		NORRIS	PAINT SLUDG	1000	10000		*2,370	*8,863	D35, D6, D7, D8, P2, P3, P5	MO5584113
-11	97840	M	CUSTOM		ROLLINS	XYLENE RAGS	2250	22500		*2,370	*8,863	D35, P2, P3, P5	MO5583920
-3-9	97840	M	CUSTOM		ROLLINS	OIL COOLANT	9000	90000		1,440	11,135	D1, D7, D8, D35, D40, P2, P3, P5	OP12117836
-3-9	90942885	M	CUSTOM		ROLLINS	RO WASTE	2000	20000		214			OP12117836
-3-9	90942885	M	CUSTOM		ROLLINS	HAI WAS	2000	20000		223			OP12127430
-9	90942885	M	CUSTOM		ROLLINS	FERRIC/HYDR	2000	20000		345	3,400	D2, D7	EO108100003
-22	92311785	M	PATTERSON		NORRIS	FERRIC/HYDR	2000	20000		345	3,400	D2, D7	EO108100003
-22	92311784	M	PATTERSON		ROLLINS	PAINT SLUDG	1500	15000		1,350	6,603	D35, P1, P3, P5	MO5584113
-22	207446	M	CUSTOM		ROLLINS	TOLUENE RAD	3300	33000					MO5583920
-7	207446	M	CUSTOM		ROLLINS	OIL	3000	30000		223	6,603	D1, D7, D8, D35, D40, P1, P3, P5	OP1447230
-7	92736415	M	CUSTOM		ROLLINS	FLAM/LIQUID	1000	10000		211			OP12117836
-7	92736415	M	CUSTOM		ROLLINS	OIL/COOLANT	4800	48000		223			OP12117836
-7	92736415	M	CUSTOM		ROLLINS	CORROSIVE	500	8000				D5, D7	OP1484709
-11	92311658	M	PATTERSON		NORRIS	CYANIDE	450	4500		310	990	D2, D3, D7	EO108100104
-11	92311658	M	PATTERSON		NORRIS	CHROMIC ACI	450	4500		310	900	D2, D6, D7	EO108100104
-12	92311857	M	PATTERSON		NORRIS	HYDRO/ACID	2000	20000		723	720	D6, D6, D2, D8	EO108100003
-13	92311853	M	PATTERSON		NORRIS	HYDRO/ACID	2000	20000		723	720	D2, D3, D7	EO108100003
-13	92311855	M	PATTERSON		NORRIS	ALDOXINE	500	5000		723	690	D6, D6, D2, D8	EO108100003
-18	92311916	M	PATTERSON		NORRIS	ALDOXINE	500	5000		723	690	D6, D6, D2, D8	EO108100003
-18	92311916	M	PATTERSON		NORRIS	ALDOXINE	500	5000		723	690	D6, D6, D2, D8	EO108100003
-18	92311917	M	PATTERSON		NORRIS	CHROMIC ACI	1000	10000		221	2,000	D2, D3, D7	EO108100003
-14	92501794	M	CUSTOM		ROLLINS	PETRO/TRICH	5800	58000		221	13,140	D1, P2	EO108100103
-14	92501794	M	CUSTOM		ROLLINS	PETRO/TRICH	5800	58000		221	13,140	D1, P2	EO108100103
-14	92501794	M	CUSTOM		ROLLINS	OIL/COOLANT	3100	31000		222			OP121178-36
-14	92501794	M	CUSTOM		ROLLINS	OIL/COOLANT	3100	31000		222			OP121178-36
-14	92501794	M	CUSTOM		ROLLINS	OIL	7000	70000		221			OP14472-30
-8-3	93167617	M	PATTERSON		NORRIS	HYDRO/ACID	2000	20000		723	4,000	D2, D6, D7, D8	EO108100003
-8-3	93167617	M	PATTERSON		NORRIS	HYDRO/ACID	2000	20000		723	4,000	D2, D6, D7, D8	EO108100003
-8-3	93167617	M	PATTERSON		NORRIS	HYDRO/ACID	2000	20000		723	4,000	D2, D6, D7, D8	EO108100003
-8-3	93167617	M	PATTERSON		NORRIS	HYDRO/ACID	2000	20000		723	4,000	D2, D6, D7, D8	EO108100003
-8-3	93167623	M	PATTERSON		CHAM WASTE	SULPHURIC	250	2500		352	370	D7, D6	EO108100103
-8-3	93167623	M	PATTERSON		CHAM WASTE	SULPHURIC	250	2500		352	370	D7, D6	EO108100103
-8-3	93167623	M	PATTERSON		CHAM WASTE	SULPHURIC	250	2500		352	370	D7, D6	EO108100103
-8-3	93167623	M	PATTERSON		CHAM WASTE	SULPHURIC	250	2500		352	370	D7, D6	EO108100103
-8-3	93167623	M	PATTERSON		CHAM WASTE	SULPHURIC	250	2500		352	370	D7, D6	EO108100103
-8-3	93167623	M	PATTERSON		CHAM WASTE	SULPHURIC	250	2500		352	370	D7, D6	EO108100103
-8-3	93167623	M	PATTERSON		CHAM WASTE	SULPHURIC	250	2500		352	370	D7, D6	EO108100103
-8-3	93167623	M	PATTERSON		CHAM WASTE	SULPHURIC	250	2500		352	370	D7, D6	EO108100103
-8-3	93167623	M	PATTERSON		CHAM WASTE	SULPHURIC	250	2500		352	370	D7, D6	EO108100103
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-8-3	93167623	M	PATTERSON		CHAM WASTE	SULPHURIC	250	2500		352	370	D7, D6	EO108100103
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-8-3	93167623	M	PATTERSON		CHAM WASTE	SULPHURIC	250	2500		352	370	D7, D6	EO108100103
-8-3	93167623	M	PATTERSON		CHAM WASTE	SULPHURIC	250	2500		352	370	D7, D6	EO108100103
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-8-3	93167623	M	PATTERSON		CHAM WASTE	SULPHURIC	250	2500		352	370	D7, D6	EO108100103
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-8-3	93167623	M	PATTERSON		CHAM WASTE	SULPHURIC	250	2500		352	370	D7, D6	EO108100103
-8-3	93167623	M	PATTERSON		CHAM WASTE	SULPHURIC	250	2500		352	370	D7, D6	EO108100103
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-8-3	93167623	M	PATTERSON		CHAM WASTE	SULPHURIC	250	2500		352	370	D7, D6	EO108100103
-8-3	93167623	M	PATTERSON		CHAM WASTE	SULPHURIC	250	2500		352	370	D7, D6	EO108100103
-8-3	93167623	M	PATTERSON		CHAM WASTE</								

FROM: KAREN L. WAECHTER
ENVIRONMENTAL AUDIT GROUP
PITTSBURGH OFFICE - AB 19

TO: JAMES S. BOYT
PITTSBURGH OFFICE - AB 19

*file
Cabinet*

1995 February 01

RE: COMPOSITE STRUCTURES (CSD) ENVIRONMENTAL AUDIT RESPONSE

I have reviewed the environmental audit response with Composite Structure's Environmental Manager as part of the response review process. The response for the special situation titled "Permitted VOC and Emissions Limits" did not clarify which daily facility VOC emission limit (54 gallons or 27 gallons) CSD would comply with until daily facility VOC emission permit revisions were made. After conversations with the South Coast Air Quality Management district, the attached letter was submitted to the agency by CSD. I believe this letter and CSD's action address the special situation in its entirety. CSD's response and action plan will effectively address the special situations and recommendations identified in the audit report.

If you have any questions regarding the response, please do not hesitate to contact me on ext. 4044.


Karen L. Waechter

Attachment

KLW:mht
(COMPOS6.DOC)

cc: R. B. Kelson - Pittsburgh, AB 30

C60699 0129