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Westinghouse
Electric Corporation

Westinghouse Building
Gateway Center
Pittsburgh Pennsylvania 15222

October 25, 1988

Mr. James R. Shack
Project Officer
Commonwealth of Pennsylvania
Department of Environmental Resources
Bureau of Waste Management
121 South Highland Avenue
Pittsburgh, PA 15206-3988

RE: Westinghouse Electric Corporation
Beaver Plant

Dear Mr. Shack:

In accordance with your letters dated September 19, 1988 and October 3, 1988, Westinghouse Electric Corporation is providing this response. We appreciate the extension of time that you allotted, however, due to the scope of your request, we are still reviewing information and may supplement this response.

It is our understanding that your request pertains to the period of time that Westinghouse has owned the Beaver facility. However, as we have previously discussed, Westinghouse has a record retention policy which usually limits the maintenance of records for six years. Therefore, documentation of the use of hazardous substances and their generation, storage, transporting and disposal is limited.

Westinghouse purchased the Beaver facility in 1947 and operations began the same year. At the same time Westinghouse constructed an on-site wastewater treatment plant and was issued an Industrial Waste Permit (No. 713) on May 28, 1948. The available documentation indicates that a majority of the "liquid" waste streams were treated in this plant. (Please refer to Attachment 1). It is difficult to provide specific responses to Questions 1, 2, and 3 contained in your September 19, 1988 letter for the entire time period you have requested information. Generally, the processes at the facility that use(d) hazardous substances and the associated storage areas are located on Attachment 2, and are as follows:

* A-4 Plating (Columns AX/5-9)
  A-9 Plating (Columns X/16-21)
* Ammonia Storage Tanks (Columns K/33 and outside X/1)
* Boiler House (Columns X/21-29)
* Bonderizer (Columns DE/16-23)
  Bonderizers (Columns GH/9-15 and CD/11-15)
* Bulk Storage Overhead Tanks (Columns X/11-15)
* Control Laboratory (Columns A/1)
* Degreasers (see itemized list in Attachment 3, MP-1)
  E-47 Molding (Columns JK/47-58)
  GR-73 Thermostat Line (Columns E/31)
* Heat Treating (Columns XA/1-5)
  Impregnation - Coils (Columns F/17-19)

* Limitrak Spray (Columns J/45-47)
* Neutralization Plant
* Nitrogen Storage (Outside Column X/13)
  Old Acid Storage Tanks (Columns X/17-19)
  Old RCRA Storage Area (Columns A/61-63 and FG/65-67)
* Paint Spray Booths (Columns EF/19-21 and BC/37)
* Paint Stripping (Columns D/13-15)
* Plating (Columns JK/29-31)
* RCRA Storage Area (Columns X/16-21)
* Receiving and Storage Areas (Columns AB/24-31, AB/39-41, AB/41-43, AB/50-51, and CD/6)
  Vinyl Coating (Columns B/15-16)
  Waste Storage Tanks (outside of A-9)
  Photo Laboratory (Columns FG/Basement of Annex to Administration Building)

* Areas and/or processes in current operations

Generally, the processes have not significantly changed over the years. The response to Question 5 provides information on the wastes generated after 1981, and we do not have any reason to believe that the character and quantity of the wastes generated prior to 1981 would be substantially different. It should be noted that hazardous substances which are piped within the plant are conveyed, with the exception of those identified in Attachment 3, via overhead piping systems. In lieu of preparing drawings of these overhead lines, we suggest that you visit the facility to view these pipes if deemed necessary.

Although records of each operation are generally not available, we have located a chart dated 1979 tabulating the materials usually present in the plant areas subject to the reporting requirements of the Clean Water Act (Attachment 4).

In addition, the facility has an SPCC Plan for its operations, and a copy of the most current Plan is attached (Attachment 5).

4. What were the methods used to treat, store, and/or dispose of hazardous substances at the facility?

We have not located any records that would indicate that any portion of the property was used for the disposal of hazardous substances. Hazardous substances were treated at the wastewater treatment plant by the following methods:

Neutralization
Cyanide Destruction
Chrome Reduction
Metal Precipitation
Aeration/Settling
Filtration

In addition three concrete lined pits have been used for the treatment of materials before their discharge. The first pit treated waste water generated in the photo laboratory before the waste water was discharged to the sanitary sewer. The second pit treated waste water generated in the control laboratory before it was discharged to the permitted outfall. The last pit was part of a spill containment/treatment system for the old acid storage area. The discharge was to 2 Mile Run.

Storage of hazardous substances are identified in our response to Questions 1, 2 and 3.

Off-site disposition of hazardous substances is addressed in our response to Question 5.

5. Where were hazardous substances disposed of off-site? Include name, address, phone number, contact person; identify the hazardous substances, quantity and methods of disposal or treatment.

Off-site disposal and/or treatment facilities as identified in the plant and headquarters files are listed on Attachment 6. Quarterly reports, identifying estimated quantities and methods of treatment/disposal have been submitted to your office since 1981, and copies as requested, are provided in Attachment 7. Prior to 1981 reporting, volumes of substances disposed of off-site were not maintained. Likewise, treatment or disposal methods and contact names were not specified on the records reviewed.

6. Identify transporters, including name, address, phone number, and contact person used to transport hazardous substances off-site for disposal or treatment. If Westinghouse Corporation [sic] owned, leased or operated the vehicles that were used, state so.

Attachment 9 lists transporters that were contracted by Westinghouse for transporting hazardous substances off-site for treatment or disposal. None are owned, leased or operated by Westinghouse, except that a Westinghouse owned and dedicated trailer was used to transport capacitors to Ensco.

7. Identify transporters, including name, address, phone number and contact person used for on-site transportation of hazardous substance for disposal or treatment.

No records have been found to indicate that contractors were hired for any on-site transportation of hazardous substances. As stated in the response to questions 1, 2 and 3, most of the liquid wastes were transported to he wastewater treatment plant through overhead piping.

Currently, on-site movement of hazardous substances for off-site disposal or treatment at the plant consist of the following:

- transferring of empty cyanide containers (30 or 55 gallon).
- movement of contained wastes from the user area to the RCRA Storage Area and to contracted (non-Westinghouse) disposal trucks.
- emergency or upset conditions handled in accordance with the SPCC Plan (Attachment 5).

Ted Kasper is the Westinghouse Beaver contact who presently arranges for on-site transporting of hazardous substances. His telephone number is 412-773-1785.

8. Identify any individual, company, corporation, or entity who arranged for the off-site treatment or disposal of hazardous substances. Include name, address, phone number, contact person.

Since 1986, Mr. Ted J. Kasper, Environmental Control Officer (ECO) at the Beaver Plant arranges for off-site treatment or disposal of hazardous substances. His address and phone number are:

Westinghouse Electric Corporation
Vanport Plant
Tuscarawas Road
Beaver, PA 15009
412-773-1785

From November, 1980 until 1986, transportation logs were kept by Ms. Jean Lotz. Jean is retired and resides in the Beaver area. Off-site transportation arrangements possibly were handled by any of the following Westinghouse personnel:

Lee Atkinson
Jerry Osmanski
Chick Hurst
Norm Bollinger
Nelson Beck

Except for Messrs. Atkinson and Hurst, all of the persons listed above are still employed by Westinghouse Electric Corporation. Mr. Atkinson is deceased and Mr. Hurst is retired and resides in Beaver.

As referenced in the October 14, 1959 policy (Attachment 8), Mr. C. Miller was responsible for receiving and disposition. Mr. Miller's existence and/or whereabouts is unknown.

9. In addition to the facility, where within the Westinghouse Corporation [sic] could records (copies, originals, microfiche, electronic storage, etc.) pertaining to the facility and quarry be stored? Include name, address, phone number, and name of contact person.

Duplicate copies of some documents are kept at Westinghouse Headquarters, Gateway Center, Pittsburgh, PA 15222. I am the contact person for Headquarters files.

In addition, Westinghouse archives records at "the mines." The "mines" are former salt mines now used as storage facilities for corporate records. Westinghouse requested indices of the Beaver files available at the "mines" as a part of this and the previous PADER request. The indices were received on October 13, 1988; and as such, the available files have not been thoroughly

reviewed because of time constraints. Ted Kasper is the initial contact person for the "mines". The "mines" address is:

Westinghouse Record Center
P.O. Box 47
Boyers, PA 16020

Records at the "mines" are normally destroyed after a time period of six years. However unlikely, if after completion of the review of the records contained there, any additional pertinent information is discovered, Westinghouse will forward such to PADER.

10. Identify any hazardous substances that Westinghouse Corporation [sic] disposed of at the quarry. Include quantities, dates, transporters.

This question is essentially a reiteration of PADER's previous request dated August 18, 1988. Please refer to our response of September 2. In reviewing the records for preparation of this response, no additional information was found pertaining to transportation and/or disposal of hazardous substances at the quarry pit. The only record found was the Westinghouse policy dated October 14, 1959 (Attachment 8), purporting that Westinghouse personnel and vehicles transported empty cyanide drums to the quarry. The policy clearly states that the only wastes shipped to the quarry were the empty drums. The sludges were to be disposed of by Mr. Ellis and we have not identified any record of the site that he used.

As we have previously stated, the scope of the request for information spanning 41 years has made our response within the time frame specified difficult. In addition, prior to 1981 there were no requirements to keep records that pertained to hazardous substances, coupled with our normal record retention policy, this has limited our ability to have specific information. We will continue to review our records to determine if there is any additional information that is responsive to this request.

Sincerely,

L. L. LeGoullon
Project Engineer
Environmental Remediation
Environmental Affairs

LLL/cm

Attachments

cc: E. Farland - Beaver Plant