CLOSURE PLAN

EPA ID. No. NYD002041242

Hazeltine Corporation
Cuba Hill Road
Greenlawn, NY 11740
January 15, 1988
Revised: February 28, 1990

1.0 Introduction

The following is Hazeltine Corporation's Closure Plan for EPA ID No. NYD002041242. The facility has been an inactive TSDF since 1984 and is seeking reclassification as a non-TSDF through implementation of this plan.

2.0 Facility Description

Hazeltine Corporation is a leading manufacturer of electronic communication components for military applications. Five buildings (#1-5) exist at this site with the predominance of hazardous waste generation accumulation occurring at Building #2.

Building #2 operations have included a former small printed circuit board plating shop (copper, tin/lead, nickel, and gold plating), and a current metal finishing area (conversion coating, deburring, and painting).

Spent chemical baths were previously accumulated in a 3000-gallon underground holding tank (Tank A) which was pumped regularly by a licensed scavenger (<90-day accumulation) for off-site treatment. The contents were manifested as Waste Corrosive Liquid NOS (D002). Currently, all spent baths are accumulated in an above ground, bermed 4500-gallon tank (Tank D) (<90-day accumulation) and manifested off-site as Hazardous Liquid NOS (F019). Tank A was emptied and is out-of-service until closure is performed.

Rinsewater generated in Building #2 was previously piped into two 5000- gallon underground equalization tanks (Tanks B and C). This non-hazardous stream was neutralized, fed through an evaporator, and the resulting concentrated residue was also accumulated in Tank A for off-site treatment. Currently, this non-hazardous rinsewater is accumulated in an above ground, bermed 4500 gallon tank (Tank E) prior to concentrating in our evaporator. Tanks B and C were emptied and are out-of-service until closure is performed.

Any other hazardous waste generated on-site that is not compatible with the contents of former Tank A or present Tank D is accumulated in 55-gallon drums and immediately transported to an off-site TSDF.

Hazeltine has had TSDF status because of past storage of hazardous waste (prior to 1984) and evaporative treatment of rinsewater (which has since been shown to have been non-hazardous). See Attachments #1, #2, #3, and #4.

3.0 Closure Procedures

1. Take three soil borings as described in Attachment #5 to assure that the site is free from contamination. Proposed locations are shown on Attachment #1.

2. Pressure wash Tanks A, B, C and D.

3. Excavate Tank A with interior PVC liner. Take a representative sample of liner and tank to determine proper disposal methods.

4. Excavate Tanks B and C with interior PVC liners. Take a representative sample of the liners and tanks to determine proper disposal methods.

5. Triple rinse all wastewater treatment equipment and tanks in the wastewater treatment room, and remove to await disposition (resale or reuse elsewhere).

6. Triple pressure wash the floor of the wastewater treatment area with a detergent/water solution. Sample the final rinsate for all parameters listed on our SPDES permit (NY0075752, outfall 001) and submit results to NYSDEC to show that it meets discharge standards. If not, repeat pressure washing until analyses of rinsate is below discharge limits.

7. Accumulate all rinsate from tanks, equipment, and floor cleaning into bermed Tank E. Take a representative analysis to determine proper disposal methods.

8. Properly manifest and dispose of all hazardous waste and contaminated materials resulting from closure operations.

9. All equipment used during closure will be the property of the contractor used and will be his responsibility to decontaminate if necessary.

10. Copies of all manifests and laboratory analyses will be provided to the State upon completion of closure and will include a report by a professional engineer supervising the project.

4.0 Closure Schedule

Closure will begin within 90 days after NYSDEC approval of this closure plan and will be completed within 180 days of start date. See Attachment #6 for estimated schedule with milestone dates to allow tracking of the progress of closure.

The site will continue solely as a generator of hazardous waste, an exempt storer as per 6NYCRR Part 373-1.1(d) (iv), and a treater of non-hazardous wastewater.

5.0 Certification of Closure

When closure is complete, Hazeltine Corporation will submit to NYSDEC letters from Hazeltine and an independent professional engineer certifying that the facility has been closed in accordance with the specifications of this plan.

6.0 Cost Estimate for Closure

See Attachment #7 for a detail of closure cost estimates. As per Paragraph 265.142 of the Resource Conservation and Recovery Act (RCRA), the cost estimates are compiled on a "worst case" basis and are revised annually to account for inflation. (Note: cost estimates are based on verbal quotes from contractors likely to be performing the closure operations).

7.0 Surety

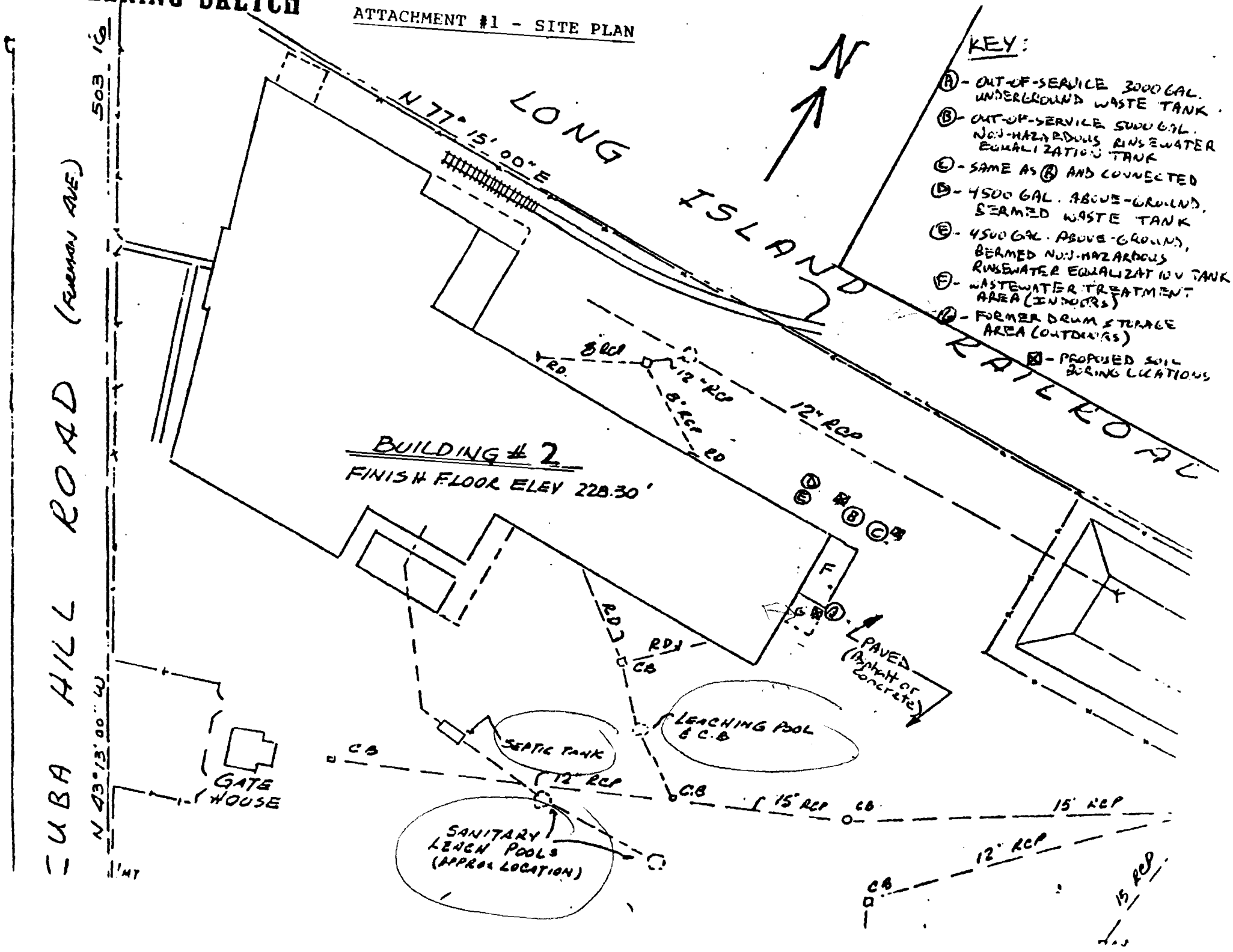
Financial assurance for closure and liability coverage (Attachment #8) was submitted to NYSDEC in February, 1990, in the form of a Financial Test and Corporate Guarantee by our parent company, Emerson Electric. This will be updated on an annual basis.

8.0 Amendments of Closure Plan

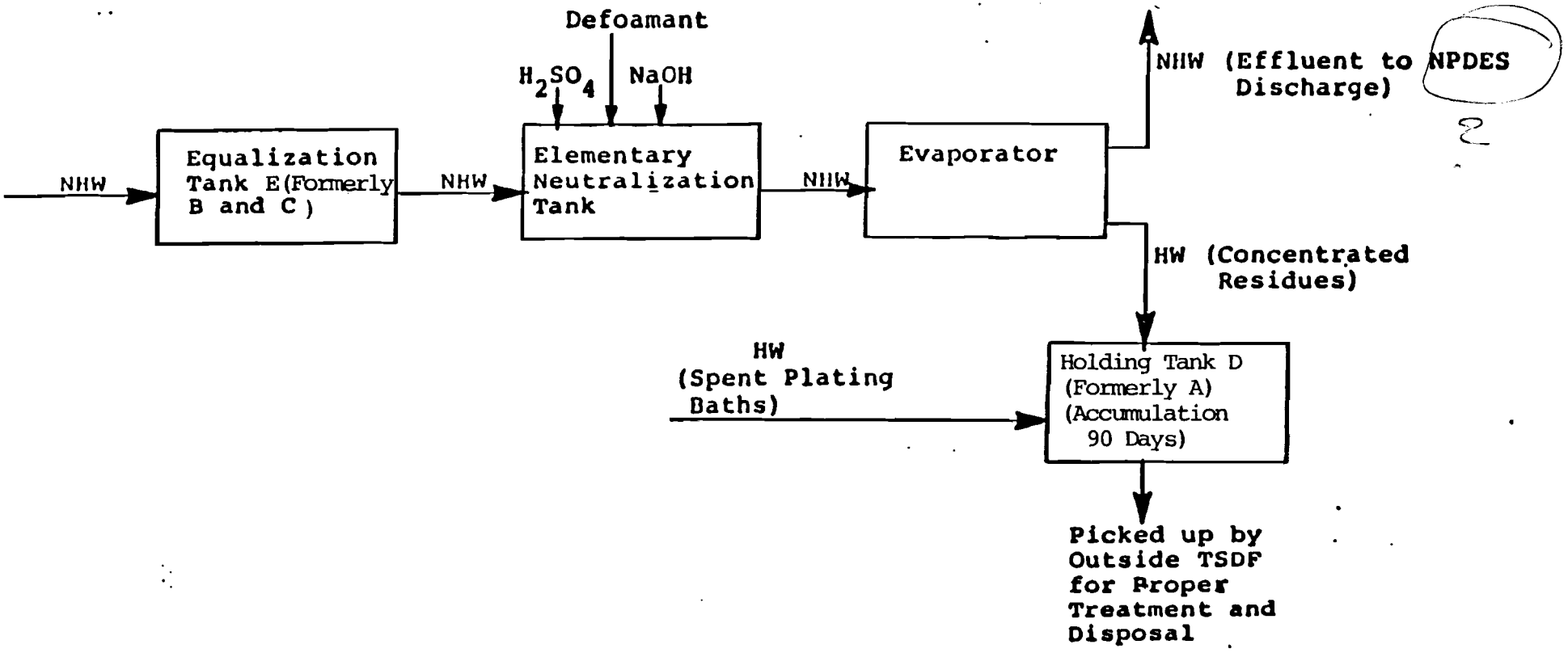
This closure plan will be amended whenever changes in operating plans or facility design affects it. If a 6NYCRR373 permit modification is requested, the closure plan will be amended at that time. If no permit modification is required, the closure plan will be amended within 60 days of any applicable change in operating plans or facility design.

ENGINEERING SKETCH

ATTACHMENT #1 - SITE PLAN



ATTACHMENT #2: BUILDING #2 WASTEWATER TREATMENT PROCESSES



Key: NHW = Non-Hazardous Rinsewater
HW = Hazardous Waste

Note: Inlet NHW generated from a metal finishing operation (and formerly from a printed circuit board plating operation)

Attachment #3 - Underground Tank Descriptions

Tank A

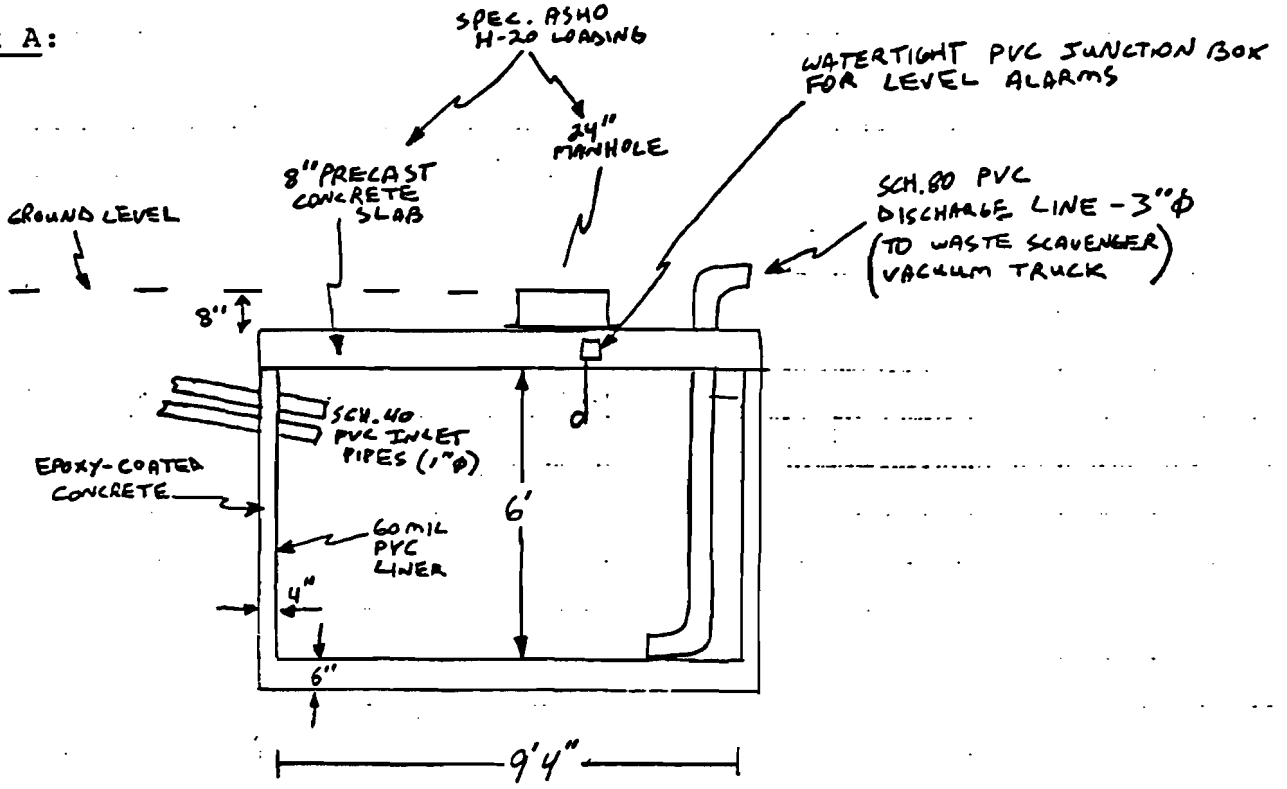
Capacity:	3000 gallons
Former Contents:	Waste Corrosive Liquid NOS (D002, F019) - Spent plating baths and concentrated residue from wastewater evaporation.
Year Installed:	1977
Installation:	Underground, cylindrical, epoxy coated (interior) concrete with 60 mil PVC liner; One manway, one discharge pipe, two fill pipes. (see Attachment #4 for schematics); level sensors and alarms.

Tanks B and C

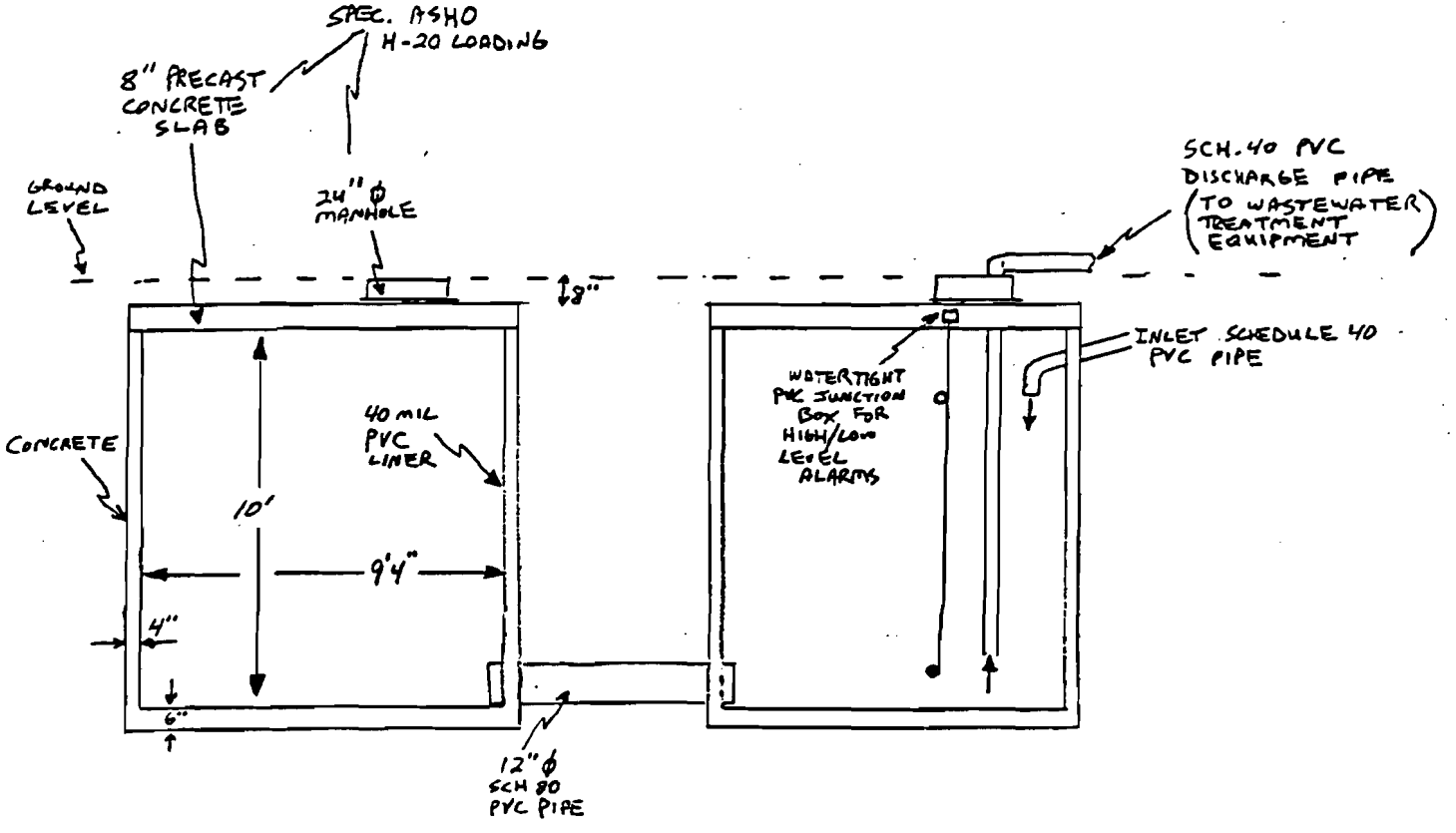
Capacity:	10,000 gallons (total)
Former Contents:	Non-hazardous rinsewater from printed circuit board plating and metal finishing operations.
Year Installed:	1977
Installation:	Two connected underground, cylindrical, 5000-gallon concrete tanks with 40 mil PVC liner; two manways, one discharge pipe, one fill pipe (see Attachment #4 for schematics); high and low level sensors and alarms.

ATTACHMENT #4 - TANK SCHEMATICS

Tank A:



Tanks B and C:



Attachment #5- Soil Sampling procedures/parameters

Three soil borings are proposed at the site to prove the lack of contamination. One is proposed on each side of the two former equalization tanks (Tanks B and C) and one at the former container storage area at the corner bordering the former waste holding tank (Tank A). See Attachment #1 for locations.

The borings will be 21 feet in depth and will be drilled with a hollow stem auger rig. Each boring will be sampled every three feet with a split spoon sampler from the ground surface to 21 feet. The split spoon samples wil be visually inspected and logged in detail including:

a. soil characteristics (type, color, etc.)
b. material characteristics (odor, texture, etc.)
c. visual contamination description
d. approximate water content
e. results of total volatile organics and conductivity screenings.

An organic vapor analyzer will be used to screen each sample for total volatile organics. A soil sample from each spoon will be collected in a 40 ml vial and the vials will be heated in a 50 C hot water bath for ten minutes. An aliquot of air from the head space within the vial will then be withdrawn by syringe for direct injection into the OVA.

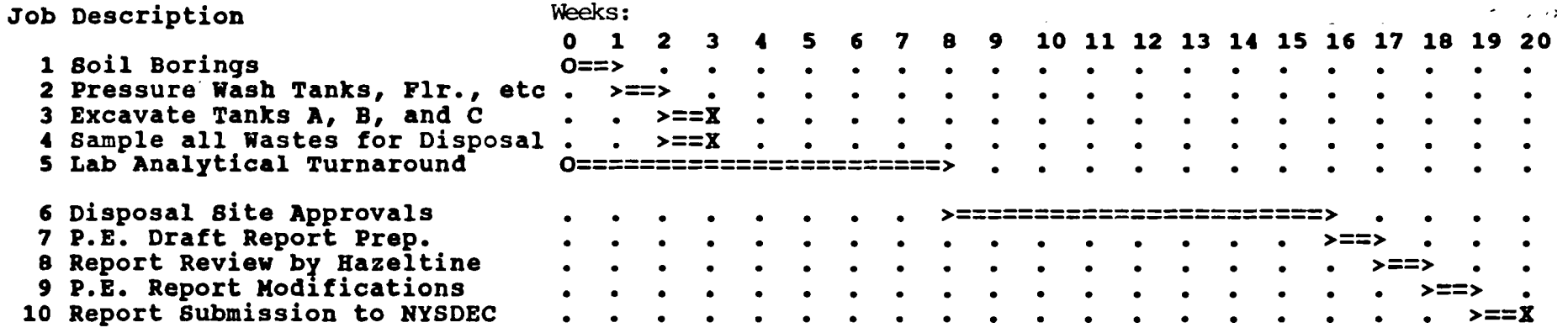
A soil slurry will be prepared for conductivity measurements by mixing a portion of soil from each sample with an equal weight of distilled water. A conductivity probe will then be inserted for readings.

All soil samples will be stored on ice for preservation until the OVA and conductivity measurements are completed and the selection The samples will be analyzed for Hazardous Substance List volatiles and metals as described in the Department of Environmental Conservation Contract Lab Protocol document. One duplicate sample, and one field blank will be also be collected.

In order to prevent any possible cross-contamination, the split spoon will be cleaned with soap and water and rinsed in distilled water between each sample. In addition, the augers will be steam cleaned between each boring to remove any soil or waste debris from the auger flights.

ATTACHMENT #6:

CLOSURE (NYD002041242), Revision 0, 3/ 9/90, File is not named
Prepared by Tony Germinario



Sorting order is Current order
From the first job to the last job
Jobs using all skills

Symbol-Explanation

>-->	Duration of a normal job
>..>	Slack time for a normal job
>==>	Duration of a critical path job
>::>	Duration of a completed job
*	Job with zero duration
+	Job deadline
O-->	Job with no prerequisites
>--X	Job with no successors
!	Time break due to holiday or week-off

Attachment #7- Closure Cost Estimates

	Item	Cost
1)	Sewer Jet to pressure wash wastewater treatment area floor (triple rinse) and Tanks A, B, C and D	$ 2,000
2)	Removal and disposal of washwater (approximately 1000 gallons @ .15¢/gal plus $425 for transportation)	575
3)	Vacuum truck (@ $90/hr)	720
4)	Soil borings and on-site screening of split-spoon samples	7,500
5)	Disposal of Tanks A, B and C plus liners (@ $400/cu yd)	10,000
6)	Disposal of one drum of miscellaneous contaminated materials	400
7)	Laboratory analysis of composite rinsate sample six soil samples, and 3 waste samples (@ 400 ea.)	4,000
8)	Certification and report by a N.Y. State licensed Professional Engineer	4,000
	Subtotal	$ 26,195
9)	Contingent Cost (20%)	5,239
10)	Administration (15%)	3,929
	TOTAL	$35,363