

**Closure Plan  
BAE SYSTEMS Controls  
Johnson City, NY 13790**

**1. Closure Plan [6 NYCRR 373-3.7]**

Air Force plant #59 is owned by the United States Air Force (USAF) and is operated by BAE SYSTEMS Controls through the Broome County Industrial Development Agency (BCIDA). This plan is applicable to BAE SYSTEMS Controls manufacturing operation only and not any Environmental liability owned by the USAF. The facility is a current IRP and Inactive Hazardous Waste site. Various documents detailing Environmental liability are available from the USAF or BAE SYSTEMS Controls.

This closure plan is required for BAE SYSTEMS Controls (Controls) in accordance with 6 NYCRR 373-1.1(d)(1)(iv)(d). Controls stores liquid and solid hazardous waste in containers for less than 90 days from the time it accumulates more than 1,000 kilograms of hazardous waste. Controls is located within the Clinton Street - Ball Park Valley Aquifer System in Broome County, NY.

This plan describes the steps necessary to partially close the 90-day storage and acid dock areas at any time, and to completely close them at the end of their operating life. A post-closure plan is not required for storage facilities, such as these, since all wastes will be removed at closure and all structures will be decontaminated. The conditions under which partial closure will occur are also discussed. Financial requirements are not applicable to Controls, since it is not a TSDF storage facility and is subject to the exemption in 6 NYCRR 373-1.1(d)(1)(iv).

Controls will maintain a copy of this closure plan on site, until certification of closure completeness has been submitted to and accepted by the NYSDEC Commissioner (and/or the authorized NYSDEC representative). Controls will notify the NYSDEC Commissioner at least 45 days (where applicable) before final closure will begin. If changes are made in the 90-day or acid dock storage areas operation or design, the closure plan will be amended to reflect these changes.

Upon closure completion, Controls will submit to the NYSDEC Commissioner a certification by both Controls and an independent registered professional engineer that the facility has been closed in accordance with the specifications of the approved closure plan.

**1.a. Closure Performance Standard [6 NYCRR 373-3.7(b)]**

The closure plan detailed below was designed to meet the closure performance standard established by RCRA. This standard specifies that closure must be conducted in a manner that:

- minimizes the need for further maintenance.
- controls, minimizes or eliminates, to the extent necessary to prevent threats to human health or the environment, post-closure escape of hazardous waste, hazardous waste constituents, contaminated rainfall, or waste decomposition products to the surface waters, groundwater, or atmosphere.

The 90-day and acid dock storage areas will not require further maintenance after closure, as all wastes will be removed at closure and any contaminated structures or equipment will be decontaminated.

#### **1.b. Partial and Final Closure Activities [6 NYCRR 373-3.7(c)]**

Controls operates hazardous waste storage areas that temporarily store hazardous waste prior to shipping them off site for treatment, reclamation, or disposal. As a result, these storage areas do not have an expected service life.

This plan has been developed to anticipate the time when Controls, or its successor, decides to discontinue hazardous waste accumulation at the 90-day or acid dock storage areas. Partial closure would involve closure of one of these hazardous waste storage areas. The procedures specified for final closure also apply for partial closure.

#### **1.c. Maximum Waste Inventory [6 NYCRR 373-3.7(c)(2)(iii)]**

The maximum inventory of containerized hazardous wastes stored in the 90-day area is 2,000 gallons of liquid waste, with remaining available space used for hazardous wastes with no free liquids. The inventory would consist of a variety of the waste streams Controls generates. The 90-day waste storage area has a secondary containment capacity of 2000 gallons, allowing 33 - 55 gallon drums with free liquids to be stored there. The acid dock has 970 gallons of secondary containment capacity, but normally stores only a few hazardous waste drums, with a maximum of 16 - 55 gallon drums as its cited hazardous waste capacity. Wastes in the flammable dispensing rooms are satellite accumulation only, and will be placed in the 90-day area for storage.

#### **1.d. Inventory Removal and Disposal or Decontamination of Equipment [6 NYCRR 373-3.7(c), 3.7(e)]**

Upon final closure of the 90-day or acid dock, all stored wastes will be transported to an EPA and/or NYSDEC permitted treatment, recycling or disposal facility by an EPA and DEC registered transporter. All remaining storage structures will be tested and any contaminated structures or equipment will be decontaminated.

Facility decontamination is not necessary because wastes are handled in closed containers and any release or satellite accumulation areas would have been cleaned promptly at the time of occurrence or discovery.

##### **1.d.(1) Closure of Containers**

At closure, any containerized wastes will be removed for off site handling in accordance with normal operations. The normal operating procedures and safety precautions used by Controls employees will be followed to ensure worker safety during closure.

##### **1.d.(2) Closure of Tanks**

There is no hazardous waste stored in waste storage tanks at Controls, therefore, this section is not applicable.

**1.e. Schedule for Closure [6 NYCRR 373-3.7(d)]**

The NYSDEC Commissioner will be notified 45 days (where applicable) before closure activities begin. All hazardous wastes will be removed from the storage areas within 90 days of receipt of the final volume of waste to be accepted. All closure activities will be completed within 180 days of this receipt date.

The completion of closure will be certified by Controls and by an independent registered professional engineer within 60 days of completion of final closure of the facility or within 60 days of partial closure of any hazardous waste storage unit. This certification will be submitted to the NYSDEC Commissioner.

**1.f. Extensions for Closure Time [6 NYCRR 373-3.7(d)]**

Controls does not expect to require an extension for closure time.

**2. Post Closure Plans**

Post closure plans are required only for facilities requiring permitting, therefore this section is not applicable.

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Revision date August 10, 2005