

CORNING INCORPORATED  
CORNING, N.Y.  
HAZARDOUS WASTE STORAGE AREA CLOSURE PLAN  
STEUBEN  
EPA I.D. NUMBER NYD000824359

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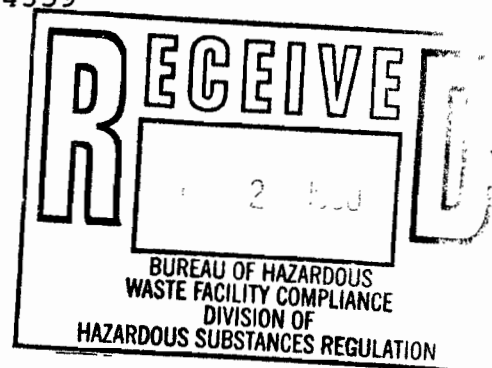
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CORNING INCORPORATED

STEUBEN - EPA I.D. NUMBER NYD000824359

CORNING, N.Y.

6 NYCRR 373.3 CLOSURE PLAN

REVISED PLAN SEPTEMBER 1984

UPDATED NOVEMBER 1984

UPDATED OCTOBER 1990

- - - - -

ENVIRONMENTAL CONTROL COORDINATOR

Karen S. Gross  
Corning Incorporated  
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Corning, N.Y. 14831  
607-974-6399

PLANT REPRESENTATIVE

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CORNING INCORPORATED  
CORNING, N.Y.  
HAZARDOUS WASTE STORAGE AREA CLOSURE PLAN  
STEUBEN-EPA I.D. NUMBER NYD000824359

1.0 GENERAL

The purpose of this document is to establish a plan, in accordance with the provisions of 6 NYCRR sub-part 373-3.7, to fulfill final closure of the Hazardous Waste Storage Area located at the Steuben facility of Corning Incorporated in Corning, N.Y. This closure plan is intended for the elimination of interim status, and thereafter, allowing this facility to be only a generator.

The location of the hazardous waste drum storage pad is shown in Figure 1.1.

In its scope, this plan includes only the hazardous waste drum storage pad located at this site.

This plan is designed such that specific information regarding the closure of this area is presented in detail in Section 2. The more generic closure information is presented as part of the basic plan discussed in this section.

The Sear-Brown Group, Inc. of Rochester, N.Y. has been retained by Corning Incorporated to provide the independent professional engineer Closure Certification.

1.1 CLOSURE PERFORMANCE STANDARD

This closure plan is designed to ensure that the Hazardous Waste Storage Area located at this site will be closed in a manner that:

- (1) minimizes the need for further maintenance; and
- (2) controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface water or to the atmosphere.

Post closure activities are not required.

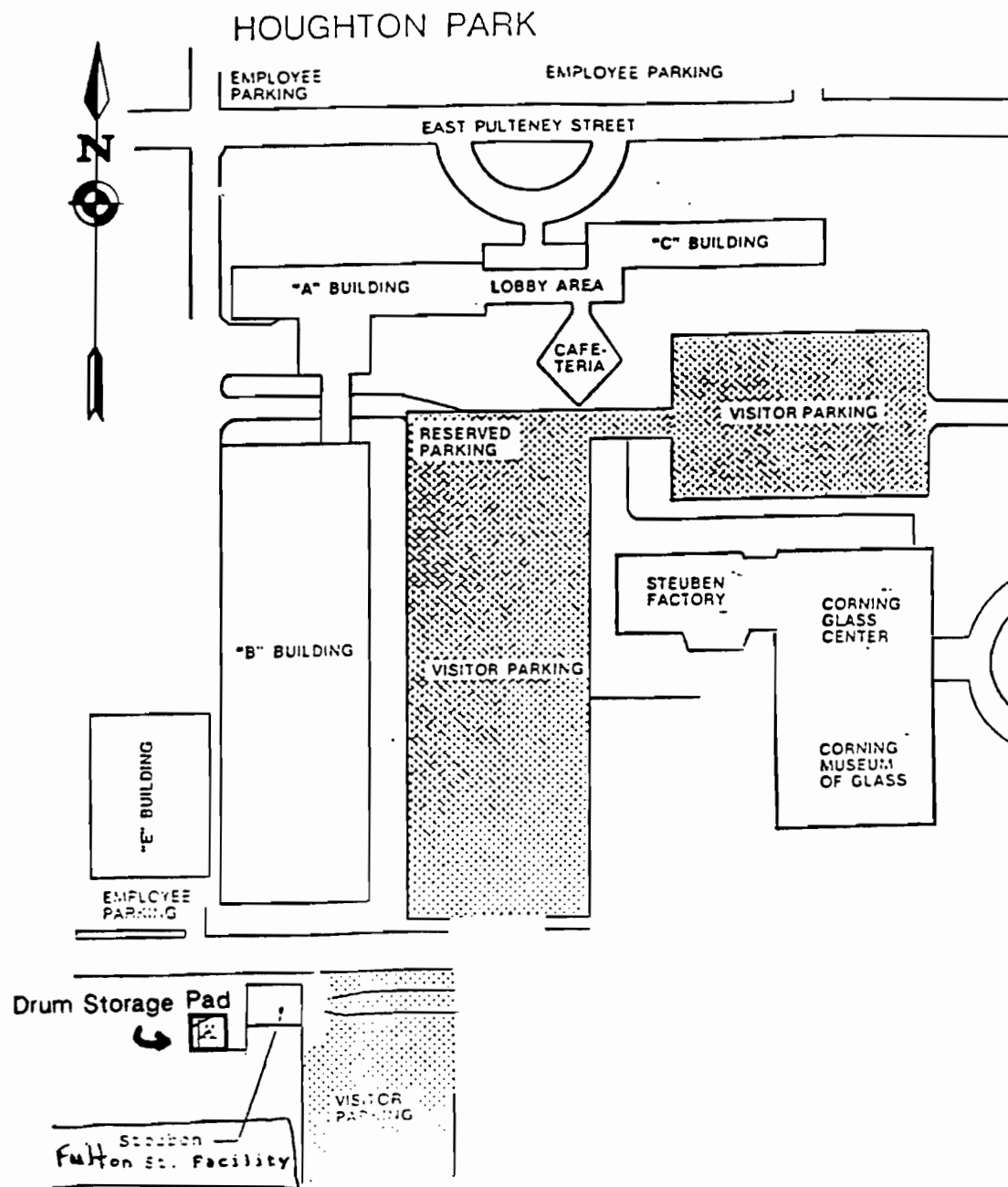


FIGURE 1.1

**STEUBEN PLANT**  
Town of Corning, Steuben County, New York

## LOCATION OF HAZARDOUS WASTE DRUM STORAGE PAD

not to scale

**THE  
SEAR-BROWN  
GROUP**  
FULL-SERVICE  
DESIGN PROFESSIONALS

85 METRO PARK  
ROCHESTER NEW YORK  
14623

716-475-1440  
FAX: 716-272-1814

Sampling procedures and laboratory analysis will be consistent with methods outlined in appropriate NYSDEC and EPA documents.

The pad and approximately eight inches of soil underneath it will be excavated and staged for disposal. Following outlined procedures, appropriate samples will be taken to confirm the level of contamination, if any, which may remain in the area.

#### 1.2 FINAL CLOSURE ACTIVITIES

Corning Incorporated expects to perform final closure activities on the hazardous waste drum storage pad by the end of 1990. The closure schedule is presented in Figure 1.2. The procedures for final closure of the hazardous waste drum storage pad located at this facility, including waste removal, pad and soil removal and decontamination activities are described in detail in Section 2 of this document.

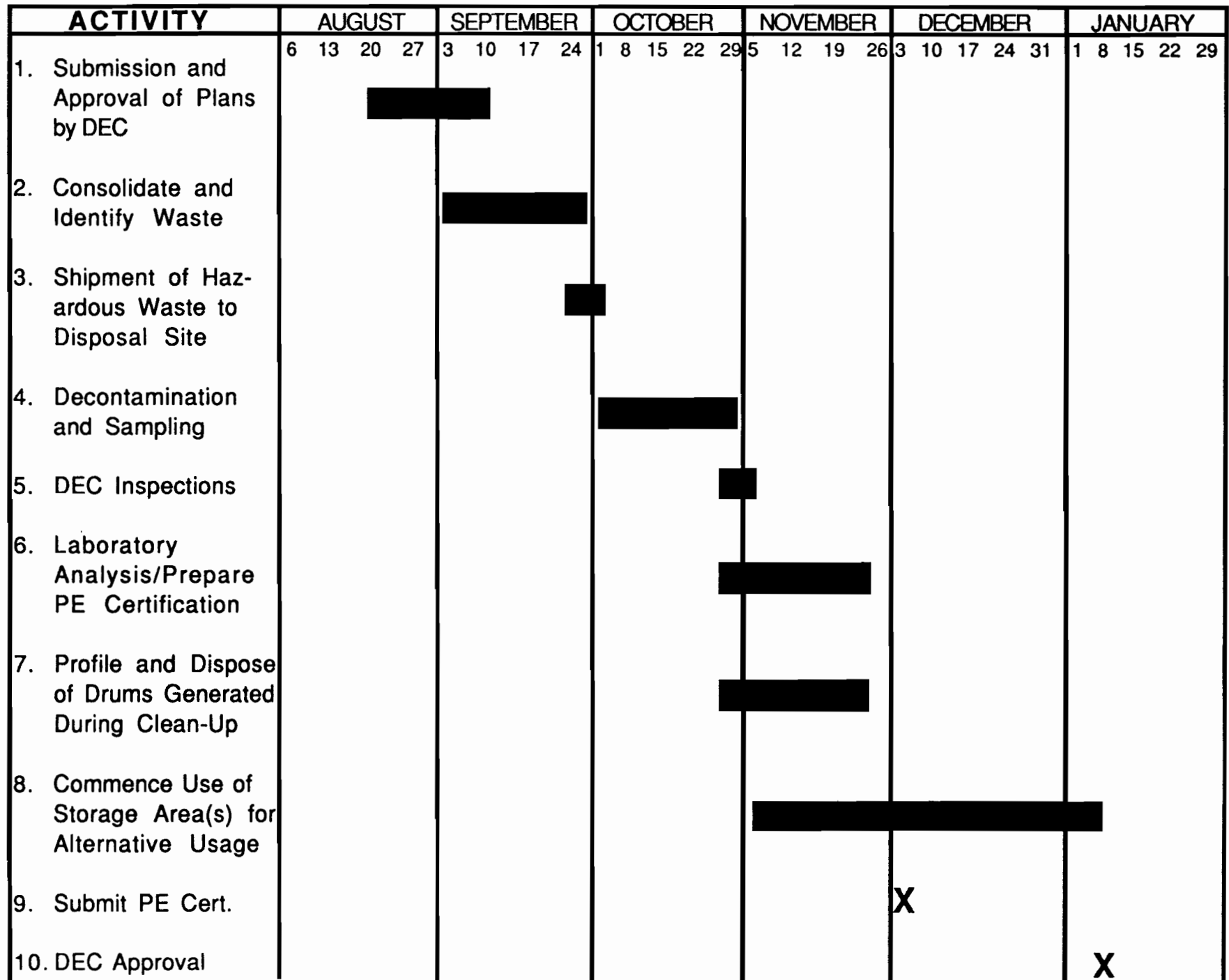
#### 1.3 SAFETY AND HYGIENE

The successful bidding Contractor will assure that workers who are engaged in activities associated with the closure of the hazardous waste drum storage pad on this site are provided with proper safety clothing and devices, training, hygiene facilities and work environment so as to minimize their exposure to the hazards associated with the work.

#### 1.4 WORK AREA PREPARATION

The successful bidding Contractor will insure that:

- Prior to any activity in the planned work area, proper signs will be displayed at all entrances or routes of access to the work area.
- The work area shall be isolated for the duration of the cleanup by the placement of appropriate fencing, signs, tape or locks.
- No one will be allowed inside the work area without proper protective clothing and, if conditions warrant, a respirator.



#### 1.5 FINAL CLEANUP OF THE WORK AREA

When hazardous waste has been removed from the isolated area, the pad and underlying/adjoining soils will be removed. Equipment, machinery, scaffolding, tools, etc. within the isolated work area shall not be removed without first being cleaned.

Excavation is to be continued until sample analysis indicates that the area is below acceptable levels. If test results exceed the action level, excavation and testing shall be repeated until test results are below acceptable levels.

Construction of a new hazardous waste drum accumulation area for the accumulation of hazardous waste for a period not to exceed 90 days will commence after:

- (1) receipt of a favorable lab report; and
- (2) a favorable inspection of the former pad area by a NYSDEC representative.

#### 1.6 DISPOSAL OF HAZARDOUS WASTE/MATERIAL

All waste generated within the isolated work area including drums, plastic sheeting, tape, cleaning materials, protective clothing, brushes, pails, brooms, and all other disposable material or items used on the work area shall be packed, sealed and disposed of according to proper procedures.

Collected items are to be placed in an appropriate container and sealed. Waste containers are to be properly labeled and properly handled at satellite accumulation areas until shipment to a hazardous waste disposal site. Hazardous waste disposal accumulation time will be less than 90 days.

Wastewater generated during the cleaning of the equipment will be stored in drums and tested to determine if the wastewater is hazardous. If the wastewater is hazardous, it will be transported off-site to an appropriate TSDF. If the wastewater is nonhazardous, it will be disposed of as industrial wastewater.

#### 1.7 CLOSURE COST ESTIMATE

The closure cost estimate may be found in Appendix A.

CORNING GLASS WORKS  
CORNING, N.Y.  
HAZARDOUS WASTE STORAGE AREA CLOSURE PLAN  
STEUBEN-EPA I.D. NUMBER NYD000824359

2.0 HAZARDOUS WASTE DRUM STORAGE PAD

2.1 GENERAL

This portion of the closure plan covers only that area associated with the storage of hazardous waste in containers on the hazardous waste drum storage pad at Steuben. It does not affect other waste generating operations covered by EPA permit NYD000824359.

Corning Incorporated expects to begin implementation of this section of the closure plan in November 1990.

This section identifies the steps that are required to close this hazardous waste drum storage pad. A post closure plan is not required since all wastes will be removed prior to, or at the time of, closure.

Corning will submit, to the NYSDEC, certification that the hazardous waste storage area has been closed in accordance with the approved plan. This certification will be signed by an independent professional engineer registered in N.Y.

The maximum inventory of waste at any given time during the operating life of this area was (90) 55-gallon drums, in addition to other smaller miscellaneous containers. The waste was never stored any higher than two drums. All hazardous waste in storage on this pad will have been removed from this area to an approved disposal site prior to closure.

The pad is constructed of asphalt. There is an asphalt dike approximately six inches high around the perimeter of the pad. The integrity of the pad has been reduced by several cracks and a hole approximately two inches in diameter.

This pad has been used for the storage of nonhazardous waste oil in drums in addition to hazardous waste drum storage. There are several oil stains visible on the pad.



The pad is not equipped with a drainage system to dispose of stormwater. Stormwater collects in the lowest corner of the pad and it appears that stormwater overflows the pad after a heavy storm. There is bare soil adjacent to the pad where overflow stormwater would collect.

The area adjacent to two sides of the pad is asphalt covered. A third side is grass covered and the fourth side is a chain link fence. The property on the other side of the chain link fence is gravel surfaced and belongs to NYSEG. The NYSEG property is upgradient of the pad with respect to surface water drainage patterns.

The hazardous wastes that have been stored on the drum storage pad are listed in Table 2.1.

The estimated final inventory of hazardous waste to be removed from the pad is presented in Table 2.2.

The hazardous wastes in the final inventory will be transported by a licensed hazardous waste transporter, to one or more of the TSDFs listed in Table 2.3, who have disposed of previously accumulated waste from this area.

TABLE 2.1

HAZARDOUS WASTES STORED ON DRUM STORAGE PAD

STEBEN PLANT

Proper Shipping Name	UN/NA #	EPA #	Description	Hazard Class
Hazardous Waste Solid N.O.S.	NA9189	D008	Grinding and polishing waste (sludge) consisting of glass fines, carborundum aluminum oxide, pumice cerium oxide and lead.	ORM-E
Hazardous Waste Solid N.O.S.	NA9189	D008	Cullet and batch materials from vacuuming floors and equipment in melting operation.	ORM-E

TABLE 2.2

DRUM STORAGE PAD FINAL HAZARDOUS WASTE INVENTORYSTEUBEN PLANT

Waste	EPA #	Quantity
Sludge	D008	8 to 12 drums
Cullet & batch materials	D008	1 to 3 drums

TABLE 2.3

HAZARDOUS WASTE TRANSPORTERS AND TSDFsSTEUBEN PLANT

Transporters:	EPA I.D. #
Hazmat Environmental Group, Inc.	NYD980769947
Frank's Vacuum Truck Service	NYD982792814
TSDFs:	
CECOS, International Pine Ave & 56th Street Niagara Falls, N.Y. 14304	NYD080336241
Chemwaste Management of New Jersey, Inc. 100 Lister Ave. Newark, N.J. 07105	NJD089216790
Michigan Disposal, Inc. 49350 North I-94 Service Drive Belleville, MI 48111	MID000724831
CWM Chemical Services, Inc. 1550 Balmer Road Model City, N.Y. 14107	NYD049836679

## 2.2 PAD REMOVAL

The work will be conducted using either a qualified outside environmental contractor, or properly trained Corning personnel, and supervised by the independent engineer.

The hazardous waste drum storage pad and a layer of soil under it will be excavated and staged in a lined roll-off container or containers approved for hazardous waste. The layer of asphalt and soil removed will be approximately one ft. thick.

The excavating equipment will be decontaminated after the pad and soil decontamination. All water/residue generated during cleaning will be collected in approved containers and analyzed.

If laboratory analysis indicates that the wastewater is hazardous, it will be properly packaged, labeled and shipped to an approved disposal site. If the wastewater is nonhazardous, it will be disposed of as industrial wastewater.

All other waste generated within the isolated work area including drums, plastic sheeting, tape, cleaning materials, protective clothing, brushes, pails, brooms, and all other disposable material or items used on the work area shall be packed, sealed and disposed of according to proper procedures.

Collected items are to be placed in an appropriate container and sealed. Waste containers are to be properly labeled and properly handled at satellite accumulation areas until shipment to a hazardous waste disposal site. This accumulation time will be less than 90 days.

Following the initial clean-up, the testing described in Section 2.3 will be implemented. Should the testing results indicate that the minimum standards discussed in Section 2.3 are not met, then further soil removal, as necessary, will be undertaken and the appropriate testing will be repeated. This procedure will continue until the standards discussed in Section 2.3 are met.

### 2.3 TESTING

Following the removal of the drum storage pad, the collected equipment decontamination water will be tested to determine if it is a RCRA hazardous waste. The hazardous waste standard listed in 40 CFR 261 will be the action level. The analysis of the decontamination water will be utilized for determining the proper disposal of the decontamination water.

The asphalt and soil staged in the roll-off container(s) will be sampled for disposal. The action level will be the hazardous waste standard listed in 40 CFR 261.

If the sample analysis exceeds the action level, then the pad and soil will be disposed of as hazardous waste. If the sample analysis is below the action level, then the pad and soil will be disposed of as nonhazardous waste.

### 2.4 SOIL SAMPLES

Three (3) soil samples will be collected. Two (2) soil samples will be collected from locations which were below areas of reduced integrity on the former pad. One (1) soil sample will be collected in the low area where overflow of stormwater would collect adjacent to the pad. The samples will be collected from a depth of one to three inches below the excavated surface. These samples will be analyzed by the method listed in Table 2.4. The action level will be provided by the DEC in order to meet the closure standard.

Should the soil sample analysis exceed the action level provided by the DEC, the level found in the soil sample analysis will be compared to the background soil level in the area. The background level will be determined by analysis of a background soil sample collected an appropriate distance from the storage area.

If any sample analysis exceeds the action level provided by the DEC and the background level, then additional soil will be removed from the area where the sample was taken and placed in lined roll-off containers suitable for hazardous waste. The sampling will be repeated in the excavation and this process will continue until the soil sample analysis is below the action level.

TABLE 2.4  
ANALYTICAL METHODS  
STEUBEN PLANT

Analysis/Analyte	Method
Lead	SW846-7421

APPENDIX A

**CORNING**

August 3, 1990

Ms. Margaret E. O'Neil  
Solid Waste Management Specialist  
NYS Dept. of Environmental Conservation  
Div. of Hazardous Substances Regulation  
50 Wolf Road - Room 204  
Albany, NY 12233-7253

RE: Corning Incorporated  
Fall Brook Plant  
Facility ID #NYD000824425

Dear Ms. O'Neil:

Subsequent to your letter dated July 17, 1990, and telephone conversation of August 1, 1990 with Joseph Kane regarding Corning's Fall Brook plant, I am attaching herewith an updated financial assurance statement which includes Fall Brook. Specifically, a closure cost estimate has been listed for Fall Brook on the facility summary sheet, and this estimate has been included on the Part B - Alternative I liability coverage sheet.

The Price Waterhouse analysis letters are being re-filed; please consider this submittal an amendment to my March 26, 1990 financial test letter.

Finally, be advised that Corning has communicated with Salvatore Carlomagno of DEC regarding RCRA interim status closure of storage areas at all New York plants, and their subsequent classification as generator-only facilities.

Very Truly Yours,



Richard B. Klein  
Vice President & Treasurer

cc: Mr. J. F. Kane  
Mr. P. K. Maier

CORNING INCORPORATED  
TREATMENT OR STORAGE FACILITIES  
MARCH, 1990  
(AMENDED AUGUST, 1990)

CLOSURE COST ESTIMATES

<u>FACILITY</u>	<u>ID#</u>	<u>EPA REGION</u>	<u>ESTIMATED CLOSURE COST</u>
<u>New York</u>			
Big Flats, NY	NYD013666821	II	48,000
Erwin Ceramics, Corning, NY	NYD000824433	II	39,000
Erwin EMP, Corning, NY	NYD000824367	II	51,000
Pressware, Corning, NY	NYD000824409	II	23,000
Steuben, Corning, NY	NYD000824359	II	5,000
Fall Brook, Corning, NY	NYD000824425	II	31,000

West Virginia

Martinsburg, WV	WVD003074770	III	24,000
Paden City, WV	WVD016120461	III	55,000
Parkersburg, WV	WVD004386074	III	8,000

Kentucky

Harrodsburg, KY	KYD006388797	IV	170,000
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TOTAL CLOSURE COSTS	454,000
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POST CLOSURE COST ESTIMATES

Bluffton, IN	IND005557244	V	975,000
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TOTAL POST CLOSURE COSTS	<u>975,000</u>
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TOTAL CLOSURE & POST CLOSURE COSTS	1,429,000
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Part B. Closure or Post-Closure Care and Liability Coverage

Alternative I

1.	Sum of current closure and post-closure cost estimates (total of all cost estimates listed above).	\$ 1,429,000
2.	Amount of annual aggregate liability coverage to be demonstrated.	\$ 2,000,000
3.	Sum of lines 1 and 2	\$ 3,429,000
*4.	Total Liabilities (if any portion of your closure or post-closure cost estimate is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6).	\$1,617,900,000
*5.	Tangible net worth	\$1,506,400,000
*6.	Net Worth	\$1,711,200,000
*7.	Current assets	\$1,169,300,000
*8.	Current liabilities	\$ 682,000,000
9.	Net working capital (line 7 minus line 8).	\$ 487,300,000
*10.	The sum of net income plus depreciation, depletion and amortization.	\$ 432,300,000
*11.	Total assets in United States (required only if less than 90% of assets are located in the U.S).	\$2,253,000,000
12.	Is line 5 at least \$10 million?	Yes
13.	Is line 5 at least six (6) times line 3?	Yes
14.	Is line 9 at least six (6) times line 3?	Yes
*15.	Are at least ninety (90) percent of assets located in the United States. If not, complete line 16.	No

16. Is line 11 at least six (6) times line 3? Yes
17. Is line 4 divided by line 6 less than 2.0? Yes
18. Is line 10 divided by line 4 greater than 0.1? Yes
19. Is line 7 divided by line 8 greater than 1.5? Yes

\* Derived from consolidated 1989 Financial Statements.

I hereby certify that the wording of this letter is identical to the wording specified in 6 NYCRR 373-2.8(j)(9) as such regulations were constituted on the date shown immediately below.

  
\_\_\_\_\_  
(Signature)

Vice President and Treasurer  
(Title)

Richard B. Klein

August 3, 1990  
(Date)

/jd

*Price Waterhouse*



March 27, 1990

Mr. Richard B. Klein  
Vice President and Treasurer  
Corning Incorporated  
Houghton Park  
Corning, New York 14831

Dear Mr. Klein:

We have performed the procedure described below with respect to the March 26, 1990 letter addressed to Ms. Margaret O'Neil of the New York State Department of Environmental Conservation signed by yourself (Exhibit A). The procedure was performed solely to assist Corning Incorporated (the Company) in complying with New York State Department of Environmental Conservation regulations 6NYCRR 373-2.8 and 373-3.8, and our report is not to be used for any other purpose. The procedure we performed is summarized as follows:

We compared the amounts in Exhibit A identified as having been derived from the Company's independently audited consolidated financial statements for the fiscal year ended December 31, 1989 with information contained in the Company's consolidated financial statements as of and for the year ended December 31, 1989 which we have audited and have issued our report thereon dated January 22, 1990.

Because the above procedure was not sufficient to constitute an audit made in accordance with generally accepted auditing standards, we do not express an opinion on any of the items contained in Exhibit A. However, in performing the procedure referred to above, no matters came to our attention that have caused us to believe that the amounts referred to above should be adjusted. Had we performed additional procedures or had we performed an audit of the information required to be submitted to the New York State Department of Environmental Conservation in accordance with generally accepted auditing standards, matters might have come to our attention that would have been reported to you. This report relates only to the amounts specified above and does not extend to any of the Company's consolidated financial statements, taken as a whole.

Yours very truly,

*Price Waterhouse*

## *Price Waterhouse*



January 22, 1990

To the Directors and Stockholders  
of Corning Incorporated

In our opinion, the accompanying consolidated financial statements, appearing on pages 21 through 23 and 30 through 43, present fairly, in all material respects, the financial position of Corning Incorporated and subsidiary companies at December 31, 1989, and January 1, 1989, and the results of their operations and their cash flows for each of the three years in the period ended December 31, 1989, in conformity with generally accepted accounting principles. These financial statements are the responsibility of the Company's management; our responsibility is to express an opinion on the financial statements based on our audits. We conducted our audits of these statements in accordance with generally accepted auditing standards which require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements, assessing the accounting principles used and significant estimates made by management, and evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for the opinion expressed above.

We concur with the changes in accounting for post-employment medical benefits in 1988 and for certain manufacturing costs in 1987 as discussed in Note 3 to the consolidated financial statements.

*Price Waterhouse*

153 East 53rd Street  
New York, New York 10022