

211 FRANKLIN STREET
OLEAN, NEW YORK 14760
716/372-6300

September 2, 1988

New York State Dept.
of Environmental Conservation
Attn: Mark D. Kauffman
Bureau of Hazardous Waste Operations
50 Wolf Road
Albany, NY 12233

Dear Mr. Kauffman:

Enclosed is a substitute Closure Plan for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "James P. Hornburg".

James P. Hornburg
Manager, Regulatory Affairs

JPH/mj

Enc.

cc: Edward Belmore

CLOSURE PLAN

The Hysol Division - Olean plant compounds epoxy resins with a number of additive materials into products which become electrical insulation in their use by Hysol's customers. Since the epoxy resins are purchased, not manufactured, by Hysol, the appropriate Standard Industrial Classification (SIC) number for Hysol - Olean activity is 3087.

Some of the equipment used for compounding is cleaned or washed with organic solvents which become hazardous (ignitable waste). The cleaning solvent includes Methylene Chloride (F002), Acetone (F003) and Methylisobutyl Ketone (F003). Recycling by distillation was done on site during 1986. During 1987 these were sent off site for incineration. During 1988, recycling will be reinitiated off site. This waste is placed in 55 gallon steel drums pending recycling by distillation. When distillation of dirty solvent was carried out, clean solvent resulted but a small amount of still bottoms was generated and are sent off premises (Cecos International or Frontier Chemical Waste Process, both of Niagara Falls - 100 miles from Olean) as ignitable waste for destruction by incineration. It is Hysol's intent not to be a hazardous waste facility.

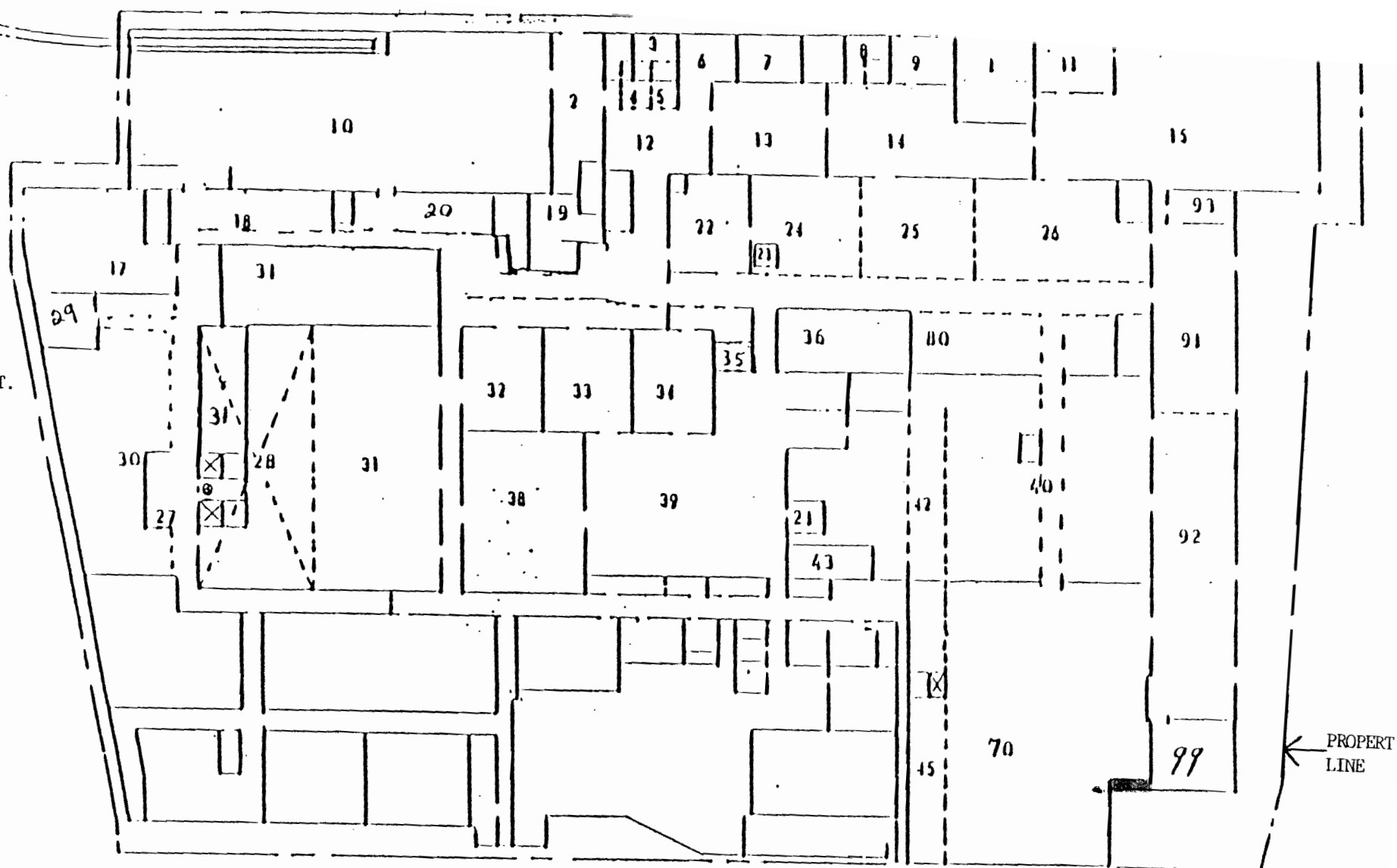
The Olean plant, located near the north edge of the city, at the intersection of east-west and north-south Conrail main lines, covers land area of about 220,000 square feet. The intersection of the tracks is very near the southwest corner of the building.

The entire floor of the production and shipping areas is concrete. The shipping area is at the west end of an essentially rectangular building and 288 square feet at the north end of the shipping area was designated as hazardous waste accumulation area for up to 80 drums of hazardous waste. That area was at the extreme northern end of the shipping dock (area 92 - attached drawing). In January 1986 the hazardous waste accumulation area was moved into area 99 for two reasons: 1. The floor level is 8 inches lower than the floor of the rest of the plant, giving effective dyking of the storage area. 2. Area 99 was designed as a solvent storage area (explosion proof wiring, an alarm to sound at detection of solvent vapors). Movement of material in drums is done by forklift. Normal maximum quantity of ignitable waste (used solvent) is less than 20 drums.

Subsequent to moving the accumulation area, the former location has been included in routine floor cleaning by a riding mechanical floor cleaner (as are aisles and all open parts of the plant for dust elimination in connection with Hysol's manufacture of powdered epoxy compounds). The floor of area 92 will be given wipe test with the samples analyzed by an outside laboratory for possible traces of contamination. Additional cleaning (by steam) will be performed if the level of contamination warrants. Tests are not planned for area 99, the blue high-lighted portion of which is designated as a hazardous waste accumulation area.

James B. Houbart
9/2/88

LYSOL PLANT
 211 FRANKLIN ST.
 ELIZABETH, NY



FRANKLIN STREET

PROPERTY LINE

- | | | | |
|----------------------------------|---|--|--------------------------------------|
| 1. Boiler Room | 15. Maintenance Shop | 27. Powder Staging | 39. Powder Blending & Packaging Area |
| 2. Trash Drying Production | 16. | 28. Powder Assembly & Preblend Area <i>over Head</i> | 40. Raw Material & P.G. Storage |
| 3. Oven #1 | 17. Powder Pilot Plant | 29. Pilot Plant Stor. & Staging | 41. |
| 4. Underground Resin Storage | 18. Trash Dock | 30. Raw Material Storage | 42. Basement Cooler |
| 5. Underground Resin Storage | 19. Electrical Room | 31. Powder Production | 43. Paint Shop |
| 6. Bulk Resin Stor. & Liq. Prod. | 20. Raw Material Storage | 32. Blending & Preforming Area | 44. |
| 7. Solvent Storage | 21. Powder Supply Room | 33. Powder Production | 45. Records Storage <i>Basement</i> |
| 8. Liquid Supply Room | 22. LED Production | 34. Refrig. In-Process Storage | 50. |
| 9. Liquid Production | 23. LED Cooler | 35. Hot Room | 60. |
| 10. Raw Material Storage | 24. Case Products Production | 36. | 70. Refrigerated Storage |
| 11. Maintenance Office | 25. | 37. | 80. |
| 12. Liquid Staging | 26. Liquid Packaging & Specialty Production | 38. | 91. Receiving Dock |
| 13. Liquid Production | | 39. | 92. Shipping Dock |
| 14. Liquid Production | | 40. | 93. Materials Equipment |
| | | 41. | 99. Solvent Storage |

