ICB

safety-kleen.

October 14, 1986
JES 86-210

Mr. Richard J. Baker, P.E.
Senior Sanitary Engineer
New York State Department of Environmental Conservation
600 Delaware Avenue
Buffalo, NY 14202-1073

Re: Closure Plan Review

Dear Mr. Baker:

Safety-Kleen has reviewed your letter of September 8, 1986 and submits the following responses to the noted deficiencies.

1. The second paragraph in Section 1 and Section 1.3.b were revised to include the removal of all drums from the facility when operation of the facility ceased on September 15, 1986.

2. Figure 1 has been revised to indicate the drum storage areas.

3. Section 1.3.c has been revised to indicate the method of cleanup. Section 1.3.e has been revised to include an estimate of the wastes to be generated during the cleanup as well as the disposal method for those wastes.

4. Appendix A has been added to detail the procedure used to determine the facility is clean after closure.

5. A Closure Cost Estimate for the remaining work has been added as Appendix B.

777 BIG TIMBER ROAD ELGIN, ILLINOIS 60120 PHONE 312/697-8460 TELEX 910 251 4479

6. The Closure Schedule has been revised to show periodic inspection by the certifying P.E. and NYSDEC.

Should you have any questions on this response or the revised Closure Plan please contact me.

Sincerely,

Jeffrey E. Simpson
Environmental Engineer

JES/ber

CLOSURE PLAN
FOR
SAFETY-KLEEN FACILITY
IN NIAGARA FALLS, NEW YORK

1.0 PURPOSE

The Safety-Kleen Corp. is submitting this closure plan for its service center facility in Niagara Falls, New York. Since this facility operated as a interim status RCRA TSD facility for the storage of characteristic and listed hazardous wastes that are recycled, it is required that this facility be closed in accordance with closure requirements of 6 N.Y.C.R.R. 373-2.7. Safety-Kleen hereby submits this closure plan for approval. Closure of the facility will be carried out in accordance with the steps outlined in this plan, as approved.

Safety-Kleen Corp. will remove all waste and residuals from the facility and will therefore eliminate the need for further maintenance and care. Safety-Kleen Corp. ceased operations at the facility September 15, 1986. All wastes stored at the facility were removed prior to the cessation of operations at the facility.

This plan identifies the steps necessary to completely close the facility. The plan also provides an estimated schedule for the completion of closure.

1.1 FACILITY IDENTIFICATION

The subject facility is described as below.

USEPA ID#: NYD055052443

Location Address: Safety-Kleen Corp. 2-028-01

2720 Niagara Falls Blvd.

Niagara Falls, NY 14304

1.2 GENERAL SCOPE OF CLOSURE

The closure of the facility will include closure of the following hazardous waste units:

Drum Storage - An area of about 3,200 square feet with a capacity for 300 16 and 30 gallon drums. The storage area is shown on Figure 1.

1.3. DRUM STORAGE AREA

a. The drum storage area contained drums of used immersion cleaner (F002/F004) and perchloroethylene (F002).

b. Upon cessation of operations at the facility, all the drums were removed and transported to one of Safety-Kleen's facilities with proper packaging, labeling and manifesting, where the contents of the drums will be reclaimed and the drums will be cleaned for reuse.

c. The concrete floor and spill containment sumps will be cleaned with detergent solution. The cleaning will be accomplished using mops, brushes, scrapers and a pressure washer or steam cleaner. All detergent solution and rinse water generated will be collected with a vacuum or pumper truck for disposal. All tools

used in the cleanup operation will be washed with detergent and triple rinsed prior to being removed from the facility.

d. The cleaned area will be inspected to assure the completeness of cleaning and removal of waste residuals. The wipe test procedure included as Appendix A will be used to document the closure.

e. All wastes generated in the closure process will be properly disposed of. It is anticipated that a maximum of 1,000 gallons of detergent solution and rinse water will be generated. This material will be shipped to a commercial aqueous waste treatment facility by a permitted transporter.

1.4 CLOSURE COST ESTIMATE

Appendix B is a closure cost estimate. The cost estimate only includes the cost for the remaining work to close the facility.

1.5 FACILITY CLOSURE SCHEDULE AND CERTIFICATION

Within 90 days after receiving the final volume of hazardous wastes, or 90 days after approval of the closure plan, if that is later, Safety-Kleen shall remove from the site, all hazardous wastes in accordance with the approved closure plan. The State may approve a longer period if Safety-Kleen demonstrates that:

The activities required to comply with this paragraph will, of necessity, take longer than 90 days to complete; or

The following requirements are met:

- The facility has the capacity to receive additional wastes;
- There is a reasonable likelihood that a person other than Safety-Kleen will recommence operation of the site;
- Closure of the facility would be incompatible with continued operation of the site; and Safety-Kleen has taken and will continue to take all steps to prevent threats to human health and the environment.

Safety-Kleen shall complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes or 180 days after approval of the closure plan, whichever is later.

A schedule for completion of closure activities, based on the starting point being the day actual closure commences, is shown in Figure 2.

When closure is completed, all facility equipment and structures shall have been properly disposed of, or decontaminated by removing all hazardous waste and residues.

When closure is completed, Safety-Kleen shall submit to the State certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan.

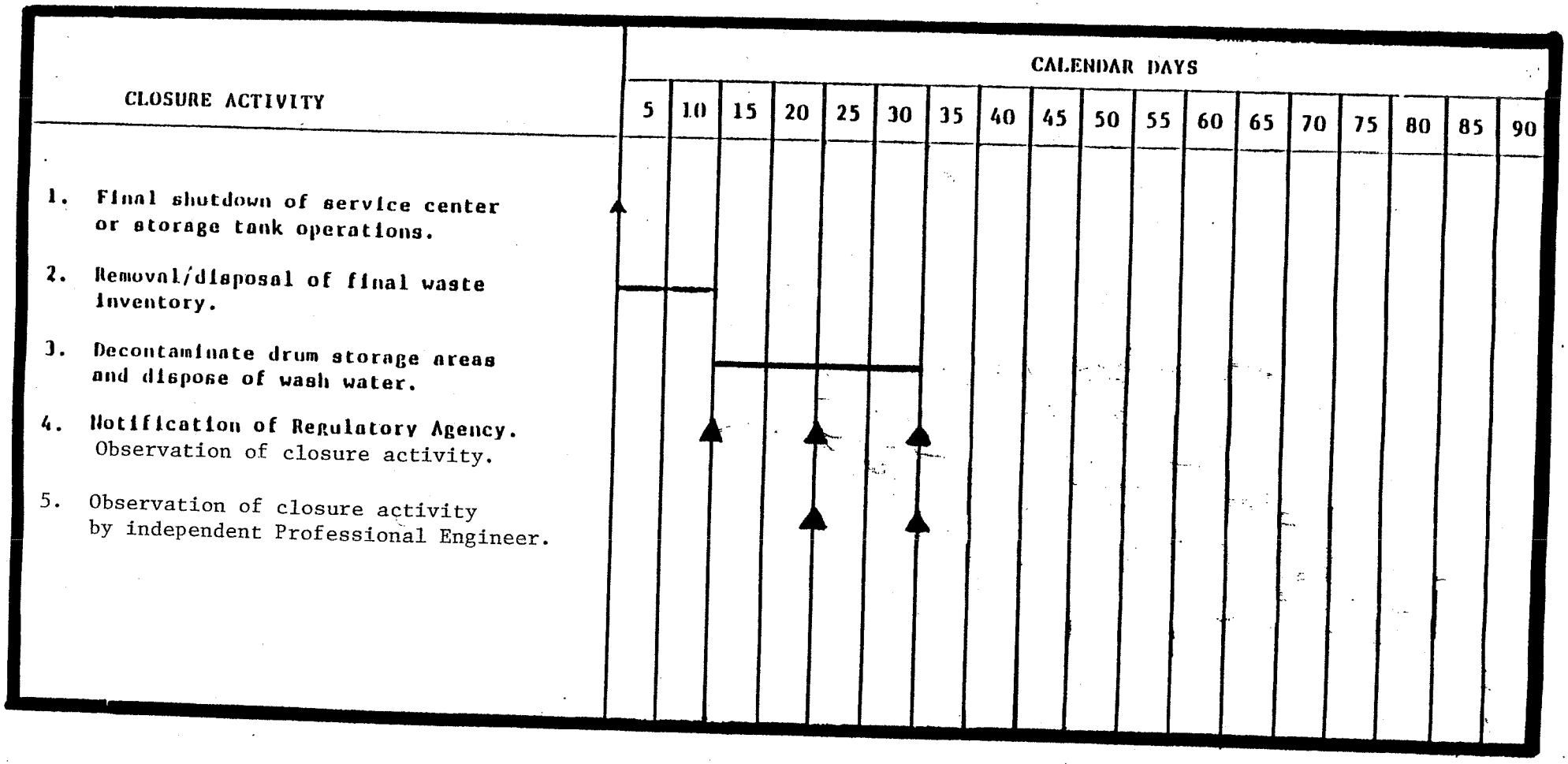

FIGURE 2

Anticipated Closure Schedule for Service Centers

APPENDIX A

WIPE TEST PROCEDURE

This procedure is used to determine the concentration of various volatile organic compounds and heavy metals adhered to solid surfaces. The following material will be analyzed for: Mineral Spirits, Chlorinated Solvents and EP Toxic (Metals). Presence of these compounds will be determined using the wipe test. The test wipe will be a clean cloth of 100 percent cotton. The wipes will be hermetically sealed in acid-washed glass containers. The containers will be sealed until just prior to sampling. Test and blank wipes will be handled in the same manner.

Procedure

1. Wear disposable latex gloves.
2. Break test wipe hermetic seal and remove wipe.
3. Firmly swab wipe along solid surface in locations indicated in the closure plan.
4. Replace test wipe in glass container and firmly seal cap.
5. Refrigerate or ice glass container for transportation to the laboratory.
6. Break blank wipe hermetic seal and remove wipe.
7. Expose blank wipe to the air for approximately the same time period as the test wipe was exposed.
8. Replace blank wipe in glass container and firmly seal cap.
9. Refrigerate or ice glass container for transportation to the laboratory.

At the laboratory the wipes will be removed from their containers and halved. One half will be used for the organic analyses and the other half for the heavy metal analyses. Both the test and blank wipes will be handled in the same manner.

Organics will be analyzed using EPA Method 8010 "Halogenated Volatic Organics" (see attached method). this method will identify other volatile organics that could be collected by the wipe test. Heavy metals will be analyzed by atomic absorption spectrophotometric methods as described in Standard Methods for the Examination of Water and Wastewater, 15th Edition, 1980, APHA-AQQA-WPCF.

Take samples in tank at side, top, and bottom at center of tank.

APPENDIX B

CLOSURE COST ESTIMATE

Clean Floor				
Labor				
Supervisor	8 hr.	@ $35/hr.	280	
Laborers (2)	8 hr. each	@ $25/hr.	400	
				680
Equipment				
Mops & Brushes			100	
Pressure Washer/Steam Cleaner			100	
Protective Clothing			100	
Vacuum/Pumper Truck (with operator)	12 hr.	2 $60/hr.	720	
				1,020
Waste Disposal				
Water and Detergent Solution				
1,000 gallons		@ $.25/gallon	250	
				250
Certification				
Engineer	16 hrs.	@ $ 75	1,200	
Laboratory Analysis	2	@ $200	400	
Travel Expenses			800	
				2,400
TOTAL				$4,350

Source to whom — actual cost to ship from [illegible]

D3087-RV5