4th copy
rec'd 8-6-85

RESOURCE CONSERVATION AND RECOVERY ACT SITE CLOSURE PLAN FOR DEBEVOISE PAINT

Prepared By:

Elson T. Killam Associates, Inc.

Prepared For:

Mr. Allen Gershoft
President
Debevoise Paint

ELSON T. KILLAM ASSOCIATES, INC.
27 Bleeker Street
Millburn, New Jersey 07041

1. CLOSURE PLAN

This closure plan identifies all steps that will be necessary to close the facility known as Debevoise Paint which is located at 74 20th Street, Brooklyn, N.Y. as shown in Figure 1, and provides for a worst case cost estimate to account for remediation of any unforeseen spills. Preparation of this plan is in accordance with the requirements of the Resource Conservation and Recovery Act (RCRA) as shown in 40 CFR 264 and 265 and pursuant to the consent judgement in United States v. PLC Enterprises Inc. and its division the Debevoise Company, 84 CV 1044 (JW).

1.A CLOSURE PLAN PERFORMANCE STANDARD

This closure plan was designed to insure that the facility:

- will not require further maintenance and controls
- minimizes or eliminates threats to human health and the environment
- avoids escape of hazardous waste or hazardous waste constituents

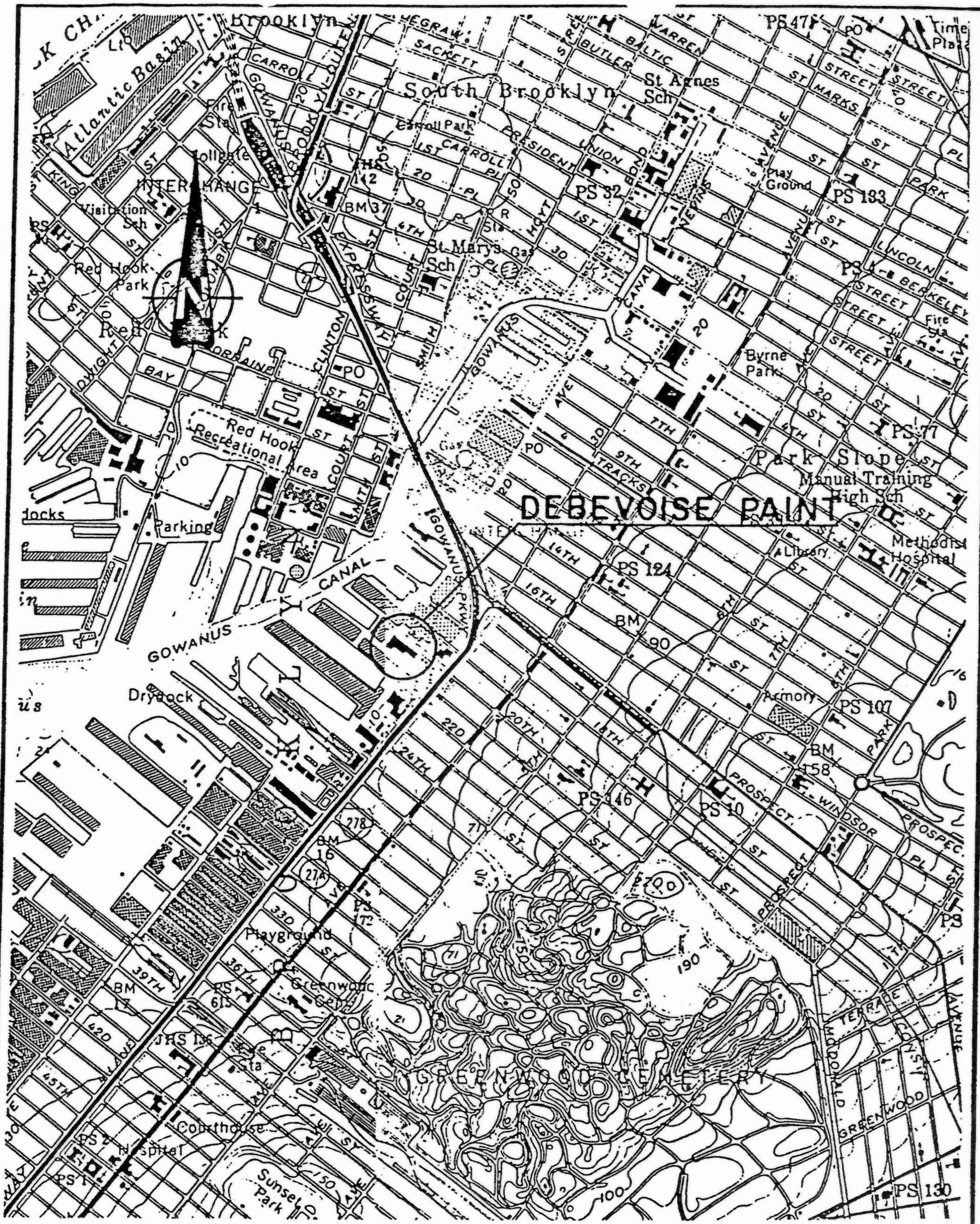
The following sections discuss in detail efforts to be made at the Debevoise facility to satisfy the closure performance standard.

1.B FINAL CLOSURE ACTIVITIES

Final closure activities on the waste storage area will occur in the three month period before final sale of facility. The EPA will be notified in writing 90 days before beginning. Procedures for final closure of the waste storage area including waste removal, cleanup and decontamination activities, are described in Section 1.D of the closure plan.

1.C MAXIMUM WASTE INVENTORY

Because the Debevoise facility is a manufacturing facility, the wastes stored on site must be differentiated from raw materials and from



SCALE: 1" = 2,000'
SOURCE: U.S.G.S. TOPO MAPS

FIGURE 1
DEBEVOISE PAINT
BROOKLYN, NEW YORK
LOCATION MAP

Elson T. Killam Associates, Inc.
Environmental and Hydraulic Engineers
27 Bleeker Street Millburn, New Jersey 07041

product inventory. Upon closure, non-waste materials will be transferred to new or expanded facilities. The total wastes on site include no more than 60 drums containing classes F003 (spent non-halogenated solvents), F005 (spent non-halogenated solvents) and sludges with pigments containing metals such as lead (Pb), titanium (Ti), chromium (Cr) and cadmium (Cd).

1.D INVENTORY REMOVAL AND DECONTAMINATION OF THE SITE

The removal of inventory (including raw materials and finished products) will be separate from removal of waste material. Inventory removal will be done in accordance with applicable city, state and federal regulations, principally focusing on Department of Transportation requirements for containers and placarding.

Removal of inventory may be accompanied by spills, so spill management could also be necessary. In the event of a spill, the focus will be directed to containment on site and proper handling. Spill cleanup would be supervised by and performed by Debevoise personnel. Personnel will be equipped with adequate safety equipment including splash protection and respiratory protection. Absorbents used for spill control will be drummed for disposal with waste material. This disposal will include transport under manifest by a licensed contractor. An allowance for disposal of 10 tons of absorbed material has been included in the worst case cost estimate for closure. Steam cleaning will be used to remove residual spilled material, with liquid being drummed for disposal with absorbant, if determined to be or assumed to be hazardous, disposal will be to an acceptable Treatment, Storage and Disposal Facility.

Soils at the Debevoise facility are not expected to be contaminated by inventory removal, but in the event that they were, provision has been for excavation and proper disposal as described above. An allowance for

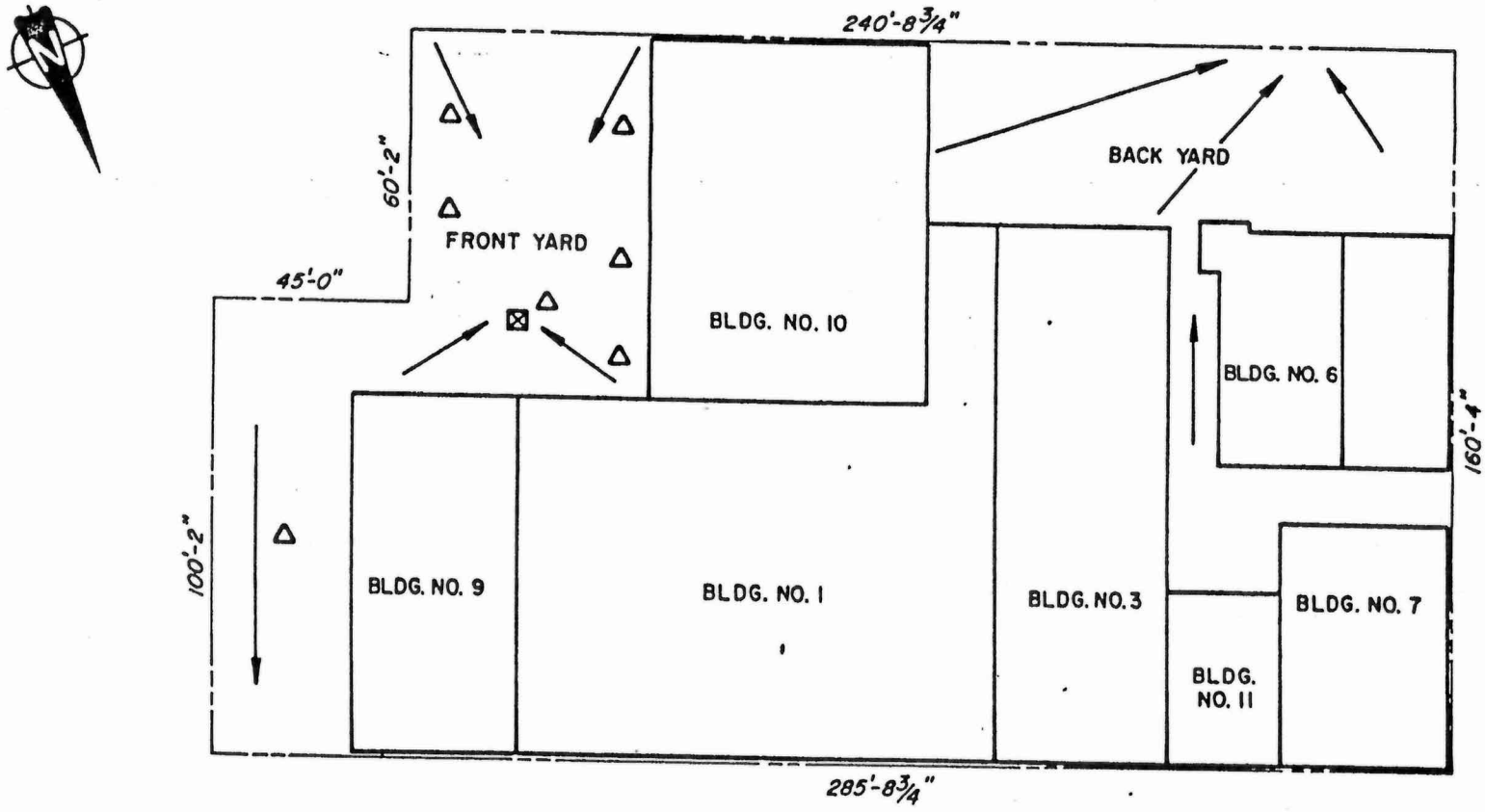


FIGURE 2

DEBEVOISE COMPANY
BROOKLYN, NEW YORK

SITE PLAN FOR CLOSURE
JANUARY, 1985

BLOCK NO. 639 LOTS 10 & 72

Elson T. Killam Associates, Inc.
Environmental and Hydraulic Engineers
27 Bleeker Street Millburn, New Jersey 07041

disposal of 10 tons of contaminated soils has also been included in the worst case cost estimate for closure to cover this eventuality. Contaminated soils will be sampled for disposal if determined to be or assumed to be hazardous, disposal will be to an acceptable Treatment, Storage and Disposal Facility.

1.D.2. DESIGNATION OF WASTE STORAGE AREA

The Waste Storage Area, for the purpose of this document, are the fenced, paved, areas south and southeast of the main plant building, as shown in Figure 2. Wastes stored in these areas are principally paint sludges and spent solvents as described in 1.C above. Company practice is to retain such wastes for less than ninety days and to dispose of it by a licensed hauler under manifest. As such, it is not anticipated that the total waste will exceed 60 drums.

The Solid Waste Storage Area is in the same general area, also as shown in Figure 2.

1.D.3. DECOMMISSIONING OF WASTE STORAGE AREA

Wastes stored in the Waste Storage Area will be removed for disposal under manifest by a licensed waste hauler. After removal of all inventory (described above) and all wastes, soil samples will be taken at the general locations shown in Figure 2 from soils underlying the paved area. These samples will be taken using a hand auger and will be analyzed for RCRA metals and for benzene, toluene and xylene (BTX). Action levels will be determined in review of results with regulatory agency personnel. If contamination is found, a second set of samples will be taken to define contaminated area. Soils contaminated above the action level will be removed, under manifest, by a licensed disposal contractor to a secure land disposal facility. In addition to the allowance for removal of

contaminated soils due to spills of inventory , a worst case allowance for disposal of 20 tons ofcontaminated soil from the waste storage area is included in the cost estimate.

Dried paint in the Solid Waste Storage Area and other areas will also be scraped, removed and tested for RCRA metals and BTX prior to disposal. Storm drains and laboratory sinks will be cleaned and recovered material will be tested for RCRA metals and BTX. Pipes will be removed and replaced as necessary. The soil area around the product pipes leading into the building will also be cleaned. Any material determined or assumed to be hazardous will be properly disposed of as a hazardous waste to an acceptable Treatment, Storage and Disposal Facility.

1.D.4 EQUIPMENT CLEANING AND TANK CLOSURE

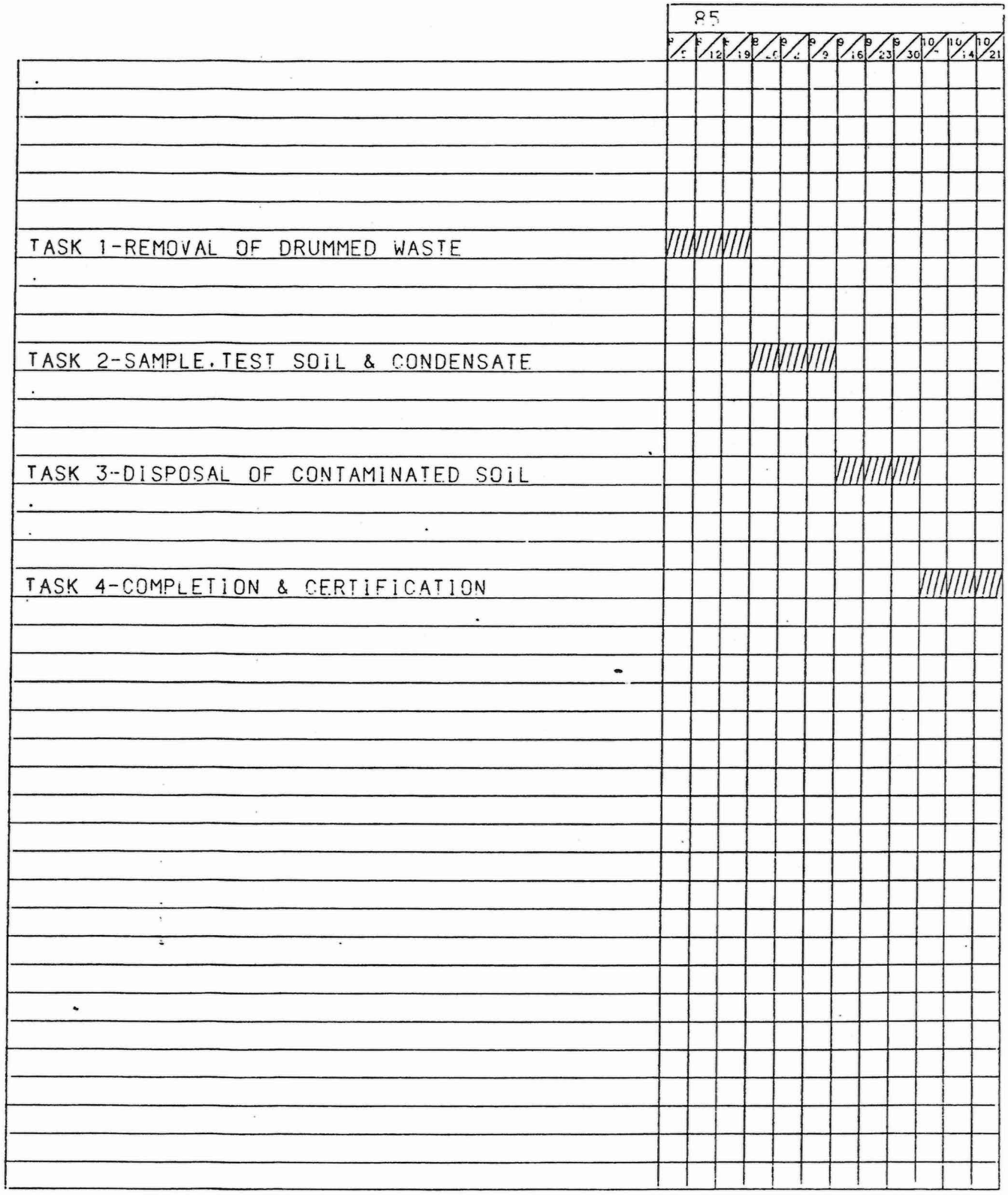
All process equipment on site will be emptied and inspected for removal. It should be noted that this equipment is not used in processing hazardous wastes, but rather is used for paint production.

1.E CLOSURE SCHEDULE

Within 30 days of ceasing waste generation on site, all final closure activities will be completed. These activities and the schedule will be as follows:

- Task 1 - Removal of Drummed Waste including Spill Cleanup Wastes - 20 days
- Task 2 - Sampling and Testing of Soil - 20 days (beginning after Task 1)
- Task 3 - Removal, Disposal of Contaminated Soil - 20 days
- Task 4 - Completion and Certification of Closure - 10 days

DEBEVOISE-CLOSURE SCHEDULE



All cost computations are based on closure occurring in 1985. Finalclosure will be supervised and certified by a professional engineer licensed in New York.

1.F EXTENSION OF CLOSURE TIME

No need for extension of the closure period is seen at this time.

2. POST CLOSURE PLAN (40 CFR ~~122.25 (a) (13)~~ 265.117)

Post closure care will not be needed because this is not a disposal facility.

3. NOTICE IN DEED AND TO LOCAL LAND AUTHORITY (~~40 CFR 122.25 (a) (14)~~ 40 CFR 265.119 & 265.120)

Deed notification is not required because this is not a disposal facility.

4. CLOSURE COST ESTIMATE

4.A ASSUMPTIONS

The assumptions used in cost estimation are:

- Closure will occur in 1985
- Materials can be disposed as follows:
  - Contaminated soil, spill absorbents to secure landfill at $300 per ton
  - Contaminated solvents to solvent reclamation or permitted fuel blending at $0.25 per gallon
- Excavation and packing will cost $20 per yard or per ton
- Bulking drummed wastes will cost $75 per drum
- Drums for absorbents will cost $30 per drum, with 200 lb per drum
- Sampling and analysis costs will be $150 per sample
- Supervision costs will be $50 per hour and will include certification of cleanup.

4.B COSTS OF CLOSURE

Closure costs are shown by task in Table 4.1, for a total worst case closure cost of $40,000. Debevoise Paints will post a bond or establish an equivalent escrow account in this amount.