

## Brady, Pat J

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**From:** Persson, Lynn A  
**Sent:** Monday, September 24, 2001 5:22 PM  
**To:** Brady, Pat J  
**Cc:** 'Lynn Persson'; McDermid, Mark  
**Subject:** FW: Revised Closure Plan  
**Importance:** High

Pat - Please give me a call on this one. Looks like Mike is only proposing to "clean" downstream tanks. I don't see anything on incinerator, upstream tanks, incinerator or drum storage area. I thought you had mentioned you wanted these also cleaned. If so I am concerned that Mike may not coming through with what you need. Lets talk on what is appropriate from your perspective. If necessary I will write what you think is appropriate into the agreement's Table C. Let me know. I will be in all day Tuesday.

Mike also said he would put together the operating conditions for the incinerator. I know he was a bit hesitant to get them on the web - but have you seen them? I can whip them together from what you gave me earlier - but would be better if Mike did it himself.

Lynn 608/267-3763

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**From:** Mike Gromacki[SMTP:Gromacki@ccponline.com]  
**Sent:** Monday, September 24, 2001 3:13 PM  
**To:** Brady, Pat J; Persson, Lynn A  
**Subject:** Revised Closure Plan



Closure Plan - CCP  
(9-24-01).doc

Pat and Lynn - I have re-worked the closure plan. I will try to call Pat to walk through.

Mike

<<Closure Plan - CCP (9-24-01).doc>>

## CLOSURE PLAN - REVISED DRAFT 9-24-01

### General Information

This Plan identifies all steps that are necessary to close the Cook Composites and Polymers Co. (CCP) Saukville Plant hazardous waste storage (see Section 12.0 of the FPOR) and incinerator facility and transition to a waste minimization Macro Porous Polymer Extraction (MPPE) process followed by a non-hazardous wastewater incinerator. No post-closure plan information is included in this Closure Plan as this is not a disposal facility.

The existing less-than ninety day tank storage and ancillary piping and equipment will remain in service and transition into use as part of the MPPE waste minimization process and non-hazardous wastewater incinerator system. The incinerator equipment will transition in use from a hazardous waste incinerator to a non-hazardous wastewater incinerator. CCP will no longer receive hazardous waste shipments from its Marshall, Texas facility.

CCP expects that the ongoing corrective action and monitoring will address the site remediation objectives and will not necessitate the need for post-closure activities.

CCP will maintain on-site copies of the approved Closure Plan and all revisions to that Plan until the certification of closure completeness has been submitted and accepted by the WDNR. Through its Notice of Intent to Comply, as well as the participation in the Environmental Cooperation Pilot Program, CCP notified at least 180 days prior to the date initiating final closure. CCP submitted to WDNR this revised closure plan, as needed for approval. Upon completion of closure activities, certification of closure will be performed by a local independent registered professional engineer. CCP will request an expedited closure review from the WDNR to allow for the transition to the waste minimization process.

### Closure Performance Standards

This Closure Plan is designed to address requirements related to termination of hazardous waste incineration at the facility. Since some of the equipment will continue in a hazardous waste generator (<90 day) service, the closure activities will <sup>initially</sup> focus on equipment that will be taken out of hazardous waste service.

Therefore, the Plan ensures that the CCP-Saukville storage and incinerator facility is closed so as to minimize threats to human health and the environment, and to prevent releases of hazardous waste, hazardous waste constituents, contaminated run-off, and/or waste decomposition products to the groundwater, surface waters, and/or atmosphere.

## Partial-Closure and Final Closure Activities

CCP does not plan to partially close the Saukville Plant storage and incinerator facility. Hazardous waste permitted storage (greater than 90 days) and incineration will end as part of the planned closure process. Termination of hazardous waste incineration is now planned on or before October 1, 2001.

## Maximum Waste Inventory

The inventory of wastes held for treatment at the storage and incinerator facility is limited to a maximum of 51,000 gallons of waste solvent and/or reaction water.

NOTE: The incinerator does not burn any solid wastes; therefore, no ash is anticipated and is not included in this waste inventory.

## Inventory Disposal and Decontamination of Equipment

Final closure is initiated following the termination of hazardous waste treatment in the Saukville Plant incinerator. Final closure is to be completed as soon as possible, but no later than 180 days of this occurrence.

Clean-up and decontamination are performed under the direction of the CCP Incinerator Operator and an Environmental Consultant present for observation and documentation. Proper personal protective equipment (PPE) will be selected and used for all closure activities, including coveralls, gloves, respirators, foot protection, etc.. Prior to leaving the decontamination area, PPE is removed and placed in proper containers for disposal.

## Less than 90-day Container (Drum) Storage Area

Containers are used at the Saukville Plant only for temporary storage (less than 90 days) prior to off-site shipment for incineration, reclamation, or final disposal in approved facilities. This area has not accumulated waste for longer than 90 days and has not received waste from off site. No further closure response is required. The manufacturing operations will continue to generate and ship hazardous waste in the future in containers (i.e. drums) off-site for disposal.

### 1.1.1 Closure of Tanks

The final hazardous waste stream will be fed to the incinerator prior to October 1, 2001. The last hazardous wastewater treatment is scheduled to occur on or before September 14, 2001. (This milestone was met by CCP). As a result the waste tanks will clearly be thoroughly rinsed (i.e. triple rinsed) by non-hazardous wastewater passing through the system from that date forward. Each batch discharge of non-hazardous wastewater is presently tested to verify it is not hazardous.



Any transfer lines or tanks *downstream* of the MPPE system, including the future non-hazardous wastewater incinerator feed tanks are to be flushed with a detergent fluid on or around October 1, 2001.

The fluid is pumped through these lines to the tanks and fed directly through the waste feed lines plumbed to discharge to the incinerator. The former incinerator waste solvent and reaction water charging systems (downstream tanks) are verified clean closed by collecting samples of rinse from the tanks. Equipment decontamination will be repeated as needed to ensure adequate decontamination.

Within 90 days of ceasing hazardous waste incineration, the tanks *upstream* of the MPPE process are to be closed and flushed three times with approximately 500 gallons of fluid. The fluids from this closure activity are to be transported off-site to an approved disposal or treatment facility.

During the cleaning and decontamination process, any possible contamination in the holding tank area and on the incinerator room sealed concrete floors will be removed. The cleanup crew will follow procedures similar to those used for tank decontamination, i.e., use an appropriate wash on the surface and rinse thoroughly, collecting the rinsing for analysis. Since CCP has passed a trial burn, minimal or no decontamination of the internal incinerator components is expected to be necessary.

This procedure is repeated until contaminant residues are gone. The definition of hazardous waste under NR 605, the appropriate EPA contaminated debris rule, or an alternative method approved by WDNR will be followed for management of any waste generated from the closure activities.

CCP will provide the WDNR certification that the incinerator has been closed in accordance with the specifications contained in the approved Closure Plan. An independent professional engineer will oversee the decontamination process and will certify that closure activities were performed in accordance with the approved Closure Plan.

## Continuance of Operation and Schedule of Closure

CCP presently plans to cease operation of the hazardous incinerator prior to October 1, 2001. The schedule for closure follows, in Table 11-1.

## Notice in Deed

The facility does not operate as a hazardous waste disposal facility. Therefore, notification in the property deed and notification of the local zoning authority for land use concerning remaining wastes after closure will not be required.

## Closure Cost Estimate

The latest cost estimate for conducting closure of the CCP hazardous waste small storage and incinerator facility at the Saukville Plant is shown in Table 11-2. This figure assumes that the hazardous waste storage

*of: clarify properties of rinse from water from MPPE that they same property capabilities as the detergent fluid*

*doesn't clarify triple rinsing*

*left out use of spray equipment!*

*1. they will be inspected. →*

*should clarify how this is determined*

and incineration facility is operated until closure. As CCP has passed a trial burn, minimum or no decontamination of the internal incinerator components are expected to be necessary. In addition, the incinerator equipment will be utilized in the non-hazardous wastewater incinerator system. The closure costs are summarized by activity in Table 11-2.

## 1.2 FINANCIAL ASSURANCE AND MECHANISM OF CLOSURE

Cook Composites and Polymers assures closure of the facility by a Letter of Credit issued by a financial institution. A copy of this instrument is in receipt of the WDNR and maintained on site.

## 1.3 LIABILITY REQUIREMENT

A copy of the Certificate of Insurance for sudden accidental occurrences is in receipt of the WDNR and maintained on site.

Table 11-1. Scheduled Closure for Saukville Storage and Incinerator Facility	
Scheduled Event	Date
Start-up and Performance Testing of MPPE System (unofficial termination of hazardous waste incineration)	September 14, 2001
Decontamination of piping and tanks downstream of MPPE complete and verified by <u>flash point</u> and <u>pH testing</u> <i>GC/MS?</i>	September 28, 2001
Official Termination of Hazardous Waste <u>Discharge</u>	October 1, 2001
Receipt of analytical results of downstream rinseate – verification of clean closure	October 5, 2001
Downstream tank clean closure; certify closure complete	January 1, 2002

\* Certification to be completed by CCP and a professional engineer for review by WDNR on an expedited basis.

*missing incinerator  
we were talking about running &  
wipe tests.*

Table 11-2  
Estimated Closure Cost

<u>Item</u>	<u>Cost</u>
1. Equipment decontamination and disposal of aqueous rinseates and residues (estimate 4,000 gallons)	\$15,000
2. Disposal of Maximum Inventory (51,000 gallons) – waste minimization technology will eliminate hazardous waste characteristic of water; solvent recycled of site	NA
3. Disposal of process residues	8,000
4. Professional Certification	2,000
5. Administrative Costs	2,400
6. TOTAL	<hr/> \$27,400
7. Contingencies (10% of 6)	\$2700
8. TOTAL COST	<hr/> \$30,100