

COOK COMPOSITES AND POLYMERS

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December 5, 2001

Mr. Pat Brady
Waste Management Engineer
Wisconsin Department of Natural Resources
2300 North Dr. ML King Drive
Milwaukee, WI 53212

recd. 12-11-01

Via Facsimile (414) 263-8716 – Hard Copy by Express Mail

RE: Revised Closure Plan
Cook Composites and Polymers Co. - Saukville, WI

Dear Mr. Brady:

Cook Composites and Polymers Co. (CCP) has enclosed a Revised Closure Plan, dated December 5, 2001. The revisions to the closure plan account for the modified tank cleaning schedule at the facility. The change to these intermediate schedule milestones described in Table 11-1 will not result in a delay for the closure since the laboratory analysis will be expedited.

The remaining upstream tanks are scheduled for the cleaning and confirmation sampling process beginning this week. At this time, CCP anticipates it will meet its original Closure Plan schedule for January 1, 2002 certification of clean closure of upstream and downstream tanks and piping.

If you have any questions, please feel free to call me at 816-391-6011.

Sincerely,
COOK COMPOSITES AND POLYMERS CO.

Michael Gromacki

Michael Gromacki
Director – Quality/Safety/Environment

CC: Lynn Persson – WDNR
John Bauer – CCP
Michael Lotman – CCP Saukville
Danny Bolz – CCP Saukville



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CLOSURE PLAN - REVISED 12-5-01

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 initially 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 wastewater 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 for flash point and pH 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 (triple rinsed) with a high-pressure water rinseate in October 2001. The rinseate is pumped through these lines to the tanks and fed directly through the waste feed lines plumbed to discharge to the incinerator. The tanks are also to be sprayed with a portable spray system to internally rinse them. The former incinerator waste solvent and reaction water charging systems (downstream tanks) are verified clean closed by collecting samples of rinse from the tanks. CCP will analyze rinse solutions for VOC constituents and hazardous characteristics including flash point, pH and VOCs by EPA Method 8260. Equipment decontamination will be repeated as needed to ensure adequate decontamination.

Within 90 days of ceasing hazardous waste incineration, the transfer lines and tanks *upstream* of the MPPE process are to be closed and flushed three times with approximately 500 gallons of a high pressure water spray. The tanks are to be sprayed with a portable spray system to internally rinse them. Confirmation sampling and testing will follow the same procedures as done for the transfer lines and tanks downstream of the MPPE system. The fluids from this closure activity are to be transported off-site to an approved disposal or treatment facility.

Closure of Containment Areas

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.

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.

Closure of Incinerator

CCP will propose an appropriate closure testing method for the firebox (refractory) in a situation with historic demonstrated DRE >99.99 %, and in which the equipment is not dismantled. CCP will seek guidance from its outside engineering resources, and the EPA Hotline on this matter since we understand that WDNR does not have specific guidance in this regard. CCP plans to include closure sampling activities for the incinerator unit in conjunction with the upstream tanks.

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 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

CCP 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 (rev. 12-5-01)	
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 analyzing rinse solutions for VOC constituents and hazardous waste characteristics including flash point, pH and VOC (EPA Method 8260) testing.	October 2001
Official date that CCP stops burning hazardous waste in its incinerator. CCP commits to no longer burning hazardous waste in its incinerator and operating the MPPE System and all units upstream of the MPPE System as a totally enclosed treatment unit by signing the Environmental Cooperative Agreement with the WDNR.	October 1, 2001
Receipt of analytical results of downstream rinseate – verification of clean closure	October 30, 2001
CCP certifies clean closure of all tanks and piping downstream of the MPPE System, clean closure of the incinerator, and verifies that the MPPE System is working as projected and that the incinerator is not burning hazardous waste based on available monitoring data.	November 30, 2001
CCP completes closure documentation of all tanks and piping upstream of the MPPE System. (CCP will follow all Large Quantity Generator regulatory requirements as it uses these tanks in the future.)	December 2001
CCP submits certification that closure of all tanks and piping upstream of the MPPE System is complete and that closure of all previously licensed hazardous waste units are complete to WDNR.	January 1, 2002

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

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