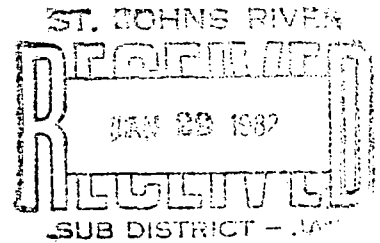


**V.A.W. OF AMERICA, INC.**

ST. AUGUSTINE, FLORIDA 32084



January 27, 1982

RECEIVED

FEB 01 '82

Hazardous Waste

Ms. Teresa Ashworth, Environmental Specialist  
St. John's River District  
3426 Bills Road  
Jacksonville, Florida 32207

Subject: Closure Plan  
V.A.W. Facilities

Dear Ms. Ashworth:

Attached please find the closure plan for our facility in St. Augustine Shores. If you should have any questions on the contents of the closure plan, please contact our consultants, LAN Associates, attention Guy VanDoren.

Very truly yours,

V.A.W. OF AMERICA, INC.

*Leon A. Smith*  
Leon A. Smith  
Operations Manager

Enc.

cc: LAN Associates, Inc.  
Maurice Roberts

LAS/bs

(VAW of America, Inc. St. Augustine Facility)

It is not anticipated that the VAW facility in St. Augustine Shores will close. There is always the possibility that the closure would take place due to market conditions, change of ownership, and/or unforeseen circumstances. It is possible that the operation responsible for generating "hazardous waste" activities could cease or be modified in such a way that the "hazardous wastes" are no longer produced. In addition, there is the possibility that the regulations defining these products namely, a waste stream with a pH greater than 12.2 and a sludge containing chromium, will no longer be considered hazardous waste. In the case of these wastes being de-listed, this particular closure plan will no longer be in effect. In the event that either the processes may be responsible for generating these wastes, the following closure activities will take place:

1. The waste containment facilities will be thoroughly cleaned and rinse waters will be tested to ascertain that there are no residual contents within the containment vessels which could be considered a hazardous waste. This action will be taken as soon as the process generating the waste ceases operation.
2. For the tank that is underground - this tank will be filled with a suitable fill material and rendered useless.
3. When all these activities have been completed, certification will be sent to the Regional Administrator of EPA informing him of the activities performed by the owner. This will be confirmed by the independent registered professional engineer, LAN Associates.
4. For the facility generating chromium sludges, at the time of closure the drums used would be disposed of by a licensed hazardous waste processor. The area would be policed and inspected to make sure that no residual chromium sludges were retained on site.

The actions described above are in conformance with the closure regulations as set forth in the Federal Register, volume 45, #98, Monday, May 19, 1980. It is our intent that sections 65.11 through section 265.115 are complied with by this closure plan.