CLOSURE DESCRIPTION

PERMIT APPLICATION SECTION II.K.1.d.

This part of the permit application describes in detail the procedures to be used for decontaminating the structures used to process hazardous wastes at the facility. These procedures were developed for conducting final closure. This plan will be modified as affected by changes in equipment and structures and changes in waste inventory, decontamination procedures, methods for verification of decontamination, and closure schedule and cost estimate, if any.

These procedures were developed to close structures in three facility areas. These areas are the container storage unit, including the transfer waste area, and the consolidation/stabilization area inside the lower warehouse. The method used to decontaminate structures is pressure cleaning with steam. The factors involved in making the decision to use steam cleaning over other methods are the ability steam has to dislodge residues with pressure, to evaporate organics with temperature, and the minimal generation of condensate.

Procedures describing the steps that will be followed to remove inventory and decontaminate every area are included below.

CONTAINER STORAGE UNIT

Transfer waste that is not stored in trucks will be stored in the container storage unit. Containers holding hazardous waste will be segregated into groups based on recommended treatment methods, following the waste classification system of Table II.K.1.c.-1. All waste inventories in drums will be loaded in trucks and shipped off-site at the time of closure. The labor required to load a van trailer to capacity with drums is expected to not exceed 4 man-hours. The maximum man-hours required to load the worst-case drum inventory at closure into van trucks = 824 drums = 86 drums/truck x 4 man-hours/truck = 39 man-hours.

The container storage unit has a floor surface area of 5,488 square feet. The floor surface area was calculated as follows: $[(1,116/12) \times (720/12)\ ft^2 - [(36/12) \times (368/12)]\ ft^2 = (93 \times 60)\ ft^2 - (3 \times 30.66)\ ft^2 = (5,580 - 91.98)\ ft^2 = 5,488\ ft^2$. At the time of closure The State will be notified and the levels for rinse water will be discussed at that time.

CONSOLIDATION/STABILIZATION AREAS

The locations where consolidation operations are conducted are in the lower warehouse. The areas that will be decontaminated by steam cleaning consist of approximately 3,583 square feet in the lower warehouse. Final rinsate samples will be taken as discussed earlier.