PART B APPLICATION

SOUTHERN CALIFORNIA CHEMICAL

Division of CP Chemical, Inc.

8851 DICE ROAD

SANTA FE SPRINGS

CALIFORNIA

EPA ID NO. CAD008488025

VOLUME ONE

NOVEMBER 8, 1988

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XIII. Closure

Include a copy of the written closure plan (all hazardous waste facilities).

A. The closure plan must indicate:

1. How and when the facility will be partially (if applicable) and ultimately closed;

RESPONSE - On December 8, 1988, the EPA signed and made effective Administrative Order of Consent under RCRA Section 3008(h) (USEPA Docket No. RCRA-09089-0001) between the U.S. Environmental Protection Agency (EPA) and CP Chemicals, Inc. of which Southern California Chemical is a Division. The primary purpose of the two parties in entering into the Order is to investigate the nature and extent of any release of hazardous waste and hazardous constituents to or from the facility, and to identify and evaluate alternatives for the corrective action necessary to prevent or mitigate any such releases.

SCC compliance with all the provisions of the Consent Order has been satisfactory and is ongoing. SCC has submitted draft and revised RFI documents, including RCRA Facility Investigation Workplan, Current Conditions Report, and Pre-Investigation Evaluation Report. Comments on the revised RFI documents have been received and the RFI documents are under revision. The Consent Order will be terminated when EPA provides written notice that SCC has satisfactorily performed all tasks required by the Consent Order. The activities conducted under the Consent Order, if they involve the closing and or relocation of any hazardous waste management units, are incorporated by reference into this Part B application. Copies of all documents generated in relation to the corrective action order will be furnished upon request to the regulatory agencies.

2. The maximum extent of the facility which will remain open during the life of the facility.

   RESPONSE - Please see the closure plan in Tab 39.

3. How need for maintenance after closure will be minimized;

   RESPONSE - Please see the closure plan in Tab 39.

4. How escape of the following to groundwater,

   surface water, or the atmosphere after closure will be controlled, minimized, or eliminated to protect health and the environment:

   a. Hazardous waste;

   b. Hazardous waste containers;

   c. Leachate;

   d. Contaminated rainfall;

   e. Waste decomposition products;

   RESPONSE - Please see the closure plan in Tab 39.

5. An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility;

   RESPONSE - Please see the closure plan in Tab 39.

6. The steps required to decontaminate the facility equipment during closure;

   RESPONSE - Please see the closure plan in Tab 39.

7. A schedule for final closure, including:

   a. Anticipated date when wastes will no longer be received.

   RESPONSE - Please see the closure plan in Tab 39.

   b. Anticipated date when final closure will be complete.

   RESPONSE - Please see the closure plan in Tab 39.

c. Intervening milestone dates which will allow tracking of the progress of closure (e.g., date removing residual wastes from treatment processes); and

RESPONSE - Please see the closure plan in Tab 39.

8. An estimate of what it will cost to implement this closure plan, as described in Section 67002, Title 22, California Code of Regulations, formerly the California Administrative Code.

RESPONSE - Please see the closure plan in Tab 39.

B. Describe procedures to ensure that the closure plan is amended whenever changes in facility design or operations occur.

RESPONSE - Please see the closure plan in Tab 39.

C. Describe procedures to ensure that DHS will be notified at least 180 days prior to the expected date of closure.

RESPONSE - Please see the closure plan in Tab 39.

D. Describe procedures to ensure that, at closure, all hazardous wastes are removed from the following facilities and all appurtenant structures and equipment are decontaminated or removed:

1. Container storage areas.

RESPONSE - Please see the closure plan in Tab 39.

2. Tanks.

RESPONSE - Please see the closure plan in Tab 39.

E. Describe plans to ensure that at closure all contaminated concrete and soils are sampled and analyzed, and removed, if necessary.

RESPONSE - Please see the closure plan in Tab 39.

F. Describe plans to ensure that when closure is complete, the owner or operator submits a certification by the owner or operator and an independent engineer registered in California that the facility has been closed in accordance with the specifications in the approved closure plan.

RESPONSE - Please see the closure plan in Tab 39.

XIV. Financial Responsibility

A. For all facilities, include an originally signed duplicate of the financial assurance mechanism adopted for closure in accordance with Article 17, Title 22, California Code of Regulations, formerly the California Administrative Code.

RESPONSE - The financial assurance document to fund closure activities is located in Tab 40.

B. Where applicable, include an originally signed duplicate of the liability insurance policy or other documentation comprising compliance with liability requirements for sudden accidental occurrences of Sections 67027 and 67028, Title 22, California Code of Regulations, formerly the California Administrative Code. Sections 67027 and 67028 require coverage of at least $1 million per occurrence with an annual aggregate of at least $2 million.

RESPONSE - A copy of the certificate of insurance issued to SCC is located in Tab 41.

XV. Corrective Action Plan

RESPONSE - On December 8, 1988, the EPA signed and made effective Administrative Order of Consent under RCRA Section 3008(h) (USEPA Docket No. RCRA-09089-0001) between the U.S. Environmental Protection Agency (EPA) and CP Chemicals, Inc. of which Southern California Chemical is a Division. The primary purpose of the two parties in entering into the Order is to investigate the nature and extent of any release of hazardous waste and hazardous constituents to or from the facility, and to identify and evaluate alternatives for the corrective action necessary to prevent or mitigate any such releases.

SCC compliance with all the provisions of the Consent Order has been satisfactory and is ongoing. SCC has submitted draft and revised RFI documents, including RCRA Facility Investigation Workplan, Current Conditions Report, and Pre-Investigation Evaluation Report. Comments on the revised RFI documents have been received and the RFI documents are under revision. The Consent Order will be terminated when EPA provides written notice that SCC has satisfactorily performed all tasks required by the Consent Order. The activities conducted under the Consent Order, if they involve the closing and or relocation of any hazardous waste management units, are incorporated by reference into this Part B application. Copies of all documents generated in relation to the corrective action order will be furnished upon request to the regulatory agencies.

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CLOSURE PLAN

SOUTHERN CALIFORNIA CHEMICAL

DIVISION OF CP CHEMICALS, INC.

SANTA FE SPRINGS, CALIFORNIA 90670

EPA ID. NO. CAD 008488025

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I. Introduction

This Closure Plan addresses the requirements of 22 CCR 67210, et seq., pertaining to closure of hazardous waste facilities. It will provide a procedure whereby Southern California Chemical (SCC) will close its Santa Fe Springs facility in a manner that minimizes the need for further maintenance and controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall or waste decomposition products to the ground, surface waters, or to the atmosphere.

The SCC facility is currently undergoing modernization. This modernization effort involves the replacement of tanks and equipment involved in hazardous waste management. Partial closure of the facility is not contemplated. All hazardous waste management tanks, pumps, pipelines, etc., replaced during the modernization will be decontaminated and properly disposed of or sold as scrap as allowed by regulation. All wash waters generated during decontamination process will be treated in the on-site wastewater treatment unit and discharged to the POTW (the same procedure currently used at the facility for all wash waters generated). This Closure Plan is directed at the hazardous waste management units detailed in the Part B application as the modernized facility (final facility infrastructure.)

On December 8, 1988, the EPA signed and made effective Administrative Order of Consent under RCRA Section 3008(h) (USEPA Docket No. RCRA-09089-0001) between the U.S. Environmental Protection Agency (EPA) and CP Chemicals, Inc. of which Southern California Chemical is a division. The primary purpose of the two parties in entering into the Order is to investigate the nature and extend of any release of hazardous waste and hazardous constituents to or from the facility, and to identify and evaluate alternatives for the corrective action necessary to prevent or mitigte any such releases.

SCC compliance with all the provisions of the Consent Order has been satisfactory and is ongoing. SCC has submitted draft and revised RFI documents, including RCRA Facility Investigation Workplan, Current Conditions Report, and Pre-investigation Evaluation Report. Comments on the revised RFI documents have been received and the RFI documents are under revision. The Consent Order will be terminated when EPA provides written notice that SCC has satisfactorily performed all tasks required by the Consent Order. The activities conducted under the Consent Order, if they involve the closing and or relocation of any hazardous waste management units, are incorporated by reference into the

Part B application. Copies of all documents generated in relation to the corrective action order will be furnished upon request to the regulatory agencies.

Since the corrective action plan will address all subsurface contamination at the facility, this Closure Plan only addresses possible subsurface contamination generated as a result of the modernized facility.

This plan outlines the scope of closure, expected date of closure, and tentative schedule. It will detail the inventory of wastes on site and describe final treatment. Finally, it will present the decontamination and disposal procedures which will be utilized at closure and provide a closure cost estimate.

This plan and all subsequent revisions will be kept on site until closure is completed and certified in accordance with 22 CCR 67215.

This Closure Plan will be amended in the event changes in the facility design or operation occur. SCC will notify the DHS at least 180 days prior to the date closure is expected to begin.

Upon completion of the closure process, SCC will submit to the DHS certification by appropriate officers of SCC and an independent, qualified engineer, registered in California, that the facility has been closed in accordance with the specifications in the approved closure plan.

II. Scope

This plan encompasses closure of the permitted hazardous waste management units at SCC's Santa Fe Springs facility located at 8851 Dice Road., Santa Fe Springs, California.

Waste management units to be closed include the following storage and treatment tanks. The volumes listed are the estimated maximum inventories of wastes in storage or treatment at any time at the facility.

A. Copper Chloride and Copper Ammonium Chloride Area

1. Treatment

a.	C-32	2,500 gal.
b.	C-22	2,500 gal.
		5,000 gal.

2. Storage

a.	C-20	15,000 gal.
b.	C-21	15,000 gal.
c.	C-30	15,000 gal.
d.	C-31	15,000 gal.
		60,000 gal.

B. Copper Sulfate Manufacturing

1. Treatment

a.	S-1A	7,000 gal.
b.	S-1B	7,500 gal.
		14,500 gal.

2. Storage

a.	S-5	10,000 gal.
b.	S-6	15,000 gal.
		25,000 gal.

C. Ferric Chloride Manufacturing

1. Treatment

a.	F-2A	3,000 gal.
		3,000 gal.

2. Storage

a.	F-1A	7,000 gal.
b.	F-1B	12,000 gal.
		19,000 gal.

D. Metals Recovery

1. Treatment

a.	J-2	3,000 gal.
b.	J-3	5,900 gal.
c.	J-5	6,000 gal.
		14,900 gal.

2. Storage

a.	J-4	5,400 gal.
b.	J-6	6,000 gal.
		11,400 gal.

E. Cyanide Destruct Unit

1. Storage and Treatment

a.	CN-1	5,000 gal.
		5,000 gal.

F. Containers

95,000 gallons = 1725 containers (55 gallons)

III. Closure Schedule and Expected Date of Closure

Closure for the SCC Santa Fe Springs facility is not expected to occur until May 2025. Full scale operations will continue until that time, and no partial closure is anticipated.

The following schedule is planned for facility closure operations:

A. Agency notification: 180 days prior to closure (November 1, 2024).

B. Final wastes received: May 1, 2025.

C. Final wastes processed: not later than May 5, 2025.

D. Tank and container decontamination/disposal: not later than June 30, 2025.

E. Containment/facility decontamination/disposal: not later than August 15, 2025.

F. Completion and certification of closure: not later than September 1, 2025.

IV. Inventory of Wastes and Final Treatment

The expected maximum inventory of wastes on site during operations and at closure is the total volume of all treatment and storage tanks in addition to the maximum permitted quantity of containerized wastes. The volumes are:

A.	Storage and Treatment Tanks	157,800 gallons
B.	Containers	95,000 gallons
	Total	252,800 gallons

At closure, all wastes on site will be treated in their respective process streams to produce recycled, saleable product. Effluent from these streams will be treated on site in SCC's wastewater treatment unit. All remaining residues, sludges, or other hazardous waste byproducts will be manifested and transported to a permitted facility.

V. Decontamination and Closure

As delineated in Section II above, the 19 permitted tanks, vessels, along with their associated pipes, pumps, and other appurtenances will be decontaminated by appropriate and accepted means and disposed of as nonhazardous material. This will be accomplished by the use of water blasters and detergents. All rinsate from this process will be collected and treated on site in SCC's wastewater treatment system. Following the decontamination of the hazardous waste management units, approximately 100 yds of nonhazardous material (scrap steel and concrete containment debris) will require disposal. It is not anticipated that any hazardous wastes requiring off-site disposal will be generated by this procedure.

All containers remaining on site at closure will also be decontaminated by the use of water, (current container decontamination procedures are described in Section VI.A., pages 60-62.). The containers will either be sold to a recycler or disposed as nonhazardous material. Rinsate will be treated on site in SCC's wastewater treatment system. It is not anticipated that any hazardous wastes for off-site disposal will be generated by this procedure.

Soil sampling during decontamination and closure procedures will proceed as outlined in Section 4.2.1 of the Sampling and Analysis Plan of the SCC RFI Workplan (11/89, CDM), with special attention given to areas of known spills and waste transfer.

The current SCC facility occupies 3.4 total acres. For the purposes of this plan, it is assumed that the waste management area comprises 50% of that total. At a nominal uniform thickness of 6", the total volume of containment is approximately 1400 yds . This concrete containment will be removed and decontaminated for disposal as nonhazardous material. However, as a contingency, it is assumed that there is a portion of this material which cannot be decontaminated and must be disposed of as hazardous. For the purposes of this plan and the subsequent cost3estimate, it is assumed that 80% of the material (1,120 yds.3) will be decontaminated, and the remaining 20% (280 yds.) will be manifested and transported to an approved facility.

VI. Costs

A. Inventory of Wastes in Storage

The maximum inventory of wastes on site at closure given the final plant configuration is the sum of all treatment and storage unit volumes. At closure these wastes will be either treated in the onsite wastewater treatment facility or removed offsite. For this estimate, the following capacity, ratio, and costs are assumed:

Total Waste Inventory: 252,800 gallons

80% is treated on site @ 0.35/gal.	=	$70,784
20% is treated off site @ $1.50/gal.	=	$75,840
	Total =	$146,624

B. Decontamination/Disposal of Tanks and Equipment

Nineteen permitted tanks and vessels will be decontaminated and disposed of as nonhazardous material. The waste water treatment system, all other pipes, pumps, and appurtenances will also be decontaminated and disposed. This procedure will generate approximately 100 yds of nonhazardous material for disposal.

Decontaminate 19 tanks @ $1,000/tank	=	$19,000
Decontaminate all other equipment	=	$15,000
Dispose of 250 yds of nonhazardous material @ $35.00/yd	=	$ 8,750
	Total =	$42,750

C. Decontaminate/Dispose of Slabs and Containment Structures

The current SCC facility occupies 3.4 total acres. For the purposes of this cost estimate, it is assumed that the waste management area comprises 50% of that total. At a nominal uniform thickness of 6", the total volume of containment is approximately 1400 yds . The concrete containment will be removed and decontaminated for disposal as nonhazardous material. However, as a contingency, it is assumed that there is a portion of this material which cannot be

decontaminated and must be disposed of as hazardous. The following ratio and costs are used:

Containment demolition & matl. sort	=	$35,000
80% of the material is decontaminated and disposed as nonhazardous matl. @ $35.00/yd	=	$39,200
20% of the material is3disposed as hazardous @ $150.00/yd	=	$42,000
	Total =	$116,200

D. Summary

I.	Treat onsite materials	$ 146,624
II.	Decontaminate/dispose tanks	$ 42,750
III.	Decontaminate/dispose slabs	$ 116,200
	Total=	$ 305,574