

Hazardous Waste Facility Permit
Safety-Kleen Barre Service Center
EPA ID NO. VTD000791699
Closure Plan
March 2022

APPENDIX I
CLOSURE PLAN AND FINANCIAL ASSURANCE

APPENDIX I

CLOSURE PLAN AND FINANCIAL REQUIREMENTS

Final closure of the Barre Service Center (BSC), and partial closure of hazardous waste management units (HWMUs) and certain solid waste management units (SWMUs) at the facility, shall be conducted in accordance with this closure plan and shall meet the closure performance standard and requirements of 40 CFR § 264 Subpart G and § 7-308(b)(17) of the Vermont Hazardous Waste Management Regulations (VHWMR). Any modifications to this closure plan shall be made in accordance with 40 CFR § 264.112(c). An estimated closure cost estimate for 2021 is attached (**Table I – 1**).

I – 1.0 GENERAL INFORMATION

BSC Location: 23 West 2nd Street
 Barre, VT 05641

EPA Identification Number: VTD000791699

The hazardous and solid waste management units subject to closure include:

- a) Spent Mineral Spirits Aboveground Tank System (HWMU #1, Tank #3): A 15,000-gallon aboveground storage tank system (i.e., the tank, its associated ancillary equipment, and secondary containment system), and the truck transfer pad and its secondary containment system.
- b) Solvent return and fill station and its secondary containment system (connected to HWMU #1)
- c) Warehouse Container Storage Area (HWMU #3)
- d) Flammable Waste Container Storage Area (HWMU #4)
- e) Metal Shelter Container Storage Area (HWMU #5)
- f) Used Oil Aboveground Tank Systems (SWMUs): Two-15,000 gallon used oil storage tanks (i.e., the tanks, their associated ancillary equipment and secondary containment system - these tanks utilize the same truck transfer pad as HWMU #1)

- g) Vacuum Waste Fractionalization Tank (SWMU): One 18,000-gallon fractionalization tank used to store vacuum waste. The fractionalization tank is located outdoors on a dedicated secondary containment pad.

I – 2.0 MAXIMUM WASTE INVENTORY

The maximum waste inventory at the BSC waste management units is:

- a) Spent Mineral Spirits Aboveground Tank System (HWMU #1): 15,000 gallons
- b) Return and Fill Station (located within HWMU #3): 375 gallons
- c) Warehouse Container Storage Area (HWMU #3): 3,500 gallons
- d) Flammable Waste Container Storage Area (HWMU #4): 1,800 gallons
- e) Metal Shelter Storage Area (HWMU #5): 2,184 gallons
- f) Used Oil Aboveground Tank Systems (SWMUs): 15,000 gallons each (30,000 gallons total)
- h) Vacuum Waste Fractionalization Tank (SWMU): 18,000 gallons

I – 3.0 NOTIFICATION AND CLOSURE SCHEDULE

The estimated year of facility closure is 2045.

Closure Schedule (See **Table I-2** for a summary of the facility closure schedule):

- Safety-Kleen shall notify the Agency in writing (via a Pre-Closure Notification Form) of its intent to close the facility (final closure) or a HWMU (partial closure) at least **30 days** prior to the commencement of partial closure activities, and **60 days** prior to the commencement of final closure activities.
- As required by 40 CFR § 264.113 (a), within **90 days** of receiving the final volume of hazardous wastes, Safety-Kleen shall remove all hazardous wastes from the facility in accordance with the approved

closure plan. The Agency may approve a longer period if Safety-Kleen requests a permit modification pursuant to 40 CFR § 264.113(a).

- As required by 40 CFR § 264.113 (b), partial and final closure activities shall be completed within **180 days** of the receipt of the final volume of hazardous waste from off-site unless an extended closure period is requested by Safety-Kleen and approved in writing by the Agency.
- Upon completion of final closure, a Certification of Closure, prepared and signed by both an independent Professional Engineer licensed in Vermont and Safety-Kleen, shall be submitted to the Agency, by registered mail, within **60 days** after completion of closure. The Certification of Closure shall certify that the facility has been closed in accordance with the specifications in the approved closure plan. Documentation supporting the Professional Engineer's license must be furnished to the Agency upon request until the Agency releases Safety-Kleen from the financial assurance requirements for closure under 40 CFR § 264.143(i).

I – 4.0 WASTE MANAGEMENT UNIT CLOSURE ACTIVITIES

Any third-party vendor selected to implement closure shall be required to prepare a health and safety plan for their personnel involved in BSC closure activities in accordance with applicable regulations. The health and safety plan shall be kept on site for the duration of closure activities. All wastes removed from the site shall be managed in accordance with the VHWMR.

I – 4.1 Aboveground Tanks, Piping and Ancillary Equipment

Closure (partial, final) of the aboveground storage tanks (i.e., the spent mineral spirits tank system (HWMU #1/Tank #3), the used oil aboveground tank systems (Tanks #1 and #2), and the vacuum waste fractionalization tank) shall be conducted as follows:

Removal of Waste from Tanks

Waste material shall be removed from tanks using an onboard tanker truck pump (for spent solvent), vacuum truck (for heavy sludge) or similar equipment and transported, in accordance with VHWMR and USDOT requirements. Hazardous waste shall be sent to a permitted off-site hazardous waste

treatment, storage, or disposal facility for reclamation and/or disposal. Used oil shall be sent to a used oil reclamation facility. Vacuum waste determined to be non-hazardous waste pursuant to **Appendix C** (Waste Analysis Plan) shall be sent to a permitted off-site treatment/disposal facility as appropriate. Records of all off-site shipments shall be maintained as part of the facility operating record.

Following removal of free-liquid wastes to the extent practicable, the aboveground waste tanks will be entered, according to confined space entry procedures (per OSHA standards), to remove residual waste and sludge from the within the tank using hand tools (e.g., shovels, squeegees, etc.) or pumps. All resulting waste will be containerized, characterized, and shipped to an off-site facility for proper management.

Tank System Decontamination Procedures

Once residual wastes have been removed to the extent practicable, the tanks, piping and other ancillary equipment shall be decontaminated as follows:

- a) The tank interior is scrubbed with a detergent/water solution and rinsed with a high-pressure water spray until the tank interior is visibly clean.
- b) Piping and other ancillary equipment shall be flushed with a detergent/water solution prior to or during tank cleaning operations; generated rinse water accumulated in the tank will be containerized, sampled, and characterized in accordance with the VHWMR.
- c) After pressure washing, the tank interior is triple rinsed. After each rinse, the generated waste rinse water will be characterized in accordance with the VHWMR.
- d) Decontamination water and residual waste materials that accumulate at the bottom of the tank during decontamination are removed using a pump and transferred to either a vac truck, tanker truck or into containers, and shipped in accordance with Vermont and DOT regulations to an off-site facility for proper management based on analytical results.

It is anticipated that approximately 500 gallons of wash/rinse water will be generated per tank during decontamination activities (estimate includes decontamination of piping and ancillary equipment, including the return and fill station).

- e) Upon completion of decontamination steps a) through d) above, the tank will either be reused at the existing location (e.g., tank temporarily taken out of service, property and structures are sold to another owner) or at an offsite location, or the tank will be managed as scrap metal in accordance with VHWMR § 7-204(e). If the tank is scrapped, a certificate of destruction will be provided and included in the closure certification report.

Decontamination of the Tank Containment Area and Truck Transfer Pad

At the time of final facility closure or partial closure, the tank containment area and truck transfer pad will be inspected and decontaminated in accordance with the following procedure. The decontaminated containment structure will be left in place at the time of closure.

- a) The secondary containment systems for the tank farm and loading/unloading area (truck transfer pad) will be inspected by an independent Professional Engineer licensed in Vermont for the presence of visible contamination, cracks, gaps, and compromised caulking. If cracks, gaps, or compromised caulking are observed, the underlying soil will be sampled as described in **Section I – 6** below (Soil Sampling). Any cracks, gaps, and compromised caulking will be sealed prior to commencement of decontamination to prevent the migration of rinsate outside of the containment area. If deemed necessary, a water level test or other quantitative test method will be employed to confirm integrity of secondary containment systems.
- b) The containment system, concrete pad, and loading/unloading truck transfer area will be swept to remove loose debris, power-washed with a detergent/water solution, and then triple rinsed. Sweepings and generated wash/rinse water accumulated will be containerized and characterized in accordance with the VHWMR.
- c) It is anticipated that approximately 500 gallons of wash/rinse water will be generated during decontamination of the tank containment area and truck pad. A sample of the final rinsate will be

collected and analyzed for constituents representative of waste codes permitted for tank storage. The results of the final rinsate analysis will be used to verify effective decontamination of the containment area.

- d) All decontamination wastes will be shipped in accordance with Vermont and DOT regulations to an off-site facility for proper management based on analytical results.
- e) Soil samples will be collected based on the Engineer's inspection (i.e., where cracks/gaps are identified). If collected, soil samples will be analyzed for the constituents representative of the waste codes permitted for tank storage. The soil sampling methodology and analysis will be conducted in accordance with the VHWMR. The analyses selected will be based upon the waste codes of the wastes stored or managed in the areas.
- f) As an alternative to leaving the containment in place for reuse, the decontaminated concrete containment structures may be demolished; if so, the resulting material will be characterized and transported offsite for disposal.

I – 4.2 Solvent Return and Fill Station

At the time of final closure or partial closure the following steps will be conducted:

- a) The sediment in the wet dumpster will be removed, containerized, and manifested as a hazardous waste to a permitted hazardous waste TSDF pursuant to the requirements of the VHWMR and USDOT.
- b) The wet dumpster and the dock area will be decontaminated using a high-pressure detergent/water solution, and triple rinsed. Generated wash/rinse water will be containerized and characterized in accordance with the VHWMR. It is anticipated that approximately 500 gallons of wash/rinse water will be generated during decontamination of the wet dumpster and dock area.
- c) Upon completion of decontamination step b), the wet dumpster will either be reused or managed as scrap metal in accordance with VHWMR § 7-204(e). If the wet dumpster is scrapped, a certificate of destruction will be provided by the scrapping company and included in the closure certification report (note that the closure cost estimate reflects the cost of disposing of the return and fill station structures).

- d) The decontamination wash/rinse water may either be pumped to the connected aboveground storage tank (prior to decontamination of the tank) or containerized.
- e) The underlying concrete secondary containment at the return and fill station will be decontaminated according to the tank containment area decontamination procedure above.
- f) Prior to decontamination of the containment area, that area will be inspected by an independent Professional Engineer licensed in Vermont for the presence of cracks, gaps, compromised caulking, etc. If cracks, gaps, or compromised caulking are identified by the Engineer, the underlying soil will be sampled during closure as described in **Section I – 6** below (Soil Sampling).

I – 4.3 Container Storage Areas

At the time of closure or partial closure of the HWMU #3 and #4 container storage areas, waste inventory will be removed and transported under manifest to an off-site permitted hazardous waste TSDF.

At the time of final facility closure or partial closure, the following steps will be conducted:

- a) The secondary containment structure will be inspected and decontaminated according to the procedure identified for the tank containment area and truck transfer pad.
- b) A sample of the final rinsate will be collected and analyzed for constituents representative of wastes permitted for storage in each area. The rinsate sample results will be used to verify the effectiveness of decontamination. It is anticipated that approximately 500 gallons of rinsate will be generated during decontamination of the container storage areas.
- c) If the independent Professional Engineer licensed in Vermont determines that the containment structure is compromised (e.g., cracked), soil samples will be collected, analyzed for the constituents representative of the waste types stored in the area, and evaluated according to **Section I – 6**, below.

I – 4.4 Metal Shelter Storage Area

The metal shelter storage area (HWMU #5) is used to store flammable/ignitable wastes, on-site generated material, transfer wastes, and product material. At the time of final facility closure or partial closure, waste

inventory will be removed and transported under manifest to a permitted hazardous waste TSDF. The following steps will be conducted during closure:

- a) The steel dock plates and underlying containment pans inside the metal storage shelter (beneath the steel grate floor) will be decontaminated using a detergent-water solution high-pressure spray, and triple rinsed. It is anticipated that approximately 500 gallons of rinsate will be generated during decontamination of the metal shelter, including containment.
- b) Following decontamination, a sample of the final rinsate will be collected from the portions of the metal shelter that are not destined for disposal or recycle. Components of the metal shelter that will be managed as scrap metal at closure will not require rinsate sampling. If disposed, a certificate of destruction will be provided in the closure certification report (note that the closure cost estimate reflects the cost to dispose of the metal shelter structure).
- c) The decontamination wash/rinsate water will be containerized. The wash/rinse water will be characterized and transported to a properly permitted waste management facility for hazardous or nonhazardous material for subsequent disposal using an appropriate disposal method.
- d) Following decontamination, if the independent Professional Engineer licensed in Vermont determines that the containment structure is compromised (e.g., cracks, gaps, etc.), soil samples will be collected from beneath the containment at a minimum of two locations. The actual soil sample locations will be determined during the inspection of the containment area by the Engineer. The analyses performed will be based on contaminants associated with the EPA waste codes for wastes stored in this area and release history. Any soils found to be contaminated shall be managed in accordance with **Section I – 6**, below.

I – 5.0 DECONTAMINATION OF CLEANUP EQUIPMENT

Equipment used to decontaminate the tanks, return/fill station components, and the container storage areas will be cleaned along with and within the respective secondary containment structure. Therefore, the anticipated amount of wash water to decontaminate equipment was included in the estimated quantity generated for each unit. Small consumable equipment (e.g., mops, rags, disposable PPE, etc.), which cannot be cleaned, will be containerized, managed as a hazardous waste, and disposed of at a permitted TSDF.

Safety-Kleen does not anticipate heavy equipment, such as cranes and backhoes, to be in contact with hazardous wastes. For example, a crane will be used to remove the storage tank only after the tank has been decontaminated. Therefore, an equipment decontamination area should not be necessary during closure. However, if necessary, heavy equipment will be cleaned by scraping, brushing and/or using a pressure washer with a detergent/water solution with tap water rinse. The wash/rinse water will be collected, using industry standard techniques, then containerized and managed as a hazardous waste in accordance with applicable regulations.

I – 6.0 SOIL SAMPLING

During closure/decontamination, if the independent Professional Engineer licensed in Vermont has reason to believe that a release has occurred (e.g., a containment structure is compromised), soil samples will be collected in the vicinity of the potentially contaminated area. Sampling and analyses will be in accordance with SW-846. The location and number of soil samples required will be determined following the Engineer's inspection of the potentially contaminated area.

The identification, characterization, and remediation of any potential contamination shall be addressed in accordance with the corrective action provisions of this permit and the Investigation and Remediation of Contaminated Properties rule.

If the soil is determined to be hazardous waste, it will be managed in accordance with the VHWMR. The soil sampling methodology, analysis, locations, and number of samples will be clarified prior to and/or during implementation of closure.

I – 7.0 CLOSURE CERTIFICATION

Within 60 days of completion of partial and final closure, Safety-Kleen shall submit to the Agency a revised Hazardous Waste Handler Site Identification Form (EPA Form 8700-12) and a Closure Certification Report, notifying that the HWMU or Facility has been closed in accordance with the approved closure plan and the provisions of VHWMR §7-308(b)(17). The Closure Certification Report shall include a certification signed by the owner or operator and an independent Professional Engineer licensed in Vermont. Such certification shall be signed in accordance with the requirements of VHWMR § 7-108.

Information contained in the Closure Certification Report will include a brief site history, site plan, closure field notes, documentation of decontamination procedures, photo-documentation, soil sampling locations, laboratory analytical reports, tabular summaries of analytical results, volumes of wastes removed, copies of hazardous waste manifests and other shipping documents, the closure certification, request for release from the financial assurance requirements, and any other documentation required by the Agency. Any agency-approved deviations from the approved closure plan will also be documented in the report.

I – 8.0 CLOSURE COST ESTIMATE

The 2021 closure cost estimate for the BSC is included in **Table I-1**. This estimate is based on unit costs for hiring a third party to perform closure operations. In accordance with 40 CFR § 264.142(b) and VHWMR § 7-504(e), the closure cost estimate will be annually adjusted for inflation within **60 days** prior to the anniversary date of the establishment of the financial instrument used to comply with 40 CFR § 264.143. Additionally, this estimate will be modified within **30 days** after a revision has been made to the closure plan that increases the cost of closure, as required in 40 CFR § 264.142(c).

I – 9.0 FINANCIAL ASSURANCE AND LIABILITY INSURANCE

Per Subpart H of 40 CFR Part 264, the BSC has established a certificate of insurance as its financial mechanism for facility closure. This financial assurance will be updated to cover any changes to the closure cost estimate in the most recent approved closure plan and on an annual basis, in accordance with 40 § CFR 264.142.

A copy of the 2021 insurance policy renewal certificate is included as **Attachment I-1**.

The BSC also maintains liability insurance coverage for sudden and accidental occurrences, as required in 40 CFR § 264.147.

I – 10.0 CORRECTIVE ACTION

The identification, characterization and remediation of any contamination that may exist in any media underlying the permitted hazardous waste management units shall be addressed in accordance with the requirements of the corrective action provisions of this permit and the Investigation and Remediation of Contaminated Properties Rule.

I – 11.0 POST CLOSURE

Safety-Kleen anticipates that the BSC will be clean-closed. However, if contamination cannot be removed, or the clean closure standards cannot be met, Safety-Kleen will submit, to the Agency, an amendment to the closure plan to include a post-closure plan pursuant to the requirements of 40 CFR §§ 264.117 through 264.120 and will meet the financial requirements of Subpart H of 40 CFR Part 264.

The post-closure plan will be submitted within **30 days** of the determination that contamination cannot be removed, or clean closure standards cannot be met.

TABLE I-1

2021 CLOSURE COST ESTIMATE

TABLE I-2
CLOSURE SCHEDULE

Hazardous Waste Facility Permit
Safety-Kleen Barre Service Center
EPA ID NO. VTD000791699
Closure Plan
March 2022

ATTACHMENT I-1

2021 INSURANCE CERTIFICATE