

## ATTACHMENT 6

### CLOSURE PLAN

#### **6.A. PURPOSE**

6.A.I. The Safety-Kleen Salt Lake City service center operates as a storage facility for hazardous wastes, and is required to close the hazardous waste management units in accordance with the closure requirements of R315-264-110 through 120. Closure of the hazardous waste management units at this facility will be carried out in accordance with the steps outlined in this plan. Safety-Kleen shall remove all hazardous wastes and residuals from the facility to a level that will be protective of human health and the environment. Appendix A of this attachment contains an estimated schedule and cost for the completion of final closure. The closure cost estimate was initially calculated in 2003 dollars and has been adjusted for inflation to make the estimate current as of 2016.

6.A.II. The portions of the facility that are subject to closure include the spent solvent aboveground storage tank system, the warehouse container storage area, the return/fill station, and the metal shelter container storage area. This closure plan identifies the steps necessary to complete closure of each unit. Additionally, the closure plan includes provisions for potential re-use of the closed units onsite or offsite, if appropriate. Alternatively, the units may be dismantled and transported offsite for disposal or as scrap to an appropriate recycling facility.

#### **6.B. MANAGEMENT OF HAZARDOUS WASTE**

6.B.I. All wastes generated during closure activities shall be managed as hazardous waste until determined otherwise. The concrete secondary containment area for the hazardous waste storage tank, return and fill station, and the warehouse container storage area shall be decontaminated, as described in this plan. The hazardous waste storage tank, return and fill station, associated piping, and the metal shelter container storage area shall also be decontaminated as described in this plan. Hazardous waste that may be generated as part of the closure activities includes facility managed waste (i.e., solvents, sludges, paint waste and thinner, etc.) and wash/rinse water. Items will be considered decontaminated if the applicable performance standards specified in Table 1-ATTACHMENT 6 are met. Samples of final rinsate will be collected and analyzed as specified in Table 1-ATTACHMENT 6 to make this demonstration. Rinsates will either be managed as hazardous waste and transported under manifest to a permitted facility or will be held on the site pending analysis and characterization. All analysis will be performed by a Utah certified laboratory.

#### **6.C. ABOVEGROUND TANK AND ASSOCIATED PIPING**

6.C.I. The aboveground storage tank is used for storage of spent parts cleaning solvents, which have been returned from customers. To safely clean and decommission the

aboveground storage tank, the following activities shall be performed during partial or final closure (as appropriate):

- 6.C.I.a. Remove the remaining material from the aboveground waste solvent tank undergoing closure, and transfer the materials to a recycle center for reclamation or alternate facility for treatment;
- 6.C.I.b. Provide access to the tank;
- 6.C.I.c. Pressure wash (water/detergent solution) and triple rinse (water), scrape and squeegee the tank interior, removing all residual waste material and rinsate. The rinsate shall be sampled and analyzed in accordance with Table 1 of this attachment to demonstrate proper decontamination.
- 6.C.I.d. Disconnect and decontaminate applicable appurtenant piping and pumping equipment and clean the concrete secondary containment (if appropriate) around the tank undergoing closure. Appurtenant piping and equipment shall also be pressure washed with detergent-water solution and triple rinsed with water;
- 6.C.I.e. Visually inspect the tank, secondary containment, and appurtenant piping and equipment for evidence of staining and residue. If staining or residue is present, repeat steps outlined in Condition 6.C.I.c. of this attachment;
- 6.C.I.f. Reuse tank and appurtenant equipment onsite or offsite or remove and dispose of as scrap metal. The closure cost estimate does not include credit for selling the tank or equipment. A certificate of destruction shall be included in the final closure certification if the tank, piping and appurtenant equipment are disposed as scrap metal.
- 6.C.I.g. Decontaminate the diking and slab as indicated in this attachment at final closure; following partial or final closure, the tank may be reused in place in accordance with applicable regulations;
- 6.C.I.h. Backfill any excavations with clean fill materials; and
- 6.C.I.i. Transport and dispose of all waste material generated during the project. All associated cleaning equipment shall be thoroughly rinsed with a detergent solution and the rinsate shall be collected and disposed of in accordance with applicable regulations. Any hazardous wastes generated will be managed according to R315 of the Rules. The waste solvent tank shall either be decontaminated to the performance standards in Table 1–ATTACHMENT 6 or managed as hazardous waste.
- 6.C.II. The tank system secondary containment area shall be inspected during partial/final closure activities. If visual inspection during closure indicates an absence of waste-related staining, cleaning of the secondary containment area may be deemed unnecessary. The secondary containment area shall be thoroughly cleaned (i.e.,

scrubbed, scraped, pressure washed and triple rinsed) if waste-related staining is observed during closure activities.

6.C.III. Tank Opening and Waste Removal

6.C.III.a. To safely open the tank and remove the waste material:

6.C.III.a.i. The contents of the tank shall be removed using a pump, vacuum pump unit, or similar equipment. The waste shall be transported in accordance with applicable regulations to a Safety-Kleen Recycle Center for reclamation or other appropriate reclamation or permitted treatment, storage and disposal (TSD) facility.

6.C.III.a.ii. To gain access to the waste solvent tank, the manway at the top of the tank shall be used. Depending on the type of opening and the condition of the equipment, a variety of tools may be used to open the manway. Care shall be exercised to minimize spark generation when working on the tank.

6.C.III.a.iii. Prior to entering the tank, personnel shall have full-face respiratory protection and protective clothing. Procedures for tank entry, purging, and venting a tank are described in various API standards and publications and in OSHA's "Permit Required Confined Spaces" (29 CFR Section 1910.146). The tank shall then be inspected to determine the approximate quantity and physical conditions of any remaining waste material.

6.C.IV. Removal of Residual Waste and Cleaning of Tank

6.C.IV.a. To safely remove the residual waste and clean the tank the following steps shall be taken:

6.C.IV.a.i. Before removing any residual waste from the tank, all piping and appurtenant equipment shall be flushed with a detergent water-solution and then triple-rinsed with water;

6.C.IV.a.ii. The method used to remove the residual waste material from the tank depends on the physical properties and quantity of material present. Prior to any person entering the tank, as much liquid and sediment as possible shall be removed;

6.C.IV.a.iii. Subsequent to vacuuming the majority of the material from the tank, it may be necessary to use a high-pressure wash system, and a detergent water-solution to rinse residual material from the walls, roof, and floor of the tank. A final water-rinse shall be used to flush the tank. The evacuated material and the rinse solution shall be shipped to an appropriate reclamation or permitted hazardous waste management facility (i.e., TSD, S-K recycle center). The quantity of wash/rinse water used shall be kept to a minimum in order to limit the amount of waste material generated. The water from the final rinse of the tank and the ancillary equipment shall be analyzed in accordance with Table 1-ATTACHMENT 6 to demonstrate successful decontamination. In the event that analysis shows that the tank and/or the ancillary equipment fails the decontamination standards,

decontamination steps shall be repeated as necessary or the tank, ancillary equipment, or both shall be managed as hazardous waste.

- 6.C.IV.a.iv. The waste solvent storage tank is considered a confined space (i.e., spaces open or closed having a limited means of egress in which poisonous gases or flammable vapors might accumulate or an oxygen deficiency might occur), and confined space entry requires special procedures. The procedures to be followed include:
  - 6.C.IV.a.iv(A). The tank shall be washed, neutralized and/or purged (where flammable atmosphere is present) prior to being entered;
  - 6.C.IV.a.iv(B). Supply valves shall be closed and "tagged" and bleeder valves left open; or supply piping shall be disconnected;
  - 6.C.IV.a.iv(C). Pumps or motors normally activated by automatic controls shall be operated manually to be sure they have been disconnected. Appurtenant power switches shall be tagged "Off";
  - 6.C.IV.a.iv(D). On tanks where flammable vapors may be present, all sources of ignition shall be removed;
  - 6.C.IV.a.iv(E). Under circumstances where "hot work" (welding, burning, grinding, etc.) is to be performed in or on the tank, a test for combustible gases shall be taken. In all tank-entering situations, an oxygen deficiency test shall also be performed prior to tank entry. The supervisor of the area in which the work is being done shall perform tests for combustible gas concentration and oxygen deficiency;
  - 6.C.IV.a.iv(F). There shall be a set of wristlets or a rescue harness and sufficient rope at the job site to affect a rescue. Any other rescue equipment considered necessary by the supervisor shall also be on the job site;
  - 6.C.IV.a.iv(G). Workers shall wear a rescue harness if entering the tank through a large enough opening to easily affect a rescue. If entering through a small opening, only wristlets may be used. In cases where there are agitator shafts, drums or other hazards in which the lifeline could be entangled and the supervisor in charge feels that wearing the lifeline may entrap a man and increase the hazard, the wearing of a harness or wristlets may be eliminated;
  - 6.C.IV.a.iv(H). Appropriate personal protective equipment and supplied air breathing devices shall be used during tank entry. In cases of short-term entry for inspection or removal of objects, a self-contained breathing apparatus (SCBA) shall be used;
  - 6.C.IV.a.iv(I). When a ladder is required to enter the tank, the ladder shall be secured and not removed while anyone is in the vessel. In cases where a rigid ladder could become an obstacle, a chain ladder may be used;

- 6.C.IV.a.iv(J). Adequate illumination shall be provided and a flashlight or other battery-operated light shall also be on hand to provide illumination for a safe exit in the event of an electrical power failure;
- 6.C.IV.a.iv(K). All electrical equipment to be used inside the tank shall be in good repair and grounded;
- 6.C.IV.a.iv(L). Other people working in the immediate area shall be informed of the work being done, and they shall inform the watcher or supervisor immediately of any unusual occurrence that makes it necessary to evacuate the tank;
- 6.C.IV.a.iv(M). The Standby Observer System shall be implemented. It consists of the following:
  - 6.C.IV.a.iv(M)(1). Workers inside a confined space shall be under the constant observation of a fully instructed standby observer;
  - 6.C.IV.a.iv(M)(2). Before anyone enters the tank, the standby observer shall be instructed by the person in charge of the entry, that an entry authorization shall be obtained from the person in charge and whether a rescue harness or wristlets shall be used on the job;
  - 6.C.IV.a.iv(M)(3). The standby observer shall also know the location of the nearest telephone (with emergency numbers posted), eyewash and/or shower, fire extinguisher and oxygen inhalator. For all "hot work" on the tank, the standby observer shall be instructed how to shut down the welding/burning equipment;
  - 6.C.IV.a.iv(M)(4). As long as anyone is inside the vessel, the standby observer shall remain in continuous contact with the worker. HE/SHE IS NOT TO LEAVE THE JOB SITE EXCEPT TO REPORT AN EMERGENCY. He/she does not enter the tank until help is available;
  - 6.C.IV.a.iv(M)(5). All welding and burning equipment shall be provided with a shutoff under the control of the standby observer; and the standby observer shall be shown how to shut off the equipment if it becomes necessary. Welding and burning equipment shall only be taken into a tank immediately prior to its use and shall be removed from the tank immediately after the job is finished; and
  - 6.C.IV.a.iv(M)(6). For all "hot work" inside a tank, a properly executed permit shall be displayed at the job site and standard welding and burning safety precautions shall always be followed.
- 6.C.V. Following removal of the residual waste, the tank shall be pressure washed with detergent-water solution and triple rinsed with tap water. Washing/rinsing shall continue until the tank, associated piping and appurtenances appear visually clean. The final rinsate shall be sampled to determine the cleanliness of the tank. The final rinsate sample(s) shall be submitted to a qualified laboratory and analyzed as indicated in Table 1-ATTACHMENT 6. If the sample analytical results indicate the final rinsate meets the decontamination standards in Table 1, the tank system

shall be considered properly decontaminated and suitable for reuse or disposal as scrap metal.

- 6.C.VI. The residual waste materials and rinsate shall be collected and shipped to an appropriate reclamation or permitted hazardous waste management facility (i.e., TSD, S-K recycle center).
- 6.C.VII. Removal or Re-use of the Tank
  - 6.C.VII.a Following completion of closure activities, the closed tank may be reused onsite or offsite or scrapped. If the tank and associated containment area undergoing closure will not be reused in the present location, the following procedures will be observed to safely remove the tank:
    - 6.C.VII.a.i. Disconnect all appurtenant piping;
    - 6.C.VII.a.ii. Disconnect all appurtenant pumping equipment;
    - 6.C.VII.a.iii. The tanks and piping shall be removed and recycled as scrap in accordance with applicable rules. The contractor or scrap metal facility shall provide verification of destruction;
    - 6.C.VII.a.iv. The diking and slab shall be decontaminated and razed and disposed of at an appropriate demolition debris or solid waste landfill. Following the razing of the diking and slab, inspect the excavation; and
    - 6.C.VII.a.v. Backfill the excavation with clean fill materials and grade to ground level.
  - 6.C.VIII. Cleaning and Inspection of Secondary Containment Areas
    - 6.C.VIII.a. The diked areas shall be dry swept prior to decontamination. All cracked areas shall be sealed prior to commencement of cleaning to prevent migration of rinsate out of the containment area. The containment dike and floor area shall be pressure washed using a detergent-water solution and triple rinsed with water at final closure. Following the final wash/rinse, the area shall be inspected to determine the effectiveness and completeness of decontamination. If necessary, the containment area shall be rewashed and rinsed until visually clean. The final rinsate shall be sampled to determine the cleanliness of the secondary containment areas. The final rinsate sample(s) shall be submitted to a Utah-certified laboratory and analyzed as indicated in Table 1-ATTACHMENT 6. If the sample analytical results indicate the final rinsate meets standards in Table 1, the secondary containment areas will be considered properly decontaminated and suitable for reuse or scrapped.
    - 6.C.VIII.b. If the tank is to be re-used onsite, the concrete slab and dike walls may also be left in place to function as secondary containment. An independent registered Professional Engineer shall inspect the concrete secondary containment dike for the presence of unsealed cracks or gaps, etc. If the secondary containment passes the inspection, soil sampling and analyses shall be considered unnecessary to complete

and document closure. If lapses of integrity are noted and determined to have the potential for wastes to migrate to underlying soils, soil samples shall be collected to evaluate the absence or presence of impacts in accordance with Condition 6.G.

**6.D. WAREHOUSE CONTAINER STORAGE AREA**

- 6.D.I. The warehouse container storage area is used for the storage of drums containing clean products, spent immersion cleaner, dry-cleaning waste, spent parts cleaning solvents, imaging/photochemical wastes, and transfer wastes segregated per the DOT and Uniform Fire Code guidelines. At closure, all drums shall be removed and transported to a Safety-Kleen Recycle Center or other appropriate reclamation or permitted disposal/treatment facility after proper packaging, labeling and manifesting.
- 6.D.II. Prior to cleaning the warehouse container storage area, all cracks shall be sealed. The concrete floor and spill containment trenches shall be cleaned with a detergent-water solution and triple rinsed with water. The final rinsate shall be analyzed in accordance with Table 1-ATTACHMENT 6 to document decontamination. The floor area and trenches will be washed/rinsed until visually clean to the extent practicable. Wash/rinse water shall be containerized in drums, tanker truck or other suitable container(s), and managed as hazardous waste in accordance with applicable regulations.
- 6.D.III. The floor area and trenches shall be considered properly decontaminated when free of waste-related residue/staining, are visually clean, and analytical results indicate the rinse water meets the standards in Table 1.
- 6.D.IV. Following decontamination, the secondary containment structure/area shall be inspected by an independent registered Professional Engineer. Soil sampling shall be conducted in accordance with Condition 6.G., if unsealed cracks, gaps or lapses of integrity are identified during the inspection.

**6.E. SOLVENT RETURN AND FILL STATION**

- 6.E.I. The return and fill station is used to collect and return the spent parts cleaning solvent to the waste storage tank. At closure, the sediment in the dumpsters shall be removed and drummed, labeled, and manifested for proper treatment and disposal at an appropriate reclamation or permitted hazardous waste management facility (i.e., TSD, Safety-Kleen recycling center).
- 6.E.II. The dumpster and the dock area in the return and fill station shall be thoroughly decontaminated with a high-pressure detergent-water solution and triple rinsed with water, until visually clean. The final rinsate shall be containerized in a tanker truck or other suitable container(s). The clean dumpster and dock structure shall be reused by S-K or dismantled and recycled as scrap metal. If not reused, the verification of destruction (i.e., remelt) shall be provided by the contractor or scrap metal facility. A final rinsate sample shall be submitted to verify decontamination. The sample shall be analyzed in accordance with Table 1-ATTACHMENT 6. If the

analytical results indicate the rinse water meets the decontamination standards in Table 1, the return/fill station shall be considered properly decontaminated and suitable for reuse or scrapped.

- 6.E.III. Wash water and rinsate shall be containerized and shipped to an appropriate reclamation facility or permitted hazardous waste TSD facility (i.e., S-K recycle center) in accordance with applicable regulations.
- 6.E.IV. Following decontamination, an independent registered Professional Engineer shall inspect the secondary containment structure/area. Soil sampling shall be conducted in accordance with Condition 6.G., if unsealed cracks, gaps or lapses of integrity are identified during the inspection.

**6.F. METAL SHELTER CONTAINER STORAGE AREA**

- 6.F.I. The Metal Shelter Container Storage Area is used to store containers of permitted wastes and 10-day transfer wastes segregated per DOT and Uniform Fire Code guidelines prior to shipment for reclamation or treatment. At closure, any residual waste shall be removed from the metal shelter and shipped to a reclaimer or appropriate treatment or disposal facility. The metal shelter and associated secondary containment pans will be thoroughly cleaned with a high-pressure detergent-water solution and triple rinsed. The rinsate will be collected, transferred to a tanker truck or other suitable container(s), managed as hazardous waste and transported to a permitted TSD (i.e., S-K recycle center).
- 6.F.II. A final rinsate sample will be submitted to verify decontamination. The final rinsate will be sampled and analyzed in accordance with Table 1-ATTACHMENT 6. If the analytical results indicate the rinse water passes the decontamination standard in Table 1, the unit will be considered properly decontaminated and suitable for reuse or scrapped. The metal structure will be reused by Safety-Kleen or dismantled and recycled as scrap metal. If not reused, the verification of destruction (i.e., remelt) will be provided by the contractor or scrap metal facility as part of the closure certification.
- 6.F.III. Following decontamination, an independent registered Professional Engineer will inspect the secondary containment structure/area. Soil sampling shall be conducted in accordance with Condition 6.G, if unsealed cracks, gaps or lapses of integrity are identified during the inspection, which may have allowed wastes to migrate to the subsurface.

**6.G. SOIL SAMPLING AND ANALYSIS PLAN**

- 6.G.I. Soil sampling and analysis shall be conducted at final closure (if necessary) to document completion of closure. If there are cracks, gaps or lapses of integrity in the tank containment area, container storage areas, containment pans or return/fill station secondary containment area, which may have allowed waste migration to underlying soils, a sampling plan will be initiated to assess the absence or presence of hazardous waste migration, potential HWMU or facility-related impacts and the

extent of impacts, if present. The sampling locations shall include previously identified unsealed cracks or gaps within each containment area.

- 6.G.II. If a concrete containment area(s) or containment pans are to be dismantled and removed, samples shall be collected from immediately beneath the unsealed crack(s)/gap(s). If the concrete containment area(s) or containment pans are to remain in-place, samples shall be collected near the perimeter of the containment areas/pans, as close to the target crack(s)/gap(s) or lapses of integrity, as practicable or through a boring directly beneath the cracks/gaps as appropriate. The soil samples will be collected at a depth of approximately 6 to 12 inches beneath the bottom of the concrete containment structure or steel containment pan.
- 6.G.III. The soil samples shall be submitted to a Utah certified laboratory and analyzed in accordance with Table 1-ATTACHMENT 6. Analytical results from soil sampling will be compared to regulatory or site-specific risk-based clean-up levels to document closure or determine the need for additional assessment or remedial action to complete closure.
- 6.G.IV. If the concrete containment area(s) or containment pans are to be removed, samples shall be collected from underneath each unsealed crack or gap through which wastes may have potentially migrated to underlying soil. To gain access to the underlying soil, a boring may need to be constructed through the concrete with an electric rotary hammer drill, coring device, or equivalent. Soil samples shall be obtained from beneath the containment areas, in accordance with industry standards (i.e., hand auger, manual driven probe sampler, split-spoon sampler, or equivalent). The soil samples shall be collected in clean brass tubes or transferred to glass containers and sealed with Teflon lined lids/caps.
- 6.G.V. In addition to the investigative samples collected from under the secondary containment areas (if any), additional samples may be collected at perimeter locations to evaluate background soil quality. If appropriate, the background soil samples will be collected at depth of 0 to 12 inches or the depth intervals representative of the investigative soil samples. The background soil samples (if collected) will be analyzed for the 8 RCRA metals using SW-846 methods.
- 6.G.VI. The sampling equipment will be decontaminated (i.e., washed/rinsed) prior to use and between sampling locations. All rinse water will be collected and managed in accordance with applicable regulations. Decontamination activities will take place over a portable containment unit, the containment sumps within each container storage area, or equivalent.
- 6.G.VII. If the analytical results for the investigative soil samples exceed the acceptable regulatory risk-based levels, the owner/operator (i.e., Safety-Kleen) shall prepare a remedial action plan/closure plan amendment and/or conduct a site-specific risk assessment. If conducted, the risk assessment results will be used to coordinate alternate clean closure objectives with the Director. Background soil quality results may also be evaluated and considered during development of acceptable clean closure objectives.

6.G.VIII. The results shall be forwarded to the Director, with the subsequent closure progress or certification report. Depending on the results of the analyses and/or risk assessment, a closure plan addendum/remedial action plan shall also be submitted to the Director for approval. The closure plan amendment shall include procedures to evaluate the extent of facility-related impacts and/or plan for remedial action to complete closure.

6.G.IX. Safety-Kleen is committed to achieving clean or risk-based closure. Therefore, if necessary, an appropriate closure plan amendment/remedial action plan will be implemented to complete closure. The closure remedial action program shall be designed to be consistent with applicable facility corrective action conditions and corrective measures programs. The additional closure activities or remedial action program may include a plan for additional sampling and analysis to determine the extent of facility-related subsurface impacts. Following completion of any additional soil assessment activities, an appropriate remedial action program shall be implemented to achieve clean or risk-based closure.

**6.H. FACILITY CLOSURE SCHEDULE AND CERTIFICATION**

6.H.I. Within 90 days of receiving the final volume of hazardous wastes, Safety-Kleen shall remove all hazardous wastes from the facility in accordance with this closure plan. The Director may approve a longer period if Safety-Kleen demonstrates that the activities required to comply with this paragraph will, of necessity, take longer than 90 days to complete or the following requirements are met:

6.H.I.a. The facility has the capacity to receive additional hazardous wastes;

6.H.I.b. There is a reasonable likelihood that someone other than the Permittee will recommence operation of the facility within one year;

6.H.I.c. Closure of the hazardous waste management units is incompatible with continued operation of the site; and

6.H.I.d. Safety-Kleen has taken and will continue to take all steps necessary to prevent threats to human health and the environment, including compliance with all applicable permit requirements.

6.H.II. Alternatively, Safety-Kleen may decide to implement partial closure of the facility (i.e., close one or more, but not all permitted hazardous waste units). In this case, Safety-Kleen shall notify the Director of the intent to close one or more of the hazardous waste management units in accordance with this approved closure plan and any subsequent modifications. The notification to the Director shall include a schedule for the planned closure activities, identification of the unit(s) to be closed and unit(s) that will remain in use.

6.H.III. The Permittee shall notify the Director at least 45 days prior to the date on which final closure of the facility is expected to begin. Safety-Kleen shall complete the

planned closure activities in accordance with the approved closure plan within 180 days after receiving the final volume of wastes. If necessary, a request for an extension to this time frame may be submitted to the Director in accordance with R315-264-110 through 120 (specifically R315-264-113(b)).

6.H.IV.

Within 60 days of completion of the final closure activities, Safety-Kleen shall submit to the Director, a certification that the hazardous waste unit or facility, as applicable, has been closed in accordance with the approved closure plan and applicable regulations. This certification shall be signed by Safety-Kleen and an independent registered professional engineer and shall include a description of the unit(s) which underwent closure, field tasks performed, field log, sampling protocols, results of analyses, a summary of the facility status, quantity of waste removed, and supporting documentation including manifests and photographic documentation.

**TABLE 1-ATTACHMENT 6****Safety-Kleen Salt Lake City Service Center  
Closure Plan Analytical Requirements**

<b>Unit</b>	<b>Media</b>	<b>EPA Methods<sup>1</sup></b>	<b>Performance Standard</b>
Tank Storage	Metal (Rinsate) <sup>2</sup>	Toxicity Characteristic - SVOC/VOCs and 8 RCRA Metals	Pass R315-261-24 <sup>3</sup>
		F001-F005 SVOC/VOCs	Below MDL <sup>4</sup>
	Concrete (Rinsate) <sup>2</sup>	Toxicity Characteristic - SVOC/VOCs, and 8 RCRA Metals	Pass R315-261-24 <sup>3</sup>
		F001-F005 SVOC/VOCs	Below MDL <sup>4</sup>
	Soil	Total SVOC/VOCs and 8 RCRA Metals	Below background/MDL <sup>4</sup> or Risk-Based levels
Return and Fill Station	Metal (Rinsate) <sup>2</sup>	Toxicity Characteristic - SVOC/VOCs and 8 RCRA Metals	Pass R315-261-24 <sup>3</sup>
		F001-F005 SVOC/VOCs	Below MDL <sup>4</sup>
	Concrete (Rinsate) <sup>2</sup>	Toxicity Characteristic - SVOC/VOCs, and 8 RCRA Metals	Pass R315-261-24 <sup>3</sup>
		F001-F005 SVOC/VOCs	Below MDL <sup>4</sup>
	Soil	Total SVOC/VOCs and 8 RCRA Metals	Below background/MDL <sup>4</sup> or Risk-Based levels
Warehouse Storage	Concrete (Rinsate) <sup>2</sup>	Toxicity Characteristic - SVOC/VOCs and 8 RCRA Metals	Pass R315-261-24 <sup>3</sup>
		F001-F005 SVOC/VOCs	Below MDL <sup>4</sup>
	Soil	Total SVOC/VOCs and 8 RCRA Metals	Below background/MDL <sup>4</sup> or Risk-Based levels

**TABLE 1-ATTACHMENT 6 - Continued**

<b>Unit</b>	<b>Media</b>	<b>EPA Methods<sup>1</sup></b>	<b>Performance Standard</b>
Metal Shelter	Metal (Rinsate) <sup>2</sup>	Toxicity Characteristic - SVOC/VOCs and 8 RCRA Metals	Pass R315-261-24 <sup>3</sup>
		F001-F005 SVOC/VOCs	Below MDL <sup>4</sup>
	Soil	Total SVOC/VOCs and 8 RCRA Metals	Below background/MDL <sup>4</sup> or Risk-Based levels

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Notes

- 1 8260 for volatiles analysis; 8270 for semivolatiles analysis; 6010 for As, Ba, Cd, Cr, Pb, Se, and Ag; 7470 for Hg
- 2 Final rinsate samples after cleaning concrete/metal media
- 3 Safety-Kleen shall demonstrate passing R315-261-24 on a dry weight correction basis
- 4 MDL = SW-846 Method Detection Limits



**ATTACHMENT 6 – CLOSURE PLAN**

**APPENDIX A**

**CLOSURE COST ESTIMATE**



Insert -Exhibit B-1, Closure Cost Estimate Worksheet Hazardous Waste Units