A1

SKF USA Inc.

SKF

King of Prussia, PA
USA

December 12, 1991

RECEIVED
DEC 16 1991
RCOM SECTION

Mrs. Diane Huffman
U.S. EPA, Region VII
Compliance Section, RCRA Branch
726 Minnesota Avenue
Kansas City, Kansas 66101

RE: 2320 Marconi Avenue
EPA I.D. #MOT300010345

Dear Mrs. Huffman:

In response to your request for information regarding the above referenced site, I have enclosed a section of the RCRA Contingency Plan that was in place while this plant was in operation. As I explained on the phone, this facility was closed in 1986 and the property sold soon thereafter. The information I have submitted identifies the storage areas for virgin and waste material. To knowledge, there were no releases that took place from any of these locations and therefore no remediation was necessary. Prior to the closing of this facility, each of these areas was cleaned and all waste materials disposed of properly.

The only areas not identified on the enclosed map that may be considered SWMU would be the four underground storage tanks. Originally, there were four tanks registered in 1986, but as you can see by the enclosed registration forms, three were closed in 1980 and the remaining tank was closed in 1986 in accordance with applicable requirements.

I have also included the existing file of correspondence dealing with our attempt to get the "TSD" status at this site relinquished. As you can see, we have made every attempt to accomplish this beginning in 1984. In this effort, we have repeatedly furnished information to MODNR and EPA clearly establishing that this facility was not operated as a TSD, rather as a generator only. During the time of our correspondence, no issues were raised by the agencies disputing our position.

R00025204
RCRA Records Center

1100 First Avenue
King of Prussia, PA 19406-1352

Telephone: (215) 962-4300
Telex: 685-1030
FAX: (215) 265-1457
Cable: "SKAYEF"

I realize that the information submitted does not answer all of the questions asked in your request, although having closed this facility five years ago, all of the files are not easily accessible. SKF, however, is very interested in resolving this issue. Therefore, if I can be of any further assistance, do not hesitate to contact me.

Sincerely,

C. W. McGlocklin

C. William McGlocklin
Director of
Environmental Affairs

CWM:bc

Enc.

cc: A. Belenson, Esq.

McQUAY-NORRIS
A UNIT OF SKF INDUSTRIES INC

August 25, 1986

Mr. S. Jorgensen, Program Director
Waste Management Program
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

Plant Closure, Generator I.D. No. MOD990870396 or
MOT300010345

Dear Mr. Jorgensen:

The McQuay-Norris facility ceased manufacturing operations on July 31, 1986. We are submitting our Generator I.D. numbers for your disposition, as you will note we were issued two Generator ID numbers.

We had eleven hazardous waste streams registered with the MODNR and nine obsolete raw material waste streams registered with the MODNR. All hazardous wastes and obsolete wastes were properly packaged and labeled in accordance with DOT regulations and then properly disposed of according to USEPA and MODNR disposal reuglations. Three dispoal facilities were used for our waste disposal, they were Ashland Chemical, I.D. No. MOD031005341, transporter I.D. H-1289, Ace Oil Service, I.D. No. H-1510 and Clayton Chemical in Illinois, I.D. No. ILD066918327, transporter was Superior Equipment, I.D. No. MOD031102023. To the best of my knowledge there is no hazardous waste left at this site.

Any future correspondence regarding McQuay-Norris should be addressed to:

Mr. Bill McGlocklin
SKF Corporate Headquarters
1100 First Avenue
King of Prussia, PA 19406-1352

2320 MARCONI AVE., ST. LOUIS, MO 63110 | (314) 776-4800 | TWX/TELEX: 910-761-0493

M-N

It has been a pleasure working with the MODNR.

Very truly yours,

James S. Stromske
Environmental Specialist

cc: M. W. Puryer
Regional Office
Missouri Department of Natural Resources
Division of Environmental Quality
8460 Watson Road - Suite 217
St. Louis, MO 63119

bcc: C. W. McGlocklin - King of Prussia
A. Belenson - King of Prussia
A. Kerns - St. Louis

8345E/jh

McQUAY-NORRIS

April 28, 1986

Mr. Gordon Ackley, UST Coordinator
Missouri Department of Natural Resources
P. O. Box 176
Jefferson City, MO 65102

RE: Underground Storage Tank Amendment

Dear Mr. Ackley:

Attached you will find USEPA Form 7530-1 (11-85) "Notification for Underground Storage Tanks" for the McQuay-Norris plant in St. Louis, Missouri. This is an amendment to the original notification filed on January 3, 1986.

Should you have any questions, please let me know.

Very truly yours,

James S. Stromske
Environmental Specialist
McQuay-Norris

BBC C. W. McGlocklin K of P
A. Kerns
B. McEwen

7135E
JSS/kw

2320 MARCONI AVE., ST. LOUIS, MO 63110 | (314) 776-4800 | TWX/TELEX 910-761-0493

M-N

Notification for Underground Storage Tanks

FORM APPROVED
OMB NO 2050-0049
APPROVAL EXPIRES 6-30-88

FOR TANKS IN MO

RETURN COMPLETED FORM TO
Gordon Ackley, UST Coordinator
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

STATE USE ONLY
I D Number
Date Received

GENERAL INFORMATION

Notification is required by Federal law for all underground tanks that have been used to store regulated substances since January 1, 1974, that are in the ground as of May 8, 1986, or that are brought into use after May 8, 1986. The information requested is required by Section 9002 of the Resource Conservation and Recovery Act, (RCRA), as amended.

The primary purpose of this notification program is to locate and evaluate underground tanks that store or have stored petroleum or hazardous substances. It is expected that the information you provide will be based on reasonably available records, or, in the absence of such records, your knowledge, belief, or recollection.

Who Must Notify? Section 9002 of RCRA, as amended, requires that, unless exempted, owners of underground tanks that store regulated substances must notify designated State or local agencies of the existence of their tanks. Owner means—
(a) in the case of an underground storage tank in use on November 8, 1984, or brought into use after that date, any person who owns an underground storage tank used for the storage, use, or dispensing of regulated substances, and
(b) in the case of any underground storage tank in use before November 8, 1984, but no longer in use on that date, any person who owned such tank immediately before the discontinuation of its use.

What Tanks Are Included? Underground storage tank is defined as any one or combination of tanks that (1) is used to contain an accumulation of "regulated substances," and (2) whose volume (including connected underground piping) is 10% or more beneath the ground. Some examples are underground tanks storing: 1. gasoline, used oil, or diesel fuel, and 2. industrial solvents, pesticides, herbicides or fumigants.

What Tanks Are Excluded? Tanks removed from the ground are not subject to notification. Other tanks excluded from notification are:
1. farm or residential tanks of 1,100 gallons or less capacity used for storing motor fuel for noncommercial purposes;
2. tanks used for storing heating oil for consumptive use on the premises where stored;
3. septic tanks;
4. pipeline facilities (including gathering lines) regulated under the Natural Gas Pipeline Safety Act of 1968, or the Hazardous Liquid Pipeline Safety Act of 1979, or which is an intrastate pipeline facility regulated under State laws;
5. surface impoundments, pits, ponds, or lagoons;
6. storm water or waste water collection systems;
7. flow-through process tanks;
8. liquid traps or associated gathering lines directly related to oil or gas production and gathering operations;
9. storage tanks situated in an underground area (such as a basement, cellar, mineworking, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor.

What Substances Are Covered? The notification requirements apply to underground storage tanks that contain regulated substances. This includes any substance defined as hazardous in section 101 (14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), with the exception of those substances regulated as hazardous waste under Subtitle C of RCRA. It also includes petroleum, e.g., crude oil or any fraction thereof which is liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute).

Where To Notify? Completed notification forms should be sent to the address given at the top of this page.

When To Notify? 1. Owners of underground storage tanks in use or that have been taken out of operation after January 1, 1974, but still in the ground, must notify by May 8, 1986. 2. Owners who bring underground storage tanks into use after May 8, 1986, must notify within 30 days of bringing the tanks into use.

Penalties: Any owner who knowingly fails to notify or submits false information shall be subject to a civil penalty not to exceed $10,000 for each tank for which notification is not given or for which false information is submitted.

INSTRUCTIONS

Please type or print in ink all items except "signature" in Section V. **This form must by completed for each location containing underground storage tanks.** If more than 5 tanks are owned at this location, photocopy the reverse side, and staple continuation sheets to this form.

Indicate number of continuation sheets attached [ ]

I. OWNERSHIP OF TANK(S)

Owner Name (Corporation, Individual, Public Agency, or Other Entity)
McQuay-Norris, A Unit of SKF Industries

Street Address
2320 Marconi Avenue

County
St. Louis

City: St. Louis | State: MO | ZIP Code: 63110

Area Code: 314 | Phone Number: 776 4800

Type of Owner *(Mark all that apply [X])*
- [X] Current
- [ ] Former
- [ ] State or Local Gov't
- [ ] Federal Gov't (GSA facility I.D. no. _____)
- [ ] Private or Corporate
- [ ] Ownership uncertain

II. LOCATION OF TANK(S)

(If same as Section 1, mark box here [X])

Facility Name or Company Site Identifier, as applicable

Street Address or State Road, as applicable

County

City (nearest) | State | ZIP Code

Indicate number of tanks at this location: 4

Mark box here if tank(s) are located on land within an Indian reservation or on other Indian trust lands [ ]

III. CONTACT PERSON AT TANK LOCATION

Name (If same as Section I, mark box here [ ]): James S. Stromske
Job Title: Environmental Specialists
Area Code: (314) Phone Number: 776-4800

IV. TYPE OF NOTIFICATION

[X] Mark box here only if this is an amended or subsequent notification for this location.

V. CERTIFICATION (Read and sign after completing Section VI.)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Name and official title of owner or owner's authorized representative	Signature	Date Signed
General Manager	[signature]	5/7/86

CONTINUE ON REVERSE SIDE

Owner Name (from Section I) Same Location (from Section II) Same Page No. 1 of 2 Pages

VI. DESCRIPTION OF UNDERGROUND STORAGE TANKS *(Complete for each tank at this location.)*

Tank Identification No. (e.g., ABC-123), or Arbitrarily Assigned Sequential Number (e.g., 1,2,3...)	Tank No. 4	Tank No.	Tank No.	Tank No.	Tank No.
1. Status of Tank *(Mark all that apply ☒)* — Currently in Use	☐	☐	☐	☐	☐
Temporarily Out of Use	☐	☐	☐	☐	☐
Permanently Out of Use	☒	☐	☐	☐	☐
Brought into Use after 5/8/86	☐	☐	☐	☐	☐
2. Estimated Age (Years)	15				
3. Estimated Total Capacity (Gallons)	1000				
4. Material of Construction *(Mark one ☒)* — Steel	☒	☐	☐	☐	☐
Concrete	☐	☐	☐	☐	☐
Fiberglass Reinforced Plastic	☐	☐	☐	☐	☐
Unknown	☐	☐	☐	☐	☐
Other, Please Specify					
5. Internal Protection *(Mark all that apply ☒)* — Cathodic Protection	☐	☐	☐	☐	☐
Interior Lining (e.g., epoxy resins)	☐	☐	☐	☐	☐
None	☒	☐	☐	☐	☐
Unknown	☐	☐	☐	☐	☐
Other, Please Specify					
6. External Protection *(Mark all that apply ☒)* — Cathodic Protection	☐	☐	☐	☐	☐
Painted (e.g., asphaltic)	☐	☐	☐	☐	☐
Fiberglass Reinforced Plastic Coated	☐	☐	☐	☐	☐
None	☒	☐	☐	☐	☐
Unknown	☐	☐	☐	☐	☐
Other, Please Specify					
7. Piping *(Mark all that apply ☒)* — Bare Steel	☒	☐	☐	☐	☐
Galvanized Steel	☐	☐	☐	☐	☐
Fiberglass Reinforced Plastic	☐	☐	☐	☐	☐
Cathodically Protected	☐	☐	☐	☐	☐
Unknown	☐	☐	☐	☐	☐
Other, Please Specify					
8. Substance Currently or Last Stored in Greatest Quantity by Volume *(Mark all that apply ☒)* — **a. Empty**	☐	☐	☐	☐	☐
b. Petroleum					
Diesel	☐	☐	☐	☐	☐
Kerosene	☐	☐	☐	☐	☐
Gasoline (including alcohol blends)	☒	☐	☐	☐	☐
Used Oil	☐	☐	☐	☐	☐
Other, Please Specify					
c. Hazardous Substance	☐	☐	☐	☐	☐
Please Indicate Name of Principal CERCLA Substance	8006-61-9				
OR Chemical Abstract Service (CAS) No.					
Mark box ☒ if tank stores a mixture of substances	☐	☐	☐	☐	☐
d. Unknown	☐	☐	☐	☐	☐
9. Additional Information (for tanks permanently taken out of service) — **a.** Estimated date last used (mo/yr)	4/86	/	/	/	/
b. Estimated quantity of substance remaining (gal.)					
c. Mark box ☒ if tank was filled with inert material (e.g., sand, concrete)	☒	☐	☐	☐	☐

McQUAY-NORRIS

January 3, 1986

Mr. Gordon Ackley, UST Coordinator
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

RE: Underground Storage Tank Notification

Dear Mr. Ackley:

Attached you will find USEPA Form 7530-1(11-85) "Notification for Underground Storage Tanks" for the McQuay-Norris plant in St. Louis, Missouri. This notification is being filed as required by CFR 40 Part 280.3.

Should you have any questions please let me know.

Very truly yours,

[redacted]
Environmental Specialist

cc: C.W. McGlocklin - KoP
A. Kerns
K. Lerch
J. Palovchik

5167E
cs

2320 MARCONI AVE., ST. LOUIS, MO 63110 | (314) 776-4800 | TWX/TELEX: 910-761-0493

M-N

APPENDIX I to §280.3

Notification for Underground Storage Tanks

FORM APPROVED
OMB NO. 2050-0068
APPROVAL EXPIRES 6-30-88

STATE USE ONLY

I.D. Number

Date Received

GENERAL INFORMATION

Notification is required by Federal law for all underground tanks that have been used to store regulated substances since January 1, 1974, that are in the ground as of May 8, 1986, or that are brought into use after May 8, 1986. The information requested is required by Section 9002 of the Resource Conservation and Recovery Act, (RCRA), as amended.

The primary purpose of this notification program is to locate and evaluate underground tanks that store or have stored petroleum or hazardous substances. It is expected that the information you provide will be based on reasonably available records, or, in the absence of such records, your knowledge, belief, or recollection.

Who Must Notify? Section 9002 of RCRA, as amended, requires that, unless exempted, owners of underground tanks that store regulated substances must notify designated State or local agencies of the existence of their tanks. Owner means:

(a) in the case of an underground storage tank in use on November 8, 1984, or brought into use after that date, any person who owns an underground storage tank used for the storage, use, or dispensing of regulated substances, and

(b) in the case of any underground storage tank in use before November 8, 1984, but no longer in use on that date, any person who owned such tank immediately before the discontinuation of its use.

What Tanks Are Included? Underground storage tank is defined as any one or combination of tanks that (1) is used to contain an accumulation of "regulated substances," and (2) whose volume (including connected underground piping) is 10% or more beneath the ground. Some examples are underground tanks storing: 1. gasoline, used oil, or diesel fuel, and 2. industrial solvents, pesticides, herbicides or fumigants.

What Tanks Are Excluded? Tanks removed from the ground are not subject to notification. Other tanks excluded from notification are:

1. farm or residential tanks of 1,100 gallons or less capacity used for storing motor fuel for noncommercial purposes;
2. tanks used for storing heating oil for consumptive use on the premises where stored;
3. septic tanks;
4. pipeline facilities (including gathering lines) regulated under the Natural Gas Pipeline Safety Act of 1968, or the Hazardous Liquid Pipeline Safety Act of 1979, or which is an intrastate pipeline facility regulated under State laws;
5. surface impoundments, pits, ponds, or lagoons;
6. storm water or waste water collection systems;
7. flow-through process tanks;
8. liquid traps or associated gathering lines directly related to oil or gas production and gathering operations;
9. storage tanks situated in an underground area (such as a basement, cellar, mineworking, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor.

What Substances Are Covered? The notification requirements apply to underground storage tanks that contain regulated substances. This includes any substance defined as hazardous in section 101 (14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), with the exception of those substances regulated as hazardous waste under Subtitle C of RCRA. It also includes petroleum, e.g., crude oil or any fraction thereof which is liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute).

Where To Notify? Completed notification forms should be sent to the address given at the top of this page.

When To Notify? 1. Owners of underground storage tanks in use or that have been taken out of operation after January 1, 1974, but still in the ground, must notify by May 8, 1986. 2. Owners who bring underground storage tanks into use after May 8, 1986, must notify within 30 days of bringing the tanks into use.

Penalties: Any owner who knowingly fails to notify or submits false information shall be subject to a civil penalty not to exceed $10,000 for each tank for which notification is not given or for which false information is submitted.

INSTRUCTIONS

Please type or print in ink all items except "Signature" in Section V. **This form must be completed for each location containing underground storage tanks.** If more than 5 tanks are owned at this location, photocopy the reverse side, and staple continuation sheets to this form.

Indicate number of continuation sheets attached: [ ]

I. OWNERSHIP OF TANK(S)

Owner Name (Corporation, Individual, Public Agency, or Other Entity): McQuay-Norris, a Unit of SKF Industries, Inc.

Street Address: 2320 Marconi Avenue

County: St. Louis

City: St. Louis | State: MO | ZIP Code: 63110

Area Code: 314 | Phone Number: 776 4800

Type of Owner (*Mark all that apply* ☒)

- ☒ Current
- ☐ Former
- ☐ State or Local Gov't
- ☐ Federal Gov't (GSA facility I.D. no. _____)
- ☐ Private or Corporate
- ☐ Ownership uncertain

II. LOCATION OF TANK(S)

(If same as Section 1, mark box here ☒)

Facility Name or Company Site Identifier, as applicable

Street Address or State Road, as applicable

County

City (nearest) | State | ZIP Code

Indicate number of tanks at this location: 4

Mark box here if tank(s) are located on land within an Indian reservation or on other Indian trust lands: ☐

III. CONTACT PERSON AT TANK LOCATION

Name (If same as Section I, mark box here ☐): Kim Lerch

Job Title: Environmental Specialist

Area Code: 314 | Phone Number: 776 4800

IV. TYPE OF NOTIFICATION

☐ Mark box here only if this is an amended or subsequent notification for this location.

V. CERTIFICATION (Read and sign after completing Section VI.)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Name and official title of owner or owner's authorized representative: Allen W. Kerns, General Manager

Signature: [signature]

Date Signed: 11/1/86

CONTINUE ON REVERSE SIDE

Owner Name (from Section I) Same Location (from Section II) Same Page No. 1 of 2 Pages

VI. DESCRIPTION OF UNDERGROUND STORAGE TANKS *(Complete for each tank at this location.)*

Tank Identification No. (e.g., ABC-123), or Arbitrarily Assigned Sequential Number (e.g., 1,2,3...)	Tank No. 1	Tank No. 2	Tank No. 3	Tank No. 4	Tank No.
1. Status of Tank *(Mark all that apply ☒)*					
Currently in Use	☐	☐	☐	X	☐
Temporarily Out of Use	☐	☐	☐	☐	☐
Permanently Out of Use	X	X	X	☐	☐
Brought into Use after 5/8/86	☐	☐	☐	☐	☐
2. Estimated Age (Years)	6	6	6	15	
3. Estimated Total Capacity (Gallons)	1000	1000	1000	1000	
4. Material of Construction *(Mark one ☒)*					
Steel	X	X	X	X	☐
Concrete	☐	☐	☐	☐	☐
Fiberglass Reinforced Plastic	☐	☐	☐	☐	☐
Unknown	☐	☐	☐	☐	☐
Other, Please Specify					
5. Internal Protection *(Mark all that apply ☒)*					
Cathodic Protection	☐	☐	☐	☐	☐
Interior Lining (e.g., epoxy resins)	☐	☐	☐	☐	☐
None	X	X	X	X	☐
Unknown	☐	☐	☐	☐	☐
Other, Please Specify					
6. External Protection *(Mark all that apply ☒)*					
Cathodic Protection	☐	☐	☐	☐	☐
Painted (e.g., asphaltic)	☐	☐	☐	☐	☐
Fiberglass Reinforced Plastic Coated	X	X	X	☐	☐
None	☐	☐	☐	X	☐
Unknown	☐	☐	☐	☐	☐
Other, Please Specify					
7. Piping *(Mark all that apply ☒)*					
Bare Steel	X	X	X	X	☐
Galvanized Steel	☐	☐	☐	☐	☐
Fiberglass Reinforced Plastic	☐	☐	☐	☐	☐
Cathodically Protected	☐	☐	☐	☐	☐
Unknown	☐	☐	☐	☐	☐
Other, Please Specify					
8. Substance Currently or Last Stored in Greatest Quantity by Volume *(Mark all that apply ☒)*					
a. Empty	☐	☐	☐	☐	☐
b. Petroleum					
Diesel	☐	☐	☐	☐	☐
Kerosene	☐	☐	☐	☐	☐
Gasoline (including alcohol blends)	X	X	X	X	☐
Used Oil	☐	☐	☐	☐	☐
Other, Please Specify					
c. Hazardous Substance	X	X	X	X	☐
Please Indicate Name of Principal CERCLA Substance OR Chemical Abstract Service (CAS) No.	8006-61-9	8006-61-9	8006-61-9	8006-61-9	
Mark box ☒ if tank stores a mixture of substances	☐	☐	☐	☐	☐
d. Unknown	☐	☐	☐	☐	☐
9. Additional Information (for tanks permanently taken out of service)					
a. Estimated date last used (mo/yr)	5 / 80	5/80	5/80	/	/
b. Estimated quantity of substance remaining (gal.)	0	0	0		
c. Mark box ☒ if tank was filled with inert material (e.g., sand, concrete)	X	X	X	☐	☐

McQUAY-NORRIS
A UNIT OF SAF INDUSTRIES, INC

August 12, 1986

N. J. Svetanics
Fire Marshal, City of St. Louis
Division of Fire & Fire Protection

Plant Closure

Dear Sir:

The McQuay-Norris plant in St. Louis, Missouri ceased all manufacturing on July 31, 1986. We are submitting the following permits for your disposition.

Permit No.	Permit Type
109934	Material Storage
109935	Service Stations and Garages
109936	Welding & Cutting 2-5 Units
109937	Storage Flammable Liquids Class 1 over 500
109938	Storage Flammable Liquids Dispensing of Fuel
109939	Hazardous Materials and Storage
109940	Liquified Petroleum Gases Under 500 lbs.

Should you have any questions please contact writer at 776-4800.

Very truly yours,

James S. Stromske
Environmental Specialist

cc: C. W. McGlocklin - King of Prussia
A. Belenson - King of Prussia
A. Kerns - St. Louis

8268E

2320 MARCONI AVE., ST. LOUIS, MO 63110 | (314) 776-4800 | TWX/TELEX: 910-761-0493

M-N

McQUAY-NORRIS
A UNIT OF SPX INDUSTRIES INC

August 11, 1986

Mr. B. Schuchman
Metropolitan St. Louis Sewer District
10 E. Grand Avenue
St. Louis, MO 63147

Plant Closure

Dear Bill,

As you are aware the McQuay-Norris Plant in St. Louis has closed and all manufacturing ceased July 31, 1986. The zinc and chrome plating lines have been cleaned, so there should be no wastewater discharge, except sanitary. At the present time there are about 80 employees in the APD aftermarket which does no manufacturing.

All hazardous material and wastes have been disposed of off the plant site. Bill, it has been a pleasure working with you. Should you have any questions please let me know.

Very truly yours,

James S. Stromske
Environmental Specialist

cc: C. W. McGlocklin - King of Prussia
A. Belenson - King of Prussia
A. Kerns - St. Louis

8259E/jh

2320 MARCONI AVE., ST. LOUIS, MO 63110 | (314) 776-4800 | TWX/TELEX: 910-761-0493

M-N

McQUAY-NORRIS

August 25, 1986

State of Illinois
Environmental Protection Agency
Division of Land Pollution Central
2200 Churchill Road
Springfield, IL 62706

Plant Closure - Generator No. IL9291890199

Dear Sir:

The McQuay-Norris facility in St. Louis, Missouri ceased all manufacturing on July 31, 1986. We are therefore submitting our Generator No. IL9291890199 and status for your disposition. All future correspondence regarding McQuay-Norris should be referred to:

Mr. Bill McGlocklin
SKF Corporate Headquarters
1100 First Avenue
King of Prussia, PA 19406-1352

It has been a pleasure working with the staff of the IEPA.

Very truly yours,

James Stromske
Environmental Specialist

cc: C. W. McGlocklin - King of Prussia
A. Belenson - King of Prussia
A. Kerns - St. Louis

8346E/jh

2320 MARCONI AVE., ST. LOUIS, MO 63110 | (314) 776-4800 | TWX/TELEX: 910-761-0493

M-N

PART III

CONTINGENCY PLAN FOR SPILL INCIDENTS

10. The Emergency Response Coordinator, or Emergency Response Action Supervisor will see that the spill kits and equipment are taken care of properly.

SPILL INCIDENT INSTRUCTIONS TO PLANT EMERGENCY RESPONSE TEAM

1. The alarm requiring services of the Plant Emergency Response Team will be the public address system in the plant.
2. Go quickly as possible to the scene of trouble.
3. Check spill area.
4. The Emergency Response Action Supervisor will be the shift foreman. All members of the Emergency Response Team report to him, in the absence of the Emergency Response Coordinator.
5. If the spill should ignite, a fire occurs, the Emergency Response Coordinator or the Emergency Response Action Supervisor will personally summon the City of St. Louis Fire Department.
6. The Emergency Response Coordinator, or Emergency Response Action Supervisor will dispatch a man to the main factory gate to meet the City Fire Department and direct them to the scene of the fire.
7. The Plant Emergency Response Coordinator, or Emergency Response Action Supervisor will see that the sprinkler system functions properly.
8. Emergency Response Coordinator, or Emergency Response Action Supervisor will direct all steps in controlling and containing any spill.
9. All emergency response members must learn the proper prevention and containment of spills and should familiarize themselves with equipment needed for cleaning up spills. (i.e., spill kits). Any questions arising will be answered in a meeting of the emergency organization. This should enable them to act promptly and efficiently under the direction of the Emergency Response Coordinator, or the Emergency Response Action Supervisor.

SPILL INCIDENT PERSONNEL INSTRUCTIONS

SECTION 1.0

Spill Prevention Plan

Precautions will be taken to prevent any accidental spills from occurring.

COUNTERMEASURE PLAN #1 IN CASE OF SPILL

OIL SPILL:

Should a spill occur, it will be contained and cleaned up using a spill kit. The spill kit will consist of shovels, empty drums, oil absorbent compounds and other necessary items will be maintained in each use area for immediate cleanup of any accidental spill. No water washdowns will be allowed.

CONTINGENCY PLAN FOR OIL AND OILY MATERIALS

SECTION 2.0

COUNTERMEASURE PLAN #8 KODAK (CORROSIVE)

Neutralize with sodium bisulfite then flush to sewer with copious amounts of water.

COUNTERMEASURE PLAN #7 FOR SOLVENT (FLAMMABLE-COMBUSTIBLE)

Eliminate all ignition sources. Persons not wearing protective equipment should be excluded from area of spill until clean-up has been completed. Shut off source. Dike area of spill. Absorb liquid with sand, clay, earth or floor absorbent. Shovel into containers. Prevent runoff.

COUNTERMEASURE PLAN # 6 FOR PARCO (CORROSIVE)

Dike to contain spill. Absorb on non-combustible material (vermiculite, sand, earth) and place in drum for disposal. Flush contaminated area with water.

COUNTERMEASURE PLAN #5 FOR CHROME (CORROSIVE)

Dike to contain spill. Absorb on non-combustible material (vermiculite, sand, earth) and place in drum for disposal. Do not flush contaminated area with water.

COUNTERMEASURE PLAN #4 FOR NICKELPENTRATE (Corrosive)

Cover contaminated surface with sodium bicarbonate or soda ash, slaked lime mixture (50-50). Mix and add water if necessary to form a slurry. Scrape up slurry and wash down drain with excess water. Wash site with soda ash solutions.

COUNTERMEASURE PLAN #3 FOR POTASH

Sweep up material and place in suitable container for disposal.

COUNTERMEASURE PLAN #2 FOR CYANIDE

Stay up wind. Keep acid away from area. Do not breathe gas, dust or mist from product. Keep product dry if possible. Contain spill. Prevent material from getting into water or sewer. If in solution, prevent contact with metals as hydrogen may be generated. If material is in dry state, shovel up into steel container, sweep up all powder, and dam area and treat residual with sodium hyprochlorite to destroy remaining cyanide. If material is in solution, contain spill and absorb with sand or gravel. Shovel into steel container.

COUNTERMEASURE PLAN #1 IN CASE OF SPILL FOR GASES

Keep upwind of leak, evacuate area and notify appropriate agencies if the leak or spill is excessive.

Keep area evacuated until all gases or vapors have been dispersed.

Remove all sources of ignition.

CONTINGENCY PLAN FOR SPILLS

A. CAUSTIC OR ACID SPILL PREVENTION

Measurements will be taken periodically of the plant effluents to determine the pH of the water. If the pH is out of the range from 5.5 to 10.5, steps will be taken to neutralize the water.

B. DRY HAZARDOUS MATERIALS SPILL PREVENTION

The dry material will be placed in a proper container and no water washdown will be allowed.

C. LIQUID HAZARDOUS MATERIAL SPILL PREVENTION

Liquid material to be maintained in proper containers and stored in accordance with good manufacturing practices.

D. GASEOUS HAZARDOUS MATERIAL SPILL PREVENTION

Gaseous material to be maintained in proper container and stored in accordance with good manufacturing practices.

HAZARDOUS AND TOXIC MATERIALS

CONTINGENCY PLAN

SECTION 3.0

LOCATION #11 - RECEIVING STORE ROOM BUILDING NO. 25

POSSIBLE SPILL MATERIAL

ITEM 1 - 6 - 55 Gallon Drum	-	Enlube 820AW
2 - 2 - 55 Gallon Drum	-	Enway 30 HWO
3 - 3 - 55 Gallon Drum	-	Entac T-45
4 - 3 - 55 Gallon Drum	-	Castral Superedge 4-122L
5 - 4 - 55 Gallon Drum	-	Ensol EM-5P-5
6 - 6 - 55 Gallon Drum	-	EC-375D

SPILL PREVENTION PLAN

Item 1 through 6 refer to plan on page 2.1.

COUNTERMEASURE PLAN IN CASE OF SPILL

Item 1 through 6 refer to plan on page 2.2.

Use spill No. 5.

LOCATION #13 - GARAGE IN BUILDING #28

POSSIBLE SPILL MATERIAL

Item 1 - 55 Gallon Drum - Lubricant; engine hydraulic oil and transmission oil.

Item 2 - 55 Gallon Drum - Anti Freeze

SPILL PREVENTION PLAN

Item 1 and 2 refer to plan on page 2.1.

COUNTERMEASURE PLAN IN CASE OF SPILL

Item 1 and 2 refer to plan on page 2.2

Use spill kit #7.

LOCATION #7 - NORTHWEST CORNER OF BUILDING #4 BY COMPRESSOR

POSSIBLE SPILL MATERIAL

Item 1 - 3 - 55 gallon drums - Lubricants, MOBILE 1409, ENSOL FM-5P-5, ENLUBE 164-AC

SPILL PREVENTION PLAN

Item 1 - Refer to plan on page 2.1

COUNTERMEASURE PLAN IN CASE OF SPILL

Item 1 - refer to plan on page 2.2

Use spill kit #7.

LOCATION #11 - NORTHEAST CORNER OF BUILDING #3

Possible Spill Material

Item 1 4-55 Gallon Drum - Lubricants, ENTAC T-45, ENLUBOL 820AW, ENWAY 30-HWO, AIRLUBE

SPILL PREVENTION PLAN

Item 1 - refer to plan on page 2.1

COUNTERMEASURE PLAN IN CASE OF SPILL

Item 1 - refer to plan on page 2.2

Use spill kit no. 1.

INTRODUCTION

All locations listed for oil or hazardous materials will be on the plant emergency equipment drawing in Part II Section 5.0. They will be designated by the letter "L".

OIL AND OILY MATERIALS CONTINGENCY PLAN

POTENTIAL SPILL AREAS IN THE FACILITY

SECTION 4.0

COUNTERMEASURE PLAN IN CASE OF SPILL

Items 1 thru 3, 16 and 17 - refer to plan on page 3.8

Items 4 thru 6 and 13 - refer to plan on page 3.6

Items 7 and 12 - refer to plan on 3.4

Items 8 thru 11 and 14 and 15 - refer to plan on page 3.6

USE SPILL KIT NO. 5

LOCATION NO. 14 - STORE ROOM

POSSIBLE SPILL MATERIAL

Item 1 - 3 - 55 gallon drum	- Kerosene
Item 2 - 6 - 55 gallon drum	- Mineral spirits
Item 3 - 12 - 55 gallon drum	- Chlorethane VG
Item 4 - 12 - 55 gallon drum	- Parco lubrite #2
Item 5 - 2 - 55 gallon drum	- Parco cleaner 2191
Item 6 - 4 - 5 gallon pail	- Parcolene #1
Item 7 - 3 - 100 lb bag	- Caustic Potash UN1813
Item 8 - 4 - 100 lb bag	- Unichrome CR110
Item 9 - 8 - 100 lb bag	- Unichrome CR130
Item 10 - 2 - 100 lb bag	- Unichrome 80X
Item 11 - 1 - 100 lb bag	- Perliton 398
Item 12 - 8 - 100 lb bag	- Potassium Stannate
Item 13 - 12 - Qt. Bottles	- Hydrochloric Acid
Item 14 - 2 - 200 lb bags	- Nickel pentrate
Item 15 - 4 - 5 gallon container	- Tin Sol B
Item 16 - 1 - 55 gallon drum	- Cooks Coolex

Item 17 - Numerous 55 gallon drums of recycled kerosene/chlorethane VG/Mineral spirits and rust veto.

SPILL PREVENTION PLAN

Item 1 thru 3, 16 and 17 - refer to plan on page 3.1 (C)

Item 4 thru 6, 13 - refer to plan on page 3.1 (A) (C)

Items 7 and 12 - refer to plan on page 3.1 (B) (C)

Items 8 thru 11 and 14 and 15 - refer to plan on page 3.1 (A) (B)

LOCATION NO. 15 - WASTE STORAGE AREA BUILDING NO. 30

POSSIBLE SPILL MATERIAL

Quantities will change depending on material being prepaid for shipment off the premises.

Use Spill Kit No. 5

LOCATION NO. 10 - PRINT SHOP BUILDING NO. 24

POSSIBLE SPILL MATERIAL

Item 1 - 2 - 5 Gal. Containers - Kodak 66 developer

Item 2 - 4 - 5 Gal. Containers - Kodak 24 Fixer

SPILL PREVENTION PLAN

Item 1 and 2 refer to plan on page 3.1 (C)

COUNTERMEASURE PLAN IN CASE OF SPILL

Item 1 and 2 - Refer to plan on page 3.9

Use spill kit no. 4

LOCATION NO. 9 - CHROME DEPT. BUILDING NO. 23

POSSIBLE SPILL MATERIAL

Item 1 - 2 - 100 lb. Drum - Chrome CR 130

Item 2 - 1 - 5 Gal. Pail - Parcolene 30

Item 3 - 1 - 55 Gal. Drum - Detrex 3750

Item 4 - 1 - 100 lb. Bag - Chrome CR110

Item 5 - 1 - 100 lb. Bag - Unichrome 80X Strip Salt

Item 6 - 1 - 100 lb. Bag - Techflake 99

SPILL PREVENTION PLAN

Item 1 thru 6 refer to plan on page 3.1 (A) (C)

COUNTERMEASURE PLAN IN CASE OF SPILL

Item 1 and 3 thru 6 - Refer to plan on page 3.6

Item 2 - Refer to plan on page 3.7

Use spill kit no. 4

LOCATION NO. 8 - SPRING DEPT. BUILDING NO. 21

POSSIBLE SPILL MATERIAL

Item 1 - 1 - 55 Gal. Drum - 111 Trichlorethane

Item 2 - 1 - 400 lb. Drum - Nickle Pentrate

Item 3 - 1 - 400 lb. Drum - Electro-Glo

SPILL PREVENTION PLAN

Item 1 - Refer to plan on page 3.1 (C)

Item 2 & 3 - Refer to plan on page 3.1 (A)(B)

COUNTERMEASURE PLAN IN CASE OF SPILL

Item 1 - Refer to plan on page 3.8

Item 2 & 3 - Refer to plan on page 3.5

Use spill kit no. 4

LOCATION NO. 12 - WELD SHOP BUILDING NO. 26A

POSSIBLE SPILL MATERIAL

Item 1 - 1 - 200 lb. Drum - Cyanide

SPILL PREVENTION PLAN

Item 1 - Refer to plan on page 3.1 (B)

COUNTERMEASURE PLAN IN CASE OF SPILL

Item 1 - Refer to plan on page 3.3

Use spill kit no. 7

LOCATION NO. 6 - CTB AREA NORTH END BUILDING NO. 4

POSSIBLE SPILL MATERIAL

Item 1 - 1 - 55 Gallon Drums - 111 Trichlorethane

SPILL PREVENTION PLAN

Item 1 - Refer to plan on page 3.1 (C)

COUNTERMEASURE PLAN IN CASE OF SPILL

Item 1 - Refer to plan on page 3.8

Use spill kit no. 1

LOCATION NO. 5 - THIMBLE MILL AND O.D. LAP NORTH END BUILDING NO. 3

POSSIBLE SPILL MATERIAL

Item 1 - 3 - 55 Gallon Drums - Calgon 816

Item 2 - 2 - 55 Gallon Drums - Kerosene

SPILL PREVENTION PLAN

Items 1 and 2 - refer to plan on page 3.1 (C)

COUNTERMEASURE PLAN IN CASE OF SPILL

Item 1 - Refer to plan on page 3.7

Item 2 - Refer to plan on page 3.8

Use Spill Kit No. 1.

LOCATION NO. 4 - BULK WRAP EAST SIDE OF BUILDING NO. 2A

POSSIBLE SPILL MATERIAL

Item 1 - 1 - 55 Gallon Drums - Rust Veto

Item 2 - 2 - 55 Gallon Drums - Mineral Spirits

Item 3 - 1 - 55 Gallon Drums - Anti Corit

Item 4 - 1 - 55 Gallon Drums - 111 Trichlrethane

Item 5 - 2 - 55 Gallon Drums - Waste Mineral Spirits

SPILL PREVENTION PLAN

Items 1 thru 5 refer to plan on page 3.1 (C)

COUNTERMEASURE PLAN IN CASE OF SPILL

Items 1 thru 5 refer to plan on page 3.8.

Use Spill Kit No. 2

LOCATION NO. 3 - PARCO LINE N.W. CORNER BUILDING NO. 2A

POSSIBLE SPILL MATERIAL

Item 1 - 1 - 55 Gallon Drum	-	Parco Cleaner
Item 2 - 2 - 55 Gallon Drum	-	Parco Lubrite 2
Item 3 - 1 - 55 Gallon Drum	-	111 Trichlorethane
Item 4 - 1 - 120 Kilogram Drum	-	Caustic Potash
Item 5 - 1 - 55 Gallon Drum	-	Detrex EC3750
Item 6 - 1 - 55 Gallon Drum	-	Phos Dip
Item 7 - 1 - 55 Gallon Drum	-	Gulf Cut
Item 8 - 1 - 55 Gallon Drum	-	Calgon P2003

SPILL PREVENTION PLAN

Item 1,2, and 6 refer to plan on page 3.1 (A)(C)

Item 3 refer to plan on page 3.1 (C)

Item 4 refer to plan on page 3.1 (A)(B)

Item 5 refer to plan on page 3.1 (A)(C)

Item 7, 8 refer to plan on page 3.1 (C)

COUNTERMEASURE PLAN IN CASE OF SPILL

Items 1, 2, and 6 refer to plan on page 3.7

Item 3 refer to plan on page 3.8

Item 4 refer to plan on page 3.4

Item 5 refer to plan on page 3.6

Item 7, 8 refer to plan on page 3.4

USE SPILL KIT NO. 3

LOCATION NO. 1 - OUTSIDE NORTH END OF MACHINE SHOP BUILDING NO. 2

POSSIBLE SPILL MATERIAL

ITEM 1 - 1 - 55 Gallon Drum - 111 Trichlorethane

SPILL PREVENTION PLAN

Item 1 - Refer to plan on page 3.1 (C)

COUNTERMEASURE PLAN IN CASE OF SPILL

Item 1 - Refer to plan on page 3.8

Use spill kit no. 2.

SUBSTANCES AND MIXTURES OF SUBSTANCES WHICH MAY BE ON THE TOXIC SUBSTANCES LIST (SECTION 307 (a) (1) OF THE CLEAN WATER ACT)

OR

HAZARDOUS SUBSTANCES LIST (SECTION 311 OF THE CLEAN WATER ACT) CONTINGENCY PLAN POTENTIAL SPILL AREAS IN THE FACILITY.

SECTION 5.0

SPILL KIT NO. 7

Kit designed for possible spill material in its location:

1. Brooms (2)
2. Inert material (2 bags)
3. Non-sparking tools
4. Shovels (2)
5. Fire extinguisher (1)
6. Protective clothing (1 suit)
7. Respirators (1 pkg.)
8. Face shields (1)
9. Sorbent sheets (1 bale)

SPILL KIT NO. 6

Kit designed for possible spill material in its location:

1. Brooms (2)
2. Inert material (2 bags)
3. Non-sparking tools
4. Shovels (2)
5. Fire extinguishers (2)
6. Protective clothing (2 suits)
7. Respirators (1 pkg.)
8. Face shields (2)
9. Soda ash (2 bags)

SPILL KIT NO. 5

Kit designed for possible spill material in its location:

1. Brooms (2)
2. Inert material (3 bags)
3. Non-sparking tools
4. Shovels (2)
5. Fire extinguishers (2)
6. Protective clothing (2 suits)
7. Respirators (2 pkgs.)
8. Face shields (2)
9. Soda ash (2 bags)
10. Sodium Hyprochlorite
11. Scott air pak (1)
12. Sorbent sheets (1 bale)
13. Sorbent boom (40 ft.)

SPILL KIT NO. 4

Kit designed for possible spill material in its location:

1. Brooms (2)
2. Inert material (3 bags)
3. Non-sparking tools
4. Fire extinguisher (1)
5. Protective clothing (2 suits)
6. Respirators (1 pkg.)
7. Face shields (2)
8. Scott air pak (1)
9. Soda ash (2 bags)
10. Shovels (2)

SPILL KIT NO. 3

Kit designed for possible spill material in its location:

1. Brooms (2)
2. Inert material (3 bags)
3. Non-sparking tools
4. Fire extinguisher (1)
5. Protective clothing (2 suits)
6. Respirators (1 pkg.)
7. Sodium hyprochlorite (2 bags)
8. Scott air pak (1)
9. Face shields (2)
10. Shovels (2)

SPILL KIT NO. 2

Kit designed for possible spill material in its location:

1. Brooms (2)
2. Inert material (3 bags)
3. Non-sparking tools
4. Fire extinguishers (1)
5. Protective clothing (1 suit)
6. Respirator (1 pkg.)
7. Shovels (2)

SPILL KIT NO. 1

The oil spill kit will generally consist of the following items:

1. Empty 55 gal drum
2. Shovels
3. Brooms
4. Oil absorbent compound
5. Sorbent boom
6. Sorbent sheets

Note: Do not put spilled material in regular trash container.

CONTINGENCY PLAN FOR SPILL CONTROL EQUIPMENT

SECTION 6.0

GOOD HOUSEKEEPING

Good housekeeping is essentially the maintenance of a clean and orderly work environment. A clean and orderly work area reduces the possibility of accidental spills caused by mishandling of equipment and should reduce safety hazards to the plant personnel. Examples of good housekeeping include:

1. Neat and orderly storage of chemicals.
2. Prompt removal of small spillage.
3. Regular garbage and rubbish pick-up for disposal.
4. Maintenance of dry clean floors.
5. Store containers and drums orderly to keep them from protruding into walkways.

Dry chemicals should be swept or cleaned up to prevent possible washdown into sewers and small liquid accumulation on the ground or floor in the building should be cleaned up to prevent further transport to other areas and possibly into sewers.

DETAILED INSPECTION

Detailed inspections relate to the specific areas of the plant facility and should be made by one of the designated persons. The detailed inspection should take place weekly. These inspections could be utilized to evaluate the need for preventative maintenance and the adequacy of good housekeeping. Potential spill problems would be reported to the Spill Committee for review and disposition. Detailed inspection would include the following:

1. Tank Corrosion
2. Tank Supports
3. Stains on walls
4. Housekeeping
5. Drain valves on tanks
6. Damage to shipping containers
7. Pipes, valves and fittings

Inspections of all spill kits will be performed by the ERC or the Assistante ERC on a weekly schedule. A record of all the detailed inspections will be kept on file in the Purchasing Office and will be on file for a minimum of three years.

ROUTINE INSPECTIONS

Routine visual inspection of the plant facilities to detect spills or evidence of potential spills or other conditions that could lead to an environmental incident will be performed by the ERAS on the night shift and performed by the Assistant ERC or any member of the Spill Committee during the day. Should a potential spill or an actual spill be detected, a report shall be made out and submitted to ERC for further action. Routine visual inspections may include visual observations of the following:

1. Storage facilities
2. Material transfer areas
3. Loading and unloading areas
4. Potential spill areas

CONTINGENCY PLAN FOR INSPECTIONS AND GOOD HOUSEKEEPING

SECTION 7.0

Cwm

SKF

SKF USA Inc.

April 14, 1989

King of Prussia, PA
USA

State of Missouri
Department of Natural Resources
Division of Environmental Quality
St. Louis Regional Office
8460 Watson Road, Suite 217
St. Louis, Missouri 63119

Attention Mr. Struckhoff

Gentlemen:

This is in response to your correspondence dated March 17, 1989 concerning the closure of our McQuay-Norris manufacturing facility on Marconi Street in St. Louis. The confusion as to the status of this facility dates back to 1984 when SKF made its first request to relinquish the "TSD" status that had been incorrectly requested. Although SKF had written numerous letters requesting this change and numerous inspections were made by DNR, no response was received from your office. As I told Mr. Singleton, Mr. James Stromske, our on-site environmental coordinator, called your office in 1986 to discuss the need for a formal closure plan for this facility and the need to submit the plan for approval within the 180 day period prior to closure. At that time he was told that due to the "generator only" status for this facility, there was no requirement to submit a closure plan. All correspondence submitted to you and received from your office refers to this facility as a generator. Of course, SKF never submitted an application for a Part B permit since we were operating as a generator only.

Although no formal closure plan was developed or submitted for approval, every precaution was taken to environmentally close this facility as effectively as possible. In response to the recommendations listed in your letter, I will attempt to address each item specifically.

1. The building in question, #30 as listed in the Risk Science Report, was not a hazardous waste storage area. This building was only used to store drums of non-hazardous waste oils. Prior to closing this facility, all drums found in this building were removed for disposal to a licensed facility. This building, along with all other buildings which may have at any time contained a waste material, were completely cleaned of any residue. This waste material was also properly disposed of. I have enclosed the existing closure plan for this facility which lists the expected closure date of 2003. I have also enclosed a copy of our hazardous waste management standard practices for this facility

1100 First Avenue
King of Prussia, PA 19406-1352

Telephone: (215) 265-1900
Telex: 685-1030
CABLE: SKAYEF

which also discusses the closure. These plans were neither changed nor updated to reflect the new date because we were under the assumption that it was not necessary to do so. The only other documentation which I could submit at this time are the SPCC and RCRA Contingency Plan. Neither of these would contain any pertinent information regarding this matter.

Since I was not personally on-site during the shutdown of this facility, I would be glad to put you in contact with Jim Stromske, who was the environmental coordinator on-site to handle the closure. Although Jim is no longer employed by SKF, he was physically the last person to leave this plant after closure and would be glad to discuss it with you.

2. Enclosed are the financial assurance documents submitted for 1985. Although no other submittals were made for 1986-88, I have enclosed the most recent annual report which shows that the financial stature of this company is still in tact and, therefore, could easily meet the financial assurance requirements. (We have recently submitted financial assurance documentation to Jefferson City in reference to a request for permit for a special waste landfill at another SKF facility. If this would be helpful I would be glad to forward a copy to you.)

I hope that this information will help to resolve this matter. Throughout the closure of this facility, as well as in dealing with other environmental matters, SKF has continually been ready and willing to offer any information to the agency necessary to verify our compliance with all environmental requirements. This matter is no different.

If I can provide any further information which would help to resolve this matter, please contact me.

Sincerely,

C. William McGlocklin

C. William McGlocklin
Corporate Environmental Manager

CWM/kts
Enclosures

McQUAY-NORRIS

August 30, 1984

Mr. Robert L. Morby
Chief, Hazardous Materials Branch
United States Environmental Protection Agency
Region VII
324 East 11th St.
Kansas City, MO 64106

Reference: EPA #MOT300010345.
MO. ID #01115

Dear Mr. Morby:

I would like to request that our facilty be reclassified from our present interim "TS&D" status to "Generator" only status.

We have not treated or disposed any hazardous waste at this facility and would see that any hazardous material generated would be disposed of off site within ninety (90) days after accumulation. Please let me know what is required to effect this change.

Your truly,

Joseph Palovchik
McQuay-Norris

JP/lg
6739D

cc: David Bedan Director
Waste Management Program
Missouri Department of Natural Resources
P.O. Box 1368
Jefferson City, MO 65102

D. Hesske
K. Henstrand - K of P

McQUAY-NORRIS

March 4, 1985

Mr. Robert L. Morby
Chief, Hazardous Materials Branch
United States Environmental Protection Agency
Region VII
324 East 11th St.
Kansas City, MO 64106

Reference: EPA #MOT300010345
MO. ID #01115

Dear Mr. Morby:

Following up on our request to resend our "TS&D" status to "Generator" only status dated August 30, 1984.

As of this date we have not received notification from your office that we have been reclassified as a "Generator Only". We would like to have this matter resolved prior to the Part B Application filing date in November, 1985. Please let me know what is required to effect this change.

Very truly yours,

James S. Stromske
Environmental Specialist
McQuay-Norris

cc: David Bedan Director - STAN JORGENSON
Waste Management Program
Missouri Department of Natural Resources
P.O. Box 1368
Jefferson City, MO 65102

A. Kerns
K. Henstrand - K of P ←

lg
0305E

SKF FOUNDRY DIVISION
SKF [illegible]

April 18, 1985

Mr. Robert L. Morby, Chief
Hazardous Materials Branch
United States Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, KS 66101

Re: EPA #MOD085909703
MO ID #04142

Dear Mr. Morby:

We would like to request that our facility be reclassified from our present "TS&D" status to "Generator" only status. Our original notification to become a "TS&D" was under protective filing.

We have not treated or disposed of any hazardous waste at this facility and we plan to dispose of any hazardous wastes generated to be shipped off-site within (90) days after accumulation. Please inform us what is required to effect this change.

Very truly yours,

James S. Stromske
Environmental Specialist
SKF Foundry Division

cc: David Bedan, Director
Waste Management Program
Missouri Department of Natural Resources
P. O. Box 1368
Jefferson City, MO 65102

F. Hodgson
A. Kincaid
K. Hendstrand-K of P

JOHN ASHCROFT
Governor

FREDERICK A. BRUNNER
Director

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation and Historic Preservation

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176
Jefferson City, MO 65102

November 3, 1986

Mr. Bill McGaulkin
SKF Industries
1100 First Avenue
King of Prussia, PA 19406

Dear Mr. McGaulkin:

RE: St. Louis # MOD990870396
Washington # MOD085909703

This letter is in response to your claim that SKF Industries does not have to comply with the financial regulations of Subpart H of 10 CSR 25-7.265 and 40 CFR 265 for the St. Louis and Washington facilities because one has been "closed" and the other has terminated its interim status as a TSD facility. Our files do not contain documentation of approved and certified closures, and termination of interim status that would remove the two facilities from the TSD regulatory requirements of 10 CSR 25-7.265 and 40 CFR 265. If you have such letters, please send us a copy of these letters. Otherwise, you will have to request termination as an interim status facility and verify closure.

Since EPA had the authority of terminating interim status, I am also asking them to look for the letters which would absolve you from the TSD regulatory requirements. I will contact you if I receive such letters from EPA.

Until we can verify your claims, SKF Industries must continue to comply with the regulations. As you can see, it is in the best interests of all involved to finalize this issue.

If you have any questions or comments concerning this letter, please feel free to call me at (314) 751-3176.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY

Thomas E. Canfield

Thomas E. Canfield
Planner
Waste Management Program

TEG:dlm

cc: Mr. Mike Wolfram, EPA

SKF INDUSTRIES, INC.

November 11, 1986

State of Missouri
Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102
Attn: Thomas E. Ganfield

Dear Mr. Ganfield:

Please find enclosed letters which were sent to EPA (with copies to Mo. DNR) regarding the relinquishment of the interim status for our St. Louis and Washington facilities. Although we have no written response on record from EPA, our people at these locations did obtain verbal approval from EPA on the termination of our interim status. Since there has been no further response from EPA or Mo. DNR as to our status, we have operated only as a generator and have not treated, stored, or disposed of any hazardous waste at either of these locations.

For this reason, we were of the consideration that the financial requirements listed in subpart H, therefore, do not apply. If there were further requirements for relinquishing our interim status, contact should have been made by either EPA or Mo. DNR upon receipt of our notification.

If I can be of any further assitance in finalizing this issue, please do not hesitate to contact me.

Sincerely,

C. W. McGlocklin

C. William McGlocklin
Corporate Environmental Specialist

CWMCG/kw

enclosure

cc: B. Zimmerman

SKF INDUSTRIES, INC.

April 21, 1987

State of Missouri
Department of Natural Resources
Division of Environmental Quality
P. O. Box 176
Jefferson City, MO 65102

Attn: Mr. Rod Breuer - Environmental Engineer

RE: RCRA Status - St. Louis # MOT300010345
Washington # MOD085909703

Dear Mr. Breuer:

As per our conversation on 4-16-87, we are hereby requesting an administrative change of our interim status to a "generator only" status. To the best of my knowledge, neither facility has ever treated and/or disposed of any hazardous waste on-site. Also, all hazardous waste has been shipped to an off-site disposal facility within ninety (90) days of accumulation.

We therefore request to relinquish our interim status without a closure plan, since neither facility has ever operated as a TSD facility. Although the Washington facility is still in operation, as I explained, the St. Louis facility has been closed and the property sold. The new owner is not presently using this site as a manufacturing facility.

I appreciate your help in this mater and will await your response. If you have any questions, do not hesitate to contact me.

Sincerely,

Bill McGlocklin

Bill McGlocklin
Corporate Environment
Specialist

BMcG/cwb

cc: A. Kincaid
S. Mansfield
J. Young

1100 FIRST AVE., KING OF PRUSSIA, PA 19406-1352
(215) 265-1900 | TELEX 84-6474 | CABLE "SKAYEF"

SKF

SKF INDUSTRIES, INC.

April 28, 1987

Mr. Thomas Ganfield
State of Missouri
Department of Natural Resources
Division of Environmental Quality
P.O. Box 176
Jefferson City, MO 65102

Re: Hazardous Waste Financial Assurance - St. Louis #MOT300010345
- Washington #MOD085909703

Dear Mr. Ganfield:

Following receipt of your letter of April 9, 1987, and our subsequent telephone conversation, enclosed is a copy of our letter to Mr. Rod Breuer of April 21, 1987.

Following our recent telephone conversation, you were kind enough to transfer us to Mr. Breuer who indicated that there should be no problem to change our status for the above facilities from that of TSD to "Generator Only". Mr. Breuer also indicated that once it has been verified that we do not and have not acted as a TSD, it will not be necessary to provide the State of Missouri with the financial assurance letters required of TSD facilities for closure/post closure care.

Accordingly, I request that you hold your file open on this matter pending receipt of verification by Mr. Breuer that our status has been changed as mentioned above. I understand that this should not take more than two to three weeks. Thank you for your cooperation, and if you have a question do not hesitate to let me know.

Very truly yours,

Steven C. Mansfield
Corporate Risk Manager

SCM:cw(ganfield)misc.#2)

Enclosure

cc: R. A. Zimmerman
B. McGlocklin

SKF INDUSTRIES, INC.

June 8, 1987

Mr. Thomas Ganfield
State of Missouri
Department of Natural Resources
Division of Environmental Quality
P.O. Box 176
Jefferson City, MO 65102

Re: Hazardous Waste Financial Assurance - St. Louis #MOT300010345
- Washington #MOD085909703

Dear Mr. Ganfield:

As of this writing, we have not yet been notified concerning our request for a change in our status to that of "Generator Only" with respect to the captioned locations. As you may recall, Mr. Rod Breuer of your department had indicated that once it was verified that we do not and have not acted as a TSD at either of these locations, our status was to be changed. Accordingly, we have not reissued the financial assurance letters required of TSD facilities for closure/post closure care.

I would very much appreciate it if you would advise us concerning the status of our request for change.

Very truly yours,

Steven C. Mansfield
Corporate Risk Manager

SCM:cw(ganfield)misc.#2)

cc: R. A. Zimmerman
B. McGlocklin

P. O. BOX 239 1100 FIRST AVE. KING OF PRUSSIA, PA 19406 (215) 265-1900

file
- TSD

JOHN ASHCROFT
Governor

FREDERICK A. BRUNNER
Director

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation, and Historic Preservation

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176
Jefferson City, MO 65102

February 23, 1988

Mr. Bill McGlocklin
Corporate Environmental Specialist
SKF Industries
1100 First Ave.
King of Prussia, PA 19406-1352

Dear Mr. McGlocklin:

Re: Washington MOD085909703

This letter is in response to your recent letters concerning the interim status classification for the above referenced facility. Your letters certify that your storage area was never used to store wastes greater than 90 days. As such, the Missouri Department of Natural Resources and the U.S. Environmental Protection Agency are administratively removing the interim status classification for this facility.

You should note, however, that Congress expanded the scope of the federal hazardous waste program with the passage of the Hazardous and Solid Waste Amendments of 1984 (HSWA). If it is ever determined that your interim status was exercised at this facility, SKF Industries, Inc. will be subject to the interim status standards including the HSWA provisions concerning evaluation of solid waste management units and corrective action for releases of hazardous constituents.

If you have any questions, please feel free to call Mr. Dan Tschirgi at (314) 751-3176.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY

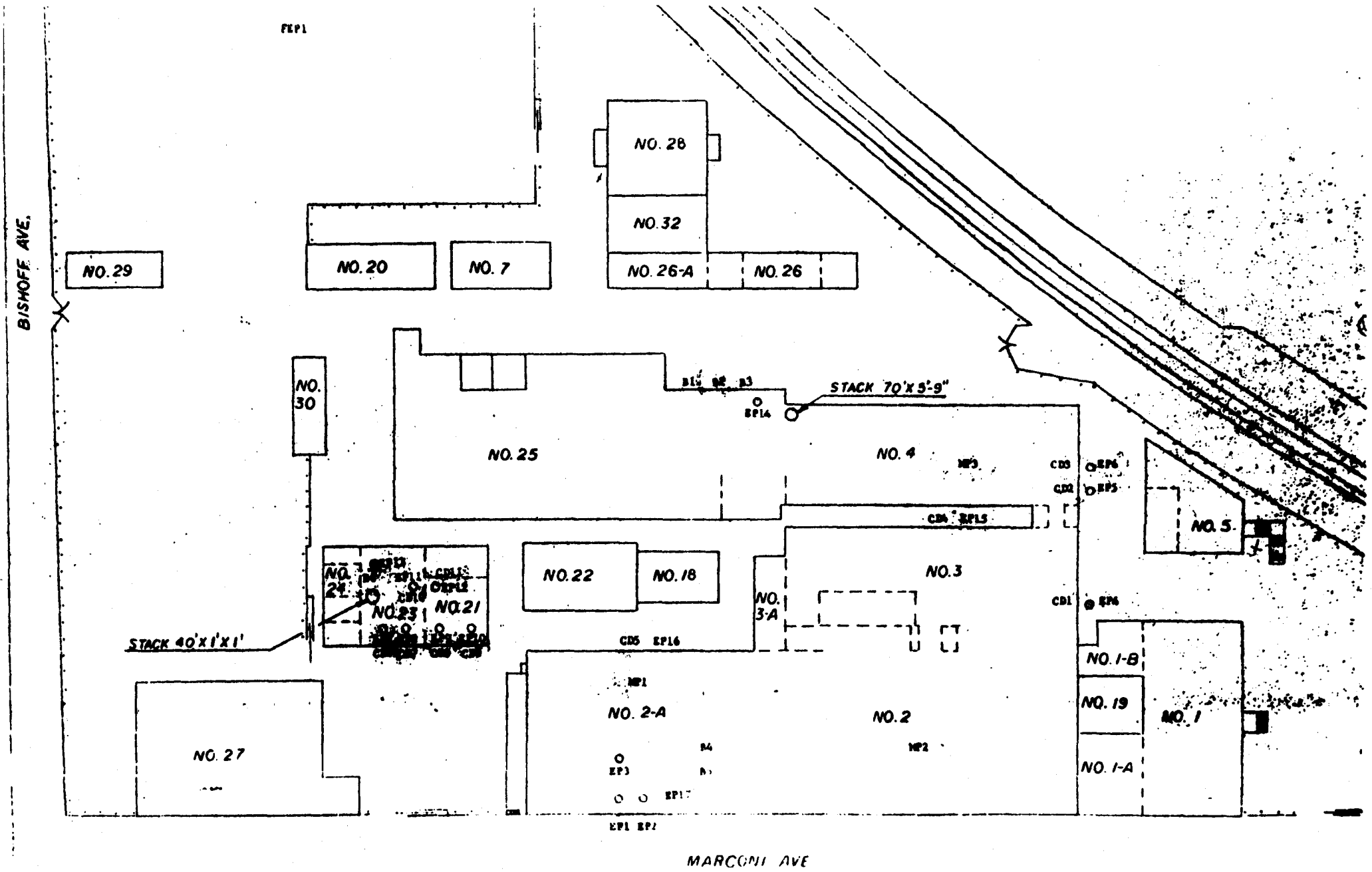
Nicholas A. Di Pasquale

Nicholas A. Di Pasquale, Director
Waste Management Program

NAD:dtt

cc: Mr. Chet McLaughlin, EPA Region VII

bcc Art Groner
SLRO


BISHOFF AVE.
MARCONI AVE
NO. 29
NO. 20
NO. 7
NO. 28
NO. 32
NO. 26-A
NO. 26
NO. 30
NO. 25
STACK 70'x 5'-9"
EP14
NO. 4
NO. 5
NO. 3
NO. 3-A
NO. 22
NO. 18
NO. 24
NO. 23
NO. 21
STACK 40'x 1'x 1'
NO. 27
NO. 2-A
NO. 2
NO. 1-B
NO. 19
NO. 1
NO. 1-A
EP1 EP2

McQuay-Norris, Inc.
2320 Marconi Avenue
St. Louis, MO 63110

EPA I.D. No. MOT 300010345

Standard Practice

Facility Closure Plan

Per EPA 40 CFR Part 265.111 through 265.115 regulations, the owner and operator has listed below the steps necessary to completely close the above facility at the end of its intended operating life.

The closure plan also includes the provisions of 40 CFR Parts 265.197.

The provisions of 40 CFR Parts 265.228, 256.280, 265.310, 265.351, 265.381, and 265.404 do not apply to this facility.

Details of Closure Plan

A. All manufacturing equipment, including tanks, piping, recirculating equipment, contaminated by hazardous materials and/or wastes will be drained, flushed, mechanically scrapped if necessary and reflushed using approved methods. All hazardous materials and wastes, including liquids, sludges, solids, and spills, will be properly removed and placed in DOT approved containers and shipped to EPA or State approved disposal sites, treatment facilities, and/or beneficial recyclers.

B. All virgin hazardous materials will be offered for sale and/or returned to the original vendor for credit. If the virgin hazardous material cannot be sold, they will be properly placed in DOT approved containers and shipped to EPA or State approved disposal sites, treatment facilities, and/or beneficial recyclers.

C. Maximum estimated inventory of hazardous materials and/or wastes requiring draining, cleaning, and decontamination are:

- Parkolene tanks containing approximately 250 gallons of chromic acid.
- Detrex tank containing approximately 250 gallons of corrosive liquids contaminated by cadmium.
- Parkolubrite tank containing approximately 450 gallons of cadmium contaminated liquid and sludge.
- Tin-nickel tank containing approximately 250 gallons of cyanide plating sludge.
- Endox-potassium stannate tank containing approximately 500 gallons of corrosive cyanide liquids and sludge.

- Stannous Chloride Tin Sol tank containing approximately 200 gallons of a corrosive liquid.
- Chrome plating tank containing approximately 100 gallons of corrosive, chromium contaminated liquids and sludge.
- Four unicrome tanks containing a total of approximately 1400 gallons of contaminated chromic acid.
- Detrex EC 775 tank containing approximately 100 gallons of corrosive liquid and cadmium.
- Parkolene tank containing approximately 100 gallons of contaminated chromic acid.
- Rusty parts washer containing approximately 100 gallons of contaminated sulfuric acid.
- Four chlorothene tanks containing a total of approximately 800 gallons of halogenated solvents.
- Three miscellaneous solvent tanks containing approximately 300 gallons of kerosene and mineral spirits.
- Hazardous material store containing approximately 10 - 55 gallon drums of various hazardous materials.
- Hazardous waste store containing approximately 30 - 55 gallon drums of various hazardous wastes.
- The total maximum inventory of hazardous in-process and storage wastes will be approximately 6000 to 7000 gallons at anytime during the life of the facility.

D. Closure

- The estimated closure date is the year 2003.
- Final closure will be completed within 180 days of the starting date for closure.

E. Amendment of Closure Plan

- The owner-operator will amend the closure plan whenever changes in operating plans or facility design affects the closure plan.
- The owner-operator will submit the final closure plan to the Regional Administrator 180 days before the date he expects to begin closure.

F. Disposal or Decontamination of Equipment

When closure is completed, all facility equipment and structures will either be removed and/or decontaminated by removing all hazardous wastes and residues.

G. Certification of Closure

When closure is completed, the owner-operator will submit to the Regional Administrator certification that the facility has been closed in accordance with the above specification. Closure certification by an independent registered professional engineer will also be provided.

McQUAY-NORRIS MANUFACTURING DIVISION
STANDARD PRACTICE

DATE:	NUMBER:	PAGE	OF
10-18-82	2505C	1	7

SUBJECT: HAZARDOUS WASTE MANAGEMENT

INDEX:

PURPOSE:

Revised 5/17/83

DESCRIPTION:

I. Inspection Of Facility

1) The facilities Maintenance Supervisor will inspect the hazardous waste storage area once each week. The inspector must observe the containers for leaks and condition.

2) The Maintenance Supervisor will inspect all plating, cleaning, and oil dip tanks at least once each week. The inspector must observe the tanks and surrounding areas for leaks and indication of leaks. He should also inspect piping and valves for condition and function.

3) A log will be kept in the Maintenance Office showing the date and time of the inspections along with a record of any discrepancies or corrective actions. A sample of the inspection form and waste storage log is attached.

4) Attached is a copy of the form used to report each inspection with the comments of the inspection highlighted.

In order to be sure nothing is overlooked we use the diagram of the area as a reporting form.

II. Personnel Training

1) The Maintenance Supervisor will train the employees handling hazardous waste. The training will include the following as a minimum:

1) The procedure for using, inspecting, repairing, replacing emergency and monitoring equipment.

2) The key parameters for waste feed cut-off systems.

ORIGINATOR: Tom Mason 5-17-83 APPROVED: [signature]

Form 0298A

3) Communications and alarm systems.

4) Response to fire and explosion.

5) Response to ground water contamination incidents.

6) Shutdown of operations.

This training will be reviewed annually.

Record Keeping Of Training

The following documents and records must be maintained in the Maintenance Office.

1) Job title for each position related to hazardous waste and the name of the employee filling each job.

2) A written job description of each job position.

3) Written description of the type and amount of training that will be given for each position.

4) Records documenting the training given to each employee.

The training records must be kept for three years from the date employee last worked or until closure of the facility.

III. Waste Analysis Plan

1) Before any hazardous waste is stored or submitted for transport, we must obtain a detailed chemical and physical analysis .

2) A well mixed sample of the material must be obtained from each container.

3) We have an open purchase order with Laclede Gas Company Labs to perform the required tests and analysis according to the latest Federal and State regulations.

Attached to this procedure is a listing of potentially hazardous waste streams. All of these are not classified as hazardous, but have been listed and are tested to be sure that no contamination has taken place. Also attached are typical analysis reports and material safety data sheets.

DESCRIPTION (CONTINUED)

4) After the samples have been collected, they will be turned over to the Purchasing Department with the following information.

   a) Description of the generation process.

   b) The trade name and number of the original material.

   c) The quantity of the material in volume, weight and number of containers.

   d) The normal generation rate per year.

   e) The hazard class (toxic, reactive, ignitable, corrosive).

IV. Storage of Hazardous Waste

1) Waste that must be stored awaiting transportation should be kept in the hazardous waste holding area just south of the maintenance building.

2) A log shall be kept showing all material in storage and the date it was put in the area. (The description should include all of the information shown in section III-4 under waste analysis in this standard).

3) Any material removed from this area must be logged down with the date, quantity and manifest number.

V. Contingency Plan

The plan for action in the case of an emergency is as follows:

1) The local Fire and Police will be notified by the use of the 911 emergency number at the first sign of an emergency.

2) The Fire Brigade will be notified by the attached list of names, addresses and phone numbers.

3) The Fire Brigade will be responsible for evacuation and direction when required. Also attached is the physical layout of the facility including fire alarms, fire hydrants, inside valves, and fire department connections. Also attached is a list of exits to be used in the various areas.

DESCRIPTION (CONTINUED)

4) During shut-down hours, the plant is monitored by the ADT system.

5) We have regular annual visits by the local fire department for a familiarization tour of the facility.

6) We have a prearranged contact with Deaconess Hospital at 6150 Oakland Avenue.

7) The maintenance supervisor is the primary emergency coordinator and fire chief.

   A. In case of a minor spill floor dry material locate at the connection of building 3 & 4 will be used. Each department has at least one bag of this material to use on spills.

   B. If spill is not a major spill (indicating possible run off) the vacuum sucker will be used to pick up the material. (All spills under A&B will be reported to the Emergency Coordinator).

   C. If the spill is major, the Emergency Coordinator will take over and the following procedure will be followed.

Duties & Responsibilities of Emergency Coordinators

1) Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee) must immediately:

   a. Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and

   b) Notify appropriate state or local agencies with designated response roles if their help is needed.

2) Whenever there is a release, fire, or explosion, the emergency coordinator must immediately identify the character, exact source, amount, and a real extent of any released materials.

3) Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release fire, or explosion.

4) If this determination indicates the situation is serious or has the potential to result in serious hazards to either the environment or personnel, the emergency coordinator must immediately nofity appropriate local authorities and appropriate government authorities.

5. During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility.

6. If the facility stops operations in response to a fire, explosion or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes or other equipment wherever appropriate.

7. Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or other material that results from a release, fire, or explosion at the facility.

Emergency Equipment

Fire Equipment

110 Fire Extinguishers
Checked monthly
REcharged as required by Webber Fire Ext. Co.

- Sprinkler system throughout the complex
- 8 Fire alarm pull boxes throughout the plant
- 2 Fire houses each with 200' of hose

Personal Protective Equipment

Eye wash stations in chemical areas
Plant is equipped with dispensary containing first aid supplies
Battery powered emergency lights

Maintain Equipment

OXY/Acetylene welding
Cutting Equipment
Electric Arc Welding Equipment
Mechanical Jacks
Ladders
Chain Hoists
Portable Fans
Elevated Platform Truck
Industrial Lift Trucks
Absorbant Materials
Sump Sucker

VI. Closure Plan

1) The approximate amount of material that must be handled in case of closure is 6,000 gallons. The attached chart shows the location and description of the materials.

2) The material will be disposed of in the same manner that hazardous waste is handled. It will be removed into holding containers, analyzed, and then disposed of according to regulations. Any material that is analyzed and found to be usable, active material, will be sold to local sources where possible. Material that is handled as currently active material will be transported according to DOT regualtions.

3) The tanks will be decontaminated according to the attached procedure.

4) Final closure will be completed within 180 days of the starting date of the closing procedure.

5) The estimated closure date is the year 2003.

VII Potentially Hazardous Waste Streams

1) Phosphate Coating Process

a) Cleaning Solutions
b) Coating Solutions
c) Fixing Solutions

DESCRIPTION (CONTINUED)

2) Degreasing Process

   a) Trichloroethylene
   b) Tricholorethane
   c) Mineral Spirits

3) Chrome Plating Process

   a) Chromic Acid Solutions
   b) Sulfuric Acid Solutions

4) Tin and Tin Nickel Plating Process

   a) Electroclean
   b) Tin-Nickel Plating Solutions
   c) Tin-Plating Solutions

SKF INDUSTRIES, INC.

ROBERT A. ZIMMERMAN TREASURER AND ASSISTANT SECRETARY

March 27, 1986

"CERTIFIED MAIL"

Mr. Robert L. Morby
Chief, Waste Management Branch
Air and Waste Management Division
United States Environmental Protection Agency
Region VII
324 East Eleventh Street
Kansas City, Missouri 64106

Re: EPA I.D. No. MOT300010345
SKF Automotive Products, Inc.
St. Louis, MO
MOD085909703
SKF Automotive Products, Inc.
Washington, MO

Dear Mr. Morby:

In compliance with the Federal Register in satisfying the financial test mechanism, the following documents are enclosed:

- Letter signed by SKF's Chief Financial Officer worded as specified in Section 264.151(f)

* - SKF's 1985 Annual Report

- Statement from SKF's Independent Certified Public Accountants, Price Waterhouse.

Very truly yours,

R. A. Zimmerman

AEF:kaa

Enclosure

* 1985 Annual Report is not included, will be mailed when received on 4/15/86.

1100 FIRST AVE., KING OF PRUSSIA, PA 19406 | (215) 265-1900

SKF INDUSTRIES, INC.

Regional Administrator
United States Environmental
Protection Agency

Regional Administrator:

I am the chief financial officer of SKF Industries, Inc., 1100 First Avenue, King of Prussia, Pennsylvania 19406. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the attached scheduled facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility (see schedule attached).

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the scheduled facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility (see scheduled attached).

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the scheduled facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility (none).

4. This firm is the owner or operator of the scheduled hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility (none).

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

P O BOX 239, 1100 FIRST AVE., KING OF PRUSSIA, PA 19406 (215) 265-1900

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1985.

I hereby certify that the wording of this letter is identical to the wording specified in 40CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

Very truly yours,

SKF INDUSTRIES, INC.

Bo Bergqvist
Vice President, Finance

March 27, 1986

SKF IN TRIES, INC.

ESTIMATED COST OF CLOSURE AND POST-CLOSURE

ON HAZARDOUS WASTE FACILITIES

DECEMBER 31, 1985

EPA I.D. NUMBER	PLANT	ADDRESS	ESTIMATED CLOSURE COST
PAD 000000190	Specialty Bearings Division	5400 Tulip St., Phila., PA 19124	None
PAD 000000182	Nice Bearings Products Div.	Detwiler Road, Kulpsville, PA 19443	None
PAD 980716062	International Products Div.	1690 E. Race St., Allentown, PA 18103	None
PAD 042147652	Roller Bearings Division	Fame Ave., Ext. RD #3, Hanover, PA 17331	None
PAD 003026606	Roller Bearings Division	W. King St., Shippensburg, PA 17257	$50,409
PAD 004344172	Ball Bearings Division	1000 Logan Blvd., Altoona, PA 16602	None
OHD 004205761	Tyson Tapered Bearings Div.	1339 Duncan St. S.W., Massillon, OH 44646	None
KYD 001737683	Tyson Tapered Bearings Div.	Highway 90, Glasgow, KY 42141	None
NYD 002209773	Mounted Bearings Division	Horton St., E. of Seneca, Hornell, NY 14843	None
IND 005460894	Bremen Bearings Corp.	Rt. 6 West, Bremen, IN 46506	None
PAT 000620823	Technology Services Div.	1100 First Ave., King of Prussia, PA 19406	None
MOT 300010345	SKF Automotive Products	2320 Marconi Avenue, St. Louis, MO 63110	$37,726
MOD 085909703	SKF Automotive Products	1801 W. Main St., Washington, MO 63090	$28,480
THD 000742267	SKF Automotive Products	Alexander St., Bradford, TN 38316	None
CAD 063553630	Dura-Bond Bearing Co.	3201 Ash St., Palo Alto, CA 94306	$4,468
			$121,083

SKF INDUSTRIES, INC.

ALTERNATIVE I

1.	Sum of current closure and post-closure cost estimates	$121,083
2.	Total Liabilities	134,579,000
3.	Tangible net worth	131,590,000
4.	Net Worth	131,590,000
5.	Current assets	171,265,000
6.	Current liabilities	77,029,000
7.	Net working capital (line 5 minus line 6)	94,236,000
8.	The sum of net income plus depreciation, depletion and amortization	647,000
9.	Percent of assets in U.S.	100%

		Yes	No
10.	Is line 3 at least $10 million?	X	
11.	Is line 3 at least 6 times line 1?	X	
12.	Is line 7 at least 6 times line 1?	X	
13.	Are at least 90% of firm's assets located in the U.S.?	X	
14.	Is line 9 at least 6 times line 1?	N/A	
15.	Is line 2 divided by line 4 less than 2.0?	X	
16.	Is line 8 divided by line 2 greater than 0.1?		X
17.	Is line 5 divided by line 6 greater than 1.5?	X	

Thirty South Seventeenth Street
Philadelphia, PA 19103-4094
Telephone 215 665 9500

Price Waterhouse

January 17, 1986

Mr. Daniel F. Collins
Vice President and
Corporate Controller
SKF Industries, Inc.

Dear Mr. Collins:

At your request, we have performed the procedures enumerated below with respect to the selected financial data of SKF Industries, Inc. (the "Company") set forth in the accompanying exhibit and to be contained in letters from you to the United States Environmental Protection Agency and selected state authorities. These procedures were performed solely to assist you in complying with the regulations of the United States Environmental Protection Agency under authority of the Resource Conservation and Recovery Act. The procedures we performed are summarized as follows:

1. We compared the amounts in the accompanying exhibit for total liabilities, net worth, current assets and current liabilities with amounts in the Company's consolidated financial statements at December 31, 1985.

2. We compared the amounts in the accompanying exhibit for tangible net worth and for the sum of net income plus depreciation, depletion and amortization to amounts calculated from the Company's consolidated financial statements at December 31, 1985 and for the fiscal year then ended.

3. We compared the response to Item 7 in the accompanying exhibit with data in the Company's accounting records as of December 31, 1985.

Because the above procedures were not sufficient to constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on any of the specific items referred to above. In connection with the procedures referred to above, no matters came to our attention that caused us to believe that the specified items should be adjusted. This report relates to the items specified above and does not extend to the consolidated financial statements of the Company, taken as a whole.

Price Waterhouse

EXHIBIT

SKF INDUSTRIES, INC.

SELECTED FINANCIAL DATA AS OF DECEMBER 31, 1985 AND FOR THE FISCAL YEAR THEN ENDED

Item	Description	Amount
1.	Total liabilities	$134,579,000
2.	Tangible net worth	$131,590,000
3.	Net worth	$131,590,000
4.	Current assets	$171,265,000
5.	Current liabilities	$77,029,000
6.	The sum of net income plus depreciation, depletion and amortization	$647,000
7.	Percentage of assets located in the U.S. to total assets	100%

Mc. QUAY-NORRIS MFG. CO
ST. LOUIS MO.

PLAT PLAN OF
ST. LOUIS PLANT NO 1

SCALE 1" = 50'

DR.

DATE 1-21-52

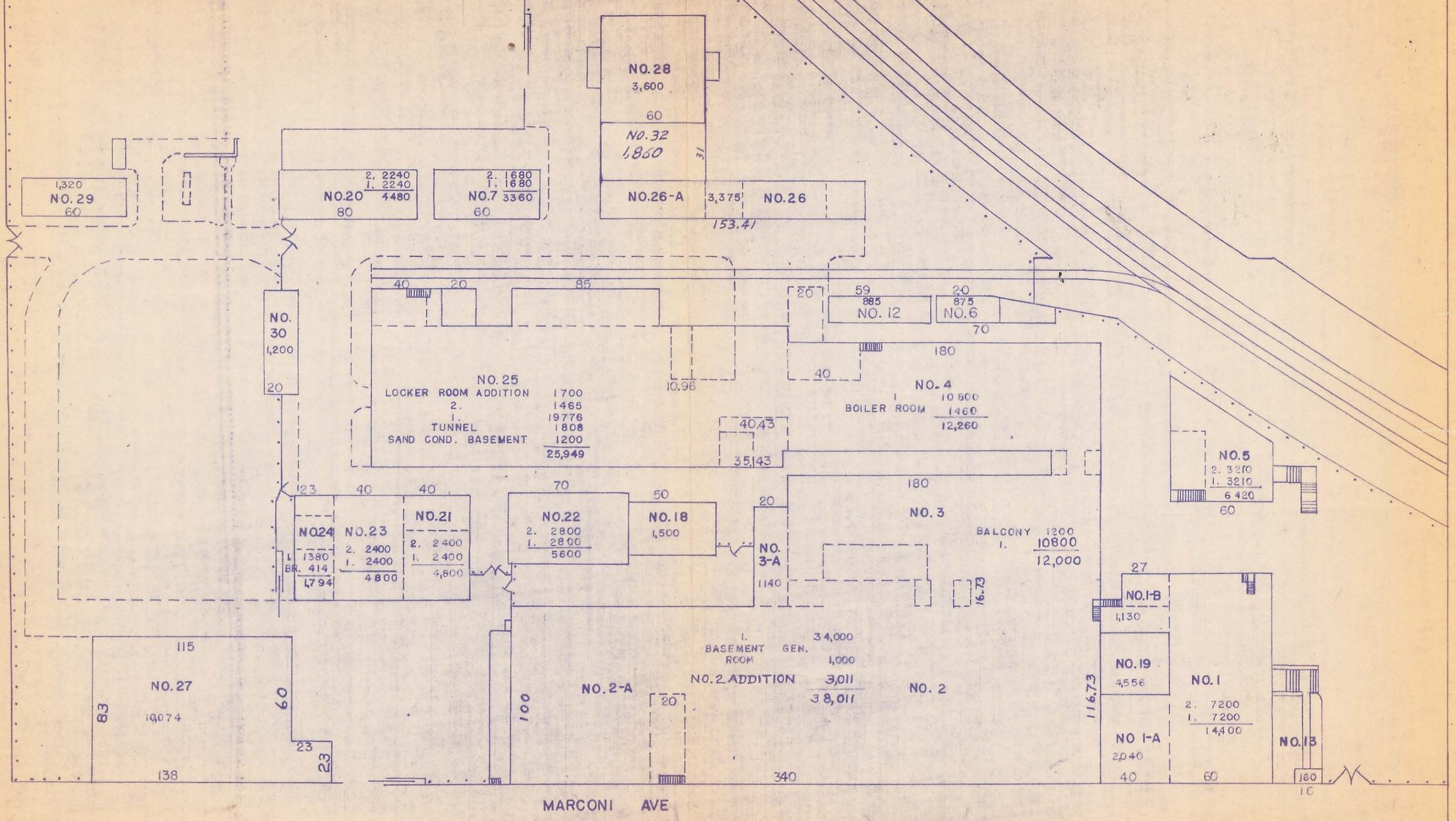
DRAWING
C-641-1

9.769 ACRES

AREA PLAT

TOTAL FLOOR AREAS

BLDG. NO.	1	14,400	SQ. FT.
" "	1A	2,040	SQ. FT.
" "	1B	1,130	" "
BLDG. NO.	2&2A	38011	" "
" "	3&3A	13 140	" "
PASSAGEWAY BET. 3&4		435	" "
BLDG. NO.	4	12,260	" "
" "	5	6,420	" "
" "	6	875	" "
" "	7	3,360	" "
" "	12	885	" "
" "	13	160	" "
" "	18	1,500	" "
" "	19	4,556	" "
" "	20	4,480	" "
" "	21	4,800	" "
" "	22	5,600	" "
" "	23	4,800	" "
" "	24	1,794	" "
" "	25	25,949	" "
" "	26&26A	3,375	" "
" "	27	10,074	" "
" "	28	3,600	" "
" "	29	1,320	" "
" "	30	1,200	" "
" "	31	158	" "
" "	32	1,860	" "
TOTAL		168,182	SQ. FT.



MARCONI AVE

FIRE HYDRANT 1
FIRE ALARM (MANUAL) 4
POST INDICATOR VALVE 3
INSIDE VALVE 5
FIRE DEPT. CONN. 2
FIRE EXTINGUISHER
SPILL KIT LOCATION

N

NO. 29
NO. 20
NO. 7
NO. 23
L-13
NO. 32
NO. 26A
NO. 26
L-12
AERO ALARM INDICATOR
F.H.
GATE 4
WASTE AND DRUM STORAGE
NO. 30
L-15
L-14
NO. 25
NO. 12
NO. 6
NO. 4
L-6
L-7
NO. 5
L-10
L-9
L-8
NO. 24
NO. 23
NO. 21
NO. 22
NO. 18
NO. 3A
L-11
NO. 3
L-5
L-4
NO. 1B
NO. 19
NO. 1
NO. 2A
L-2
NO. 2
L-1
L-3
NO. 1A
NO. 13
NO. 27
GATE 3
GATE 2
PISCHOFF AVE
MARCONI AVE

FACILITY FIRE PROTECTION SYSTEM AND EMERGENCY EQUIPMENT

CHANGE NO. 2

McQuay-Norris
OEM Division

TOLERANCES UNLESS SPECIFIED OTHER
FRAC ± 1/64 DEC ± .001 ANGLES ±
DRAWN DATE SCALE
CHECKED DATE DRAWING NO
APPROVED DATE
DR. DWG. NO

F.A. FIRE ALARM (MANUAL) 4

POST INDICATOR VALVE 5

INSIDE VALVE 5

FIRE DEPT. CONN. 2

N

NO. 29

NO. 20

NO. 7

NO. 28

GARAGE

NO. 32

NO. 36A

WELD SHOP

NO. 26

AERO ALARM INDICATOR

F.H.

3

NO. 30

NO. 25

F.A.

NO. 12

NO. 6

VAT AREA
VEAT AREA
SKF HOOK JOINT
CTB NO. 4
LARGE CAM AREA

WAREHOUSE

NO. 5

BATTERIES
HOOK JOINT
EQUIPMENT GAGE
NO. SCAMLINE
TOOL ROOM
ALUM LINE
1926 (AREA)

PRINT SHOP

NO. 24

NO. 23
CHROME DEPT.

NO. 21
SPRING DEPT.

NO. 22
MAINTENANCE

NO. 18

NO. 3A

NO. 1B

CREDIT

PERSONNEL

NO. 19

MAIN FLOOR

NO. 1
MAIN OFFICE
ACCTS. PAYABLE
DATA PROCESSING
PURCHASING DEPT.
INVENTORY CONTROL

NO. 1A
PRODUCT ENGRG.
PRODUCTION CONTROL
ENGINEERING

NO. 13

1

2

NO. 27

AFTERMARKET OFFICE

NO. 2A

RECEIVING
SHIPPING
PLATING
BULK WRAP
R.C.
INSPECTION

NO. 2

O.D. CHAMFER
ARB. SIZE TRIM
CUTTER GRINDER
GAGE
NYLON BUFFERS
GLASS BEAD
B+K. AREA

UP

UF

BIRCHOFF AVE

FACILITY EVACUATION ROUTES AND ASSEMBLY AREAS

MARCONI AVE

McQuay-Norris
OEM Division

TOLERANCES UNLESS SPECIFIED OTHERWISE
FRAC ± 1/64 DEC ± .001 ANGLES ± 1°

DRAWN	DATE	SCALE
CHECKED	DATE	DRAWING NO.
APPROVED	DATE	

DR.

DWG NO. D-13