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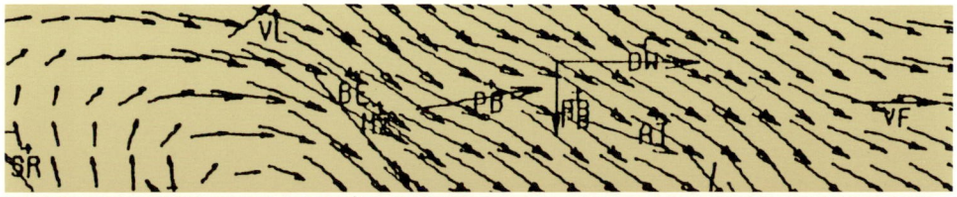

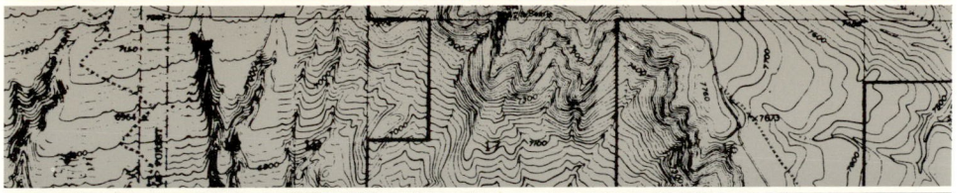

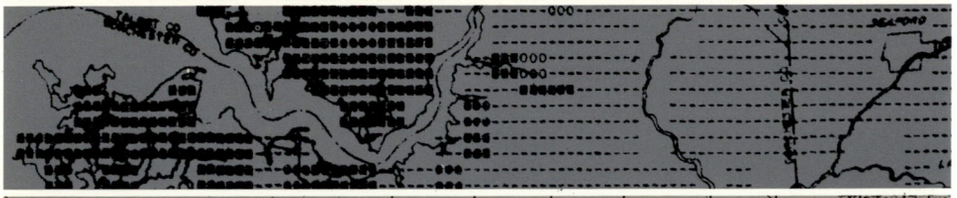

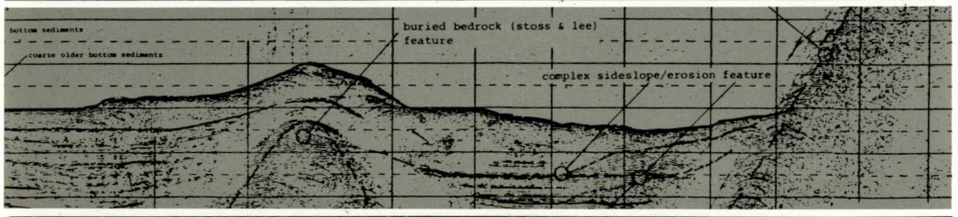

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CLOSURE PLAN AND COST ESTIMATES
FOR CONTAINER STORAGE AREAS
BUILDINGS 17 AND 39
2000 EAST COLUMBIA WAY
VANCOUVER, WASHINGTON

For
HILLMAN PROPERTIES NORTHWEST, INC.
September 16, 1988

Dames & Moore

CLOSURE PLAN

AND COST ESTIMATES FOR

CONTAINER STORAGE AREAS

BUILDINGS 17 AND 39

2000 EAST COLUMBIA WAY
VANCOUVER, WASHINGTON

Hillman Properties Northwest, Inc.

September 16, 1988

PREFACE

The plan and cost estimate in this document describe the procedures that Hillman Properties Northwest, Inc. (Hillman) has conducted or will conduct to close the container storage areas at Buildings 17 and 39, 2000 East Columbia Way, Vancouver, Washington. The plan has been prepared in conformance with the requirements of 40 CFR Part 265, Subpart G, and WAC 173-303-400.

Section 1.0 of this document describes the container storage areas and presents the methods Hillman has taken to date to close them, and the additional procedures required to be taken to attain clean closure.

The cost summary for closure is presented in Section 2.0, together with the assumptions used to develop the costs and the detailed cost estimates for container storage area closure activities.

The approved Closure Plan will be kept at the facility until the Closure Plan has been implemented and completed. Hillman will close the facility immediately upon approval of this Closure Plan by the US Environmental Protection Agency (EPA) and/or the Washington Department of Ecology (Ecology). As a consequence, amendments of cost and technical segments of the approved plan are not anticipated.

1.0 CLOSURE PLAN

CONTAINER STORAGE AREAS
BUILDINGS 17 AND 39
200 EAST COLUMBIA WAY
VANCOUVER, WASHINGTON

1.1 FACILITY IDENTIFICATION

1.1.1 Facility Identification WAD 980979751
Owner/Operator Name: Hillman Properties Northwest, Inc.
Address and Telephone Number: 900 North Tomahawk Island Drive Way
Portland, Oregon 97217
(503) 283-4111

1.1.2 Facility Address: 200 East Columbia Way
Vancouver, Washington

1.1.3 Person Responsible for Maintenance of the Facility Closure Plan: Douglas A. Hardesty
Address and Telephone Number: Hillman Properties Northwest, Inc.
900 North Tomahawk Island Drive Way
Portland, Oregon 97217
(503) 283-4111

1.2 INTRODUCTION

This Closure Plan is written pursuant to and in partial satisfaction of a Consent Agreement and Final Order of the USEPA, Docket No. 108801-02-3008.

The container storage facilities to be closed are within an industrial park operated by Hillman. Cascade Tempering, Inc. (Cascade) was a tenant of the industrial park until it ceased operations under bankruptcy on December 20, 1985. Cascade is alleged to have generated and/or stored hazardous waste or dangerous waste on the industrial park property. At the time Cascade ceased operations, approximately 200 5-gallon buckets and 6 55-gallon drums of lead paint waste sludge were left by Cascade in the parking area adjacent to Building 39. Analysis results of the lead paint waste sludges and supernatent liquids sampled by Ecology on March 1, 1985 identified these as regulated hazardous/dangerous wastes.

Cascade is also alleged to have generated wastes which contaminated soils adjacent to Building 5. Activities conducted to remediate Building 5 area contamination were conducted and generated waste for disposal. Three 55-gallon drums generated from the Building 5 cleanup, one containing excavated soils and two containing waste cleanup-related material such as tyvek suits and rubber gloves, remained on site. These drums were discovered on March 31, 1988, and were assumed to have been stored at Building 17 since the 1985 remediation.

The Administrative Consent Agreement and Final Order require closure of the areas at Building 17 and Building 39 in which the containerized wastes have been stored. The Order was based upon the facts summarized above, which were generated by EPA and Ecology inspections through March 31, 1988. On August 17, 1988, the 55-gallon drums stored at Building 17 and Building 39 were removed from the site for disposal by licensed hazardous waste transportation and disposal concerns. The contents of the 5-gallon buckets were likewise removed for disposal; the containers themselves have been stored in a lined dumpster in the storage area pending disposal (which is anticipated to be completed on or about September 16, 1988).

The remainder of this Closure Plan will set out a description of the storage areas, volume of stored inventory, a schedule of the remaining steps needed for final closure, a description of the removal of wastes, and contingent procedures for facility decontamination.

1.3 FACILITY CONDITIONS

1.3.1 Storage Area Construction

1.3.1.1 Building 39

The Building 39 storage area was located on the parking lot surface about 100 feet west of the metal sided, slab-on-grade Building 39. Five gallon buckets and 55-gallon drums were stored on an asphalt surface which shows no sign of contamination or deterioration. The storage area was not roofed nor specifically drained. The area of the parking lot used for storage is bordered by a landscaped planting area. A storm sewer is located 10 feet from the storage area across the planting strip. There is no visual evidence of waste leakage or migration to the planting strip or the storm sewer.

1.3.1.2 Building 17

The Building 17 storage area was located in the central portion of the slab-on-grade 200 x 85 feet metal-sided roofed building. Three 55-gallon drums were stored on pallets on the concrete floor. There are several small expansion cracks in the building floor, but they show no sign of contamination or deterioration. The building does not have internal drains. The nearest storm sewer drain is located outside the building, about 50 feet to the east.

1.3.2 Inventory Disposal

The entire waste inventory of the Building 39 area consisted of about 200 5-gallon buckets and 6 55-gallon drums of lead paint waste sludge. The entire waste inventory of the Building 39 area consisted of 2 55-gallon drums of miscellaneous cleanup project refuse (tyvek suits, rubber gloves, etc.), and 1 55-gallon drum of contaminated soils.

All containerized wastes were removed from the site on August 17, 1988 by a licensed hazardous waste transporter and disposed at Envirosafe Services of Idaho, Inc. (ESI). The 55-gallon drum containers were removed and disposed. The empty 5-gallon buckets, from which waste had been transferred to 32 55-gallon drums for disposal, were placed in a lined dumpster pending removal (which will be completed on September 16, 1988).

1.3.3 Schedule of Final Closure

Final closure of the container storage areas consists of the following tasks:

- Remove remaining empty waste containers,
- Inspect container storage areas for evidence of contamination,
- If necessary, decontaminate container storage areas, and sample and analyze rinse waters after decontamination procedures, and
- Certify closure.

The schedule for completing these tasks is illustrated in Table 1-1, which shows that the total estimated time required to close the container storage areas is 1 week, unless contingent closure activities are required. Removal of the remaining empty waste containers will be completed on September 16, 1988. Provision of a Closure Report and Engineers Certification of Closure is anticipated on or about September 23, 1988.

If contingent closure activities are required, the total procedure will take 10 weeks. The majority of this time represents laboratory analysis turnaround time.

TABLE 1-1

SCHEDULE OF FINAL CLOSURE
CONTAINER STORAGE AREA

Task	Week									
	1	2	3	4	5	6	7	8	9	10
Remove remaining waste containers	—									
Inspect container storage areas	—									
Contingent decontamination		—	—							
Contingent rinse water sample analysis				—	—	—	—	—	—	
Certify closure										—

1.4 REMOVAL OF REMAINING WASTE CONTAINERS

1.4.1 Method and Procedure for Removal

The empty waste containers remaining on site will be removed and disposed of off site at an approved hazardous waste facility following standard operating procedures for transporting hazardous wastes.

1.5 FACILITY INSPECTION

The container storage areas will be carefully inspected to identify evidence of contamination of the facility by leakage or other release of the containerized materials. The inspection will include visual observation of the storage areas for paint sludge staining and waste-related surface deterioration, as well as observation of the concrete/asphalt floors for cracks or other potential migration pathways. Nearby storm drains will be inspected for visual signs of paint sludge contamination. If no visual evidence of paint sludge contamination is observed, the facility will be considered closed.

1.6 DECONTAMINATING THE FACILITY

If visual evidence of a release is observed, the facility will be decontaminated. The container storage areas will be washed with a high pressure water system. The decontamination rinse waters will be collected and disposed as hazardous waste.

After a period of decontamination activities, a sample of the rinse waters will be collected and analyzed for those constituents listed in the Administrative Order as indicators that the paint sludge is hazardous, lead and chromium. The values obtained will be compared with the results of testing (for the same closure parameters) a sample of the municipal water provided to the facility by the City of Vancouver. Decontamination activities will be considered completed when this comparison shows no residual contamination in the rinse waters.

1.7 CLOSURE CERTIFICATION

An independent professional engineer will be engaged to certify that the closure of the container storage areas has been completed in accordance with the closure plan specifications. It is anticipated that the professional engineer will visit the site and observe various closure steps, including contingent decontamination procedures and collection of rinse water and background samples, if required.

The certification of closure by the independent professional engineer will be submitted to the EPA Regional Administrator and the Director of the Washington Department of Ecology in accordance with the requirements of 40 CFR 265.115 and WAC 173-303-610.

No post-closure care activities will be necessary for the container storage areas.

2.0 CLOSURE COST ESTIMATE

CONTAINER STORAGE AREAS
BUILDINGS 17 AND 39
VANCOUVER, WASHINGTON

2.1 DEVELOPMENT OF COSTS

The costs for activities associated with closure of the container storage areas are presented in this section. The estimates are based upon the following:

- Unit costs are "fully loaded" and include: labor, fringe benefits, overhead, and required equipment for the specific tasks.
- The unit costs for engineering services are for independent professional personnel.
- Transportation and disposal costs are based on data developed from contracting companies engaged in these businesses.

2.2 CLOSURE COST ESTIMATE

2.2.1 Cost Estimate

The Cascade bankruptcy estate and Hillman have expended over $12,500 to date for removal and disposal of stored containerized wastes. The estimated remaining cost of closure for the container storage areas is $7,700. This cost is based on the current value of the dollar as of the most recent revision. A detailed cost estimate for closing the Container Storage Area is given in Table 2-1.

2.2.2 Financial Assurance

Financial assurance materials will be submitted as required within 60 days of the issuance date of the Consent Agreement and Final Order.

TABLE 2-1

CONTAINER STORAGE AREAS
CLOSURE COST ESTIMATE
SEPTEMBER 16, 1988

	Item	Quantity	Cost
Closure-Related Costs Expended to Date			
1.	Remove, transport, dispose waste	38 55-gallon drums (Bldg. 39) 3 55-gallon drums (Bldg. 17)	$ 10,589 1,789
Remaining Closure Costs			
2.	Closure Plan Preparation	Lump Sum	$ 2,000
3.	Remove, transport, dispose empty containers	200 (approximately) 5-gallon containers 12 55-gallon drums	3,500
4.	Inspection and engineering certification	Lump Sum	1,200
5.	Management and administration	Lump Sum	1,000
Contingent Closure Costs			
6.	Wash container storage areas	(to be supplied, if needed)	
7.	Collect and analyze wash samples		