



## **GUIDANCE FOR CLOSURE AND PHASED CLOSURE OF FORMER CCA LUMBER TREATING PLANT DRIP PADS**

### **Steps to Pursue Closure**

- 1) Discussions with consultant, corporate and plant personnel to determine objectives and strategy. Will need to determine if full or phased closure is wanted. Considerations such as potential down time, costs, etc. will need to be evaluated.
- 2) Site visit by consultant to access the condition of the pad and conduct a preliminary risk assessment. The consultant would evaluate the likelihood of obtaining closure, determine how much work would be involved in obtaining partial or full closure, and assess the level of work that would be required to clean the pad. Depending on the condition of the pad, the consultant would recommend partial or full closure. If the pad is in poor condition, which would indicate a high potential for sub-surface soil or groundwater contamination, then a partial closure would most likely be recommended.
- 3) Communicate with state to establish closure criteria. The preferred methods of closure vary from state to state. Some states leave it to the consultant to develop cleaning and sampling methods, while other states have written procedures established. Also, the level of decontamination of the pad surface (evaluated by surface or rinseate sampling) will need to be negotiated with the state.
- 4) Develop a closure plan and possibly a post-closure care plan for submittal to the state and wait for state approval of the plan.
- 5) Conduct remedial actions. This will consist of cleaning the drip pad, sumps, treating cylinder, and tanks. If cleaning has been conducted in the past, then documentation of this cleaning may be sufficient.
- 6) Conduct sampling. If partial closure is pursued, this will consist of surface sampling of the drip pad. Various methods can be utilized to evaluate the surface condition, including: rinseate sampling, surface wipe sampling, and concrete chip sampling. The condition of the pad and requirements from the state will determine what sampling technique will be utilized. If full closure is performed, below-pad soil samples and/or groundwater sampling will be required in addition to the surface sampling.
- 7) Develop a closure or partial closure certification report for submittal to the state.
- 8) Await approval from the state agency.

## **Possible Timeframes**

### To obtain full closure:

The timeframe necessary to obtain full closure is dependent on the results of sampling. If the pad is easily decontaminated, and no or minimal subsurface contamination is found, closure could take from 3 to 6 months. Of that time, the plant would need to be shut down for possibly 2 to 3 weeks to decontaminate the surface, resurface as needed, and obtain the samples. If the pad and treating system have been sufficiently decontaminated in the past, the downtime could be reduced. If subsurface contamination is found, remediation could take from 2 to 6 weeks, provided the contamination is limited to the soil and can be remediated. If contamination is significant and can not be removed, then the pad could be replaced, and post closure care actions would be initiated. Post closure care actions could stretch out over years or decades, depending on how extensive the contamination is.

### To obtain partial closure:

The timeframe necessary to obtain partial closure is dependent on how easily the pad is decontaminated. If decontamination has not been conducted in the past, the plant would need to be shut down for 1 to 3 weeks to decontaminate the surface and resurface as needed. The partial closure process, including developing the closure plan, conducting the site work, preparing a partial-closure certification report, and awaiting response from the state could take from 2 to 6 months.

## **Advantages and Disadvantages**

### Full Closure:

The advantages of obtaining full closure are that the drip pad and treating plant will be completely deregulated from Subpart W. There will be no generation of hazardous waste, no limited access of forklifts, no annual certification by a professional engineer, reduced liability, reduced training requirements, etc.

The disadvantages are that once closure is initiated, there is no going back. Below-pad samples are likely going to be required, which means the pad will have to be reconstructed. If contamination is found, large sections of the pad may have to be removed, expensive remediation may be required, and the possibility exists that the contamination detected reaches groundwater or is larger than can be remediated. If this is the case, post-closure care may be initiated, which would include the installation of groundwater monitoring and/or remediation systems and long term observation of the facility.

Phased (Partial) Closure:

The advantages of phased closure are that the scope of work is reduced with partial closure. Subsurface sampling can be postponed, which is good for facilities likely to have experienced releases to the below-pad soil or groundwater. The generation of hazardous waste is eliminated, and if the state agrees, limited access of forklifts may be eliminated as well.

The disadvantages are that full closure will still be required in the future, and until then, certain Subpart W requirements will apply to the facility. Primarily, annual certification by a professional engineer will still be required. Also, the pad surface and run-on / run-off controls will need to be maintained in compliance with Subpart W. Ultimately, the pad will still be in the hazardous waste universe, which means it may be subject to future inspections from the state and EPA. Also, it is likely that the criteria for full closure of drip pads will only become more stringent as time goes on, so it may be more difficult and more costly to close the pad in the future.

**Additional Information**

Additional information can be obtained by contacting the following individuals:

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