



Environmental Management & Engineering, Inc.

437 Industrial Lane Post Office Box 19866 Birmingham, AL 35219
(205) 940-7700 Fax (205) 940-7701

December 19, 1995

VIA AIRBORNE EXPRESS

Mr. Brian Oliva
Senior Hazardous Materials Specialist
Division of Environmental Protection
Department of Environmental Health
1131 Harbor Bay Parkway, 2nd Floor
Alameda CA 94502

Re: Closure Plan for the Grove Valve and Regulator Company Facility
Emeryville, California
DRS-95-E942

RECEIVED
FBI/DOJ
95 DEC 20 AM 9:57

Dear Mr Oliva:

Enclosed please find a copy of the Closure Plan for the Grove Valve & Regulator Company that you requested in your inspection report of November 6, 1995. Please note that this report was prepared in conjunction with Mr. Bill Tallent of the Grove Valve & Regulator Company and Ms. Robin Spencer.

If you have any questions or comments please call me at (205) 940-7700.

Thank you for your kind consideration.

Sincerely,

James Thomas
Senior Hydrogeologist

JT/jjf

cc: Mr. Lee DeNooyer - w/report copy
Mr. Bill Tallent - w/report copy
Ms. Robin Spencer - w/report copy

CONFIDENTIAL
PROTECTION

95 DEC 20 AM 9:57

December 13, 1995

**CLOSURE PLAN – Grove Valve &
Regulator Company,
Emeryville, California**

Prepared For:

**Grove Regulator & Valve Co.
6529 Hollis Street
Emeryville, California 94549**

TABLE OF CONTENTS.

	<u>PAGE</u>
I. Introduction	1
II. Hazardous Materials Used On-Site	1
III. Activities Which Generate Hazardous Waste	2
IV. Anticipated Quantities of Hazardous Wastes	2
V. Sumps	3
VI. Other Materials Which May Need to be Disposed	3
A. Metal Equipment and Wood Flooring	4
B. Wood Flooring	4
C. Other Materials	4
VII. Health and Safety Considerations	4
VIII. Disposal of Hazardous Wastes	5

CLOSURE PLAN

Grove Valve & Regulator Company
Oakland, California

December 13, 1995

I. Introduction

Grove Valve & Regulator Company manufactures valves and regulators for use in industrial applications such as pipelines. Facility activities include metal machining, welding, parts cleaning, sandblasting, paint spraying, product testing, rubber O-ring fabrication, parts assembly, and shipping. Other related activities include administration, accounting, purchasing, engineering, and sales. Grove has been operating the Emeryville facility for approximately 60 years. This year Grove was sold to Dresser Industries and is now in the process of moving its manufacturing activities to Texas. The physical plant is for sale.

The Main Plant at Grove is located in a building of approximately 220,000 square feet. The building, in which most of the production activities are carried out, occupies an entire city block between 65th and 66th Streets.

II. Hazardous Materials Used On Site

Many products, mainly paints, are used in the process of finishing valves and regulators. Other products, such as lubricating oils and cleaning agents are used for the maintenance of equipment. At the close of business, these products will be inventoried. Those with potential use at the new Texas plant will be shipped under proper bills of lading following all DOT regulations for transport of hazardous materials. Materials not deemed necessary for operations in Texas will be used if possible on site or disposed according to all applicable local, state, or federal regulations.

III. Activities Which Generate Hazardous Waste

There are several activities which have generated the ten hazardous waste streams at Grove:

- The stock valves and other pieces to be machined are cleaned by a parts washer which uses a non-corrosive detergent. This cleaning process generates a portion of the tramp oil and water waste stream. Rancid machine coolant (a mixture of water and soluble oil) adds to this waste stream.
- Collection of waste oil from the machines and material handling equipment during oil changes generates the waste oil waste stream.
- The painting process generates four waste streams: waste liquid paint, solid paint, paint booth sludge, and paint booth water from the paint spray booth waterfall.
- The manufacture of rubber products produces the waste stream rubber dust.
- The shot blast process prepares metal surfaces for paint which generates the baghouse dust waste stream.
- Spent carbon from the air stripper unit generates the spent carbon waste stream.
- The oily absorbent material (floorsweep) waste stream is generated in the cleaning and maintenance process.

IV. Anticipated Quantities of Hazardous Wastes

The ten waste streams described above have been managed as hazardous wastes for the past several years. At the close of operations it is expected that the waste streams will have accumulated the following amounts of material:

Waste Oil	2000 gallons
Waste Tramp Oil and Water	6000 gallons
Waste Liquid Paint	200 gallons
Waste Solid Paint	2000 pounds
Waste Paint Booth Sludge	200 gallons
Paint Booth Water	2000 gallons
Waste Rubber Dust	400 pounds
Waste Baghouse Dust	5000 pounds
Oily Absorbent	200 pounds
Spent Carbon	none

These materials will be disposed of in the usual manner, consistent with local, state, and federal regulations, using a licensed hazardous waste hauler, proper shipping containers and manifests.

V. Sumps

Sumps at Grove Valve will be pumped into above ground storage tanks and the contents characterized for disposal. Process knowledge will guide in the selection of analytical tests to be performed. The sump contents will be disposed according to local, state and federal regulations. Sumps will be cleaned and inspected for any damage. Photos (either video or still) will be taken to document the status of sumps after cleanout.

VI. Other Materials Which May Need to be Disposed

At this time it is unknown how much of the facility will be sold "as is". It is possible that the new owner will set up a machine shop in which case some equipment and the flooring may remain intact. On the other hand, if the new owner proposes other operations, the facility may be gutted and rebuilt. If this were the case, then some of the current materials would need to be disposed, e.g., metal equipment, wood flooring, and other material, etc.

A. Metal Equipment

If unusable for manufacturing applications, the metal equipment will be scrapped and sent to a metals recycler, taking care to inspect each piece for free-flowing oil or asbestos linings. If free-flowing oil is found, it will be drained to a waste oil tank and the part wiped cleaned before sending for recycling. If any asbestos is found it will be abated by a certified handler of asbestos.

B. Wood Flooring

The wood flooring, which is located in parts of the shop area, is in good condition with many remaining years of useful life. In the event that the wood flooring must be removed, care will be taken to inspect areas which may have been more impacted by operations than others. The wood will then be segregated for disposal. Analytical tests for solvents, heavy metals, and oil and grease will be made to determine if the wood could be a hazardous waste. The wood will be disposed according to local, state, and federal regulations.

C. Other Materials

Other materials needing hazard characterization may be identified at a later date. These materials will be handled carefully and disposed, if necessary, according to local, state, and federal regulations.

VII. Health and Safety Considerations

During removal of machines and materials, employees may encounter some health and safety issues. Grove Valve employees working in these operations will be those trained in hazard communication and emergency response procedures. Care will be taken to keep dust to a minimum, and proper respiratory protection will be used.

VIII. Disposal of Hazardous Wastes

All hazardous wastes will be sent to appropriate facilities for either recycling or disposal. All shipments will be under proper DOT regulations, including manifests. Once the plant is closed, these documents will be maintained at the Texas facility under the supervision of the Plant Services Manager, Bill Tallent.