May 15, 1996

# UPDATED FACILITY CLOSURE PLAN Grove Valve and Regulator Company Emeryville, California

### Prepared For:

Grove Valve and Regulator Company 6529 Hollis Street Emeryville, California 94549

### Prepared By:

Environmental Management & Engineering, Inc. 437 Industrial Lane Birmingham, Alabama 35211 Project No. DRS-95-E942

(Revised May 23, 1996)



Environmental Management & Engineering, Inc.

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#### UPDATED FACILITY CLOSURE PLAN

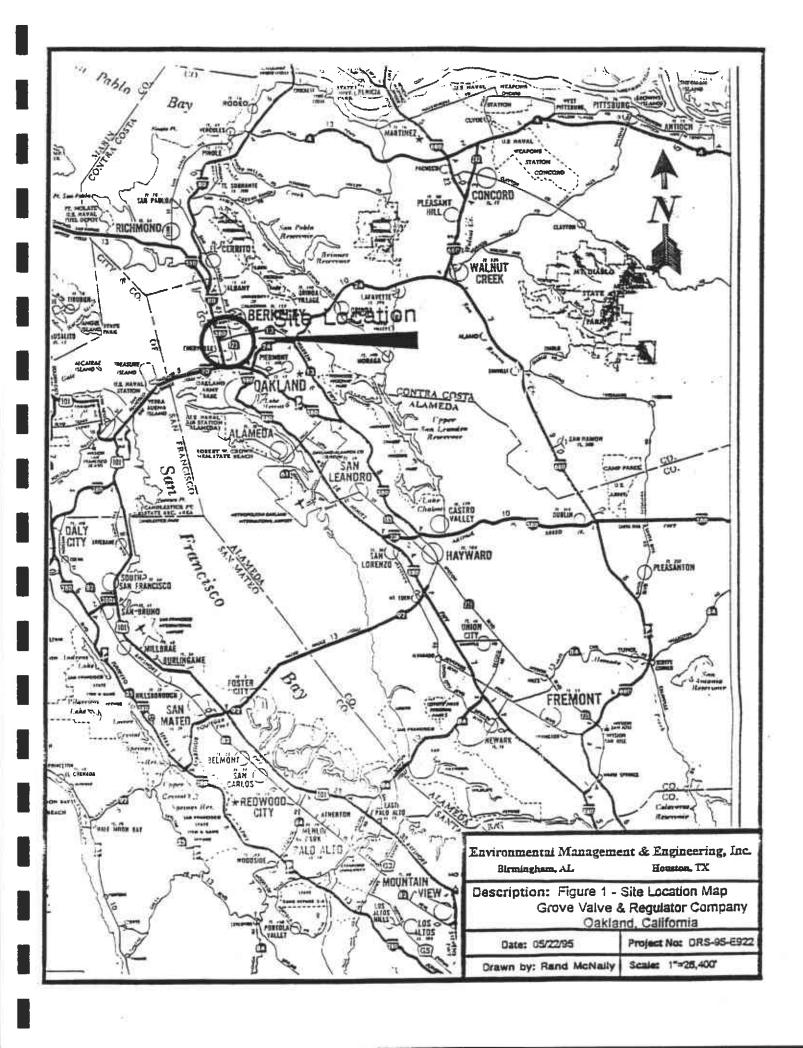
Grove Valve and Regulator Emeryville, California May 15, 1996 (Revised May 23, 1996)

#### I. General Information

The Grove Valve and Regulator Company (Grove) facility is situated on approximately seven acres located at 6529 Hollis Street, Emeryville, California and has been involved in the development, manufacture and sale of valves and pressure regulators for the oil and gas industry. The area in which the facility is located is highly developed with manufacturing, warehouses, commercial offices, etc. The area under roof at the facility totals approximately 250,000 square feet. Grove formerly leased an additional 45,000 square feet of space across 66th Street. The property is no longer under lease and is occupied by a new commercial tenant. The property is bisected by a multi-track railroad right-of-way on the western portion of the property. Figure 1 is a facility site location map. Figure 2 is a facility layout diagram.

Grove is currently relocating its manufacturing operation to Houston, Texas and is in the process of closing the facility in preparation for the eventual sale of the property. The following is a summary of the closure activities which have been carried out to-date, as well as a description of the remaining closure activities.

Grove is currently conducting quarterly groundwater monitoring as a result of the discovery of low levels of Trichlorothylene (TCE) in the underlying groundwater from an apparent offsite source. The results of this monitoring program are already reported to the Alameda County Department of Environmental Health (ACDEH) periodically and are therefor not discussed in this report.



ATTACHMENT 3 — "Closure of Engineering Test Facility" Robin K. Spencer, April 1996



## ROBIN K. SPENCER

Certified Hazardous Materials Manager Registered Environmental Assessor

## CLOSURE OF ENGINEERING TEST FACILITY

GROVE VALVE AND REGULATOR COMPANY 6529 HOLLIS STREET EMERYVILLE, CA 94608

## Prepared for

Grove Valve and Regulator Company 11100 W. Airport Blvd. Stafford, TX 77477

Prepared by

Robin K. Spencer, CHMM, R.E.A. 6 Via San Inigo Orinda, CA 94563

April 1996

### Background

The Grove Valve Engineering Test Facility is located at the corner of Bay and 65th Streets across the Southern Pacific railroad tracks to the west of the main plant. This facility was used to perform strength and other hydraulic tests on valves. Production of Grove products has moved out of state and the facility is in the process of closure and cleanup.

### Description of Facility

The Engineering Test Facility primarily consists of a metal building approximately 1950 square feet with a main pit (dimensions 45' x 17' x 7'), and a secondary cylindrical pit (dimensions 6.5' I.D.x 15' deep), a loft, and a restrooom. Adjacent to the test facility is a covered storage area of approximately 5400 square feet.

### Closure Methodology

To close this facility, Grove Valve pumped all the water out of the two pits and had it and any sludge treated as a hazardous material. The two pits were then steam cleaned and wipe samples were taken for confirmation that the pits were clean. The pipes and ancillary equipment will be moved to the new facility. The pits will be backfilled with clean pea gravel and capped with a 4-to 6-inch layer of concrete.

Grove Valve contracted with Broco Environmental to clean out the pits and transport and dispose of the water. On February 14 and 15, 1996, eight 5000-gallon vacuum tanker trucks were filled with water from the two pits. A total quantity of 34,965 gallons was pumped. On February 16 and 17, workers entered the reservoir using Level B safety protection (complete personal protection with supplied air) to prepare the pits for cleaning and to pressure wash the walls and floors. The entire pump system was drained into the reservoir and the valves and piping removed. The water was pumped out. Workers then steam-cleaned the walls, floors, supports, and other appurtances, and that water was pumped out. In total, an additional 385 gallons of water was pumped. The water and sludge was profiled and sent to Broco Environmental in Rialto, CA for treatment.

Once clean, three surface wipe samples were taken - two from the primary pit and one from the secondary pit. These were submitted for analysis for mercury and chromium.

### Acid Cleaning

Test results of the wipe samples showed an elevated level of mercury on the pit floor. On March 13 and 14, Broco technicians returned and cleaned all surfaces with a 1 percent solution of hydrochloric acid, followed by a pressure wash. The water and acid mix was pumped out to five 55-gallon drums for a total of 275 additional gallons of waste liquid. The water and acid mix was sent to Broco Environmental in Rialto, CA for treatment.

### Additional Confirmation Sampling

Wipe samples analyzed after the acid wash showed mercury levels below levels of concern (see attached analytical).

### Visual Documentation

Photographic documentation of the clean-out was made using a still camera and a video camera. These photographs and the video cassette are included as attachments.

## Supporting Written Documentation

Chain of custody forms, analytical results, manifests, and certificates of treatment are also included as attachments.

ATTACHMENT 1 - Analytical Results of Sump Wipe Samples

**Analytical Results After First Cleaning** 

2002 PACE 3/4

Enviro - Chem, Inc. 1214 E. Lexington Avenue, Pomona, CA 91766 . Tel (909) 590-5905 Fax (909) 590-5907

## LABORATORY

RTALTO: CA 92376 CUSTOMER : BROCO. 2824 NORTH LOCUST TEL (909) 350-0580

PROJECT: GROVE VALVE & RESULATER CO

MATRIX:WIPE SAMPLING DATE : 02/17/96 REPORT TO:MR. JAY STRENG DATE SAMPLE (S) REC'D: 02/19/96 DATE ANALYZED: 02/20/96 DATE REPORTED: 02/21/96

SAMPLE I.D.: #1

LAB T.D.: 960219-24

PARAMETER TOTAL CHROMIUM (C=) : UG/WIPE.

COMMENTS

RG = MICROGRAM

TOTAL MERCURY (Hg)

D.L. - DETECTION LIMIT

ND = BELOW THE DETECTION LIMIT OR NOW-DETECTED

DATA REVIEWED AND APPROVED BY:

CAL-DES ELAP CERTIFICATE No.: 1555

### Enviro - Chem, Inc.

1214 E. Lexington Avenue, Pomona, CA 91766 Tel (909) 590-5905 Fax (909) 590-5907

#### LABORATORY REPORT

CUSTOMER: BROCO, 2824 NORTH LOCUST AVE, RIALTO, CA 92376 TEL (909) 350-0580 FAX (909) 356-2878

PROJECT: GROVE VALVE & RESULATER CO.

DATE SAMPLE(S) REC'D:02/19/96 MATRIX: WIPE

DATE ANALYZED: 02/20/96 SAMPLING DATE: 02/17/96

DATE REPORTED: 02/21/96 REPORT TO: MR. JAY STRENG

LAB I.D.: 960219-25 SAMPLE I.D.: #2

SAMPLE RESULT UNIT PARAMETER

TOTAL CHROMIUM (CF) UG/WIPE 6010 920 10

7471 13,100 TOTAL MERCURY (Hg) ug/WIPE

#### COMMENTS

ug = MICROGRAM

D.L. = DETECTION LIMIT

ND = RELOW THE DETECTION LIMIT OR NON-DETECTED

DATA REVIEWED AND APPROVED BY:

CAL-DHS ELAP CERTIFICATE No.: 1555

Enviro - Chem, Inc. 1214 E. Lexington Avenue, Pomona, CA 91766 Tel (909) 590-5905 Fax (909) 590-5907

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2824 NORTH LOCUST AVE TEL (909) 350-0580

PROJECT: GROVE VALVE & RESULATER CO

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SAMPLE I.D.: #3

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DATA REVIEWED AND APPROVED BY:

CAL-DHS ELAP CERTIFICATE No.: 1555



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Enviro - Chem, Inc. 1214 E. Lexingion Avenue, Pomona, CA 91766 Tel (909) 590-5905 Fax (909) 590-5907

## REPORT LABORATORY

CUSTOMER: BROCO, 2824 NORTH LOCUST AVE. RIALTO, CA 92 TEL (909) 350-0580 FAX (909) 356-2878 CA 92376

PROJECT: GROVE VALVE & RESULATER CO.

MATRIX: WIPE SAMPLING DATE: 03/14/96 REPORT TO:MR. JAY HAAF DATE SAMPLE(S) REC'D: 03/18/96 DATE ANALYZED: 03/20-21/96 DATE REPORTED: 03/21/96

LAB I.D.: 960318-42

SAMPLE I.D.: #1

SAMPLE RESULT

PARAMETER ug/WIPE TOTAL MERCURY (Hg)

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DATA REVIEWED AND APPROVED BY:

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1214 E. Lexington Avenue, Pomona, CA 9.1766 Tel (909) 590-5905 Fax (909) 590-5907

## REPORT LABORATORY

CUSTOMER: BROCO, 2824 NORTH LOCUST AVE. RIALTO. TEL (909) 350-0580 FAX (909) 356 CA 92376 FAX (909) 356-2878

PROJECT: GROVE VALVE & RESULATER CO.

MATRIX: WIPE EAMPLING DATE: 03/14/96 DATE SAMPLE(S) REC'D:03/18/96 DATE ANALYZED: 03/20-21/96 DATE REPORTED: 03/21/96

REPORT TO:MR. JAY HAAF

LAB I.D.: 960318-43

SAMPLE I.D.: #2

PARAMETER

TOTAL MERCURY (Hg) UG/WIPE

COMMENTS

ug = MICROGRAM

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DATA REVIEWED AND APPROVED BY:

CAL-DHS ELAD CERTIFICATE No.: 1555

ATTACHMENT 2 — Engineering Test Sump Waste Disposal Documentation

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2824 North Locust Ave. Rialto, California 92377 (909) 350-0580 Cust. Serv. Fax (909) 356-9337 Corporate Fax (909) 356-2878

## Certificate of Recycling or Disposal

ISSUED IO. Grove Value & Regulator Co.

Broco Environmental has received, accepted and taken title to the waste identified on manifest number 95710883.

Broco Environmental has assumed all liability for the waste identified on this manifest.

Broco Environmental has recycled or beneficially reused these items where economically and technically feasible.

3/4/96 Date



If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

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20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this man

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TSDF SENDS THIS COPY TO GENERATOR WITHIN 30 DAYS.

(Generators who submit hazardous waste for 'ransport out-of-state, produce completed copy of this copy and send to DTSC within 30 days.)

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2824 North Locust Ave. Rialto, California 92377 (909) 350-0580 Oust. Serv. Fax (909) 356-9337 Corporate Fax (909) 356-2878

## Certificate of Recycling or Disposal

ISSUED TO: Grove Valve & Regulator Co.

Broco Environmental has received, accepted and taken title to the waste identified on manifest number 95710855.

Broco Environmental has assumed all liability for the waste identified on this manifest.

Broce Environmental has recycled or beneficially reused these items where economically and technically feasible.



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2824 North Locust Ave. Rialto, California 92377 (909) 350-0580 Cust. Serv. Fax (909) 356-9337 Corporate Fax (909) 356-2878

## Certificate of Recycling or Disposal

ISSUED 10. Grove Valve & Regulator Co.

Broco Environmental has received, accepted and taken title to the waste identified on manifest number 95710851.

Broco Environmental has assumed all liability for the waste identified on this manifest.

Broco Environmental has recycled or beneficially roused these items where economically and technically feasible.

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2824 North Locust Ave. Rialto, California 92377 (909) 350-0580 Cust. Serv. Fax (909) 356-9337 Corporate Fax (909) 356-2878

## Certificate of Recycling or Disposal

ISSUED 10. Grove Value & Regulator Co.

Broco Environmental has received, accepted and taken title to the waste identified on manifest number 95533143.

Broco Environmental has assumed all liability for the maste identified on this manifest.

Broco Environmental has recycled or beneficially reused thase items where economically and technically feasible.

3/6/96 Date



G. STRONGEROUSE



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## Certificate of Recycling or Disposal

ISSUED IO: Grove Value & Regulator Co.

Broco Environmental has received, accepted and taken title to the waste identified on manifest number 95533140.

Broco Environmental has assumed all liability for the waste identified on this manifest.

Broco Environmental has recycled or beneficially reused these items where economically and technically feasible.

3/6/96

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20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this

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2824 North Locust Ave. Rlaito, California 92377 (909) 350-0580 Cust. Serv. Fax (909) 356-9337 Corporate Fax (909) 356-2878

## Certificate of Recycling or Disposal

ISSUED TO. Grove Value & Regulator Co.

Broco Environmental has received, accepted and taken title to the waste identified on manifest number 95533139.

Broco Environmental has assumed all liability for the waste identified on this manifest.

Broco Environmental has recycled or beneficially reused these items where economically and technically feasible.

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Date

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2824 North Locust Ave. Rialto, California 92377 (909) 350-0580 Oust. Serv. Fax (909) 356-9337 Corporate Fax (909) 356-2878

## Certificate of Recycling or Disposal

ISSUED 70: Grove Value & Regulator Co.

Broco Environmental has received, accepted and taken title to the waste identified on manifest number 95533144.

Broco Environmental has assumed all liability for the waste identified on this manifest.

Broco Environmental has recycled or beneficially reused these items where economically and technically feasible.



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2824 North Locust Ave. Rialto, California 92377 (909) 350-0580 Cust. Serv. Fax (909) 356-9337 Corporate Fax (909) 356-2878

## Certificate of Recycling or Disposal

ISSUED TO: Grove Valve & Regulator Co.

Broco Environmental has received, accepted and taken title to the waste identified on manifest number 95533142.

Broco Environmental has assumed all liability for the waste identified on this manifest.

Broco Environmental has recycled or beneficially reused these items where economically and technically feasible.

3/6/96

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IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550



2824 North Locust Ave. Rialto, California 92377 (909) 350-0580 Cust. Serv. Fax (909) 356-9337 Corporate Fax (909) 356-2878

## Certificate of Recycling or Disposal

ISSUED 10: Grove Valve & Regulator Co.

Broco Environmental has received, accepted and taken title to the weste identified on manifest number 95922845.

Broco Environmental has assumed all liability for the waste identified on this manifest.

Broco Environmental has recycled or beneficially reused these items where economically and technically feasible.

3/6/96 Date



20. Equility Owner or Operator Cartification of receipt of hazardous materials covered by this manifest except as noted in item 19.

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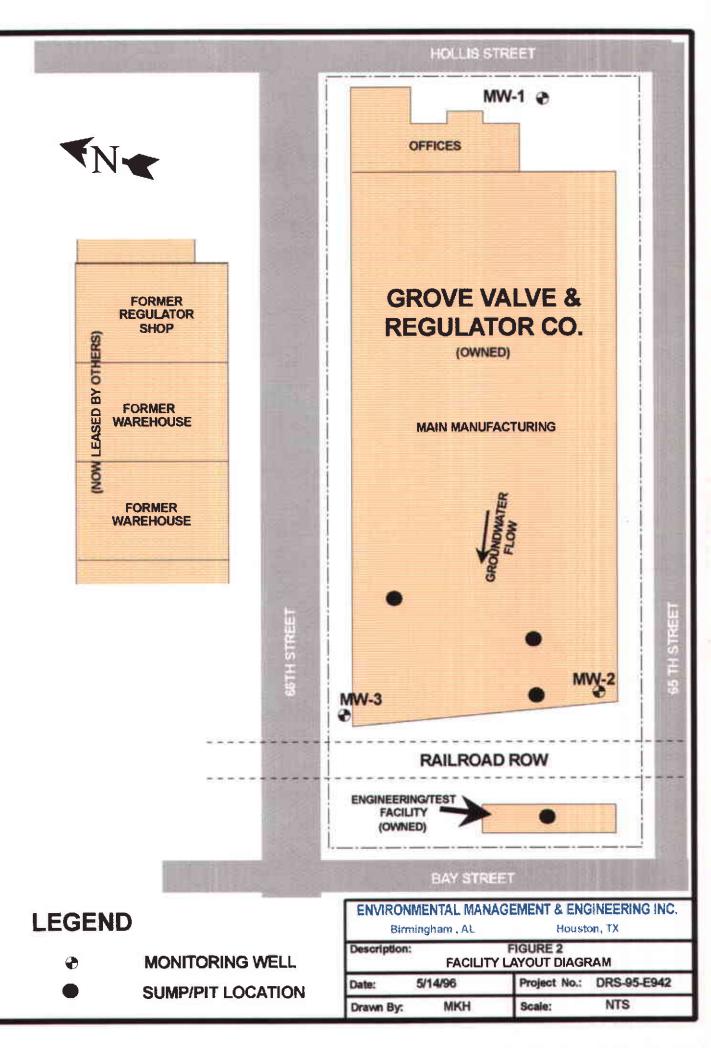
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### II. Facility Closure Activities

#### A. Equipment Removal

The majority of the usable manufacturing equipment and stock inventory has been relocated to the new facility in Texas. Any remaining equipment and/or material will be recycled/disposed in accordance with applicable local, state and federal regulations.

All equipment will be inspected to ensure that it has been drained of any fluids and cleaned prior to recycling. Any equipment which is found to include asbestos containing insulation, gaskets, etc. will be abated by a certified handler of asbestos. All wastes resulting from the above activities will be disposed in accordance with applicable local, state and federal regulations.

### B. Sump Cleaning

The Grove facility has several sumps/pits which were used to store and circulate water used for hydrostatic testing of Grove products. The largest of these pits with a combined capacity of approximately 40,000 gallons were located within the Engineering Test facility building located on the western portion of the property. In preparation for facility closure, Grove contracted with Broco Environmental to pump out the water and sludge from the pits, steam clean the interior surfaces and perform wipe tests to confirm adequate cleaning. The results of the wipe tests revealed slightly elevated levels of Mercury on the pit floor. The work was carried out on February 14-15, 1996. Broco conducted additional cleaning by hydrochloric acid bath followed by pressure washing. A second round of wipe samples confirmed adequate cleaning of the sump pit. Analytical results for both rounds of wipe sampling are included as Attachment 1. A total of 35,625 gallons of liquid and 2,900 pounds of sludge waste was generated by the pit closure/cleaning activities in the Engineering Test Facility.

The waste was profiled and disposed by Broco Environmental. Attachment 2 contains copies of the disposal documentation related to this waste.

After cleaning, the pits were carefully inspected and photographically documented and appeared to be structurally sound with no evidence of leaks or cracks. Grove has filled the pits with pea gravel and capped the area with reinforced concrete 4-6 inches thick. The closure was observed by Ms. Robin Spencer (Consultant). Ms. Spencer's resulting report is included as Attachment 3.

In addition to the pits in the Engineering Test Facility, two small pits which were also used to store circulating test water were located in the main facility. These pits were pumped of water and steam cleaned on February 16, 1996. A total of 4,850 gallons of waste water was accumulated in the pumping/cleaning activities and profiled for disposal by Broco Environmental. Attachment 4 contains copies of the disposal documentation for this material. The pits were then closely inspected, photographed and documented to confirm structural integrity. No evidence of leaks or cracks were apparent. The decision to fill the pits or not will be based on the needs of prospective buyers of the facility.

On February 17, 1996, the water curtain reservoirs at the facility's three paint booths were cleaned, producing approximately 13,600 pounds of wastewater/sludge. The material was disposed by Broco Environmental. Attachment 5 contains copies of the disposal documentation.

An additional sump associated with the recirculating steam cleaning operations in the main building remains in use at the facility in support of closure activities. This sump will be pumped and cleaned when it is no longer needed. Other small sumps and pits will be addressed as they become accessible after the removal of facility equipment. All wastes generated will be disposed in accordance with applicable local, state and federal regulations.

#### C. Miscellaneous

Few process wastes are being generated during closure activities at the facility. Those that are accumulated (steam cleaning waste, materials determined to be unusable at the new location, etc.) will be handled and disposed in accordance with applicable local, state and federal regulations.

As the nature of the future use of the facility by prospective buyers in unknown, Grove has not determined the extent of facility modification which will be necessary. Should interior demolition be necessary, all recycled materials and wastes will be handled and disposed properly. A portion of the main shop floor is covered with wooden block flooring. Should it be necessary to remove this flooring, it will be properly profiled to determine its hazardous or non-hazardous status and disposed of accordingly in compliance with local, state and federal regulations.

## III. Summary

The Grove Valve and Regulator Company (Grove) is in the process of relocating its manufacturing operation from its facility in Emeryville, California to Texas. Various closure activities of environmental significance are being conducted in preparation for the eventual sale of the property. Various sumps and pits have been pumped and cleaned and the generated waste disposed properly. One sump which is still in use will be properly closed at the cessation of activity at the facility. Useable equipment, stock inventory, and other materials are being transferred to the new facility. The majority of process wastes which were generated during production activities have already been properly disposed. Any wastes generated during facility closure activities, remodeling, etc. will likewise be handled and disposed in accordance with applicable local, state, and federal regulations. Upon completion of closure activities, a final closure update will be prepared and submitted to appropriate regulatory agencies as may be required.

ATTACHMENT 4 - Main Facility Sump Waste Disposal Documentation

18. Transporter 2 Acknowledgement of Receipt of Materials 19. Discrepancy Indication Space

DO NOT WRITE BELOW THIS LINE

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2824 North Locust Ave. Rialto, California 92377 (909) 350-0580 Cust. Serv. Fax (909) 356-9337 Corporate Fax (909) 356-2878

## Certificate of Recycling or Disposal

ISSUED TO: Grove Valve & Regulator Co.

Broco Environmental has received, accepted and taken title to the waste identified on manifest number 95922834.

Broco Environmental has assumed all liability for the waste identified on this manifest.

Broco Environmental has recycled or beneficially roused these items where economically and technically feasible.



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IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800424-8802; WITHIN CALIFORNIA, CALL 1-800-832-7550



2824 North Locust Ave. Rialto; California 92377 (909) 350-0580 Oust. Serv. Fax (909) 356-9337 Corporate Fax (909) 356-2878

# Certificate of Recycling or Disposal

ISSUED TO: Grove Valve & Regulator Co.

Broco Environmental has received, accepted and taken title to the waste identified on manifest number 95922840.

Broco Environmental has assumed all liability for the waste identified on this manifest.

Broce Environmental has recycled or beneficially reused these items where economically and technically feasible.

3/6/96

Vate

President

ATTACHMENT 5 - Paint Booth Sludge
Disposal Documentation

DO NOT WRITE BELOW THIS LINE.

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## Certificate of Recycling or Disposal

ISSUED 70: Grove Valve & Regulator Co.

Broco Environmental has received, accepted and taken title to the waste identified on manifest number 95922804.

Broco Environmental has assumed all limbility for the waste identified on this manifest.

Groco Environmental has recycled or beneficially roused these items where economically and technically feasible.

3/4/96

Date

President

