



# NORFOLK ENVIRONMENTAL

Reply to: 1583 Post Road  
Fairfield, CT 06430-5932  
Phone (203) 259-7722  
Fax (203) 259-6088

22 December 1995

Mr. Joseph Fishera  
New York State Department  
of Environmental Conservation  
SUNY Stony Brook  
Building 40  
Stony Brook, New York 11790-2356

12-28-95

Re: Closure Plan  
Pass & Seymour/ Legrand Facility  
Glen Cove, New York

Dear Mr. Fishera:

Thank you for your assistance yesterday regarding the closure of the above referenced facility. In accordance with our discussion, I have attached a copy of the current Pass & Seymour/ Legrand (PSL) closure plan.

PSL, a tenant at the property, will cease its operations at the facility at the end of December 1995. Closure of the container storage area will be conducted in January 1996 according to the procedures described in the attached plan (which follows the general guidance that you provided during our discussion). Upon completion of closure activities, a certification of closure will be submitted to the commissioner. TO U.S.

Please don't hesitate to call me at 203-259-7722 if you have any questions or comments. Again, thanks for your help in this matter.

Very truly yours,

Robert Ehlers  
Project Director

Sub-1000

cc D. Simmons  
N. Lorian

***FACILITY CLOSURE PLAN***

***PASS & SEYMOUR LEGRAND***

***45 SEA CLIFF AVENUE***

***GLEN COVE, NEW YORK***

***DECEMBER 1995***

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## 1.0 INTRODUCTION

Pass & Seymour Legrand (PSL) has been engaged in the production of electrical wiring devices such as switches, junction boxes, and receptacles at its Glen Cove facility since 1988. PSL was classified as a large quantity generator of hazardous wastes (NYD002036564) during this period. Hazardous wastes included tetrachloroethylene (PCE) used in a former vapor degreasing operation, contaminated rags, and waste petroleum naphtha solution from the cleaning of stamping equipment (die wash).

PSL will discontinue manufacturing operations at the Glen Cove facility at the end of 1995. Because the facility is located in Nassau County, above a sole source aquifer, PSL is performing a formal closure procedure in accordance with New York State Department of Environmental Conservation's (NYSDEC) requirements for large quantity generators of hazardous waste in sole source aquifer areas.

New York State hazardous waste management facility standards are contained at 6 NYCRR 373-2. These standards include requirements for closure and post-closure care of hazardous waste management units at 6 NYCRR 373-2.7. This Closure Plan (Plan) has been prepared in accordance with these standards.

Section 373-2.7(b) contains the closure performance standard that facilities must meet when closing hazardous waste management units. This standard requires the owner/operator to close the facility in a manner that:

1. Minimizes the need for further maintenance;

2. Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere; and
3. Complies with closure requirements of 6 NYCRR 373-2.

Section 373-2.7(c) requires that closure plans identify steps necessary to perform final closure of a facility. In addition, section 373-2.9 includes requirements for the closure of container storage. Section 373-2.9(i) requires that all hazardous waste and hazardous waste residues be removed from the containment system. Remaining liners, bases, and soil containing or contaminated with hazardous waste or hazardous waste residues must be decontaminated or removed. This Plan has been prepared to close areas of the facility associated with the generation and management of hazardous wastes during the occupancy of PSL and according to applicable requirements.

## 2.0 FACILITY DESCRIPTION AND HISTORICAL OPERATIONS

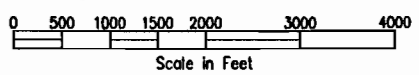
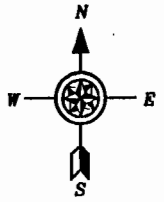
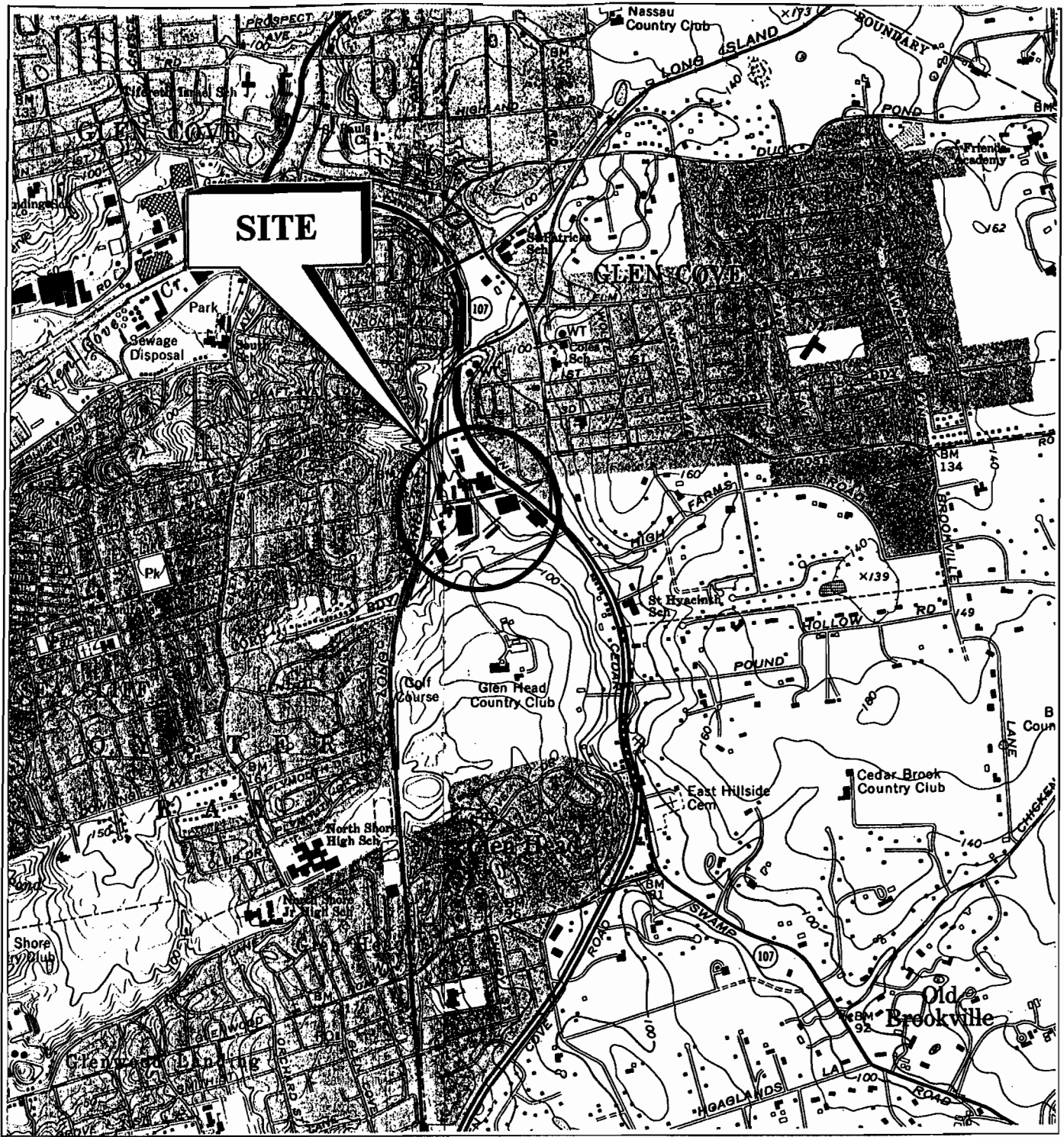
### 2.1 Facility Description

The facility is located on a 7.5 acre site at 45 Sea Cliff Avenue. The facility is located approximately 1,500 feet west of Cedar Swamp Road, 1,000 feet east of Glen Cove Avenue, and 500 feet east of the Sea Cliff Railroad Station. A site location map is provided as Figure 1.

From 1957 to 1988, the facility was operated by the Slater Electric Company, which also manufactured electrical components, switches, outlets and wall boxes. The facility currently consists of eight (8) interconnected buildings constructed between 1957 and 1981, totaling approximately 131,000 sf of manufacturing and administrative office space. PSL leases the facility from ENAL Development, the current owner of the property. The entire facility is either completely paved or occupied by plant buildings. Figure 2 provides a site plan of the facility.

There are no industrial wastewater discharges at the facility. Sanitary wastewater enters the City of Glen Cove sanitary sewer system for treatment at the City's wastewater treatment plant. Storm water either runs off the site as sheet flow, or enters a series of catch basins that discharge to a small stream located adjacent to the eastern property line.

The facility has two ground water supply wells used solely for non-contact cooling purposes. Cooling water is recharged through three diffusion wells on the site. These wells were formerly covered by a State Pollutant Discharge Elimination System (SPDES) permit (NY0106241). The permit was eventually determined by NYSDEC to be inapplicable since the supply wells provided only non-contact cooling water that was recharged on-site. The facility has only intermittently operated one of the supply wells during recent PSL operations.

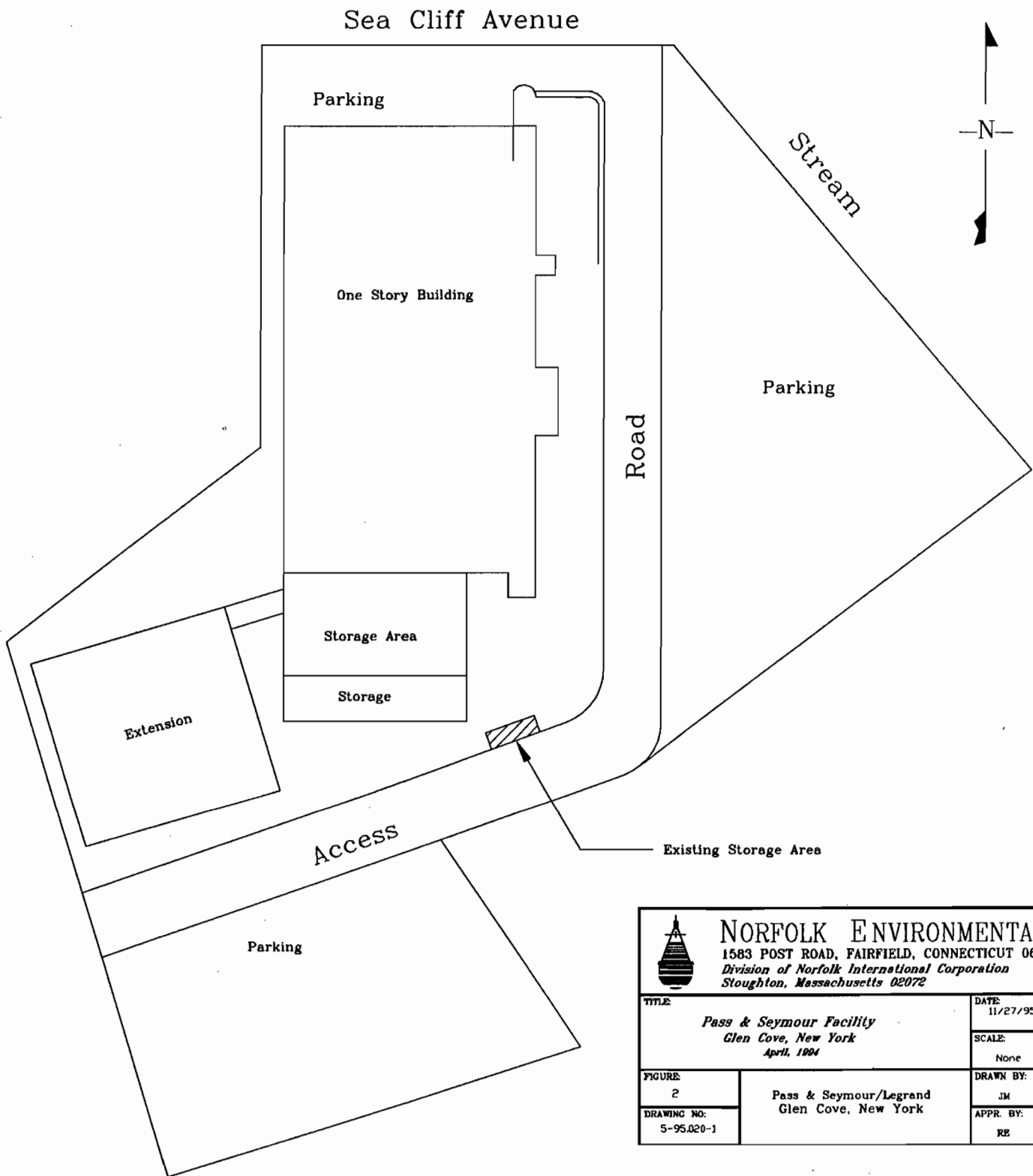



Scale in Feet

SOURCE: USGS TOPOGRAPHIC MAP, SEA CLIFF, NY QUADRANGLE - 1968 AND HICKSVILLE, NY QUADRANGLE - 1967; PHOTOREVISED 1979

**NORFOLK ENVIRONMENTAL**  
 1583 POST ROAD, FAIRFIELD, CONNECTICUT 06430  
 Division of Norfolk International Corporation  
 Sloughton, Massachusetts 02072

TITLE: <b>SITE LOCATION MAP</b>		DATE: 12/1/95
FIGURE: 1		SCALE: AS SHOWN
DRAWING NO: 95-020A	DRAWN BY: J.J.S.	
PASS & SEYMOUR GLEN COVE, NEW YORK		APPR. BY: M.C.



 <b>NORFOLK ENVIRONMENTAL</b> 1583 POST ROAD, FAIRFIELD, CONNECTICUT 06430 <i>Division of Norfolk International Corporation</i> Stoughton, Massachusetts 02072		DATE: 11/27/95
		SCALE: None
TITLE: <i>Pass &amp; Seymour Facility</i> <i>Glen Cove, New York</i> <i>April, 1994</i>		DRAWN BY: JM
FIGURE: 2	Pass & Seymour/Legrand Glen Cove, New York	APPR. BY: RE
DRAWING NO: 5-95.020-1		



## 2.2 Current and Historical Operations

PSL has been in operation at the Glen Cove location since early 1988 manufacturing residential grade electrical wiring devices including switches, junction boxes and receptacles. Developed in 1957 by Slater Electric, the facility was also used for the manufacture of electrical wiring devices prior to occupation by PSL. Manufacturing operations have been phased out during the last few months of 1995, and will be ceased by December 31, 1995. During full operation of the facility, manufacturing activities included plastic injection molding, spot welding, stamping, component assembly, packaging and shipping. Manufacturing was conducted on several manually operated lines and one fully automated line.

## 2.3 Hazardous Waste Generation and Management

PSL operated as a large quantity generator of hazardous waste. The majority of wastes that were generated during PSL's operation of the facility were from two closed PCE vapor degreasing units. PCE degreasing was discontinued in 1994, and all PCE, vapor degreasing equipment and associated wastes were appropriately removed from the facility in accordance with all applicable regulatory requirements.

In addition, a 95% naphtha solution was used to clean equipment used in the stamping operation. Generation and management of these wastes was limited to three areas at PSL. These areas are discussed below:

### Vapor Degreasers

From 1988 to 1994, PSL operated two PCE vapor degreasers. These degreasers were located within an impermeable bermed area inside Building 7, and were used to clean metal parts after tapping. The degreasers were connected by pipe to two 275-gallon above ground steel PCE storage tanks located within an impermeable secondary

containment area outside the western wall of Building 7. The containment area around the tanks was covered to prevent the accumulation of storm water.

The vapor degreasers were manufactured by Baron-Blakeslee of Chicago, Illinois of heavily reinforced welded stainless steel construction, with galvanized piping. During operation, PCE waste sludge (up to approximately 660 gallons per month) was removed from the degreaser units and placed into 55 gallon steel drums. All waste transfer operations (from degreasers to drums) were conducted inside the bermed area. The 55-gallon drums were then transferred to the container storage area until removed for appropriate off-site disposal. PSL knows of no historical PCE spills, either at the vapor degreaser location or elsewhere in the facility, during its operation of the plant. Rags contaminated with PCE were also generated in this area and placed in drums for appropriate off-site disposal.

The degreasers and associated storage tanks were removed from service in 1994, and replaced by an aqueous parts washing system. After discontinuation of the use of the vapor degreasers, all PCE waste, vapor degreasing system equipment, and virgin PCE was removed from the site in accordance with applicable regulatory requirements.

The PSL facility, as well as the entire industrial area surrounding PSL, has been subject to extensive soil and ground water investigation, primarily for the presence of volatile organic compounds including PCE. As discussed in greater detail in Section 2.4, below, the only even minimally impacted area of the facility identified through the comprehensive investigative activities was confined to a small area of surface soil associated with a former owner/operator storage area. This container storage area was replaced with the current, state of the art container storage area by PSL ("container storage area"). This area of impacted surface soil was also fully remediated by previous owner/operators of the facility through excavation of all impacted materials.

Since the entire PSL facility has been investigated extensively for the presence of PCE or any volatile contamination in soil and ground water, and the identified area of PCE concern was completely remediated in November, 1995, no PCE sampling of environmental media is appropriate for the regulatory closure activity which is the subject of this plan.

### **Stamping Operation**

A 95% naphtha solution was used to clean metal punch press dies in the stamping department. Waste die wash generated in this department was transferred to 55-gallon steel drums and stored in the container storage area until removed for disposal.

### **Container Storage Area**

The hazardous waste streams discussed above were placed into 55-gallon steel drums and, from 1988 through 1990, stored for less than 90 days on a concrete pad south of Building 1, while awaiting transportation for off-site disposal. In 1990, a more secure, covered and elevated secondary containment storage area was constructed as a replacement, adjacent to the southeast of the original pad. Wastes stored at each of these container storage areas by PSL included PCE rags and sludge (F001) and die wash (95% naphtha solution, D001). Non-hazardous hydraulic oil generated during machine maintenance was also placed in drums and stored in this area until it was pumped to three 275-gallon above ground waste oil storage tanks at a different location on the site.

## **2.4 Hazardous Waste Quantities**

As previously discussed, PCE wastes constituted the majority of hazardous wastes generated by PSL. Use of this material was discontinued in 1994. The following table summarizes approximate amounts of hazardous waste generated by PSL since 1991.

YEAR	WASTE	QUANTITY
1994	Waste Tetrachloroethylene	880 gallons
	Tetrachloroethylene rags	150 pounds
	Die Wash (95% Naphtha)	385 gallons
1993	Waste Tetrachloroethylene	1,470 gallons
	Tetrachloroethylene rags	300 pounds
	Die Wash (95% Naphtha)	55 gallons
1992	Waste Tetrachloroethylene	740 gallons
	Die Wash (95% Naphtha)	110 gallons
1991	Waste Tetrachloroethylene	1,610 gallons
	Tetrachloroethylene rags	400 pounds
	Die Wash (95% Naphtha)	310 gallons

Shipments of hazardous waste from PSL during this period generally ranged from six to eight drums. Waste PCE was removed by Pride Solvent & Chemical Company, Inc. (NYD057722258) located in Holtsville, New York. Waste die wash and PCE rags were removed by Chemical Pollution Control, Inc. located in Bayshore, New York.

## 2.5 Previous Environmental Investigations

In response to ground water contamination in an area associated with the closure of public water supply wells in Glen Cove, the area around the PSL facility has been designated by environmental regulatory agencies as the Sea Cliff Industrial Study Area. The study area includes five industrial properties (Photocircuits Corporation, Pass & Seymour, Inc. [Slater Electric/Enal Corporation], August Thomsen, Pall Corporation and Associated Drapery) and one non-industrial property (the Carney Street Wellfield owned by the City of Glen Cove). A June 1990 report entitled Investigation of Contaminated Aquifer Segment, City of Glen Cove, Nassau County, New York, issued by Nassau County Department of Health (NCDOH), identified detectable levels of tetrachloroethylene (PCE) and trichloroethylene (TCE) in ground water at 3,700 ppb and 500 ppb respectively. The study further reported that the highest concentrations were found under properties located east and northeast of

the PSL facility (Photocircuits, August Thomsen and Pall Corp.). Significantly lower levels of ground water contamination were identified under the PSL property.

The City of Glen Cove subsequently sued Photocircuits for contamination of its public supply wells. Photocircuits, in turn, brought suit against PSL, Enal Corporation, Slater Electric (PSL's predecessors) and others in the area. Several investigations to characterize soil and ground water conditions were conducted as a result of these legal actions, and a Preliminary Site Assessment was conducted by NCDOH on behalf of NYSDEC in 1994. Investigative activities conducted at the PSL facility included the following:

- A soil gas survey was performed, consisting of 64 sample points laid out in a grid pattern across the entire PSL facility. This study was conducted to identify areas of the facility that may have been contaminated with volatile organic compounds (VOCs) such as PCE and TCE.
- Soil samples were collected from over 20 soil boring locations throughout the PSL facility. Numerous samples were collected from these soil borings, which were installed during the course of a number of investigations conducted by different consulting firms, including Photocircuits' consultant (who was specifically attempting to identify a source of ground water contamination on PSL property). Based on field screening of many soil samples, a total of 27 soil samples were selected for laboratory analysis for VOCs.
- Three ground water monitoring wells were installed on PSL property and analyzed for VOCs.

The results of the extensive investigative activities outlined above identified only one localized area of surficial soil contamination at the PSL facility. Two soil samples in the vicinity of the former (Slater) container storage area contained PCE at .032 mg/kg and

.294 mg/kg at 1-3 feet below the current asphalt surface. No contamination was detected at greater depths, and no source of contamination to ground water was identified on PSL property.

After review of these findings, NYSDEC Division of Hazardous Waste Remediation, pending further review of analytical results from adjacent properties, agreed that the current area of concern was only a small area of surface soil contamination at the former storage area. This area was remediated in November 1995 through excavation of all impacted soils. A report on the excavation activities is being prepared at this time for submittal to NYSDEC.

In summary, the PSL facility has been extensively investigated to identify the presence of any potential contamination. PCE concentrations were only identified in soils at one small area of the facility, at a maximum concentration of .294 mg/kg. This small area has been remediated. No conditions at the facility represent a significant threat to the environment and public health. Appropriate removal and disposal of all hazardous wastes from the facility at the time of (or prior to) closure, coupled with adequate cleaning of hazardous waste storage and management areas and proper management of any wastes generated during such cleaning, will fully satisfy NYSDEC's closure performance standards for PSL [6 NYCRR 373-2.7(b)]. PSL's specific procedures to accomplish such closure, in accordance with all applicable regulatory requirements, are described below.

### 3.0 FINAL CLOSURE PLAN FOR HAZARDOUS WASTE UNITS

This section describes the steps that will be taken to close the hazardous waste container storage area, and to ensure that areas where hazardous wastes were generated are free of hazardous waste or hazardous waste residues. Closure will be conducted in a manner that eliminates the need for further maintenance and the potential for post closure escape of hazardous constituents to ground or surface waters or to the atmosphere, and will comply with applicable closure requirements of 6 NYCRR 373-2.

#### 3.1 Unclosed Operations

Closure of the areas of the facility associated with the generation and management of hazardous waste will be performed immediately after all manufacturing and administrative operations at the facility cease. As such, no unclosed operations will remain.

#### 3.2 Container Storage Area

There have been no known releases of hazardous waste in the elevated container storage area since its construction by PSL. The elevated containment structure will be closed through the following procedures:

1. All hazardous waste and drums will be removed from the storage area by a licensed hazardous waste transporter for disposal at a licensed hazardous waste disposal facility.
2. All solid materials such as sediment and debris, if any, will be removed from the containment area, and interior portions of the containment structure will be power washed with water and a non-toxic detergent to remove any waste residues.

3. Wastewater from power washing will be collected within the containment structure and transferred to 55-gallon steel drums. Samples of the wastewater will be collected and analyzed, and the wastewater disposed in accordance with all requirements applicable to its characterization.

Since PCE has not been used at the facility since 1994, and PCE contamination at the facility was remediated in November 1995, no sampling of environmental media around the existing container storage area is appropriate for this closure activity.

### 3.3 Former Vapor Degreasing Area

There have been no known releases of hazardous materials in the bermed former vapor degreasing area, or in the bermed PCE storage tank area. The former vapor degreaser area in Building 7 is of poured concrete construction, and is surrounded by a six inch high berm on three sides and the west wall of Building 7 on its fourth side. The storage tank containment area is also of poured concrete construction, and is surrounded by a berm on three sides and the west wall of Building 7 on its fourth side.

These areas will be closed through the following procedures:

1. All interior portions of the bermed areas will be cleared of any debris or sediments, and power washed with water and a non-toxic detergent to remove any waste residues.
2. Wastewater from power washing will be collected in the containment structures and transferred to 55-gallon steel drums. Samples of the wastewater will be collected and analyzed, and the wastewater disposed in accordance with all requirements applicable to its characterization.



### 3.4 Stamping Department

Small quantities of die wash were generated in the stamping department from the cleaning of metal punch press dies. Waste die wash solution (95% naphtha solution) was placed directly into drums in this area. There have been no known releases of hazardous waste in the stamping department. The floor in this area is of poured concrete construction. The floor in this area will be washed after facility closure to remove any waste residues. Wastewater will be collected, characterized and disposed in accordance with all applicable requirements based on its characterization.

### 3.5 Post-Closure Care

The closure activities contained in this Plan will adequately prevent the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere. The facility does not include any hazardous waste disposal units. As such, no post-closure care is required at the facility to satisfy the closure standard at 373-2.7(b).

## 4.0 CLOSURE SCHEDULE

This section presents the proposed schedule for performance of the closure activities outlined in Section 3.0. Closure activities will begin immediately after manufacturing operations cease at the facility, and will be completed within ninety (90) days of initiation.

### 4.1 Termination of Operations

PSL will cease all operations at the Glen Cove facility at the end of December, 1995. Closure activities will begin at this time, and will coincide with the transfer of manufacturing equipment to other PSL facilities. PSL plans to complete all relocation and closure activities and vacate the facility by the end of March 1996.

### 4.2 Schedule of Closure Activities

The following table provides a schedule of closure activities, and includes the associated dates for start-up and completion.

CLOSURE ACTIVITY	START DATE	COMPLETION DATE
1. Remove all hazardous waste & waste drums	Ongoing	10 January 1996
2. Decontaminate drum storage containment structure	10 January 1996	31 January 1996
3. Decontaminate former PCE tank containment structure	3 January 1996	31 January 1996
4. Decontaminate former vapor degreaser containment structure	3 January 1996	31 January 1996
5. Decontaminate Stamping Department floor	3 January 1996	31 January 1996