SECTION I

CLOSURE PLAN, CLOSURE COST ESTIMATE AND FINANCIAL ASSURANCE

Siemens Water Technologies Corp. 2523 Mutahar Street Parker, Arizona 85344

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TABLE OF CONTENTS

<u>Section</u> Pa		<u>ige</u>
I.1	INTRODUCTION	1
	LIST OF CITED APPENDICES	
<u>Apper</u>	<u>ndix</u>	
X۱	/ CLOSURE PLAN	

I.1 INTRODUCTION

The Siemens Water Technologies Corp. (SWT) facility accepts spent activated carbon in containers (drums and bulk) from various customers. The spent activated carbon is identified as both hazardous and non-hazardous waste and is managed at the facility in the container storage area, five storage tanks (T1, T2, T5, T6, and T18), and ultimately in the carbon reactivation unit (RF-2).

The Closure Plan for the SWT facility, which can be found in Appendix XV, covers activities related to the eventual closure of the hazardous waste portions of the facility, including all hazardous waste management units (HWMUs) described in the facility's Part A application. The contents of the Closure Plan are based upon, and meet all the criteria set forth in 40 CFR Part 264, Subparts G and H.

Activities associated with closure of the HWMUs will include treatment and/or removal of all hazardous waste inventory, decontamination of storage and treatment equipment and paved surfaces, sampling and analysis to ensure that decontamination is adequate, sampling and analysis to determine if soil contamination has occurred and certification of closure by the facility owner and/or operator and a registered professional engineer. The Closure Plan also includes a cost estimate and financial assurance mechanism for the closure activities.

There are no underground storage tanks or other treatment and disposal units at the facility that require the submittal of a contingent post-closure plan per 40 CFR 264.118.