

**TE** TRIAD  
ENGINEERING  
INCORPORATED

325 East Chicago Street  
Milwaukee, Wisconsin 53202  
414/291-8840  
FAX: 414/291-8841

COPY

October 5, 1995

Ms. Barbara Schmitt  
Pheasant Run Recycling & Disposal Facility (RDF)  
19414 60th Street  
Bristol, WI 53104

Dear Ms. Schmitt:

**RE: Generator's Waste Profile Sheet for Sector 50 Soil Disposal  
Triad Engineering Project No. W943324.21**

Enclosed are copies of the Chemical Waste Management, Inc.'s Generator's Waste Profile Sheet and associated analytical results for select soil piles from Sector 50. One of the Sector 50 soil samples had a detected TCLP lead concentration of 12 mg/l. A letter (*Segregation of Soil within Sector 50*) submitted to Mr. Rick Pager of Waste Management of Wisconsin, Inc. on July 18, 1995, describes field-sampling procedures and the rationale used to characterize, identify, and segregate select soil piles from Sector 50. A copy of this letter (without the associated attachments) is included.

Please arrange for transportation, stabilization, and appropriate disposal of approximately 100 to 200 cubic yards of soil. If you have any comments or questions, please do not hesitate to call Ross Creighton or Rick Binder at (414) 291-8840.

Sincerely,

TRIAD ENGINEERING INC.



Ross M. Creighton  
Project Hydrogeologist

TRIAD ENGINEERING INC.



Richard B. Binder, CPG, CGWP  
Project Manager

rmc:mao\w943324\943324.21\943324-g

c: Mr. Curt Chapman, Chrysler Pollution Prevention and Remediation  
Mr. Jack Bugno, Chrysler Pollution Prevention and Remediation  
Ms. Pamela Mylotta, Wisconsin Department of Natural Resources  
Ms. Sarah Levin, Triad



# Chemical Waste Management, Inc.

## GENERATOR'S WASTE PROFILE SHEET WORKSET



Return this completed workset to:

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## GENERAL INSTRUCTIONS

This workset contains one form:

– **GENERATOR'S WASTE MATERIAL PROFILE SHEET**

1. The Generator's Waste Profile Sheet must be completed, and signed by the actual generator. Upon approval, a restated Waste Profile Sheet with additional information will be supplied by CWM and returned to the generator with a confirmation letter.
2. This document is perforated so the forms and the instructions may be separated for your convenience.
3. Please provide answers to **ALL QUESTIONS**.
4. Please print in ink or type all answers.
5. Instructions are included to help you complete these forms correctly. The letters and numbers which precede each instruction refer to the lettered and numbered entries on the forms.
6. Page one of the Generator's Waste Material Profile Sheet must be signed by the actual waste generator or an agent authorized in writing by the generator.
7. If you have any questions concerning the use of this form, please contact your Chemical Waste Management Sales Representative or the office that issued this workset to you or call our toll free customer service number (800) 843-3604.
8. **MAKE A COPY OF THESE FORMS FOR YOUR RECORDS. SEND THE ORIGINAL AND ALL ATTACHMENTS TO THE ADDRESS SHOWN ABOVE OR TO THE ADDRESS PROVIDED BY YOUR CHEMICAL WASTE MANAGEMENT, INC. SALES REPRESENTATIVE.**



# Chemical Waste Management, Inc. BX 2701

Profile #

## WASTE PROFILE

(Please carefully read the instructions before completing this form)

TSDF requested \_\_\_\_\_ Technology requested \_\_\_\_\_ Sales # \_\_\_\_\_  
 Check here if this is a Recertification  Check here if a Certificate of Destruction or Disposal is required

### GENERAL INFORMATION

1. GENERATOR NAME: Chrysler Corp. - Kenosha Engine Plant Generator USEPA ID: \_\_\_\_\_  
 2. Generator Address: 5555 30th Avenue Billing Address:  Same \_\_\_\_\_  
Kenosha, WI 53142-2800  
 3. Technical Contact/Phone: John P. Bugno (414) 658-6000  
 4. Alternate Contact/Phone: Ross Creighton // 291-8340 Billing Contact/Phone: Paula Schultz (414) 291-8840  
(414) 291-8840

### PROPERTIES AND COMPOSITION

5. A. Process Generating Waste: Unknown excavated fill material potentially containing  
 B. Is the waste from a CERCLA or state mandated cleanup? Yes  No  Location name: foundry sand  
 6. Waste Name: Soil contaminated with lead  
 7. A. Is this a USEPA hazardous waste (40 CFR Part 261)? Yes  No   
 B. If D001, D002, D012- D043 do any underlying hazardous constituents (UHC's) apply? Yes  No  (If yes, attach UHC form)  
 C. Does this waste contain debris (List size and type in chemical composition)? Yes  No   
 D. Identify ALL USEPA listed and characteristic waste code numbers (D,F,K,PU): D008  
 State Waste Codes: \_\_\_\_\_  
 8. Physical State @ 70°F: A. Solid  Liquid  Both  Gas  B. Single Layer  Multilayer  C. Free liquid range \_\_\_\_\_ to \_\_\_\_\_ %  
 9. A. pH: Range 8.08 or Not applicable  B. Strong Odor  describe None  
 10. Liquid Flash Point: < 73°F  73-99°F  100-139°F  140-199°F  ≥ 200°F  N.A.

11. CHEMICAL COMPOSITION: List ALL constituents (including halogenated organics and UHC's) present in any concentration and forward available analysis

Constituents	Range	Units	Constituents	Range	Units
TCLP Copper	1.6	mg/l	Cadmium	1.5	mg/kg
TCLP Lead	12	mg/l	Chromium	93	mg/kg
TCLP Zinc	14	mg/l	Lead	3110	mg/kg
Arsenic	4.4	mg/kg	Mercury	0.11	mg/kg
Barium	198	mg/kg	Soil	>99.6	%

TOTAL COMPOSITION MUST EQUAL OR EXCEED 100%

12. OTHER: PCBs if yes, concentration \_\_\_\_\_ ppm, PCBs regulated by 40 CFR 761  Pyrophoric  Explosive  Radioactive   
 Water Reactive  Shock Sensitive  Oxidizer  Carcinogen  Infectious  Other \_\_\_\_\_  
 13. If Benzene, concentration \_\_\_\_\_ ppm. Is the waste subject to the Benzene Waste Operations NESHAP? Yes  No  Unknown   
 14. Is the waste subject to RCRA subpart CC controls? Yes  No  Volatile organic concentration, if known \_\_\_\_\_ ppmw.  
 15. If the waste is subject to the land ban and meets the treatment standards, check here: \_\_\_\_\_ and supply analytical results where applicable.

### SHIPPING INFORMATION

16. PACKAGING: Bulk Solid  Type/Size: 200 cy Bulk Liquid  Type/Size: \_\_\_\_\_ Drum  Type/Size: \_\_\_\_\_ Other \_\_\_\_\_  
 17. SHIPPING FREQUENCY: Units \_\_\_\_\_ Per:  Month  Qtr.  Year  One Time  Other \_\_\_\_\_

### SAMPLING INFORMATION

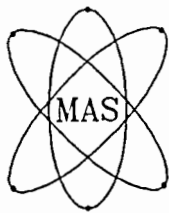
18. A. Sample source (drum, lagoon, pond, tank, vat, etc.) Stockpile  
 Date Sampled: 6/21/95, 4/10/95 Sampler's Name/Company: Jeanne Ramponi/Kurt Waldhuetter/Triad  
 18. B. Generator's Agent Supervising Sampling: Triad Engineering 19. No sample required (See instructions.)

### GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261- Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize CWM to obtain a sample from any waste shipment for purposes of recertification. If this certification is made by a broker, the undersigned signs as authorized agent of the generator and has confirmed the information contained in this Profile Sheet from information provided by the generator and additional information as it has determined to be reasonably necessary.

Jack P. Bugno Signature Jack P. Bugno/Site Administrator Printed (or typed) name and title 10/3/95 Date





# Midwest Analytical Services, Inc.

"Where industry comes for answers"  
 Metropolitan Center for High Technology  
 2727 Second Avenue  
 Detroit, Michigan 48201

Phone: 1-800-801-4MAS (MI only)  
 : (313) 964-3680  
 Fax No: (313) 964-2339

IN: DLB  
 PAGE 1 OF 2

## TEST REPORT

MAS #: 50623005

ROSS CREIGHTON  
 TRIAD ENGINEERING, INC.  
 325 EAST CHICAGO STREET  
 MILWAUKEE, WI 53202

DATE COMPLETED: 05-Jul-95  
 P.O. #: W943324.21

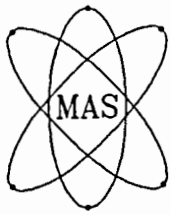
PROJECT: CHRYSLER CORP.  
 SAMPLE IDENTIFICATION: 50F,50X,50Y,50Z 06/21/95 1400  
 PHYSICAL DESCRIPTION: SOLID

PARAMETER	SAMPLE RESULT	UNITS	DETECTION LIMIT	PARKVIEW ACCEPTANCE LIMITS	METHOD #	DATE ANAL.	LAB TECH
* pH/CORROSIVITY	8.08	UNITS	----	2.0 ≤pH≤ 12.5	SW-846 9045B	6/24/95	BB
SPECIFIC GRAVITY	1.9	---	----	----	ASTM D5057	6/26/95	CH
TOTAL SOLIDS	88	%	----	----	EPA 160.3	6/27/95	CH
PAINT FILTER TEST	0% FREE LIQUIDS		----	0%	SW-846 9095	6/27/95	DB
IGNITIBILITY	> 200	F	----	> 140	SW-846 1010	6/24/95	BB
**CHLORINE	N/D	%	0.1	< 1.0	SW-846 9076	6/26/95	CH
REACTIVE SULFIDE	N/D	mg/kg	50	< 50	SW-846 7.3.4.2	6/24/95	BB
REACTIVE CYANIDE	N/D	mg/kg	10	< 50	SW-846 7.3.3.2	6/24/95	BB
TCLP PHENOL	N/D	mg/l	0.1	< 2000	EPA 420.1	6/27/95	BB
PCB:		mg/kg		< 50	SW-846 8080A	6/28/95	MH
AROCLOR 1016	N/D		1.0				
AROCLOR 1221	N/D		1.0				
AROCLOR 1232	N/D		1.0				
AROCLOR 1242	N/D		1.0				
AROCLOR 1248	N/D		1.0				
AROCLOR 1254	N/D		1.0				
AROCLOR 1260	N/D		1.0				

\* SAMPLE pH MEASURED IN WATER AT 23.7°C.

\*\*ANALYZED AS TOTAL HALOGENS.

Krystyna Czyzo  
 Lab. Quality Manager



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 PAGE 2 OF 2

## TEST REPORT

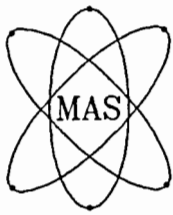
MAS #: 50623005

(continued)

PROJECT: CHRYSLER CORP.  
 SAMPLE IDENTIFICATION: 50F,50X,50Y,50Z.06/21/95 1400  
 PHYSICAL DESCRIPTION: SOLID

PARAMETER	SAMPLE RESULT	UNITS	DETECTION LIMIT	PARKVIEW ACCEPTANCE LIMITS	METHOD #	DATE ANAL.	LAB TECH
<b>TCLP METALS :</b>		mg/l			SW-846		
ARSENIC	N/D		1.0	< 5.0	6010A	6/28/95	KW
BARIUM	N/D		5.0	< 100.0	6010A	6/28/95	KW
CADMIUM	N/D		0.5	< 1.0	6010A	6/28/95	KW
CHROMIUM	N/D		1.0	< 5.0	6010A	6/28/95	KW
COPPER	1.6		1.0	< 100.0	6010A	6/28/95	KW
LEAD	12		1.0	< 5.0	6010A	6/28/95	KW
MERCURY	N/D		0.10	< 0.2	7470A	6/28/95	DB
NICKEL	N/D		1.0	< 35.0	6010A	6/28/95	KW
SELENIUM	N/D		0.50	< 1.0	6010A	6/28/95	KW
SILVER	N/D		1.0	< 5.0	6010A	6/28/95	KW
ZINC	14		5.0	< 200.0	6010A	6/28/95	KW
<b>TCLP SEMI-VOLATILES:</b>		mg/l			SW-846 8270B	6/27/95	EH
1,4-DICHLOROBENZENE	N/D		2.0	< 7.5			
2,4-DINITROTOLUENE	N/D		0.13	< 0.13			
HEXACHLOROBENZENE	N/D		0.13	< 0.13			
HEXACHLORO-1,3-BUTADIENE	N/D		0.13	< 0.5			
HEXACHLOROETHANE	N/D		2.0	< 3.0			
NITROBENZENE	N/D		2.0	< 2.0			
PYRIDINE	N/D		2.0	< 5.0			
TOTAL CRESOL	N/D		10	< 200.0			
PENTACHLOROPHENOL	N/D		3.0	< 100.0			
2,4,5-TRICHLOROPHENOL	N/D		2.0	< 400.0			
2,4,6-TRICHLOROPHENOL	N/D		2.0	< 2.0			

Krystyna Czyzo  
 Lab. Quality Manager



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Fax No: (313) 964-2339

IN: DLB

## TEST REPORT

MAS #: 50623006

ROSS CREIGHTON  
TRIAD ENGINEERING, INC.  
325 EAST CHICAGO STREET  
MILWAUKEE, WI 53202

DATE COMPLETED: 05-Jul-95  
P.O. #: W943324.21

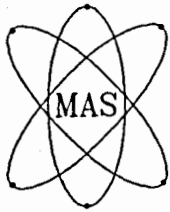
PROJECT: CHRYSLER CORP.  
SAMPLE IDENTIFICATION: 50X 06/21/95 1408  
PHYSICAL DESCRIPTION: SOLID

PARAMETER	SAMPLE RESULT	UNITS	DETECTION LIMIT	PARKVIEW ACCEPTANCE LIMITS	METHOD #	DATE ANAL.	LAB TECH
TCLP VOLATILES		mg/l			SW-846 8010B/8020AM	6/28/95	DM
BENZENE	N/D		0.15	< 0.5			
CARBON TETRACHLORIDE	N/D		0.15	< 0.5			
CHLOROBENZENE	N/D		0.30	< 100			
CHLOROFORM	N/D		0.15	< 6.0			
1,2-DICHLOROETHANE	N/D		0.15	< 0.5			
1,1-DICHLOROETHYLENE	N/D		0.15	< 0.7			
METHYL ETHYL KETONE	N/D		10	< 200			
TETRACHLOROETHYLENE	N/D		0.15	< 0.7			
TRICHLOROETHYLENE	N/D		0.15	< 0.5			
VINYL CHLORIDE	N/D		0.15	< 0.2			

Krystyna Czyzo  
Lab. Quality Manager







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Fax No: (313) 964-2339

IN: NWB

## TEST REPORT

MAS #: 50411012

KURT R. WALDHUETTER  
TRIAD ENGINEERING, INC.  
325 EAST CHICAGO STREET  
MILWAUKEE, WI 53202

DATE COMPLETED: 25-Apr-95

JOB #: W943324.21

PROJECT: CHRYSLER SOIL PILES KENOSHA, WI MAIN PLANT  
SAMPLE IDENTIFICATION: 50F 04/10/95 1320  
PHYSICAL DESCRIPTION: SOLID

DATE ANALYZED: 04/20/95

LAB TECHNICIAN: MK

METHOD : DRO BY WISCONSIN LUST MODIFIED

PARAMETER	SAMPLE RESULT (mg/kg) DRY WEIGHT	DETECTION LIMIT (mg/kg) DRY WEIGHT
*DIESEL RANGE ORGANICS	N/D	10

PEAKS OUTSIDE OF THE REQUIRED TIME WINDOW: YES, LATE  
SAMPLE OBSERVATION (VISUAL AND OLFATORY): SOIL  
WAS SAMPLE EXTRACTED AND ANALYZED WITHIN HOLDING TIME? YES

\* EXTENDED TIME WINDOW (+5 MIN.)

PARAMETER	SAMPLE RESULT	UNITS (DRY WEIGHT)	DETECTION LIMIT	METHOD #	DATE ANAL.	LAB TECH
TOTAL METALS :		mg/kg				KW
ARSENIC	4.4		0.10	SW-846 6010A	04/12/95	
BARIUM	198		1.0	SW-846 6010A	04/12/95	
CADMIUM	1.5		0.40	SW-846 6010A	04/12/95	
CHROMIUM	93		2.5	SW-846 6010A	04/12/95	
LEAD	3110		0.50	SW-846 6010A	04/13/95	
MERCURY	0.11		0.10	SW-846 7471A	04/15/95	
SELENIUM	N/D		0.50	SW-846 7741A	04/12/95	
SILVER	N/D		0.50	SW-846 6010A	04/12/95	

Krystyna Czyzo  
Lab. Quality Manager



**FILE COPY**

July 18, 1995

Mr. Rick Pager  
Waste Management of Wisconsin, Inc.  
W124 N8925 Boundary Road  
Menomonee Falls, WI 53051

**RE: Segregation of Soil within Sector 50  
Chrysler Corporation – Kenosha Engine Plant – 20,000-cubic-yard Soil Pile  
Kenosha, Wisconsin  
Triad Project No. W943324.21**

Dear Mr. Pager:

Per your request, this letter has been prepared to document the soil sampling rationale used by Triad to justify segregating the soil in Grid Sector 50. Based on available information, approximately 20,000 cubic yards of soil were generated during upgrading of assembly lines and manufacturing areas at the Chrysler Corporation (Chrysler) Kenosha Engine Plant. The source of the excavated soil is described in a letter to the Wisconsin Department of Natural Resources (WDNR) dated July 5, 1995. The letter is included as Attachment A to this letter. During field investigation activities, the stockpiled soil was divided into 61 300-cubic-yard sectors utilizing a grid. The sectors are shown in Figure 3 of Attachment A. Within each sector, a minimum of five locations were identified, flagged, and field-screened for volatile organic compounds (VOCs) using a photoionization detector (PID).

One soil sample from each sector was collected, placed into new laboratory-supplied sample jars, and submitted, following standard chain-of-custody procedures, to a Wisconsin-certified laboratory. Analyses generally consisted of VOCs (EPA Method 8260 or 8021), diesel range organics (DRO; Wisconsin Department of Natural Resources [WDNR] Modified DRO Method)), and gasoline range organics (GRO; WDNR Modified GRO Method). Several sectors which were discolored were also sampled and analyzed for Resource Conservation Recovery Act (RCRA) metals. Additional DRO samples were collected and analyzed from soil piles that had low PID results but were visibly stained or had a petroleum-like odor.

The sample was typically collected within the sector at the sample location exhibiting of the highest PID result. However, if the highest PID sample result was regularly in the same soil type, a location with a lower PID result in a different soil classification was sampled to characterize constituents associated with that soil type.

325 east chicago street  
milwaukee, wisconsin 53202  
414/291-8840  
fax: 414/291-8841



Mr. Rick Pager  
July 18, 1995  
Page 2

The characterization data are summarized in Attachment A (Tables 1 and 2). After characterization, select locations were sampled and analyzed for Protocol B parameters to confirm that they are not characteristically hazardous under RCRA. Approximately 10 samples were collected from the following locations: the seven piles previously sampled for metals (4A, 8E, 19F, 3SE, 40F, 53A, and 50F) and the three sector samples with the highest detected trichloroethene concentrations (10G, 44G, and 48C). The samples from the sectors previously analyzed for metals were composites of four locations within each soil pile. Discrete samples were collected from the remaining piles at locations adjacent to the original sampling sites. The samples were collected at a depth of 1 to 2 feet below the pile surface to obtain representative samples. With the exception of one sample (the composite from Sector 50 which contained lead at a concentration of 12 mg/l), detected constituents are present at levels well below the landfill acceptance criteria. The sample from Sector 50 exceeded the criteria for TCLP lead.

Field observations indicate that Sector 50 contains two visually distinct soil types. Approximately one-third of the sector contains darkly stained soil. The protocol B sample was a composite of both unstained and stained soil. Triad collected a second TCLP metal sample on July 6, 1995. This sample was a composite of only the unstained soil in Sector 50. The data are included as Attachment B. The two sets of data indicate the visibly stained soil is RCRA-hazardous by characteristic, but the unstained soil is not RCRA-hazardous.

Triad, therefore, proposes to segregate the soil in Sector 50 into two portions: visibly stained soil and unstained soil. The unstained soil would be treated with the other 20,000 cubic yards of soil at the Pheasant Run Recycling and Disposal Facility. The stained soil would be disposed of at a Subtitle C facility.

If you have any further questions or comments, please contact Rick Binder or me at (414)291-8840.

Sincerely,

TRIAD ENGINEERING INC.

Ross M. Creighton  
Hydrogeologist

RMC/mao  
W943324\943324.21\943324-F

cc: Mr. Curt Chapman, Chrysler Pollution Prevention and Remediation  
Mr. Jack Bugno, Chrysler Pollution Prevention and Remediation