

Chrysler Technology Center

October 13, 1995

Ms. Pamela Mylotta
Environmental Repair Project Manager
State of Wisconsin Department of Natural Resources
4041 N. Richards Street
P.O. Box 12436
Milwaukee, WI 53212

RE: Solid Waste Storage Exemption for Stockpiled Soils Chrysler Corporation - Kenosha Engine Plant

Dear Ms. Mylotta:

Chrysler Corporation (Chrysler), respectfully requests an exemption, under NR 500.08(4), Wisconsin Administrative Code (WAC), to the Solid Waste Storage requirements of NR 500 - 522, WAC. This letter demonstrates that the exemption will not cause environmental pollution as defined in s. 144.01(3) Statutes. Approximately 70,000 cubic yards of stockpiled soil will be generated as part of construction and expansion activities at the Chrysler Kenosha Engine Plant facility. Approximately 60,000 cubic yards have been generated to date. The soil is scheduled to be treated within the next two months at Waste Management Inc.'s (WMI) BiositeTM facility located at the Pheasant Run Recycling and Disposal Facility in Bristol, Wisconsin. The treatment schedule is contingent upon Wisconsin Department of Natural Resources (WDNR) and WMI approval. A brief evaluation of remedial treatment and disposal options will be submitted under separate cover to the WDNR at a later date.

The request for exemption is based on laboratory analytical results (attached to the letter to Barb Schmitt (WMI) dated August 17, 1995; a copy of this letter was also sent to you), current temporary storage on an impermeable surface (concrete) and the criteria set forth in NR 502.04, WAC. The NR 502.04, WAC, criteria are addressed below.

The stockpiled soil is not located within:

- 1,000 feet of any navigable lake, pond, or flowage;
- 300 feet of any navigable river or stream;
- a floodplain;
- 1,000 feet of the nearest edge of the right-of-way of any state trunk highway, interstate or federal aid primary highway, or the boundary of any public park; or
- 1,200 feet of any public or private water supply well.

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In addition, the stockpiled soil will not cause:

- A significant adverse impact on wetlands;
- A significant adverse impact on critical habitat areas;
- A detrimental effect on any surface water;
- A detrimental effect on groundwater quality, or exacerbate an attainment or exceedance of any preventive action limit or enforcement standard at a point of standards application as defined in ch. NR 140;
- The migration and concentration of explosive gases in any facility structures, or in the soils, or in the air at or beyond the facility property boundary in excess of 25% of the lower explosive limit for such gases of any time; or
- The emissions of any hazardous air contaminants exceeding the limitations for those substances contained in s. NR 445.03, WAC.

Chrysler appreciates your time and attention to this matter. If you have any questions or require additional information, please do not hesitate to call.

Sincerely,

CHRYSLER-CORPORATION

Gregory M. Rose

Supervisor/Environmental Remediation

CC:mo

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cc: Mr. Ken Hein\WDNR

Mr. Jack Bugno\Chrysler

Mr. Rick Binder\Triad