From: Ackerman, Jeffrey A - DNR
Sent: Monday, April 27, 2020 3:47 PM
To: 'Trent Ott'; John M. Van Lieshout
Subject: Questions on DB Oak Hazardous waste determination request.
Attachments: 3-12-95 Thimke Letter to Brusca.pdf

Hi John and Trent,

I am reviewing the contained out request and questions for you.

Questions about the waste:

1. What is the current status of the waste? How much is there? Where is it stockpile, and how?
2. What were the sample depths and what was the rationale behind the sample intervals and depths? How do we know these locations are an accurate representation of all excavated material, especially in light of the point below; if you don't know the source, how can you say the samples are representative? Sampling the excavated material (aka waste) would provide a better evaluation.

The contained-out request states, *"There is no information regarding a source of contamination for CVOCs detected in soil or groundwater samples at the DB Oak Property."*

3. Does the attached document change your opinion regarding that statement?
4. Would further review of site-related documents change your opinion regarding the contained-out determination?

Please note contained-out concurrence (when and if granted) will only apply to waste generated as part of the mitigation system installation and not to the site as a whole as was requested.

Thanks, Jeff

Jeff Ackerman
Cell: 608-622-6743
Desk (Voice Mail): 608-275-3323
jeff.ackerman@wisconsin.gov

FOLEY & LARDNER
ATTORNEYS AT LAW

MADISON
CHICAGO
WASHINGTON, D.C.
JACKSONVILLE
ORLANDO
TALLAHASSEE
TAMPA
WEST PALM BEACH

FIRSTAR CENTER
777 EAST WISCONSIN AVENUE
MILWAUKEE, WISCONSIN 53202-5367
TELEPHONE (414) 271-2400
TELEX 26-819
(FOLEY LARD MIL)
FACSIMILE (414) 297-4900
WRITER'S DIRECT LINE
414-297-5832

A MEMBER OF GLOBALEX
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FRANKFURT
LONDON
PARIS
SINGAPORE
STUTTGART
TAIPEI

May 12, 1995

Mr. Joe Brusca
Southern District
Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg, WI 53711

Re: D.B. Oak Limited Partnership Property, Fort Atkinson, Wisconsin

Dear Joe:

This letter is to confirm our conversations of Friday, April 28, and Monday, May 8, 1995, in which I summarized the results of the environmental investigation on the D.B. Oak Limited Partnership property located at 700-710 Oak Street in Fort Atkinson, Wisconsin. As we discussed, the report indicated the presence of VOCs (perchloroethylene, trichloroethylene and related breakdown products) in the groundwater in excess of the relevant NR 140 enforcement standards.

The report was performed by ATEC Associates, Inc. for Firstar Bank. John Van Lieshout of Reinhart, Boerner, Van Deuren, Norris & Rieselbach, S.C. represents Firstar in this matter, and he has forwarded to you a copy of the ATEC report under separate cover. As John mentioned in the May 8 telephone call, Firstar performed the study as a preliminary step in potentially foreclosing on the property.

D.B. Oak Limited Partnership believes the groundwater contamination is associated with the former Thomas Industries operations that were conducted on the property. As we discussed, it is our understanding that solvents were used in that operation. The information we have collected to date shows significant use of perchloroethylene by Thomas Industries during its time on the property. Attached to this letter are relevant documents showing the historic use of PCE by Thomas Industries.

We have notified Thomas Industries of the situation. For your information, we understand the contact person at Thomas Industries is:

Mr. Ralph Y. McCord
Director-Corporate Environmental Services
4360 Brownsville Road, Suite 300
Post Office Box 35120
Louisville, KY 40232-5120

Telephone: 502-893-4600
Facsimile: 502-895-6618

As we discussed, D.B. Oak Limited Partnership has limited financial resources. It lacks the ability to proceed with the NR 716 investigation. In order to move ahead with an investigation, we recommend that all of the concerned parties, including Thomas Industries, be involved in a meeting to determine how best to proceed under the circumstances.

Very truly yours,

Mark A. Thimke

cc: Randy Knox
John Van Lieshout
Ralph Y. McCord

C:\WP51\DOCS\LETTER\BRUSCA.LET|5/12/95|34W012|MAT:smm

ATTACHMENTS

Attachment A	--	United States Environmental Protection Agency Notification of Hazardous Waste Activity completed by Thomas Industries, dated August 12, 1980. Lists spent halogenated solvents used in degreasing.
Attachment B	--	Department of Natural Resources, Southern District, Compliance Inspection, dated March 21, 1984. Describes presence of two conveyorized perchloroethylene vapor degreasers.
Attachment C	-	Thomas Industries, Inc. Spill Prevention and Countermeasure Plan, dated August 31, 1984. Refers to potential emergency of rupture or release of perchloroethylene; lists a 10,000-gallon aboveground storage tank for perchloroethylene.
Attachment D	--	Department of Natural Resources memorandum dated January 31, 1985. Describes a perchloroethylene still used for degreasing operation.
Attachment E	--	Department of Natural Resources letter to Thomas Industries, Inc., dated May 3, 1985, attached to WPDES permit. Permit sets monitoring requirements for tetrachloroethylene.
Attachment F	--	Department of Natural Resources, South District, file memorandum dated October 5, 1984. Describes a 4,000-gallon perchloroethylene still used in the degreasing operation.
Attachment G	--	Department of Natural Resources file memorandum dated April 18, 1986. Describes removal, at time of sale of site by Thomas Industries, Inc. to Wand Corporation, of degreasers, degreaser waste and perchloroethylene filter.

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

GSA No. 0246-EPA-OT

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

INSTALLATION'S EPA I.D. NO.: WID006100929

I. NAME OF INSTALLATION: THOMAS INDUSTRIES INC

II. INSTALLATION MAILING ADDRESS: 700 OAK STREET
FORT ATKINSON, WI 53538

000018 AUG 12 80

III. LOCATION OF INSTALLATION: 700 OAK STREET
FORT ATKINSON, WI 53538

A DETACH A

FOR OFFICIAL USE ONLY

COMMENTS:

INSTALLATION'S EPA I.D. NUMBER: T/A 31

APPROVED:

DATE RECEIVED (yr., mo., & day): 80 08 11

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX:

CITY OR TOWN: | ST. | ZIP CODE

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER:

CITY OR TOWN: | ST. | ZIP CODE

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: WILSON, BRUCE PLANT MANAGER

PHONE NO. *(area code & no.)*: 414-563-2411

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: THOMAS INDUSTRIES INC

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: WID006100929

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

AUG 11 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

W WID006100929 T/A 2 C 1

IX: DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F001	F003	F006	F007	F009	F017
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
P029	P030	P098	P106	P121	U210
37	38	39	40	41	42
U239					
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

- [X] 1. IGNITABLE (D001)
- [ ] 2. CORROSIVE (D002)
- [ ] 3. REACTIVE (D003)
- [X] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Bruce I. Wilson	Plant Manager	

EPA Form 8700-12 (6-80) REVERSE

F001 – Spent halogenated solvents used in degreasing
F003 – spent non-halogenated solvents
F006 – wastewater treatment sludges from electroplating operations
F007 – Spent plating bath soln. from electroplating operations
F009 – Spent stripping and cleaning bath soln. from electroplating operations
F017 – Paint residues generated from Industrial painting
P029 – copper cyanide
P030 – cyanides
P098 – Potassium cyanide
P106 – sodium cyanide
P121 – zinc cyanide
U210 – Tetrachloroethene
U239 – Xylene

DEPARTMENT OF NATURAL RESOURCES
SOUTHERN DISTRICT
COMPLIANCE INSPECTION

Facility

Thomas Industries, Inc.
Residential Lighting Division
700 Oak Street
Fort Atkinson, Jefferson County

FID # 128003260

Contacts: Mr. Bob Chady, Manager Process Engineering
414 563-2411
Mr. Bruce Wilson, Plant Manager

Date of Inspection

March 21, 1984

Date of Last Inspection

October 13, 1982

Inspected by

Brian Galley, SD Air Mgmt. Section

Facility Designation

Thomas Industries is an A1 facility for volatile organic compound (VOC) emissions located in area which is attainment/unclassified for all criteria ambient air pollutants. Jefferson County is in the 18 county RACT administrative non-attainment area for ozone, however.

Compliance Summary

Source	Regulation	Status
EI Process P30- Surface Coating	Sec. NR 154.13(4)(m)(2), Wis. Adm. Code - RACT VOC, Misc. Metal Parts and Products (cured) Emission Limitations	Non-compliance
	Sec. NR 154.13(12)(c), Wis. Adm. Code - RACT VOC compliance schedule	Non-compliance
EI Process P31 - Vapor Degreasing	Sec. NR 154.13(6)(a), Wis. Adm. Code - RACT VOC, solvent metal cleaning (conveyorized degreasers)	Compliance

EI Boilers B40-B41 Natural Gas Boilers	NR 154.11(4)(b)1.a., Wis. Adm. Code - 0.60 lb part. matter/mm BTU heat input	Not Observed
	NR 154.11(6)(b), Wis. Adm. Code - 40% opacity	Not Observed
EI Toxic Sources X60-X62 -- Chrome, Brass, and Barrel Plating	NR 154.19(1), Wis. Adm. Code - General Limitation, Haz. Pollutants	Not Observed

Conclusions and Recommendations

Thomas Industries had two daily surface coating VOC emission violations during the months of January and February, 1984 (January 19 and February 10). Because of this it may be inappropriate to close-out the formal enforcment action against Thomas Industries at this time.

Facility Description

Thomas Industries produces primarily residential lighting products at the Fort Atkinson plant. Other household products, such as medicine cabinets, are also produced.

Source Description

The surface coating line at Thomas Industries consists of a 5 stage pre-cleaning and drying unit; one automatic waterwash spray booth and seven hand spray dry filter booths; and a curing oven. Parts not cleaned in the 5 stage washer are cleaned in either of two conveyorized per-chlorethylene vapor degreasers.

The two natural gas boilers are rated at 8.6 and 14.3 MM BTU/hr., respectively. Chrome, brass, and barrel plating lines are also operated at the facility.

Background

Thomas Industries was issued a Notice of Violation dated November 16, 1983 for violations of the applicable surface coating RACT VOC requirements. The final compliance date for the miscellaneous metal parts and products surface coating category, cured coatings, was August 1, 1983 for low solvent content coatings. Thomas Industries had identified low solvent coatings as their compliance method in their original compliance plan. A review of Thomas Industries daily coating VOC emission records after August 1, 1983 determined that several coatings used exceeded applicable emission limitations, and that insufficient internal offsets were being created to continuously achieve daily compliance.

In response to the NOV Thomas Industries indicated that they intended to continue to pursue low solvent coatings to achieve compliance. The Department responded indicating that this approach was inadequate and asked for more specific compliance measures and a schedule. Thomas Industries next response, dated December 20, 1983 indicated that compliance had been achieved as of

December 7, 1983 through the successful conversion of several coatings to high solids. Subsequently Thomas Industries has submitted product data sheets for these coatings, and has also submitted information documenting coating and clean-up solvent reclamation.

Obersvations and Additional Comments

I met with Mr Chady and Mr. Wilson and first reviewed Thomas Industries daily surface coating VOC emission records. Because of their December 20, 1983 letter I did not anticipate to find any daily violations. However, two daily violations had occurred since mid-December, one on January 19 and the other on February 10. Both violations were less than 20 pounds VOC (14.56 lb. on 1/19 and 16.16 lb on 2/10). I asked Mr. Chady and Mr. Wilson the cause of the violations, and they attributed them to operator inexperience. I reiterated that daily compliance had to be achieved, and indicated that I would disucss these violations with Ron Curtis before deciding the Department's enforcement position.

In the plant I observed the surface coating operation and the larger of the two perchlorethylene degreasers. Starting with the 5-stage precleaner, modifications are being made to the precleaning process to better accommodate their "medicine cabinet white" high solids coating. Presently this high solids coating is being used but additional part cleaning is necessary prior to its use. Thomas Industries hopes to eliminate this additional cleaning through the modifications being made, including installing additional steam coils and risers, enclosing one end of the pre-cleaning unit, and installing a water softener.

I also observed modifications made to the coating process. Heaters have been installed on the paint booths and at least one 1 inch paint line has been installed to spray high soilds coatings. Paint storage areas have also been insulated and heated to allow quicker application of coatings.

The perchlorethylene degreaser I observed is used for the majority of parts which are not cleaned in the 5 stage precleaner. This degreaser, and the smaller degreaser, are both Blakeslee conveyorized units equipped with water-cooled (not refrigerated) condenser coils. It was indicated that a Detrex carbon adsorber is on order for both degreasers, and installation will be around June 1, 1984. A spec sheet for the absorber is attached.

Respectfully submitted,

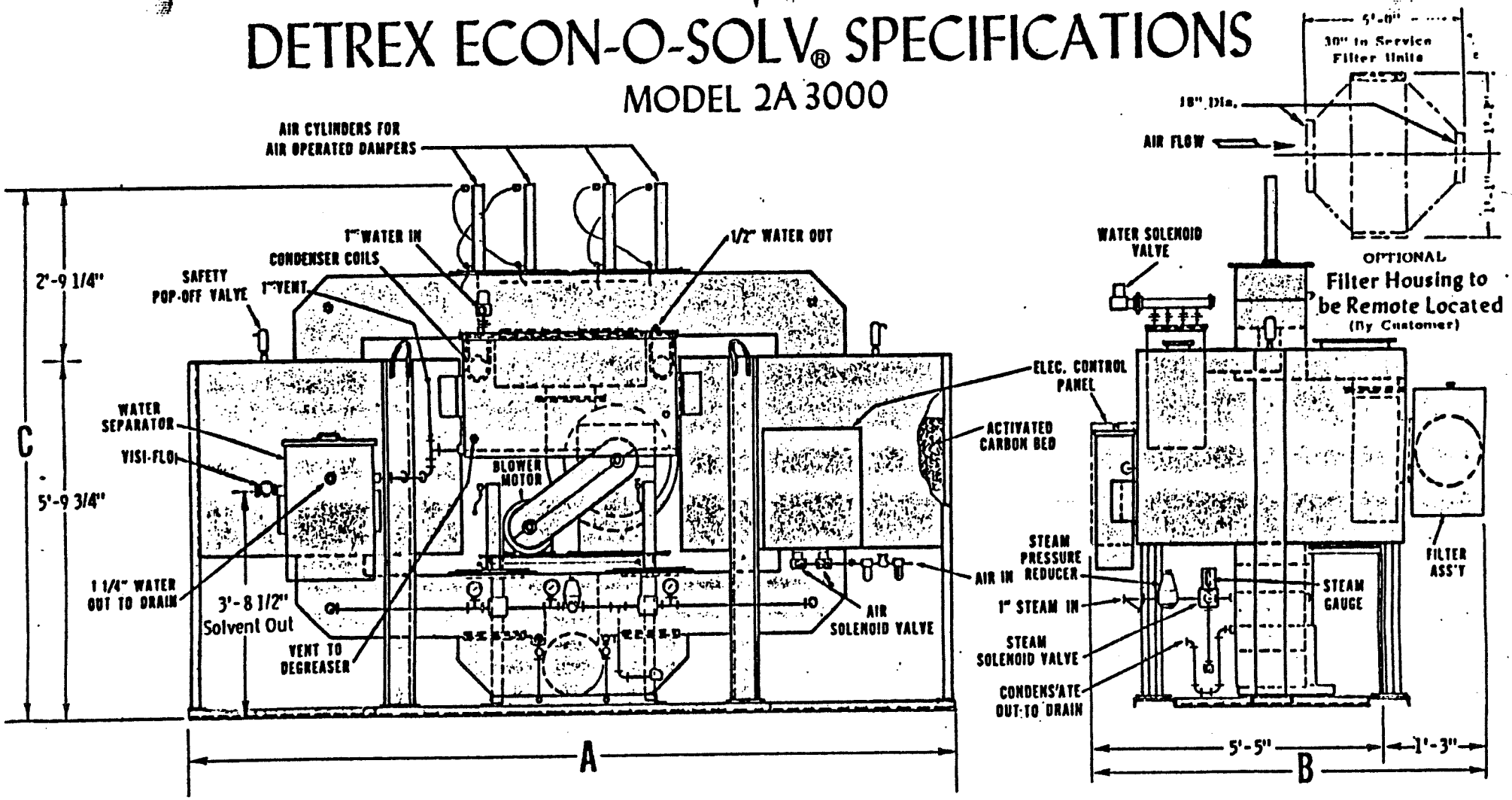
J. Brian Galley
Air Management Engineer

JBG:smm

cc: AIR/3 - D. Packard
Horicon Area
SD - Ron Curtis

DETREX ECON-O-SOLV® SPECIFICATIONS

MODEL 2A 3000



MODEL	OVERALL DIMENSIONS			*SOLVENT RECOVERY CAPACITY - LBS.							STEAM** REQUIRED LBS/HR	WATER** REQUIRED GPM @ 70°	AIR INLET PORT IN. DIA.	EXHAUST PORT IN. DIA.	ESTIMATED SHIPPING WEIGHT
				RATED CFM	TRICHLORO-ETHYLENE	PERCHLORO-ETHYLENE	METHYLENE CHLORIDE	FREON TF	BLOWER MOTOR						
	A	B	C						HP	Voltage					
2A 3000	13'-0"	6'-8"	8'-7"	3000	132	171	42	84	10	230/460-3-60	500	20	14	12	7,000

*With inlet concentration of approximately 275 ppm by volume of solvent air. **Maximum required based on 1/2 hr. strip cycle and using perchloroethylene.

DETREX CHEMICAL INDUSTRIES, INC.
P.O. BOX 501, DETROIT, MICHIGAN 48232

Litho in U.S.A. 8/73

REVISED 8/31/84

THOMAS INDUSTRIES INC.

SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

GENERAL INFORMATION

1.	NAME OF FACILITY:	Thomas Industries Inc. 563-2411 (Residential Division)
2.	TYPE OF FACILITY:	Light Fixture Manufacturer
3.	LOCATION OF FACILITY:	700 Oak Street Fort Atkinson, Wisconsin 53538
4.	DESIGNATED PERSON(S) ACCOUNTABLE FOR SPILL PREVENTION AND CONTROL AT FACILITY	
5.	GENERATOR ID NUMBER	WID 006100929

ALL AREA CODES (414)

PRIMARY EMERGENCY COORDINATOR	D. Ketter Supervisor	563-3797
EMERGENCY COORDINATORS	R. Stray Plant Superintendant	563-5307
	R. Chady Process Engineering Manager	563-5982
	J. Dommisse Process Engineer	563-9682
	J. Bolduc Lab Chemist	473-3542
PLANT PERSONNEL	ALL NUMBERS AVAILABLE TO MANAGEMENT	
	ALL MAINTENANCE STAFF (4)	
	PLATING & PAINT GROUP LEADERS (2)	

DURING NON-WORK HOURS APPROPRIATE PERSONNEL NEEDED WILL BE CALLED BY A MANAGEMENT PERSON IN CHARGE.

NORMAL PLANT OPERATING HOURS ARE MONDAY THRU FRIDAY, 7:00 A.M. TO 12:00 MIDNIGHT. NON OPERATING HOURS ARE MONITORED BY WATCH GUARD PERSONNEL WHO HAVE THE RESPONSIBILITY TO NOTIFY MANAGEMENT IN

CASE OF A FIRE OR SPILL.

6. ALARM SYSTEM: DIAL 65 FROM ANY PHONE TO ACTIVATE

7. EMERGENCY CODES: CONDITION RED (AREA) - IMMEDIATE EVACUATION TO NEAREST EMERGENCY EXIT AWAY FROM THE DESIGNATED AREA. EMERGENCY COORDINATORS REPORT TO THE NEAREST ACCESIBLE ENTRANCE.

CONDITION BLUE (AREA) - CHEMICAL HAZARD - EMERGENCY COORDINATORS REPORT TO DESIGNATED AREA IMMEDIATELY.

CONDITION YELLOW (AREA) - FIRE - EMERGENCY COORDINATORS REPORT TO THE DESIGNATED AREA IMMEDIATELY.

MANAGEMENT APPROVAL

THIS SPCC PLAN WILL BE IMPLEMENTED AS HEREIN DESCRIBED

SIGNATURE: Bruce Wilson

NAME: Bruce Wilson 563-3485

TITLE: Plant Manager

DATED: 8-31-84

IMPLEMENTATION OF CONTINGENCY PLAN

THE CONTINGENCY PLAN WILL BE IMPLEMENTED IF AN INCIDENT MIGHT THREATEN HUMAN HEALTH OR THE ENVIRONMENT. THE EMERGENCY COORDINATOR HAS FULL AUTHORITY TO MAKE THIS DECISION. DEPENDING ON THE DEGREE OF SERIOUSNESS, THE FOLLOWING POTENTIAL EMERGENCIES MIGHT CALL FOR THE IMPLEMENTATION OF THE CONTINGENCY PLAN:

1. ACID STORAGE TANK RUPTURE CAUSING RELEASE OF ACID IN POLLUTION CONTROL ROOM AND POSSIBLY TO YARD AREA OF THE PLANT PREMISES.

2. ON-SITE SPILLAGE OF ELECTROPLATING WASTE DURING TRANSFER, STORAGE, OR TREATMENT.

3. FORMATION AND RELEASE OF HYDROGEN CYANIDE GAS.

4. SPILLAGE OF SODIUM HYDROXIDE SOLUTION OR RELEASE OF CHLORINE GAS.

5. RUPTURE OR RELEASE OF PERCHLORETHYLENE .

6. RUPTURE OR LEAKAGE FROM AMMONIA TANK CAUSING RELEASE OF AMMONIA GAS.

EMERGENCY RESPONSE PROCEDURES

ANY SUPERVISORY PERSON BEING NOTIFIED OF, OR DISCOVERING, A FIRE OR HAZARDOUS RELEASE THAT IS NOT READILY CONTAINABLE WITH THE EQUIPMENT AND MATERIALS AT HAND MUST ACTIVATE THE EMERGENCY ALARM SYSTEM AND CONTACT THE FORT ATKINSON FIRE DEPARTMENT AND THE EMERGENCY COORDINATOR.

ALL EMERGENCY RESPONSE EMPLOYEES HEARING THE ALARM MUST REPORT TO THE DESIGNATED AREA IMMEDIATELY.

THE EMERGENCY COORDINATOR WILL ASSESS THE SITUATION AND NOTIFY THE APPROPRIATE PARTIES AND INCLUDE THE FOLLOWING INFORMATION:

1. NAME AND TELEPHONE NUMBER OF THE REPORTER.

2. NAME AND ADDRESS OF THE FACILITY.

3. TIME AND TYPE OF INCIDENT.

4. IDENTIFICATION AND QUANTITY OF MATERIALS INVOLVED.

5. INJURIES AND EXTENT OF INJURIES IF ANY.

6. POSSIBLE HAZARDS TO THE ENVIRONMENT OR HUMAN HEALTH OUTSIDE THE FACILITY.

CONTAINMENT AND CONTROL

THE EMERGENCY COORDINATOR AND OTHER RESPONSE TEAM MEMBERS WILL TAKE THE NECESSARY MEASURES TO CONTAIN THE HAZARD WITHIN THE FACILITY.

IN THE CASE OF A SPILL THE PROPER ABSORBENT MATERIAL OR NEUTRALIZATION AGENT WILL BE APPLIED AND HAUSZ BROTHERS CALLED IN CASE OF CONTAMINATION OF SOIL.

IN THE CASE OF A RELEASE OF A TOXIC GAS AN ALARM WILL BE GIVEN FOR THE EVACUATION OF ALL AREAS AND THE FIRE DEPARTMENT IMMEDIATELY NOTIFIED.

FOLLOW UP ACTIONS

FOLLOWING THE CONTAINMENT OR CONTROL OF THE EMERGENCY, THE EMERGENCY COORDINATOR WILL PROVIDE FOR COLLECTION, TREATMENT, AND DISPOSAL OF THE WASTE AND CONTAMINATED SOIL, WATER, OR OTHER MATERIALS BY THE EMERGENCY CREW OR OUTSIDE CONTRACTOR, AS APPROPRIATE.

THE EMERGENCY COORDINATOR WILL ENSURE THAT ALL EMERGENCY EQUIPMENT IS RESTORED TO AN OPERATIONAL STATUS AND WITH THE ASSISTANCE OF OTHER TEAM MEMBERS INVESTIGATE THE CAUSE OF THE EMERGENCY AND TAKE THE APPROPRIATE STEPS TO PREVENT A RECURRENCE OF SUCH OR A SIMILAR SITUATION.

THE EMERGENCY COORDINATOR WILL DETERMINE WHEN THE CLEANUP HAS PROGRESSED TO THE POINT OF ALLOWING RESUMPTION OF OPERATION.

EMERGENCY EQUIPMENT

1. A CYANIDE ANTIDOTE KIT IS LOCATED IN THE PERSONNEL DEPARTMENT TO BE USED IN CASE OF A CYANIDE GAS EMERGENCY.

2. EXISTING EXHAUST SYSTEMS WOULD BE UTILIZED TO REMOVE ANY AIRBORNE GAS.

3. THERE IS A SELF-CONTAINED BREATHING APPARATUS UNIT ON SITE IN THE PERSONNEL DEPARTMENT.

4. ALL WORKING AREAS ARE EQUIPPED WITH CHEMICAL FIRE EXTINGUISHERS WHICH ARE CHECKED EVERY MONTH.

5. ABSORBENT MATERIALS AND NEUTRALIZATION AGENTS ARE AVAILABLE FOR SPILLS.

6. THE FACILITY IS EQUIPPED WITH AN ALARM SYSTEM WHICH CAN BE ACTIVATED BY MANAGEMENT PERSONNEL FROM THE NEAREST AVAILABLE PHONE BY DIALING 65.

7. THE FACILITY IS EQUIPPED WITH 16 2 1/2" FIRE HYDRANTS OR OUTLETS WITH HOSES AVAILABLE FOR WASHING DOWN SPILLS OR FOR THE FIRE DEPARTMENT TO HOOK UP TO. (DIAGRAM OF LOCATIONS ATTACHED)

8. THE FORT ATKINSON FIRE DEPARTMENT HAS SEVEN FIRE FIGHTING TRUCKS AVAILABLE (ALL WITH FOAM CAPABILITIES) AS WELL AS MUTUAL AID AGREEMENTS WITH SEVERAL SURROUNDING COMMUNITIES WHICH WOULD PROVIDE ADDITIONAL EQUIPMENT IF NECESSARY.

9. THE FORT ATKINSON FIRE DEPARTMENT HAS A RESCUE SQUAD AND AMBULANCE AVAILABLE FOR TREATMENT AND TRANSPORTATION OF ANY INJURED. THERE IS ALSO A LOCAL FIRM, KUTZ AMBULANCE, AVAILABLE WITH THREE LOCAL AMBULANCES. ADDITIONAL AMBULANCES COULD BE BROUGHT IN BY BOTH KUTZ FROM SURROUNDING COMMUNITIES AS WELL AS FROM THE SURROUNDING AREA FIRE DEPARTMENTS WHICH WE HAVE A MUTUAL AID AGREEMENT WITH. THE FORT ATKINSON FIRE DEPARTMENT IS APPROXIMATELY ONE MILE FROM THE FACILITY.

10. THE FORT ATKINSON MEMORIAL HOSPITAL HAS A FULL TIME STAFFED EMERGENCY ROOM FOR TREATMENT OF ANY INJURED PERSONNEL AND IS LOCATED LESS THAN ONE MILE FROM THE FACILITY. THE HOSPITAL IS ALSO EQUIPPED WITH A HELIPORT AND THROUGH THE FLIGHT FOR LIFE PROGRAM CAN TRANSPORT SERIOUSLY INJURED PERSONNEL TO SPECIALIZED TREATMENT CENTERS.

11. THE EMERGENCY NUMBER (414) 563-5511 IS A CENTRAL EMERGENCY NUMBER WHICH WOULD DISPATCH THE FIRE DEPARTMENT, THE POLICE DEPARTMENT, AMBULANCE, AND ANY ADDITIONAL BACK-UP REINFORCEMENT THAT MIGHT BE REQUIRED.

COORDINATION AGREEMENTS

1. FORT ATKINSON FIRE DEPARTMENT 563-5511

2. THE FORT ATKINSON FIRE DEPARTMENT HAS RECEIVED A COPY OF THE CONTINGENCY PLAN.

3. THE FORT ATKINSON FIRE DEPARTMENT IS FAMILIAR WITH THE OPERATIONS PERFORMED AT THE FACILITY AND HAZARDS WHICH COULD BE PRESENT. THEY ALSO KNOW THE LAYOUT OF THE FACILITY AND INSPECT IT ONCE A YEAR.

4. THE FORT ATKINSON FIRE DEPARTMENT HAS BEEN TRAINED TO HANDLE EMERGENCY SITUATIONS THAT MIGHT ARISE AT THE FACILITY.

EVACUATION PLAN

1. FACILITY PERSONNEL WILL BE EVACUATED IF AN EMERGENCY COORDINATOR DECIDES THAT THEIR PERSONAL SAFETY IS IN DANGER.

2. IF EVACUATION IS NECESSARY THE ALARM SYSTEM WILL BE ACTIVATED BY A MEMBER OF MANAGEMENT DIALING 65 AND GIVING A CONDITION RED.

3. EVACUATION WILL TAKE PLACE THROUGH THE NEAREST EMERGENCY EXIT AWAY FROM THE EMERGENCY AREA.

REQUIRED REPORTS

THE OPERATOR WILL NOTIFY THE EPA REGIONAL ADMINISTRATOR AND APPROPRIATE STATE AND LOCAL AUTHORITIES THAT THE FOLLOWUP ACTIONS HAVE BEEN IMPLEMENTED.

THE OPERATOR WILL NOTE IN THE OPERATING RECORD THE TIME, DATE, AND DETAILS OF ANY INCIDENT THAT REQUIRES IMPLEMENTATION OF THE CONTINGENCY PLAN AND WILL SUBMIT A WRITTEN REPORT ON THE INCIDENT TO THE EPA REGIONAL ADMINISTRATOR IN ACCORDANCE WITH 40 CFR 265.56(J).

THE EMERGENCY COORDINATOR WILL MAKE ANY APPROPRIATE REVISIONS TO THE CONTINGENCY PLAN THAT MIGHT BE NECESSARY AS THE RESULT OF AN INCIDENT AND SEND REVISED COPIES TO EACH HOLDER OF THE ORIGINAL PLAN.

POTENTIAL SPILLS

PREDICTION AND CONTROL

PLATING AREA

NOTE: All plating area tanks are double walled, should a rupture or leak develop in any of these tanks, no external (out-of-plant) exposure would result. Area is diked with a 10" curb for containment of major failure. Runoff is into internal sump system eliminating possibility of discharge into sanitary sewer systems. Direction of flow and containment are controlled (see diagram).

SOURCE	MAJOR TYPE OF FAILURE	QUANTITY (TANK CAP.)
Barrel plate line (diagram A)		
1. Alkaline Soak Cleaner	Leak	300 Gallons
2. Alkaline Electro Cleaner	Leak	150 Gallons
3. Hydrochloric Acid (20% solution)	Leak	150 Gallons
4. Alkaline Zinc	Leak	150 Gallons
5. Alkaline Copper Cyanide (Sodium & Copper Cyanides Caustic soda)	Leak	150 Gallons

SOURCE	MAJOR TYPE OF FAILURE	QUANTITY (TANK CAP.)
6. Alkaline Cyanide Brass (Copper Zinc Sodium Cyanides Caustic Soda)	Leak	300 Gallons
7. Chromate (Acid Chromate)	Leak	150 Gallons
8. Alkaline Oxidizer	Leak	150 Gallons
Brass Plate Line (Diagram B)		
1. Alkaline Electro Cleaner	Leak	900 Gallons
2. Hydrochloric Acid (20% Solution)	Leak	350 Gallons
3. Alkaline Copper Cyanide (Sodium & Copper Cyanides Caustic Soda)	Leak	500 Gallons
4. Alkaline Cyanide Brass (Zinc, Copper & Sodium Cyanides, Caustic Soda)	Leak	1000 Gallons
5. Nickel Sulfate (Nickel Sulfate & Chlorides Sulfuric & Boric Acids)	Leak	1600 Gallons
6. Alkaline Oxidizer Sodium Bichromate	Leak	500 Gallons
7. B.P.A. Treatment Sodium Chromate & Nitrate	Leak	350 Gallons
8. Alkaline Cyanide Brass (Zinc, Copper & Sodium Cyanides Caustic Soda)	Leak	350 Gallons
Chrome Line (Diagram C)		
1. Alkaline Electro Clean Soak	Leak	900 Gallons
2. Alkaline Electro Clean	Leak	500 Gallons
3. Hydrochloric Acid (20% Sol.)	Leak	350 Gallons

SOURCE	MAJOR TYPE OF FAILURE	QUANTITY (TANK CAP.)
4. Nickel Sulfate Bath (Nickel Sulfate & Chloride Boric & Sulfuric Acid)	Leak	1600 Gallons
5. Hydrochloric Acid (50% Solution)	Leak	350 Gallons
6. Chromium Bath	Leak	500 Gallons
7. Bisulfite (Sodium Metabisulfite)	Leak	350 Gallons

Pollution Room
NOTE: This area is also self-contained, no external hazard to sanitary sewers.

1. Muriatic Acid	Tank or Line Leak/Rupture	6000 Gallons
2. Caustic (Sodium Hydroxide)	Tank or line Leak/Rupture	1200 Gallons 1850 Gallons
3. Sodium Bisulfate (Sodium Metabisulfite)	Leak	200 Gallons

Outside Pollution Room

(2) Chlorine Gas Cylinders	*	2000 lbs.

* Containers are stored securely and equipped with emergency relief valves. No fire hazard - would escape to (environment) open air.

Ammonia **	Above Ground Tank	250 Gallons
Fuel Oil **	Underground	18000 Gallons
Perchlorethelyene **	Above Ground	10000 Gallons

** Located outside facility

HAZARDOUS EVENTS

(1) The solutions in each of the plating tanks are greatly diluted. As listed the main chemical solution is noted for each tank. Should a combination of the solutions occur due to simultaneous ruptures the internal design of the dike and sewer system would contain and process the spill through the waste treatment center. There is A REMOTE possibility of explosion or fire under the worst combination of rupture or leaks.

(2) Most Extreme Incident:

If sulfuric acid were inadvertantly dumped into the brass or copper tanks containing cyanide a reaction would occur developing cyanide gas. The probability of this occuring is very minute, controls include:

A. The sulfuric acid is separated from all chemicals in its own storage cage.

B. Access to this cage is restricted to the chemical technician, group leader and foreman. Unauthorized personnel are not permitted to remove chemicals from this area nor make additions to or deletions from any existing tanks.

EMERGENCY PHONE NUMBERS:

Fire Department & Rescue Squad	563-5511
Police Department	563-5511
Sheriff	674-2122
Poison Control Center	(608)262-3702
Hospital	563-2451
CHEMTREC	1-800-424-9300
KUTZ AMBULANCE	563-6212

GOVERNMENT AGENCIES TO CONTACT:

DNR (State of Wisconsin)	(608)266-6961
DNR (HAZARDOUS SPILLS)	(608)266-3232

Fort Atkinson Water Department	563-5584

CONTRACTORS:

Boiler: Package Boiler	(608)249-6604
Waste Removal: Valley Sanitation	563-4505
Plumber: Harry May	563-2155
Electric: Hanson Electric	563-3262
Wisconsin Electric Power (Emergency Service)	563-8421
Wisconsin Natural Gas Company	563-6602
HAUSZ BROTHERS	563-3993

NEUTRALIZATION AGENTS OR ABSORBENTS

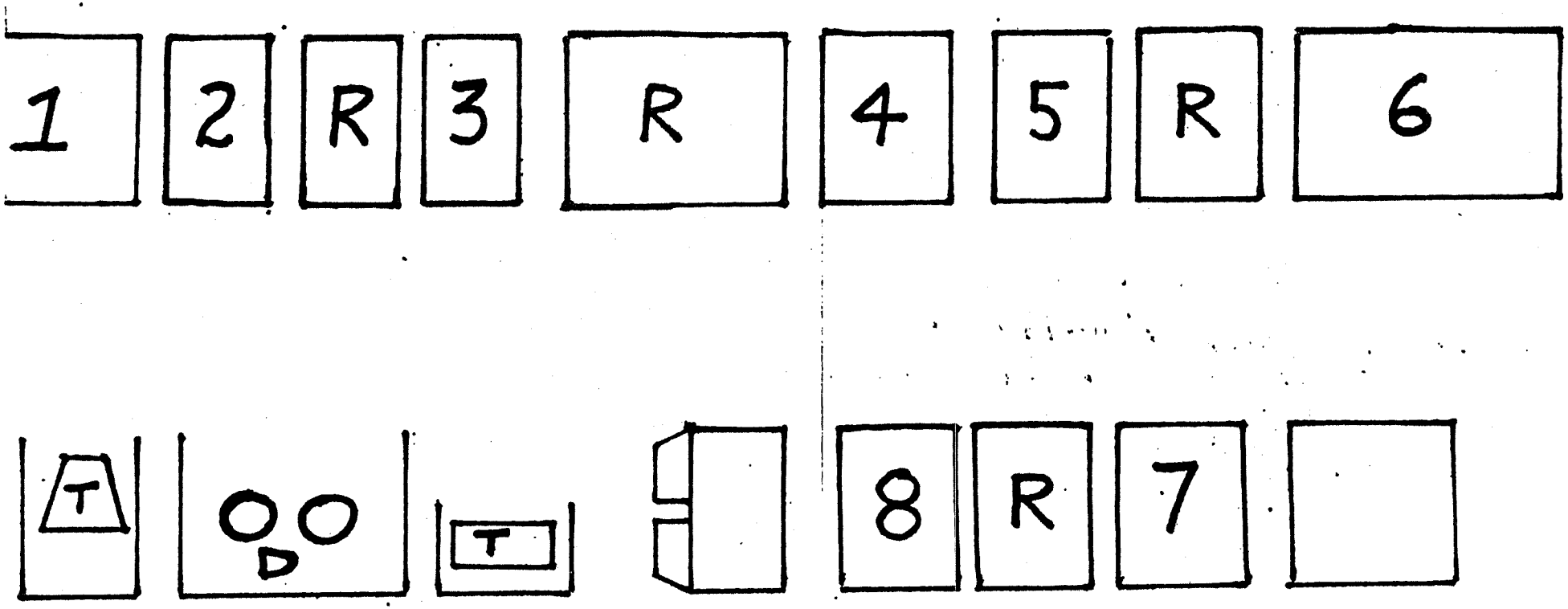
1. HYDROCHLORIC ACID LEAK

NEUTRALIZE WITH SODA ASH OR SLAKED LIME. REMOVE SOURCES OF IGNITION. STAY UPWIND OF SPILL. IF NECESSARY TO ENTER SPILL AREA, WEAR SELF CONTAINED BREATHING APPARATUS AND FULL PROTECTIVE CLOTHING INCLUDING BOOTS. FLUSH THE SPILL THOROUGHLY WITH WATER THEN NEUTRALIZE WASHINGS BEFORE DISCHARGING TO A SEWER.

2. SODIUM HYDROXIDE LEAK

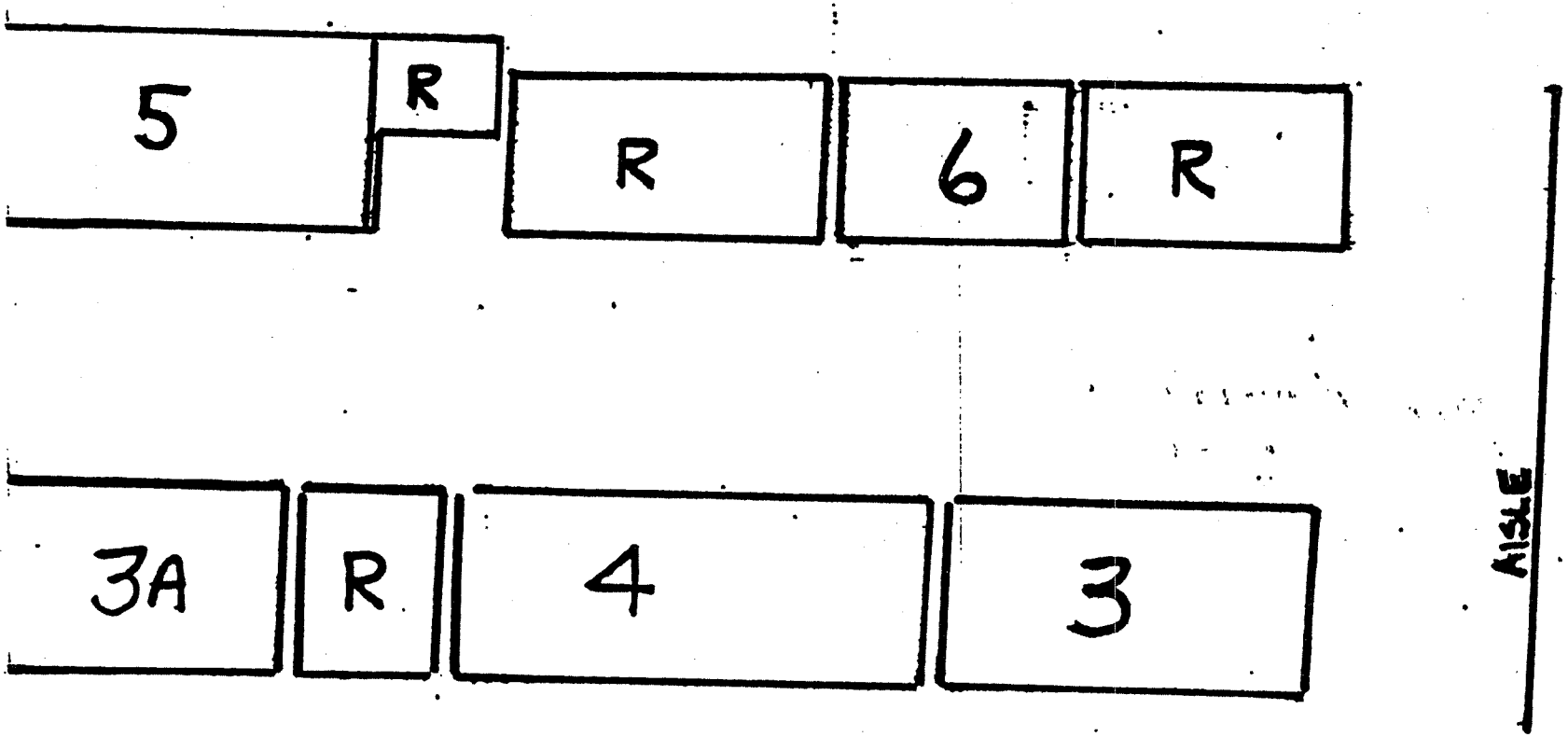
NEUTRALIZE WITH DILUTE ACID. FLUSH AREA WITH WATER FOLLOWED BY LIBERAL COVERING OF SODIUM BICARBONITE FOR REMOVING LAST TRACES OF CAUSTIC SODA. NEUTRALIZATION CHEMICALS ARE ANY INORGANIC ACID, SUCH AS HYDROCHLORIC, SULFURIC, NITRIC, PHOSPHORIC, AND ACETIC.

BARREL PLATE LINE (Diagram A.)



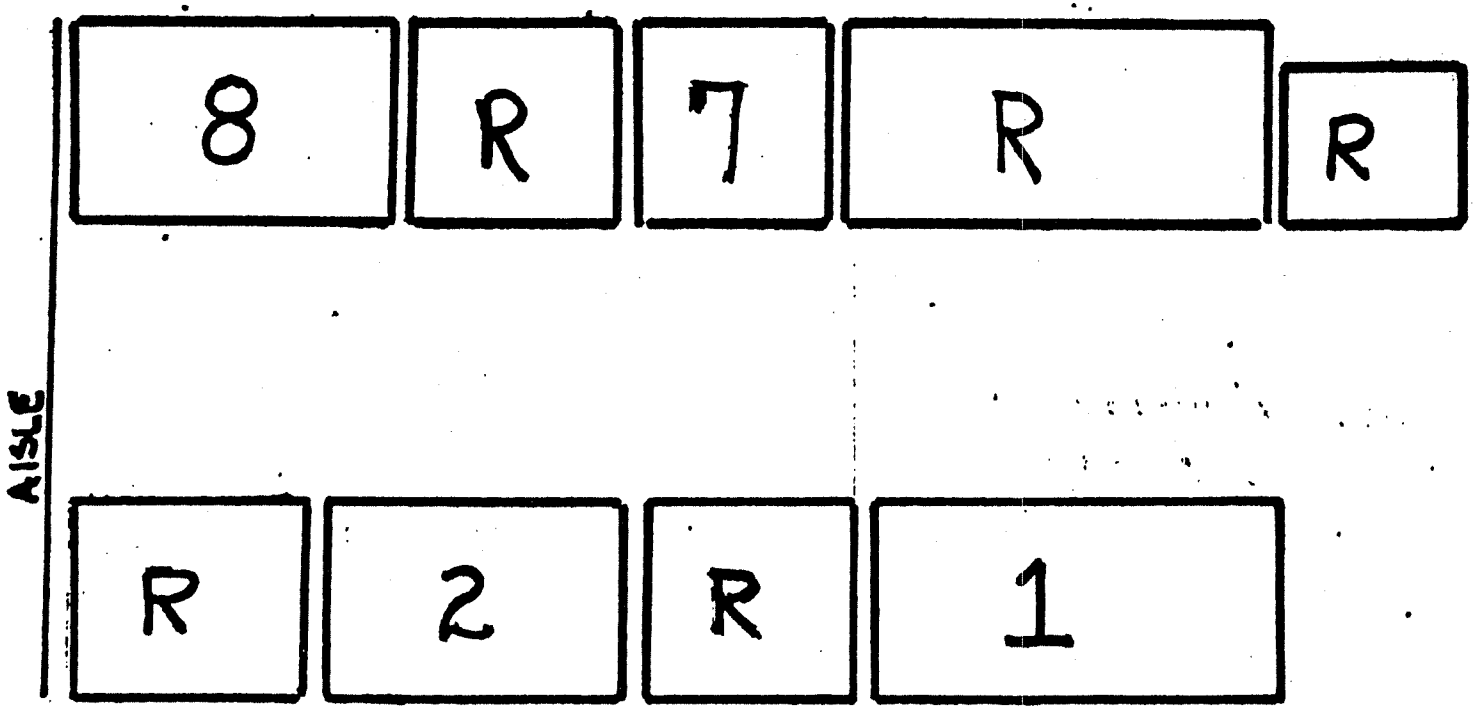
Numbers correspond to source listing
R= Rinse Tank
T= Tumbler
D= Dryer

BRASS PLATE LINE (Diagram B 1 of 2)



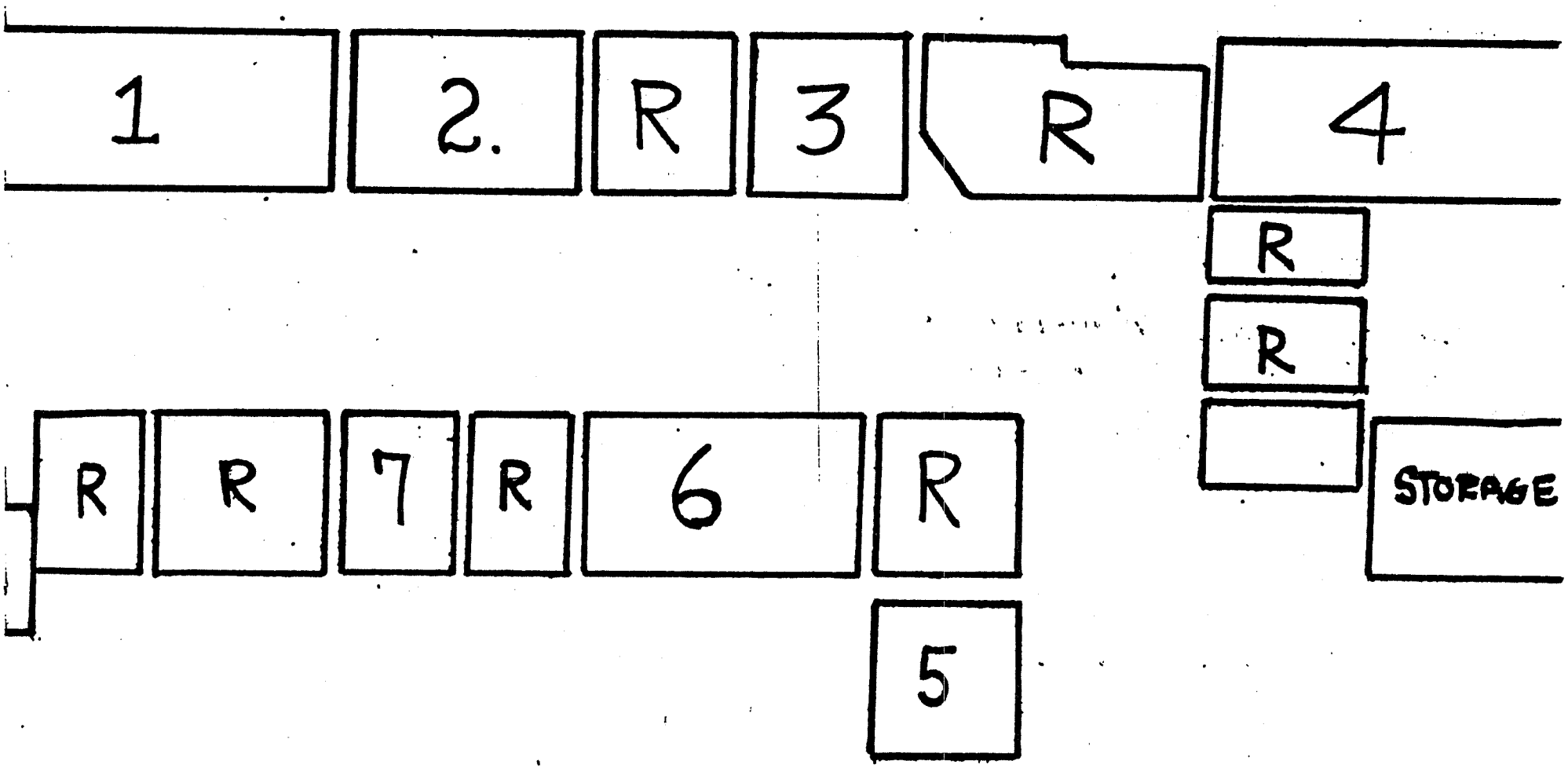
Numbers correspond to source listing
R= Rinse Tank

BRASS PLATE LINE (Diagram B 2 of 2)

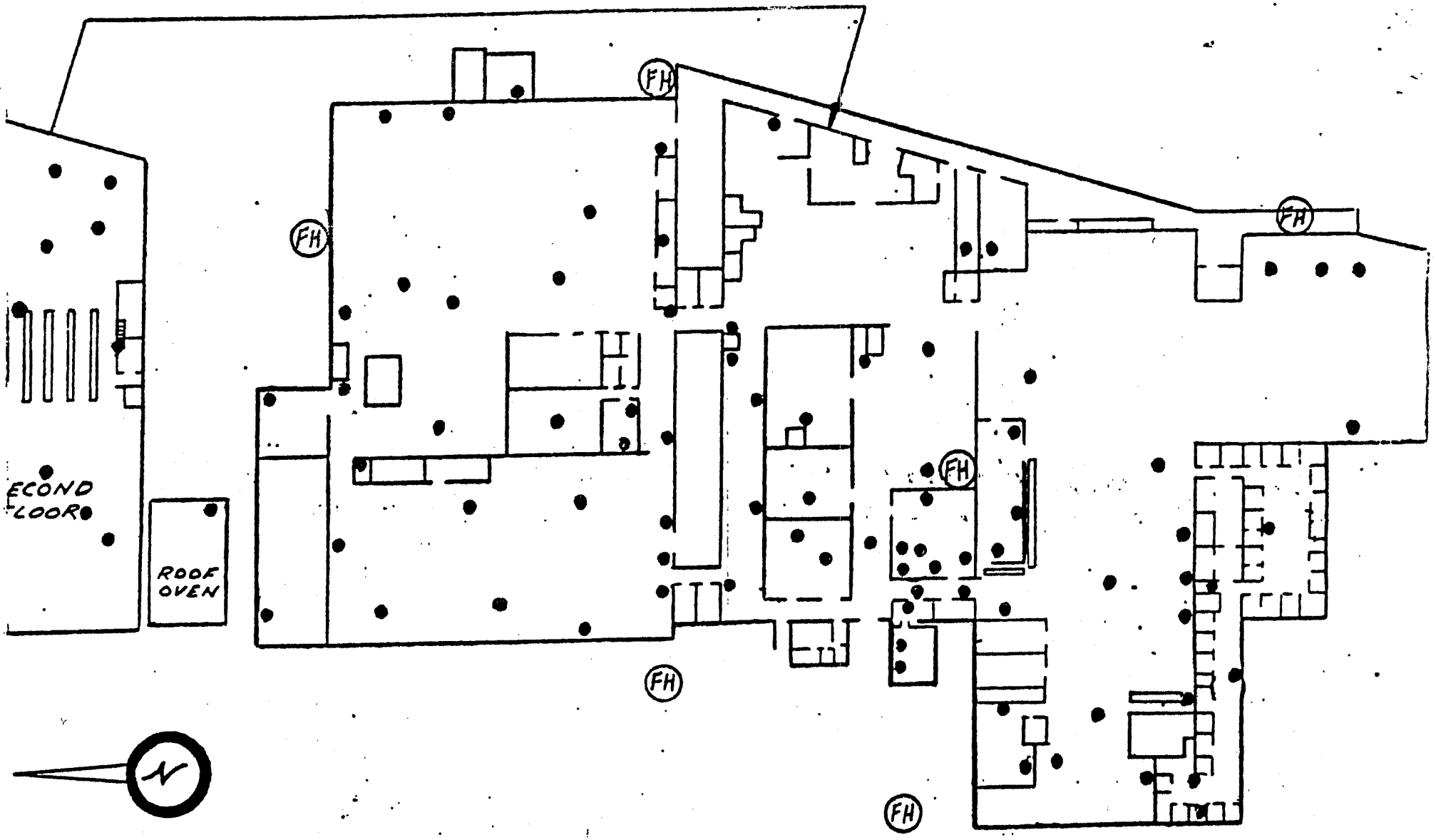


Numbers correspond to source listing
R= Rinse Tank

CHROME LINE (Diagram C.)



Numbers correspond to source listing
R= Rinse Tank

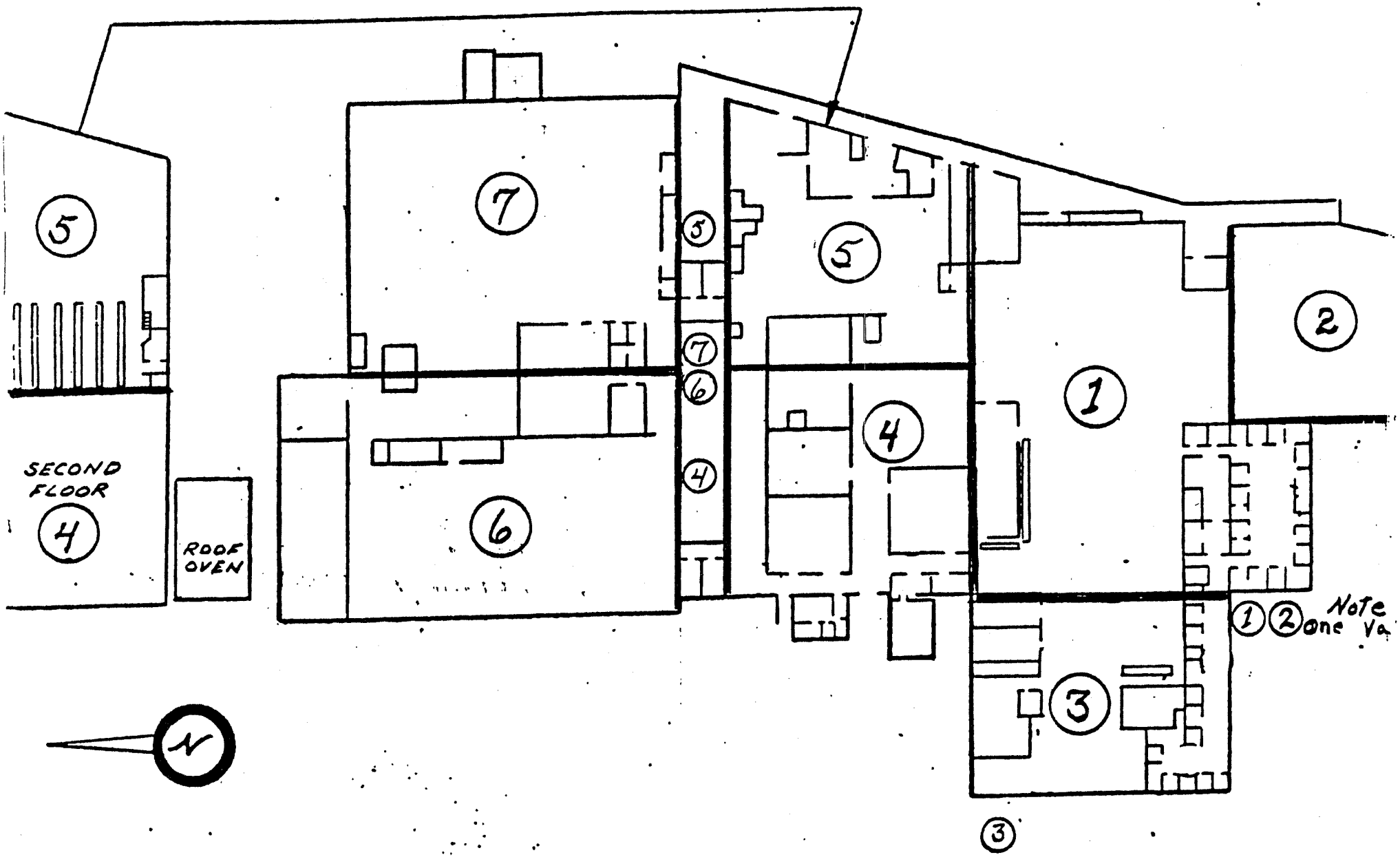


Fire Extinguisher Locations — ●

Fire Hose Locations — FH

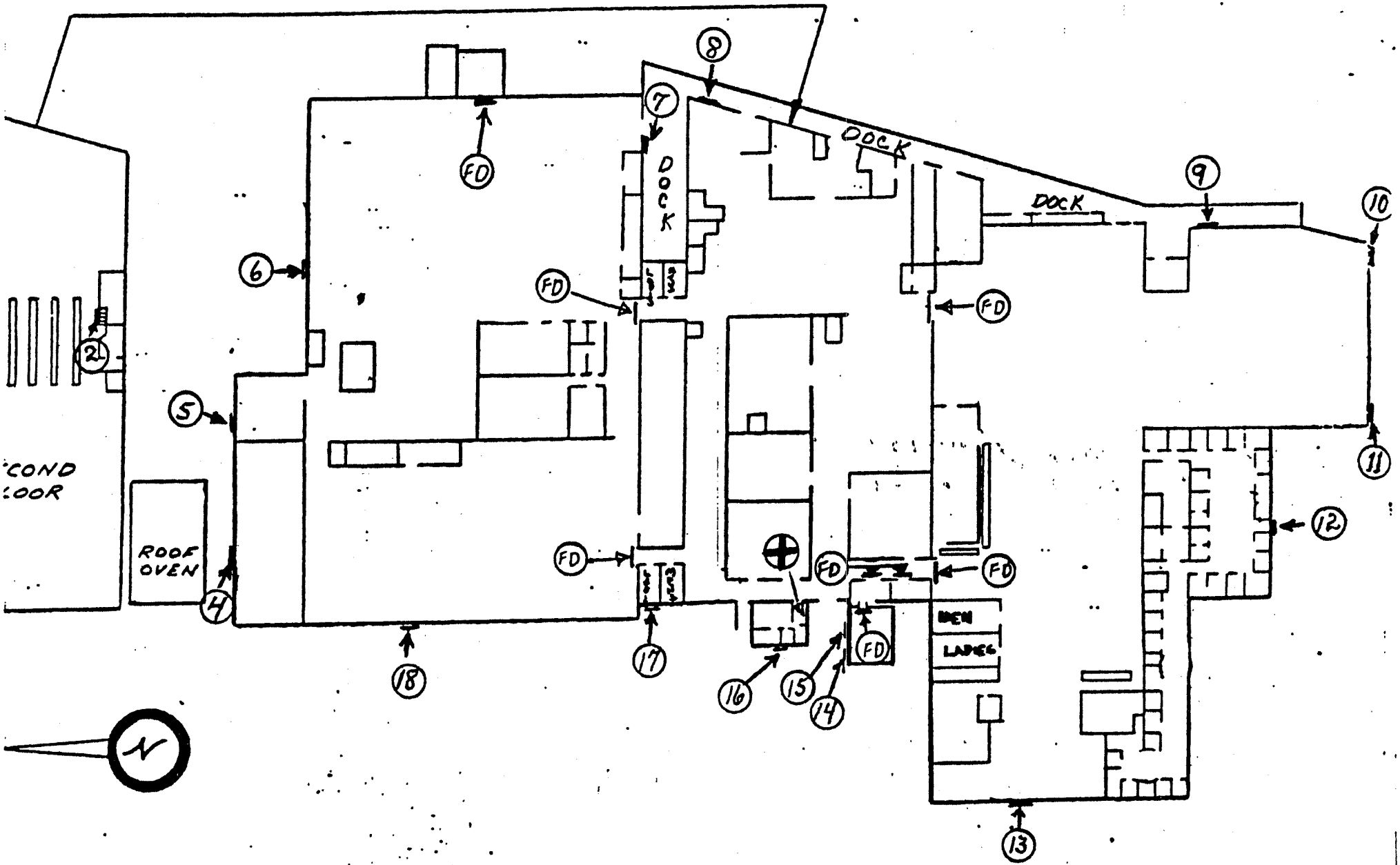
1" = 80'

AJS
11-14-79



Sprinkler Shut Off Valves & Area Served Nos. ① ② ③ ETC.

AH 11-14-19

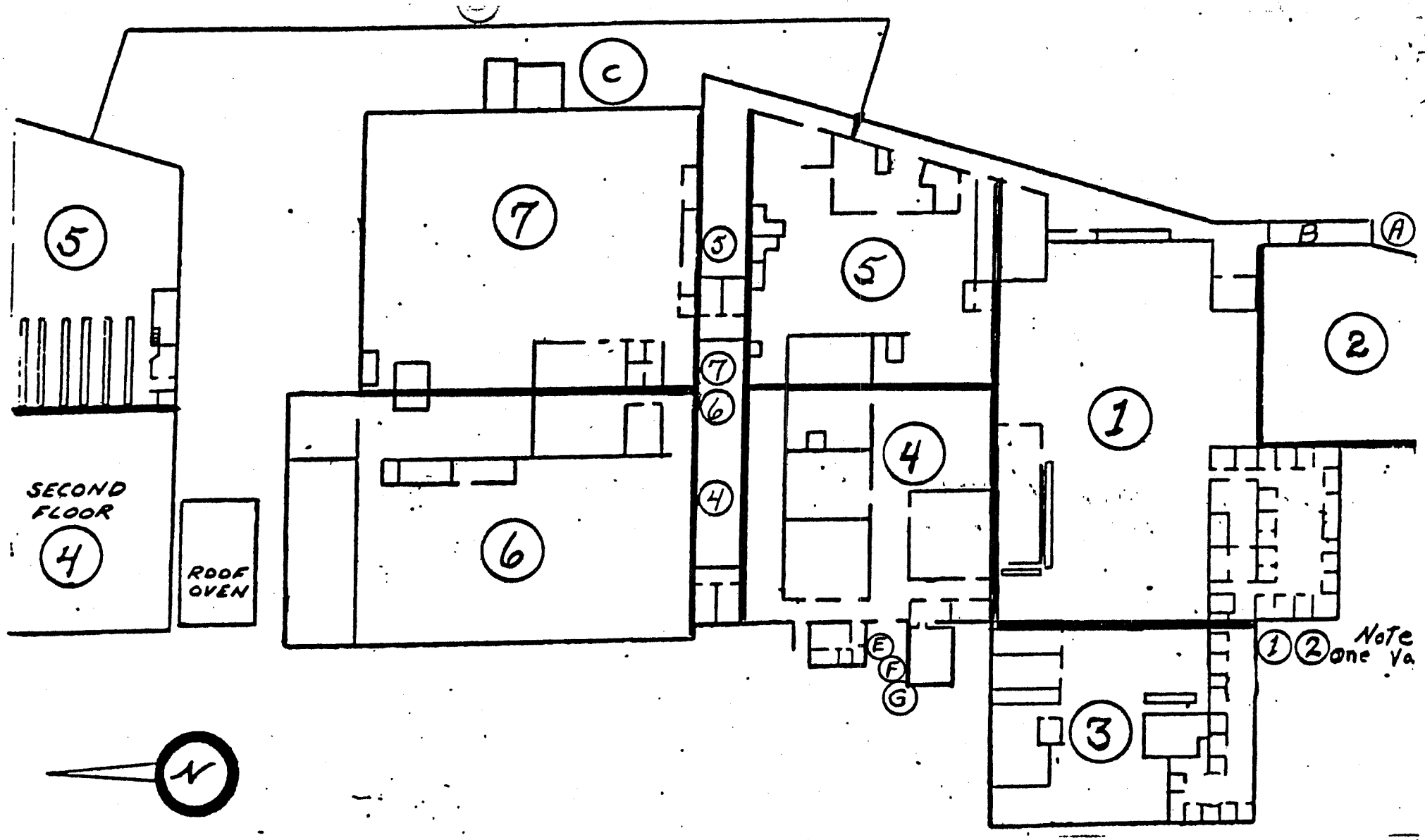


First Aid Station — ⊕

Fire Door Locations — (FD)

Fire Exit Locations Nos. (1) (2) (3) Etc. 1" = 80'

AAS 11-14-79



(A) 500 GAL. GASOLINE TANK UNDER GROUND
(B) HAZARDOUS WASTE DRUMS - EMPTY DRUMS, THINNER, PAINT, SLUDGE, OIL, AND PERC.
(C) 19,000 GAL. FUEL OIL TANK UNDERGROUND
(D) 10,000 GAL. STORAGE TANK PERCLORETHELENE
(E) 1,000 GAL. AMMONIA BOTTLE
(F) 1,000 GAL. CLORINE BOTTLE
(G) HAZARDOUS WASTE DRUMS - METAL HYDOXIDE SLUDGE

#14 HW file

CORRESPONDENCE/MEMORANDUM

STATE OF WISCONSIN

Date: 1/31/85

File Ref: 4430 (SW Coordinator)

To: District Director
Rhinelander Eau Claire Milwaukee Spooner (Southern) Green Bay
Attn: Wendy

From: R. O'Hara - ~~SW/3~~ HW/G3 R. Fischer - SW/3

Subject: Information Audit by Bureau of Solid Waste Management (Hazardous Waste Non-Activity Review)

EPA ID #: WID006100929

Facility Name: Thomas Industries

Location Address: 700 Oak St

City: Fort Atkinson, Wi 53538

Completed by Hazardous Waste Section Auditor: Gary Edelstein HW/G3

I have completed an audit for the above named facility of the following information:

- [x] EPA Notification Form 8/80
- [x] Small/Non-Generator Activity Form 4/7/82 Box 2
- [ ] Subsequent Notification
- [ ] HW Transport Non-Activity Form
- [x] EPA Part A Submittal 11/80
- [x] T-S-D Non-Activity Form 9/11/81 Box 4
- [ ] DNR Part A Submittal
- [x] HW Manifest File Copies GFI Printout
- [x] Facility Inspection Forms (Specify Type Gen 9/25/84)
- [x] Waste Analysis Report(s) Lab Reports rec'd @ 9/25 insp
- [x] Annual/Quarterly Reports Annual - 1983
- [ ] District Field Verification Form(s)
- [x] Other File Information My note to file (cc D. Hon-SD) of 5/26/82
  Note from WJW to Ed Lynch of 12/12/84 on Paint filters
  Memo to file from WJW of 10/5/84, Photos from 9/25 insp

Comments: (Note reason for incomplete audit, etc.)

(1) Per GFI printout, they have had trouble meeting 90 day rule - this should be watched in future

(2) On Paint Filters: Per our conversation, air won't let 'em open burn. Therefore, if they can pack 'em in H2O, they can be sent to a SW landfill if ignitability characteristic w/ lost and not EP toxic.

(3) If the filter cartridges from the perc degreasing ~~still~~ are hooked to a

-perc...., they are then considered ... of the ... which is
hard piped directly to the degreasing operation, it is totally enclosed treatment. You indicated that these are the facts. If not, let me know.
(4) The pretreatment facility is an exempt WW Treatment Unit.

Based on the audit I recommend that the Facility's HW Status & Activity Indicator(s) be designated as: (check all appropriate boxes)

- [X] HW Generator Activity
- [ ] Small Quantity Generator (only)
  - ___ > 100 kg < 1,000 kg
  - ___ > 1 kg < 100 kg
- [ ] Non-HW Status and Generator Activity
- [ ] Non-HW Status with no activity specified
- [ ] HW Transporter Activity
- [X] T-S-D - HW Activity — WWT Unit Exempt; Tot. Encl. Treatment Exempt
  - ___ Storage
  - X Treatment
  - ___ Disposal
- [ ] Closed/ceased operations
- [ ] HW Status Remain Unchanged
- [ ] A recommendation cannot be made at this time (see comments).
- [ ] Other (explain) ______________________

HWS Auditor [signature] Date 1/31/85

Completed By Systems Management Section:

The Facility's HW Status/Activity Code(s) will:

- [ ] be changed to HW Generator
- [ ] be changed to HW Transporter
- [ ] be changed to HW Generator and HW Transporter
- [ ] be changed to Small Quantity Generator
  - [ ] > 100 kg < 1,000 kg
  - [ ] > 1 kg < 100 kg
- [ ] be changed to HW T-S-D
- [ ] be changed to Non-HW Status and Generator activity specified
- [ ] be changed to Non-HW Status and no activity specified
- [ ] be changed to Operations "Moved/Closed"
- [ ] be changed to HW Status "Under Review"
- [X] not be changed at this time (see comments)

SMS Reviewer Wayne Ringquist Date 2-5-85

Comments Notified as HW Generator & TSD as they are now. But TSD-Status will be modified to indicate Exemption status as indicated above by Gary E.

cc: HW Notification & Correspondence File

4352S

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES
Carroll D. Besadny
Secretary

BOX 7921
MADISON, WISCONSIN 53707

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

IN REPLY REFER TO: 3430

Mr. Bruce Wilson, Plant Manager
Thomas Industries, Inc.
700 Oak Street
Fort Atkinson, WI 53538

Re: WPDES Permit No. WI-0002348-4

Dear Mr. Wilson:

Your application for reissuance of Wisconsin Pollutant Discharge Elimination System (WPDES) permit, Number WI-0002348-4, has been processed in accordance with Section 147.03, Wisconsin Statutes.

The enclosed reissued WPDES permit covers the discharge from the facility located at 700 Oak Street, Fort Atkinson, Wisconsin into the Rock River via a drainage ditch. All discharges from this facility and actions or reports relating thereto shall be in accordance with the terms and conditions of this permit.

In accordance with this reissued permit, discharge monitoring report forms are required to be submitted by you to the Department on a periodic basis. Blank copies of these reports and forms and instructions for completing them will be mailed to you under separate cover within sixty days.

The WPDES permit program has been approved by the Administrator of the U.S. Environmental Protection Agency pursuant to Section 402(b) of the Federal Water Pollution Control Act Amendments of 1972 (33 U.S.C. Section 1342 (b)). The terms and conditions of this permit are accordingly subject to enforcement under Sections 147.21 and 147.29, Wisconsin Statutes and Section 309 of the Federal Act (33 U.S.C. Section 1319).

If you believe that you have a right to challenge this decision, Section 147.20, Wisconsin Statutes, and Chapter NR 3, Wisconsin Administrative Code require that you file a verified petition for review with the Secretary of the Department of Natural Resources within 60 days of the date of this decision. This notice is provided pursuant to Section 227.11(2), Wisconsin Statutes.

for L. F. Wible, P.E.
Administrator
Division of Environmental Standards

Dated MAY 3 1985

LFW:MH:RP:ms/1087d.PERM
Enclosures
cc: Southern District

Name: Thomas Industries, Inc. Issuance Date: by May 1, 1985

Public Noticed: Feb. 14, 1985

Location: Fort Atkinson Mod. No.: —

Permit No.: WI- 0002348-4

Comments received:

✓ No significant comments have been received
___ See attached letters

EPA Concurrence:

___ Concurrence received: _____ (Date) _____ No concurrence needed
✓ No comments by EPA
___ The following changes were requested by EPA:

Action taken:

___ A. No changes have been made.
___ B. NPDC Consent Decree Clause added.
___ C. The expiration date has been changed to _____.
✓ D. The due date for the first monitoring report has been changed to June 15, 1985
___ E. The schedule of compliance has been changed:
✓ F. Other Effective date changed to May 1, 1985

✓ G. Permit condition changes noted by DMR coordinator 12/4/84 (Date).

✓ H. Update permit data sheet 12/13/84.

By Michael D. Hammers Date 4/24/85

Approved by K. Wiesner Date 4/24/85

Permit No. WI-0002348-4

PERMIT TO DISCHARGE UNDER THE
WISCONSIN POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of Chapter 147, Wisconsin Statutes,

THOMAS INDUSTRIES, INC.

is permitted to discharge from a facility located at

700 OAK STREET, FORT ATKINSON, WISCONSIN

to THE ROCK RIVER VIA A DRAINAGE DITCH AND STORM SEWER

in accordance with the effluent limitations, monitoring requirements and other conditions set forth in this permit.

This permit shall become effective on May 1, 1985.

This permit to discharge shall expire at midnight, June 30, 1989.

The permittee shall not discharge after the date of expiration. If the permittee wishes to continue to discharge after this expiration date an application shall be filed for reissuance of this permit in accordance with the requirements of Chapter NR 200, Wisconsin Administrative Code, at least 180 days prior to this expiration date.

State of Wisconsin Department of Natural Resources
For the Secretary

By J. G. Hochmuth for
L. P. Wible, P.E.
Administrator
Division of Environmental Standards

Dated MAY 3 1985

1087d.PERM

1. Compliance
All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit.

2. Adverse Impact
The permittee shall take all reasonable steps to minimize any adverse impact on waters of the State resulting from noncompliance with any effluent limitations specified in this permit, including such special or additional monitoring as may be required by the Department or may be necessary to determine the nature and impact of the noncomplying discharge.

3. Removed Substances
Solids, sludges, filter backwash or other pollutants removed from or resulting from treatment or control of wastewaters or intake waters shall be stored and disposed of in a manner such as to prevent any pollutant from such materials from entering the waters of the State. Land disposal of treatment plant solids and sludges shall be either at a site or operation licensed by the Department under Chapter NR 180 and 181, Wisconsin Administrative Code, or in accordance with a sludge disposal plan approved by the Department.

4. Right of Entry
The permittee shall allow authorized representatives of the Department of Natural Resources, and the Administrator of the United States Environmental Protection Agency or his authorized representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises where an effluent source is located or in which any records are required to be kept under the terms and conditions of this permit; and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any wastewaters.

5. Permit Modification
After notice and opportunity for a hearing as provided in Section 147.03, Wisconsin Statutes, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:

a. Violation of any terms or conditions of this permit;

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

c. A change in any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge.

6. Toxic Pollutants
Nothing in this permit shall be construed to authorize the discharge of any toxic pollutant or combination of pollutants in amounts or concentrations which exceed any applicable toxic effluent standard or prohibition.

If a toxic effluent standard or prohibition, including any schedule of compliance specified in such effluent standard or prohibition, is promulgated under Section 147.07(1), Wisconsin Statutes, for a toxic pollutant or combination of pollutants which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit shall be revised or modified in accordance with the toxic effluent standard or prohibition.

7. Civil and Criminal Liability
Except as provided in permit conditions on "Bypassing" (Part I,23) and "Power Failures" (Part I,24), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties under Section 147.21, Wisconsin Statutes, for noncompliance with the terms and conditions of this permit.

8. Oil and Hazardous Substance Liability
Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under Section 311 of the Federal Water Pollution Control Act (33 U.S.C Section 1321). This applies to surface water discharges only.

9. State Laws
Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any other applicable State law or regulation.

10. Property Rights
The issuance of this permit does not convey any property rights in either real or personal property, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

11. Severability
The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

12. Schedule of Compliance Progress Reports
No later than 14 calendar days following a date identified in any schedule of compliance in Part II, the permittee shall submit either a report of progress or, in the case of specific actions being required by identified dates, a written notice of compliance or noncompliance. In the latter case, the notice shall include the cause of noncompliance, any remedial actions taken and the probability of meeting the next scheduled requirements.

13. Flow Measurement, Sample Collection, and Test Procedures
Flow measurement, sample collection and test procedures shall be those listed in the following Chapters of the Wisconsin Administrative Code, or an alternate method authorized in Part II.

a. Effluent flow measurement and sample collection - Chapter NR 218;
b. Effluent analysis - Chapter NR 219;
c. Ground water sample collection and analysis - Chapter NR 214.

14. Recording of Results
For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

a. The exact place, date, and time of sampling;
b. The dates the analyses were performed;
c. The person(s) who performed the analyses;
d. The analytical techniques or methods used; and
e. The results of all required analyses.

15. Additional Monitoring by Permittee
If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified in Chapters NR 214 and NR 219, the results of such monitoring shall be included in the Discharge Monitoring Report Form 3200-28 or 3200-40. Such increased frequency shall also be indicated.

16. Records Retention
All records and information resulting from the monitoring activities required by this permit including all records of analyses performed and calibration and maintenance of instrumentation and recordings from continuous monitoring instrumentation shall be retained for a minimum of three (3) years, or longer if requested by the Department of Natural Resources.

17. Construction of Onshore or Offshore Structures
This permit does not authorize or approve the construction of any onshore or offshore physical structure of facilities or the undertaking of any work in any navigable waters. This applies to surface water discharge permits only.

18. Confidential Information
Except for data determined to be confidential under Section 147.08(2)(c), Wisconsin Statutes, all monitoring reports required by this permit shall be available for public inspection at the Department of Natural Resources. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in Section 147.21, Wisconsin Statutes.

19. Transfer of Control of Operation
In the event of a transfer of control of operation of the facility from which the permitted discharges emanate to a person not named on page one (1) of this permit, the permittee prior to such transfer shall notify his successor by letter that this permit is not transferable and that prior to any discharge after such transfer, a new WPDES permit must be obtained. A copy of this letter shall be forwarded to the Department of Natural Resources, WPDES Permit Section, Box 7921, Madison, Wisconsin 53707.

20. Change in Discharge
Any anticipated facility expansion, production increases or process modifications which will result in new, different, or increased discharges of pollutants must be reported in accordance with Chapter NR 200, Wisconsin Administrative Code, by submission of a new WPDES application or, if such changes will not exceed the effluent limitations specified in this permit, by notice to the Department of Natural Resources of such changes. Following such notice, the permit may be modified to specify and limit any pollutants not previously limited.

21. Noncompliance Notification
If, for any reason, the permittee does not comply with or will be unable to comply with any daily maximum effluent limitation specified in this permit, he shall provide the Department of Natural Resources in writing within five (5) days of becoming aware of such condition, with the following information.

a. A description of the discharge and cause of noncompliance; and
b. An identification of the period of noncompliance, including exact dates and times; or, if continuing, the anticipated time the noncompliance is expected to continue, and a description of the steps being taken to reduce, eliminate and prevent recurrence of the noncompliance.

22. Facilities Operation
The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

23. Bypassing
Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except (i) an inadvertent bypass lasting no longer than one hour and resulting from equipment damage of temporary power interruption, or (ii) an unavoidable bypass necessary prevent loss of life or severe property damage, or (iii) a bypass of excessive storm drainage or runoff which would damage any facilities necessary for compliance with the effluent limitations and prohibitions of this permit. In the event of occurrence of a bypass described by (ii) or (iii) the permittee shall immediately notify the Department District Office by telephone of such occurrence. In addition, the permittee shall notify the Department of Natural Resources, WPDES Permit Section and for surface water dischargers, the Administrator of the U.S. EPA - Region V in writing of each such diversion or bypass by letter within 72 hours.

24. Power Failures
In order to maintain compliance with the effluent limitations and prohibitions of this permit in the event of the reduction, loss, or failure of one or more of the primary sources of power to the wastewater control facilities, the permittee shall either:

a. Provide an alternative power source sufficient to operate the wastewater treatment or control facilities if required by the Schedule of Compliance contained in Part II, or,

b. If there is no such requirement, halt, reduce or otherwise control production and/or all discharges from the facility.

25. Definition Terms
(i) For those terms used in Parts I and II which are defined in Section 147.015, Wisconsin Statutes, and meanings of that Section shall apply.

(ii) As used in daily Effluent Limitations, Part II:
(1) "Average" means the arithmetic mean of daily monitoring test results obtained during a calendar month for the given parameter; that is the total of such daily results, in pounds per day, milligrams per liter, or other appropriate unit divided by the number of days for which results are totaled. For example, if a facility operates or discharges and monitors 30 days during a month the daily average is the sum of daily values in pounds per day, milligrams per liter, or other appropriate unit divided by 30 for each parameter, but if one day's result is missing for any parameter the divisor in that case is 29.

(2) "Maximum" means the highest daily monitoring test result, in pounds per day, milligrams per liter, or other appropriate unit, during the calendar month unless a different time period is specified for the given parameter.

(3) "Minimum" means the lowest daily monitoring test result, in the appropriate unit, during the calendar month unless a different time period is specified for the given parameter.

(4) The "average" for fecal coliform bacteria shall be the geometric mean of the samples collected in a reporting period.

(5) "Hydraulic Loading Rate" means the average daily discharge to a land disposal system during a calendar month or other period as specified in a permit for such discharge, calculated by dividing the total discharge for such period by the number of days in that period.

(6) "Perimeter" means the boundary of the parcel of land under one ownership or control not intersected by any surface waters of the state on which a land disposal system is located.

(7) "Ground Water monitoring" means measuring the ground water level in and the analysis of samples taken from one or more test wells or the analysis of water in soil.

26. Spill Reporting

In the event that a spill or accidental release of any material or substance results in the discharge of pollutants from this facility at a rate or concentration greater than that which is limited by this permit or which results in the discharge of pollutants not limited by this permit because such discharge was not contemplated when application was made for the permit, the permittee shall, within 1 hour of becoming aware of any such spill or release, notify the Department by telephone at 608-266-3232.

At the time of notification to this 24-hour emergency number, the following information shall be presented: a) The name and location of facility and WPDES permit number. b) The name of the material which was spilled and a list of its chemical constituents. c) The estimated time the spill commenced and has or will be stopped. d) The name of the receiving water in which the spill occurred or could occur. e) The name, title and telephone number of the persons making the notification.

Notification made in accordance with this section does not relieve the permittee of any other noncompliance notification requirements contained in this permit or in Section 311 of the Federal Water Pollution Control Act Amendments of 1972.

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

(1) During the period beginning on May 1, 1985 and lasting until June 30, 1989, the permittee is authorized to discharge from outfall serial number 001 (noncontact cooling water and boiler blowdown).

(2) This discharge shall be limited and monitored by the permittee as specified below.

(a) There shall be no discharge of floating solids or visible foam in other than trace amounts.

(b) Samples taken in compliance with the monitoring requirements specified below shall be taken at the following location: Outfall 001, prior to discharge to the drainage ditch.

	DAILY EFFLUENT LIMITATIONS					MONITORING REQUIREMENTS	
	Quantity-kg/day (lbs/day)			Other Limitations (Specify Units)		Sample	Sample
EFFLUENT CHARACTERISTIC	Average	Maximum	Minimum	Average	Maximum	Frequency	Type
Flow - MGD	-	-	-	-	-	Quarterly	Estimated
Temperature	-	-	-	-	31.7°C(89°F)	Quarterly	Grab
Oil and Grease	-	-	-	-	15 mg/l	Annually	Grab
Tetrachloroethylene(ug/l)	-	-	-	-	-	Annually	Grab

(c) The above discharge shall be limited solely to noncontact cooling water and boiler blowdown free from process and other wastewater discharges. In the event that the permittee wishes to commence use of a water treatment additive other than those listed in the application for this permit, or use the listed additives at concentrations greater than those specified in the application for this permit, he must request modification of this permit.

1087d.PERM

B. OTHER SPECIAL CONDITIONS

1. Reporting

a. Monitoring reports and reports required by Sections 12, 20, 21 and 23 of Part I of this permit shall be signed;

(1) for a corporation by a principal executive officer of at least the level of Vice President or his duly authorized representative having overall responsibility for the operation of the facility for which this permit is issued,

(2) for a partnership by a general partner, and

(3) for a sole proprietorship by the proprietor, except that

(4) in the case of reports required by Sections 21 and 23, the individual required to sign in accordance with this subsection may authorize another individual to sign such reports in his absence.

b. Monitoring results obtained during the previous 3 months shall be summarized and reported on Discharge Monitoring Report Forms postmarked no later than the 15th day of the month following the completed reporting period. The first report is due on June 15, 1985. Duplicate signed copies of these reports and of all other reports required herein shall be submitted to the:

Wisconsin Department of Natural Resources
Southern District
Division of Environmental Protection (Permits)
3911 Fish Hatchery Road
Fitchburg, WI 53711

1087d.PERM

STATE OF WISCONSIN DEPARTMENT OF NATURAL RESOURCES

PUBLIC NOTICE OF INTENT TO REISSUE A WISCONSIN POLLUTANT DISCHARGE ELIMINATION SYSTEM (WPDES) PERMIT

Public Notice Number: 841-4108; Notice Issued: JAN 10 1985 ; Permit Number: WI-0002348-4;
Current Permit Issued: June 27, 1980; Expiration Date: December 31, 1984;
Proposed Expiration Date: June 30, 1989.

Permittee: **Thomas Industries, Inc., 700 Oak Street, Fort Atkinson, WI 53538.**

Facility Where Discharge Occurs: **Thomas Industries, Inc., 700 Oak Street, Fort Atkinson, WI 53538.**

Receiving Water: **The Rock River in Jefferson County via a drainage ditch and a storm sewer.**

Activities or Operations Resulting in an Existing Discharge: Thomas Industries, Inc. manufactures residential lighting fixtures. Process wastewaters from metal finishing operations are discharged to the sanitary sewer following pretreatment. Noncontact cooling water and boiler blowdown are discharged at an average rate of 31,000 gallons per day to the Rock River.

The Department has tentatively decided the WPDES permit described above should be reissued. Appropriate effluent limitations and special conditions will be included in the permit.

Persons wishing to comment on or object to the proposed permit, or to request a public hearing, are invited to do so in writing to the Department of Natural Resources, WPDES Permits Section, 101 S. Webster Street, P.O. Box 7921, Madison, WI 53707-7921. All comments or suggestions received from members of the public and interested government agencies no later than 30 days from the date of issue of this public notice will be used along with other information on file in making a final decision regarding the permit. Where designated as a reviewable surface water discharge permit, the U.S. Environmental Protection Agency is allowed up to 90 days to submit comments or objections regarding this permit determination.

A public informational hearing may be held if response to this notice indicates significant public interest pursuant to Section 147.13, Wisconsin Statutes, or if a petition requesting a hearing is received from 5 or more persons. Requests for a public informational hearing should state the following: the name and address of the person(s) requesting the hearing; the interest in the proposed permit of the person(s) requesting the hearing; the reasons for the request; and the issues proposed to be considered at the hearing.

Information on file for this permit may be inspected and copied at the address above, Monday through Friday (except holidays), between 9:00 a.m. and 3:30 p.m. Information on this permit may also be obtained by calling (608) 266-3221 or by writing to the Department. Reasonable costs will be charged for copies of information in the file other than the public notice and fact sheet.

Please be further advised that in the event it is not possible to reissue this permit by December 31, 1984, because a public hearing must be conducted or because of the occurrence of other unforeseen events, the Department may without further public notice modify the present permit pursuant to Section 147.03(2)(a), Wisconsin Statutes, by extending its term and the effectiveness of the final effluent limitations to no later than December 31, 1985. During the extension period, the reissuance process for the new permit will be completed. In the event such a modification is made, the Department will deem that this public notice satisfies the notice requirements of Section 147.03(2)(b) and (c), Wisconsin Statutes.

1087d.PERM

OK-jws
1/10/85

MDH reviewed by JWS 11/27/84:
89°F temp limit 15 mg/l O & G,
Tetrachloroethylene monitoring.
NO TSS, pH MONIT.

CORRESPONDENCE/MEMORANDUM — STATE OF WISCONSIN

Date: October 5, 1984

File Ref: DNR - Southern District 4430

To: File

From: Wendell Wojner

Subject: Thomas Industries, EPA I.D. #WID 006100929, Jefferson County

On September 25, 1984, there was a Notification of TSD Non-Activity form field verification inspection at Thomas Industries.

Present at the inspection from Thomas Industries were Bruce Wilson the plant manager, Robert Chady the manager for manufacturing and engineering and Dan Ketter. DNR representatives present were Raj Vakharia and Wendell Wojner.

Thomas Industries is a manufacturer of lighting fixtures and light metal fabrication. The operation involves cleaning of raw material, plating and painting. Raw material is in the form of steel coils, steel material and a few other metals. This material is either spun or stamped and can be placed through the degreasing process which has a large 4,000 gallon perchloroethylene still. Another cleaning process to prepare the raw material is called a bonderizer. This is a five stage caustic cleaning process which would include the use of phosphotizers in a line series. From the bonderizer metal would go to the painting process. They have seven hand spray units and one automatic water wash unit in the assembly line. The water wash unit generates a sludge which from the last analysis was considered non-hazardous. This unit is cleaned once a week. The unit produces sludge which could be considered combustible for DOT requirements.

The hand spraying operation generated waste filters. These are fiberglass filters that are contaminated with paint that need to be changed approximately once a day. These filters are then taken out at the end of a shift and burned in a 55-gallon drum with a turbo blower. The ash of this incineration would then be placed into a landfill. There's a question as to what the form of regulation would be proper for these particular disposal techniques used for the fiberglass filters. Jon Heinrich from Southern District will be contacted. Thomas Industries stated that the paint filters spontaneously combust. Therefore, they might be considered as reactive or hazardous waste. If this is the case then disposing of them via the incineration route would not be considered a viable alternative.

Attached to this memo is a photocopy of the analysis for waste paint sludge. At the time of the visit it was said that this material would represent the coatings that would be placed onto the fiberglass filters. The fiberglass filters would have no other heavy metals in them other than what was placed upon them during painting operation. It is hoped from this analysis that a decision can be made with respect to how the paint filters should be properly disposed of.

(4/13/82)?

It is suspected that a file memo was placed out in March of 1983 which would indicate that the paint filters should be soaked into a 55-gallon drum of water where upon they would be able to be disposed of as solid waste in the regular trash. If this is the case the question should also be addressed as to how the wastewater in the 55-gallon drum should be disposed of. The answers to these questions are being sought. There is approximately twenty-five different coatings of paints that might be variable in the material safety data sheets for these paints.

What is the answer?

Another waste stream would be in the electroplating operation. Brass, bright brass, nickel plating, alkaline zinc and copper plating are performed at this particular site. All of the plating lines are interconnected and flow into the same pre-treatment system. There is a pre-treatment sludge which is generated at the rate of approximately 4,000 pounds per month. This sludge would be classified as hazardous waste category F-006. The electroplating operation and pre-treatment system has been in existance for eight years since approximately 1976. Sludge was being shipped to Michigan via Aqua-Tech or disposal site in Idaho via WRR.

An additional waste stream coming from the painting area would be from the flushing out of the lines or the guns on the lines. A thinner material is collected and this is called Waste Paint Related Material. This product is ignitable and is sent to Hydrite Chemical for reclamation.

All the electroplating operation is batch treated. Currently they are centrifuging the sludge after it comes out of the clarifier for dewatering purposes. There is approximately 20% solid in the sludge. Barrels filled with the F-006 waste are 17H drums.

There is a carbon filter for reducing the amount of VOC released into the atmosphere from the perchlorylethylene installation units and degreasing units. Questions are raised as to what to do with the carbon filter when this material has been spent. Would this be a hazardous waste?

A generator site inspection was performed.

WW:ps
Attach.

cc: Wayne Rinquist - SW/3
~~Joe~~ Brusca - SD
Kim Nash - Madison Area
Jon Heinrich - SD

AQUA-TECH, INCORPORATED
140 South Park Street, Port Washington, Wisconsin 53074
Phone (414) 284-5746 or (414) 375-0407 (Metro Milw.)

Generator Name Thomas Industries
Generator's EPA Identification Number WIN000610092 9
Facility Address
700 Oak St
Fort Atkinson WI 53538

Business Address (if different)

Contact Bob Chadly / Dan Ketter Title Phone No. 414/563-2411
Emergency Phone No.

Generator's Common Name for the Waste or DOT Shipping Name	EPA Hazardous Waste Number	Volume and Frequency of Generation
Waste Paint Sludge		

Process Generating Waste Coating Operations

Constituents of Waste Stream (Account for 100%)	
Water	30-40%
Resins + Pigments	50-60%
Trash	10%

Physical Properties (Circle Appropriate Letters)

1. Physical State at 70°F
   a. Solid b. Semi-Solid c. Liquid
   (d) Sludge e. Gas
2. Specific Gravity 8-10 lb/gal
3. Flash Point ~~200~~ 154 °F
4. Viscosity @ 70°F a.Low b.Medium c.High
5. pH (indicate range) 7-8
6. %solid 70-60 %liquid 30-40
7. Phase/Layering a. None (b) Bilayered
   c. Multi-layered water/solid
8. Color Multi
9. Odor
10. BTU (if applicable)
11. Pumpable YES ____ NO X

METALS
Please indicate if in %, ppm, mg/l or mg/kg.

	TOTAL	EP
Arsenic		<.05
Barium		~~4.5~~ 1.3
Cadmium		<.05
Total Chromium		<.05
Lead		<.05
Mercury		.07
Selenium		.07
Silver		<.01

NON-METALS
Please indicate if in %, ppm, mg/l or mg/kg.

N/A	Chloride
.83	Free Sulfide
15.1	Free Cyanide
	Others

Does the Waste Material contain any of the following: Halogenated Aromatics (e.g. PCB, PBB); Aromatic Amines; Pesticides; Ureas or Thioureas; Cyclic Nitrogen (e.g. Pyridine); Phenols; Quinones Phosphorus Compounds; Polycyclic Organics; Asbestos; Radioactive Material. Any other critical materials?

____ YES _X_ NO Furnish additional pertinent data. If yes, write in detailed analysis data.

Any special handling procedures recommended: None

I hereby certify that I have personally examined and am familiar with the information submitted in this and all attached documents. Based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete to the best of my knowledge and ability and that all known and suspected hazards have been disclosed.

7-2-84 Engineering Manager [signature]

Date Title Signature

FOR COMPLETION BY AQUA-TECH, INC.

Method of Disposal:

This profile has been reviewed and approved by:

Any additional comments:

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF HAZARDOUS WASTE MANAGEMENT
BOX 30038
LANSING, MICHIGAN 48909

WASTE CHARACTERIZATION REPORT

SECTION A. WASTE GENERATOR IDENTIFICATION INFORMATION

EPA IDENTIFICATION NUMBER: WID006100929

BUSINESS NAME: Thomas Industries

ADDRESS: 700 Oak St

CITY: Fort Atkinson STATE: WI ZIP CODE: 5373

NAME AND TITLE OF CONTACT PERSON: Bob Chaddy

TELEPHONE NUMBER: 414/563-2411

SECTION B. COMMON NAME OF THE WASTE

ENTER TYPE OF WASTE (i.e. common name) characterized on this form and the source or process from which it was produced: Paint Sludge

SECTION C. LISTED HAZARDOUS WASTE

	HAZARDOUS WASTE NO.
1. If the waste is listed in tables 301 a, b, c, or d of Rule 299.6308, 299.6309, 299.6310 or 299.6311, respectively or table 305 of Rule 299.6317, enter the hazardous waste number from the appropriate table	
2. If the waste is a discarded commercial chemical product, off-specification specie, container or spill residue of a substance listed in Table 302a, Rule 299.6312, or Table 302 b or c, Rule 299.6313 or 299.6314, respectively, enter the hazardous waste number from the applicable table	
3. If waste *contains* any substances listed in table 302 a, b, or c, Rule 299.6312, 299.6313, or 299.6314, respectively, enter their hazardous waste number(s) from the applicable table AND record the component concentrations. (COMPONENT CONCENTRATION: ____ to ____ %)	
4. If the waste contains viable desease-causing agents listed in table 304, Rule 299.6316, enter the hazardous waste number(s) from the table	

SECTION D. HAZARDOUS WASTE BASED ON CHARACTERISTICS

	Test Results	Parameters	Reference
5. Ignitable Wastes			
5a Liquid flash point test (aqueous solutions containing less than 24% alcohol by volume are excluded from this test).	____ to ____ °c	Flash Pt. 60°C	299.6201 (c) (i)
5b Non-liquid — Is it ignitable based on conditions stated in the reference?	☐ Yes ☒ No	See Reference	299.6201 (c) (ii)
5c Compressed gas — Is the waste a flammable compressed gas as defined in the reference?	☐ Yes ☒ No	See Reference	49 CFR § 173.300
5d Oxidizer — Is the waste an oxidizer as defined in the reference?	☐ Yes ☒ No	See Reference	49 CRF § 173.151
5e Enter "D001", as the hazardous waste number if the waste exceeds one or more of the parameters listed or meets the definition of a hazardous waste based on the reference			
6 Corrosive Wastes (concentrated salt solutions are by definition not coorosive)	Test Results	Parameters	Reference
6a Aqueous Solution — ph test	____ ph	See Reference	299.6201 (a) (i)
6b Liquid-Steel (type SAE 1020) corrosion test	____ mm/yr	Rate 6.35 mm/yr	299.6201 (a) (ii)
6c Albino rabbit skin test — Is the tissue destroyed or irreversibly changed?	☐ Yes ☒ No	See Reference	299.6201 (a) (iii) & 49 CFR § 173.240
6d Enter "D002", as the hazardous waste number if the waste exceeds one or more of the parameters listed			

7 Reactive wastes

7a Is the waste normally unstable and capable of undergoing violent chemical or physical change without detonating?	☐ Yes ☒ No
7b Does it react with water forming potentially explosive mixtures with water?	☐ Yes ☒ No
7c When mixed with water, does it generate toxic gases, vapors, or fumes?	☐ Yes ☒ No
7d Is it a sulfide or cyanide bearing waste which when exposed to ph conditions between 2 and 12.5 can generate toxic gasses, vapors or fumes?	☐ Yes ☒ No
7e Is the waste capable of detonation or explosive reaction when subjected to a strong initiating source or if heated under confinement?	☐ Yes ☒ No

— over —

7f Is the waste capable of detonation or explosive decomposition or reaction at standard temperature and pressure? ☐ Yes ☒ No

7g Is the waste a forbidden explosive as defined in 49 CFR § 173.51? ☐ Yes ☒ No

7h Is the waste a Class A explosive as defined in 49 CFR § 173.53? ☐ Yes ☒ No

7i Is the waste a Class B explosive as defined in 49 CFR § 173.88? ☐ Yes ☒ No

7j If the answer to any of the questions 7a through 7i is yes enter D003 as the hazardous waste number

8 EPA Toxic Wastes Upon obtaining an extract of the waste as described on 40 CFR § 261 Appendix II, test for the components listed in Table 303, Rule 299.6315. For each component material that exceeds the extract concentration listed in the table, enter the hazardous waste number(s) and the tested concentration(s).

Hazardous Waste No	Concentration
	mg
	mg
	mg
	mg

SECTION E. PHYSICAL STATE AT 25°

9 What is the average density of the material?

10 Solids Does the material produce dust if exposed to air movement? ☐ Yes ☐ No

11 Liquid — Sludge What is the percent solids? %

Do the solids settle out? ☐ Yes ☐ No

Can the material be pumped? ☐ Yes ☐ No

Can the material be poured? ☐ Yes ☐ No

12 Liquid At what temperature does it freeze? °C

13 Gases What is the maximum pressure of the container? PSIG

SECTION F. OTHER INFORMATION:

14 What is the maximum quantity of this waste that is generated per month? KG

15 If the only hazardous waste numbers listed on this form are the numbers that have been entered for Item 3, enter the numbers in the space provided if the component concentration (Item 3) and the quantity of the waste generated (Item 14) cause the waste to be considered as a notification waste based on R 299.6201 (1) (g) (iii) and (iv). *figure A* of R299.6201(2) or *figure B* of R299.6201 (3).

NOTE If the hazardous waste numbers that have been entered under Item 3 begin with the letter "P" use *figure A* to determine if it is a notification waste. If the number begins or ends with the letter "U" use *figure B*

16 Are the hazardous wastes listed on this form disposed of onsite? ☐ Yes ☒ No

17 If the waste is a hazardous waste, is it exempt under the small quantity exemptions pursuant to R 299.6203(2) and (3)? ☐ Yes ☒ No

18 If tests were conducted in the evaluation of the waste, all of the following information shall be transmitted to the Department of Natural Resources with the waste characterization Record

(a) The sampling procedure and the reasons for determining that the sample is representative of the waste

(b) The results of all tests conducted

(c) The accuracy and precision of any test conducted

SECTION G U.S. DEPT. OF TRANSPORTATION REPORTING REQUIREMENTS

Hazardous Materials Description and Shipping Name: Hazardous Waste Liquid N.O.S

Hazard Class: ORM-E

UN/NA ID No: NA 9189

Special Handling and Shipping Requirements

If the waste is hazardous and not exempt or excluded from management, or is a notification waste, send the completed form to the Department of Natural Resources Office of Hazardous Waste Management, P.O. Box 30038, Lansing, MI 48909.

Signature

Engr Mgr
Title

7/2/84
Date

CORRESPONDENCE/MEMORANDUM — STATE OF WISCONSIN

Date: April 1, 1986 File Ref: 4430

To: File

APR 10 1986

From: Wendell Wojner
WJW

Subject: Thomas Industries Inc., EPA I.D. #WID 006100929, Jefferson County

On March 27, 1986, a generator inspection was to be performed at Thomas Industries Inc., at 700 Oak Street in Fort Atkinson. Upon visiting this site it was observed that Thomas Industries had ceased operations at the site.

The building had been sold to Wand Corporation. I met with Phil Powell, the plant manager. Mr. Powell showed me the site specifically addressing the areas that Thomas Industries had used for the paint booths, electroplating, wastewater treatment, degreasing with subsequent perchloroethylene filtering apparatus and hazardous wastes storage locations.

The entire plant was gutted prior to Wand Corporation moving in. Wand Corporation was very careful about having the area cleaned up prior to moving in so that no hazardous waste would be on site. Thomas Industries was responsible for the cleaning and removal of all hazardous wastes from the site. The electroplating area was a concrete constructed flooring which was broken up and subsequently disposed of. New concrete was layed down for that area. Wastewater treatment tanks were drained and flushed according to Mr. Powell. The degreasers were drained, decontaminated and all waste was removed. The degreasers were then removed from that location. The perchloroethylene filter was subsequently removed. The hazardous waste in the storage area next to the wastewater treatment area was appropriately removed. The hazardous waste in the storage area in the rear of the plant near the railroad tracks had been removed.

Mr. Powell also stated that two large transformers had been examined for oil containing PCB's. Oil was appropriately removed and the transformers were in the process of being dismantled. Thomas Industries was responsible for checking the fluid. AMP Electric out of Janesville was thought to be the contractor that had performed the checking work.

The building had been reconstructed or gutted by Jim Cullen, a general contractor from Janesville.

After the area had been cleaned out and had been observed by Thomas Industries personnel, Wand Corporation personnel gave it a thorough going over to determine if other problems were left. Insurance agents also examined the premises to make sure that it received a clean bill of health with respect to hazardous waste or PCB's or other potential problems.

In the rear of the plant there was a foundation for holding a large tank. I observed two stand pipes that resembled monitoring wells at this location. It was uncertain whether these were actually monitoring wells or whether it was just a vent. This matter will be further investigated.

No hazardous wastes from Thomas Industries was observed on that location. Therefore this site should be deleted from the annual report list. A letter to Thomas Industries to try to correct the past manifest problems has been sent. This letter also requests certification or other documentation procedures that would detail how clean up was carried out at that site.

WW:ps

cc: Pat Kirsop - SW/3
Marie Stewart - Madison Area

SOUTHERN
DNR District

WID 006 100929
EPA ID Number

STATE OF WISCONSIN
Department of Natural Resources
Hazardous Waste Generation Site Inspection Form
(Subchapter III of NR 181)

Note: Complete this form only for: 1) facilities which generate quantities of hazardous waste greater than those small quantities subject to the special requirements of s. NR 181.13, Wis. Adm. Code; 2) facilities which do not treat or dispose of hazardous waste on-site; and 3) facilities which do not receive hazardous waste from off-site.

I. General Information

APR 10 1986

Corporate/Facility Name: Thomas Industries Inc

Facility Location:

Street: 700 Oak St.

City & Zip: Fort Atkinson 53538 Town: _____ County: Jefferson

Contact Person: _____ Title: _____

Facility Mailing Address:

Street: _____

City: _____ State: _____ Zip Code: _____

Phone: _____

Operator: _____ Title: _____

Street: _____

City: _____ State: _____ Zip Code: _____

Phone: _____

Legal Owner: Thomas Industries Inc

Street: 207 East Broadway

City: Louisville State: Kentucky Zip Code: 40202

Phone: 502 582 3771

DNR District Inspector: Wendell Woiner Date: 3/27/86

Revised November 1985