

→ Singer/Kopar - E.C.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

RECEIVED
NOV 6 1997
WAUSAU DNR

NOV 3 1997

REPLY TO THE ATTENTION OF:

D-8J

Mr. Rudolph J. Weisenberger RECEIVED
506 8th Avenue NW
Forest Lake, Minnesota 55025 NOV - 7 1997

Mr. Chuck Sommers
Marathon Mills
P.C. Box 157
Marathon, Wisconsin 54448

Re: Visual Site Inspection (VSI)
Weisenberger Tie and Lumber Co.
Weisenberger Road
Marathon, Wisconsin 54448

Dear Mr. Weisenberger and Sommers:

The United States Environmental Protection Agency (U.S. EPA) Region 5 has requested TechLaw, Inc., U.S. EPA's RCRA Enforcement, Permitting and Assessment Contractor, to conduct a Preliminary Assessment/Visual Site Inspection (PA/VSI) at the previous Weisenberger Tie and Lumber Company (currently Marathon Mills) facility. It is our understanding that Weisenberger Tie and Lumber Company no longer operates at this site and that Marathon Mills currently leases the property from Mr. Weisenberger. Under the 1984 Hazardous and Solid Waste Amendments (HSWA), a PA/VSI is required of the Weisenberger Tie and Lumber Company facility. The assessment requires identification and systematic review of all solid waste streams at the facility. The objective of this assessment is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the site which require further investigation. This analysis will provide information to establish priorities for subsequent remedial investigations.

An integral part of this assessment is a visual site inspection (VSI) of your facility to verify the location of all "solid waste management units" (SWMUs) and to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered

during a preliminary file review. During this site visit, no samples will be taken.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. This site visit is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of each SWMU are to be taken to document the condition of each unit at the facility and the waste management procedures used.

The VSI has been scheduled for November 20, 1997. The TechLaw inspection personnel may be accompanied by a U.S. EPA Region 5 or State of Wisconsin representative. Your cooperation in admitting and assisting them while on site is appreciated.

In preparation for the VSI, the inspection personnel are required to identify any potentially hazardous conditions likely to be encountered at the site during performance of the VSI and to prepare a safety plan that deals with the hazards, if necessary. You will be contacted by a TechLaw representative by telephone in the near future to obtain specific information on the level(s) of personal protection required and materials handled in each area of your facility.

A copy of the proposed VSI agenda (Attachment I) is enclosed. Please review and gather the information requested in Attachment II, the information needs list, prior to the VSI. Should you have questions regarding this letter, please contact me at (312) 886-0977 or Mr. Robert Gurdikian of TechLaw at (703) 818-1000. Also, please contact me if you would like to request a copy of the PA/VSI report when completed, excluding Section IV (Conclusions and Suggested Further Actions).

Sincerely,



Gerald Phillips, EPA Region 5
Corrective Action Process Manager

Enclosure

cc: Richard Brown Wisconsin DNR

ATTACHMENT I

**PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION
VISUAL SITE INSPECTION AGENDA**

FACILITY: Marathon Mills (former Weisenberger Tie
and Lumber Company)
Weisenberger Road
Marathon, Wisconsin 54448

EPA I.D. No.: WID063379796

FACILITY CONTACT: Mr. Chuck Sommers
Facility Manager
Mr. Rudolph J. Weisenberger
Site Owner

DATE OF INSPECTION: November 20, 1997

PERSONNEL: R. Gurdikian, TechLaw
A. Mubiru, TechLaw
Richard Brown, State of Wisconsin

PURPOSE OF INSPECTION:

The Hazardous and Solid Waste Amendments of 1984 (HSWA) broaden the Scope of the Environmental Protection Agency's (EPA's) authority under the Resource Conservation and Recovery Act (RCRA) by requiring corrective action for releases of hazardous wastes and constituents at facilities that manage hazardous wastes. The RCRA Facility Assessment (RFA) is conducted to evaluate the potential for releases to the environment and the need for corrective action. The Preliminary Assessment/Visual Site Inspection is a form of a RFA.

The RFA includes a desk-top preliminary assessment (PA) of available file information, a visual site inspection (VSI) of the facility and, if necessary, a sampling visit. Based on the review of available data for this facility, a visual site inspection (VSI) has been determined to be necessary. The purpose of the VSI is to:

PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION
VISUAL SITE INSPECTION AGENDA, CON'T
WEISENBERGER TIE AND LUMBER COMPANY
WEISENBERG ROAD
MARATHON, WISCONSIN
EPA I.D. NO. WID063379796

NOVEMBER 20, 1997

1. Survey the site for hydrologic, geologic, and surficial features.
2. Identify solid waste management units (SWMUs) and other areas of concern, documenting and photographing all SWMUs and other areas of concern.
3. Review site information with facility representatives.

INSPECTION ORGANIZATION

TechLaw personnel will form a two-member team to perform a one-day inspection tour. The team, in general, will inspect waste generation and disposal areas such as container storage areas, surface impoundments, waste piles and release pathways for release of wastes into the environment. To the extent possible, an interview with the facility staff will be performed to develop a better understanding of past waste disposal practices. Pertinent geologic information consisting of well logs, USGS topographic maps, plat and zoning maps and surrounding land use patterns will be reviewed. The team will concentrate on developing a better understanding of the vertical and horizontal alignments of any surface impoundments, container storage areas, and any other waste generation, treatment, storage and disposal facilities. A review of the regional hydrogeology and site-specific data will be performed to make an assessment of depth to groundwater and its flow direction in the proximity of the Solid Waste Management Units.

The overall rationale of this inspection plan is to enable the team to trace waste streams from process through treatment and disposal. Some adjustments to the agenda will more than

PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION
VISUAL SITE INSPECTION AGENDA, CON'T
WEISENBERGER TIE AND LUMBER COMPANY
WEISENBERG ROAD
MARATHON, WISCONSIN
EPA I.D. NO. WID063379796

NOVEMBER 20, 1997

likely be necessary to accommodate facility staff,
geographical location of units and/or operational constraints.

Preliminary information needs have been submitted as
Attachment II to aid Marathon Mills in preparing for the site
visit. These issues will be resolved in an introductory
meeting during the VSI. A more efficient agenda may be
arranged at that time to ensure that all SWMUs identified will
be inspected.

PROPOSED INSPECTION SCHEDULE

November 20, 1997: 9:00 a.m. - 5:00 p.m. (0900 - 1700)

INTRODUCTORY MEETING

Inspection Team will meet with Marathon Mills personnel to
discuss:

- Purpose of visit;
- Agenda;
- Health and safety considerations;
- Transportation arrangements (if appropriate)
- Facility history and current operations; and,

PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION
VISUAL SITE INSPECTION AGENDA, CON'T
WEISENBERGER TIE AND LUMBER COMPANY
WEISENBERG ROAD
MARATHON, WISCONSIN
EPA I.D. NO. WID063379796

NOVEMBER 20, 1997

- Additional information needs pertaining to the SWMUs identified during the PA.

INSPECTION TOUR OF POTENTIAL SWMUs

The inspection tour will consist of a visual inspection of the identified SWMUs. Photographs of these units and areas will be taken. The inspection tour schedule will be discussed and agreed upon during the introductory meeting and discussions.

The following is a list of potential SWMUs identified during the file review. These and all other SWMUs and areas of concern identified while at the site will be inspected.

PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION
VISUAL SITE INSPECTION AGENDA, CON'T
WEISENBERGER TIE AND LUMBER COMPANY
WEISENBERG ROAD
MARATHON, WISCONSIN
EPA I.D. NO. WID063379796

NOVEMBER 20, 1997

LIST OF POTENTIAL SWMUS AND AOCs

| <u>SWMU NO.</u> | <u>LIST OF POTENTIAL SWMUS FROM HISTORICAL ACTIVITIES</u> |
|-----------------|---|
| 1. | Drying Stacks |
| 2. | Dip Tank pads and waste containment vessels |
| 3. | Landfilling Sludge |
| 4. | Container Storage Area |
| 5. | Pressure Treatment Plant |
| 6. | 30,000 gallons storage tanks containing contaminated waters |
| | |
| <u>AOC</u> | <u>LIST OF POTENTIAL AOCs FROM HISTORICAL ACTIVITIES</u> |
| A. | Dip Tanks |
| B. | Above ground product storage tanks |
| C. | Groundwater contamination - F027 Waste - Pentachlorophenol |

WRAP-UP MEETING

Inspection Team will meet with Marathon Mills personnel to conclude day's activities.

PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION
VISUAL SITE INSPECTION AGENDA, CON'T
WEISENBERGER TIE AND LUMBER COMPANY
WEISENBERG ROAD
MARATHON, WISCONSIN
EPA I.D. NO. WID063379796

NOVEMBER 20, 1997

ATTACHMENT II

PRELIMINARY INFORMATION NEEDS FOR
RCRA FACILITY ASSESSMENT

1. Identify past and present known SWMUs and AOCs which have not been listed elsewhere in the VSI Agenda. Include a brief description of wastes managed in these units and the unit's period of operation. Units to identify include, but are not limited to, the following:
 - Above ground and underground waste storage tanks.
 - Abandoned storage tanks.
 - Waste storage units for solid and hazardous wastes which fall under the 90-day exemption from RCRA.
 - All waste handling areas and associated activities, including loading zones, transfer areas, and waste accumulation areas.
 - All process and spill containment areas and sumps.
2. Submit information relative to the history of the facility including former owners, site uses, manufacturing practices used, wastes generated, and existing buildings and/or structures.
3. Provide facility maps, including all historical topographic maps and aerial photographs, which identify the locations of all plant operations and the SWMUs and AOCs listed in the VSI Agenda.
4. Provide a description of the current practices at the facility and any utilization of historical activities,

PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION
VISUAL SITE INSPECTION AGENDA, CON'T
WEISENBERGER TIE AND LUMBER COMPANY
WEISENBERG ROAD
MARATHON, WISCONSIN
EPA I.D. NO. WID063379796

NOVEMBER 20, 1997

buildings, storage tanks, etc. which could impact past contamination identified at the site.

5. If applicable, provide copies of all current environmental permits, and provide information on the history of each permit.
6. Provide information regarding the status of the facility. Is the facility closed or operating?
7. Provide a description and identify the location of all past and present underground and above ground storage tanks at the facility.