



George E. Meyer
Secretary

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

101 South Webster Street
Box 7921
Madison, Wisconsin 53707
TELEPHONE 608-266-2621
SOLID WASTE TELEFAX 608-267-2768
TDD 608-267-6897

November 5, 1993

File Ref: WID-560010118

Brown Co.
SW/SFND

Ms. Sue Coll
Wisconsin Project Officer
U.S. EPA, Region V, HSM9J
77 West Jackson Street
Chicago, IL 60604

Subject: Better Brite, C.A. No. V995102-01
Quarterly Report, July - September, 1993

Sue
Dear Ms. Coll:

Please find enclosed for your review, a summary of the 4th quarter, fiscal year 1993 state activities conducted under the Better Brite Cooperative Agreement.

We have also enclosed a revised 3rd quarter report as requested in your September 30, 1993 letter.

If there are any questions, please contact Mr. James McLimans at (608) 266-0830.

Sincerely,

Paul

Paul P. Didier, P.E., Director
Bureau of Solid and Hazardous Waste Management

PPD/JMM/jm

cc: Mark Giesfeldt - SW/3
Doug Rossberg - LMD-SW
Gary Edelstein - SW/3

Jane Lemcke - SW/3
Terry Koehn - LMD-SW

SUPERFUND COOPERATIVE AGREEMENT
QUARTERLY PROGRESS REPORT
STATE LEAD SITE

Assistance ID number: V995102-01
Site name: Better Brite
Activity: RI/FS & RA
Reporting period: FY93,4th Quarter

WORK ACCOMPLISHED DURING REPORTING PERIOD FOR THIS SITE AND
ACTIVITIES:

1. Analytical results from surface soil samples collected by EPA in early May, 1993 by EPA have been received. Some samples indicated areas with elevated concentrations of chromium and cyanide. The results were forwarded to the Wisconsin Division of Health for review. The concentrations observed are not expected to represent direct contact hazards.
2. On July 26 and August 6, 1993, following precipitation events, the WDNR collected five surface water samples from the area of the Chrome Shop. A memorandum presenting the results of that sampling, dated September 15, 1993 was prepared. The highest total chromium concentration observed from the sampling was 29 ug/l.
3. A modified scope of work was prepared and presented to the WDNR by Simon Hydro-Search (HSI) on August 17, 1993. The proposal was determined to be acceptable and final contracting procedures were initiated. However, due to recent changes in EPA's indemnification procedures additional negotiations with HSI became necessary. EPA was contacted to obtain suggested/required language to be included in a contract as related to indemnification.
4. By letter dated July 28, 1993 an amendment to the Cooperative Agreement (CA) was submitted to EPA for the performance of the RI/FS. The amendment requested an increase in funds of \$124,606 and extension of the project period through December, 1994. This amendment was based on the final proposal from HSI which presented the reduced scope discussed with EPA.
5. In April, 1993 the WDNR was contacted by EPA (D. Yeskis) regarding a study of the Galena/Platteville aquifer. A draft workplan for the work, dated June 11, 1993, was provided. Drilling is currently scheduled for October, 1993 with testing of the well in late October and November, 1993.

6. The City of DePere continued to operate the pretreatment plant at the Chrome Shop, handling water from both the Chrome Shop and the Zinc Shop. A total of 69,150 gallons of water were treated during the quarter. 19,300 gallons of water were transferred from the Zinc Shop for treatment. A Scope of Work (SOW) was prepared to address the continued transfer of contaminated groundwater from the Zinc Shop to the Chrome shop for treatment. This SOW will be used to obtain bids from contractors for a long term (1 year with renewal options) contract and an interim (4 months) contract. The interim arrangement was required to meet the time demands of obtaining a long term contract. It is expected to go out for bid in October, 1993.
7. One transfer of filter cake from the pretreatment plant was completed on August 19, 1993 (18 drums). Stabilization and disposal is to be performed by the Controlled Waste facility in Menomonee Falls, WI.

PROBLEMS AND DELAYS ENCOUNTERED THIS PERIOD:

The initiation of the SACM Like Action caused the postponement of the RI/FS. Negotiations to limit the scope and cost of the RI/FS, at EPA's request, are completed. Negotiations to address EPA's current indemnification requirements are in progress. However they have caused additional delays to the project.

CORRECTIVE MEASURES TAKEN OR PLANNED:

A new scope of work has been negotiated with HSI to limit the scope of the project. Negotiations to address the indemnification problem are in progress.

PROJECT SCHEDULE

Tasks/Deliverables	Original CA Approved Sched.	CA Approved Amended Schedule	Actual Completion Date
Data Summary (DNR)	1/1/91		6/17/91
Contractor Procurement	2/1/91		7/29/91
Preparation of Project Plans	8/1/91		4/15/92(draft)
Field Investigations	5/1/92		
Sample Analysis and Validation	7/1/92		
Data Evaluation	7/1/92		
Risk Assessment	7/1/92		
Treatability Study	to be determined		
Remedial Investigation Report	9/1/92		
Remedial Alternatives Development and Screening	11/1/92		
Detailed Analysis of Alternatives	1/1/93		
Feasibility Study Report	3/1/93		
Conceptual Design	6/1/93		

PERCENTAGE OF ACTIVITY SCHEDULED TO BE COMPLETED: 80%

PERCENTAGE OF ACTIVITY ACTUALLY COMPLETED: 20%

EXPLANATION OF SIGNIFICANT DIFFERENCE:

Delays associated with the SACM like action remain in effect. These delays have become compounded due to problems encountered in negotiating indemnification with the consultant.

ESTIMATED COST FOR CURRENT TASKS UNDERWAY OR JUST COMPLETED IN THIS REPORTING PERIOD:

RI/FS Activity

1. A contract for Phase 2 of the RI/FS project with HSI is being negotiated. Questions related to indemnification remain to be resolved. HSI submitted their final invoice under the contract for Phase 1 activities on February 1, 1993.
2. State costs incurred: \$1700

RA Activity

1. City of De Pere costs incurred: \$3,390.81 (Invoice Amount)
2. State costs incurred : \$3000

ESTIMATED TIME AND FUNDS NEEDED TO COMPLETE REQUIRED WORK:

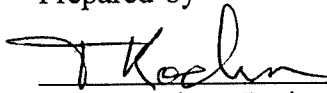
A reasonable estimate of the time or funds is currently not available. It is currently anticipated, based on HSI's latest proposal that the contractual costs for the reduced scope RI/FS will be \$633,000. A CA Amendment will be prepared and submitted. The amendment has been approved by EPA.

ACTUAL TIME AND FUNDS REMAINING:

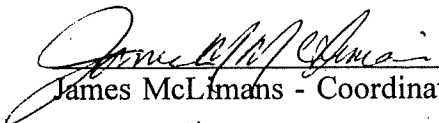
RI/FS - 15 Months and \$555,000
RA - 15 Months and \$710,000

EXPLANATION OF ANY SIGNIFICANT DISCREPANCY/RATIONALE FOR ANY PLANNED FUNDING INCREASE REQUEST OR TIME EXTENSION REQUEST:

Prepared by

 Date 11-4-93
Terry Koehn - Project Manager

Approved by

 Date 11-4-93
James McLimans - Coordinator

SUPERFUND COOPERATIVE AGREEMENT
QUARTERLY PROGRESS REPORT
STATE LEAD SITE

Assistance ID number: V995102-01
Site name: Better Brite
Activity: RI/FS & RA
Reporting period: FY93, 3rd Quarter

WORK ACCOMPLISHED DURING REPORTING PERIOD FOR THIS SITE AND
ACTIVITIES:

1. WDNR staff time was spent in conjunction with EPA work on the SACM Like Remedial Action at both of the Better Brite sites. This work was basically completed in late June, 1993. Soils were excavated from areas selected by EPA and disposed. The collection systems were installed. Clay caps were placed over the collection systems and seeded (no topsoil was placed over the caps).
2. WDNR staff assisted in planning the collection of confirmatory surface soil samples. These samples were collected in early May, 1993 by EPA from both the Zinc and the Chrome Shops and forwarded to the CLP for analysis. Analytical results have not been received to date. Screening samples were not collected at the Zinc Shop site as originally planned.
3. Recommendations regarding abandonment of existing monitoring wells at the Better Brite sites were provided to EPA by letter dated February 15, 1993. EPA elected to excavate around the wells rather than abandon them. The impacts to the surface seals etc. makes their future use as sampling points questionable.
4. An initial proposal for the second phase of the RI/FS was prepared by Simon-Hydro Search (HSI) and forwarded to the WDNR in February, 1993. Following this EPA advised WDNR that a major reduction in scope was required to meet budgetary limitations. EPA provided their suggestions to reduce the scope of the RI/FS to the WDNR by letter received on April 20, 1993. The WDNR was not in full agreement with a number of the suggestions made by EPA as outlined in a letter to EPA dated May 27, 1993. However, with the understanding that much of the proposed work would be performed later in the project, WDNR accepted many of the reductions. Negotiations proceeded with HSI to limit the scope and cost of the project. A meeting between the WDNR and HSI was held in this regard in Milwaukee on May 3, 1993.

5. A second proposal was prepared by HSI and submitted to the WDNR on May 18, 1993. This proposal included substantial reductions in scope resulting in a cost reduction of approximately \$265,000. The scope of the RI/FS was basically reduced to only address groundwater conditions. To keep the cost of the RI/FS down, a significant amount of work has been postponed to the RD stage. A third proposal was then provided by HSI on July 8, 1993 to address several requested modifications. It is anticipated that this proposal will be accepted with several possible changes.
6. D. Yeskis (EPA) contacted the WDNR regarding the installation of a boring in the general area of the Better Brite sites as part of a study of the Galena/Platteville aquifer. Comments on EPA's scope of work for this study were provided. The WDNR anticipates assisting EPA in this study when possible. Results from the study may prove useful in evaluating groundwater conditions at the Better Brite sites. The borehole is planned to be drilled outside the limits of site contamination.
7. Interim Action activities other than continued operation of the pretreatment plant, remain on hold. A preliminary cost estimate was prepared in anticipation of significantly increased operating costs for the pretreatment plant. The increased costs being due to increased volumes of water to be treated because of the recent collection system modifications.
8. The City of DePere continued to operate the pretreatment plant at the Chrome Shop, handling water from both the Chrome Shop and the Zinc Shop. A total of 538,900 gallons of water were treated during the quarter. 111,200 gallons of water were transferred from the Zinc Shop for treatment. Arrangements were made with the City of DePere to operate the pretreatment plant over several weekends to address the increased volume of water which resulted from the spring weather and EPA's excavation work.
9. Two transfer of filter cake from the pretreatment plant were completed on May 6, 1993 (20 drums) and June 4, 1993 (17 drums). Stabilization and disposal is to be performed by the Controlled Waste facility in Menomonee Falls, WI.

PROBLEMS AND DELAYS ENCOUNTERED THIS PERIOD:

The initiation of the SACM Like Action caused the postponement of the RI/FS to assess effects on the project plans. Current negotiations to limit the scope and cost of the RI/FS at EPA's request are in progress.

CORRECTIVE MEASURES TAKEN OR PLANNED:

Continuing to work with HSI to develop a new scope of work and schedule which will take into account the SACM Like action and EPA's request to limit the scope of the project.

PROJECT SCHEDULE

Tasks/Deliverables	Original CA Approved Sched.	CA Approved Amended Schedule	Actual Completion Date
Data Summary (DNR)	1/1/91		6/17/91
Contractor Procurement	2/1/91		7/29/91
Preparation of Project Plans	8/1/91		4/15/92(draft)
Field Investigations	5/1/92		
Sample Analysis and Validation	7/1/92		
Data Evaluation	7/1/92		
Risk Assessment	7/1/92		
Treatability Study	to be determined		
Remedial Investigation Report	9/1/92		
Remedial Alternatives Development and Screening	11/1/92		
Detailed Analysis of Alternatives	1/1/93		
Feasibility Study Report	3/1/93		
Conceptual Design	6/1/93		

PERCENTAGE OF ACTIVITY SCHEDULED TO BE COMPLETED: 80%

PERCENTAGE OF ACTIVITY ACTUALLY COMPLETED: 20%

EXPLANATION OF SIGNIFICANT DIFFERENCE:

Delays associated with negotiations and the SACM like action remain.

ESTIMATED COST FOR CURRENT TASKS UNDERWAY OR JUST COMPLETED IN THIS REPORTING PERIOD:

RI/FS Activity

1. A contract for Phase 2 of the RI/FS project with HSI is being negotiated. HSI submitted their final invoice under the contract for Phase 1 activities on February 1, 1993.
2. State costs incurred: \$2670

RA Activity

1. City of De Pere costs incurred: \$22,026.13
2. State costs incurred : \$1770

ESTIMATED TIME AND FUNDS NEEDED TO COMPLETE REQUIRED WORK:

A reasonable estimate of the time or funds is currently not available. It is currently anticipated, based on HSI's latest proposal that the contractual costs for the reduced scope RI/FS will be \$633,000. A CA Amendment will be prepared and submitted.

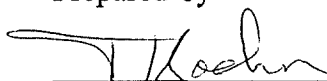
ACTUAL TIME AND FUNDS REMAINING:

- 1 Month and \$555,000

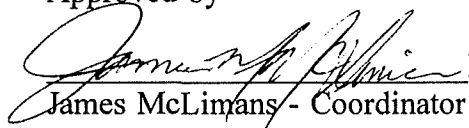
EXPLANATION OF ANY SIGNIFICANT DISCREPANCY/RATIONALE FOR ANY PLANNED FUNDING INCREASE REQUEST OR TIME EXTENSION REQUEST:

We have submitting a time extension request and a request for an increase of funding based on current EPA activities at the site and the latest proposal from Simon Hydro-Search.

Prepared by

 Date 11-4-93
Terry Koehn - Project Manager

Approved by

 Date 11-4-93
James McLimans - Coordinator
Attachment: Contractor's Monthly Reports



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary

PO Box 7921
101 South Webster Street
Madison, Wisconsin 53707-7921
TELEPHONE 608-266-2621
FAX 608-267-3579
TDD 608-267-6897

OCT 17 1996

Mr. Valdas Adamkus
Regional Administrator
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, IL 60604

ATTENTION: Acquisition and Assistance Branch (MCG-10J)

SUBJECT: Better Brite Cooperative Agreement No. V995102-01

Dear Mr. ^{Val} Adamkus:

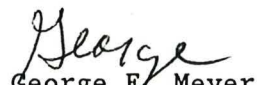
We are sending this letter to transmit our acceptance of amendment number 5 to the Superfund Better Brite Cooperative Agreement. The amendment provides funding to conduct Remedial Design activities as well as complete a 5-Year review of the Pretreatment Remedial Action. The amendment also extends the project and budget periods to September 30, 1997.

Enclosed please find the signed original and two copies of the Cooperative Agreement amendment.

We greatly appreciate EPA's cooperation and assistance in helping us prepare this request and in continuing the uninterrupted funding for this critical state lead project.

If there are any questions, please contact Dick Kalnicky at (608) 267-7554.

Sincerely,


George E. Meyer
Secretary

Enclosure

cc: T. Burns - FN/1
M. Giesfeldt/E. Lynch/G. Edelstein - RR/3
B. Urben - LMD
M. McDermid - SW/3
D. Kalnicky - RR/3

U.S. ENVIRONMENTAL PROTECTION AGENCY EPA ASSISTANCE AGREEMENT / AMENDMENT PART I - ASSISTANCE NOTIFICATION INFORMATION	1. ASSISTANCE ID NO. V 995102-01-5	2. LOG NUMBER 05-V -
	3. DATE OF AWARD SEP 30 1996	4. MAILING DATE OCT 07 1996

5. AGREEMENT TYPE	6. PAYMENT METHOD
<input type="checkbox"/> Cooperative Agreement <input type="checkbox"/> Grant Agreement <input checked="" type="checkbox"/> Assistance Amendment	<input type="checkbox"/> Advance <input type="checkbox"/> Reimbursement <input checked="" type="checkbox"/> ACH Number <u>ACH-0536</u> Send Payment Request to: COMPROLLER BRANCH, MF-10J
	7. TYPE OF ACTION INCREASE REVISION

8. RECIPIENT WISCONSIN DNR P.O. BOX 7921 MADISON, WI 53707	9. PAYEE WISCONSIN DNR P.O. BOX 7921 MADISON, WI 53707
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EIN NO. 39-6006436	CONGRESSIONAL DISTRICT 02	10. RECIPIENT TYPE STATE, COMMONWEALTH, TERR GOVT
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11. PROJECT MANAGER AND TELEPHONE NO. MARK F. GIESFELDT (608) 267-7562	12. CONSULTANT (WWT Construction Grants only) N/A
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13. ISSUING OFFICE (CITY / STATE) US ENVIRONMENTAL PROTECTION AGENCY ACQUISITION-ASSISTANCE BRANCH US EPA, REGION 5, MC-10J 77 W JACKSON BLVD CHICAGO, IL 60604-3590	14. EPA PROJECT / STATE OFFICER AND TELEPHONE NO. COLL SUPERFUND DIVISION SR-6J, (312) 886-6044
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15. EPA CONGRESSIONAL LIAISON & PHONE BARBARA BROOKS, (202) 260-5660	16. STATE APPL ID (Clearinghouse)	17. SCIENCE FIELD	18. PROJECT STEP (WWT Construction Grants Only) N/A
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19. STATUTORY AUTHORITY CERCLA: SEC. 104	20. REGULATORY AUTHORITY 40 CFR PTS 31, 35 SUBPT O	21. STEP 2 + 3 & STEP 3 (WWT Construction Grants Only)
		a. Treatment Level b. Project Type <u>N/A</u> c. Treatment Process d. Sludge Design

22. PROJECT TITLE AND DESCRIPTION ADDITIONAL FUNDING FOR REMEDIAL DESIGN AND PRETREATMENT
 REMEDIAL ACTION ACTIVITIES, BUDGET AND PROJECT PERIOD EXTENSIONS FOR THE BETTER BRITE
 COOPERATIVE AGREEMENT

23. PROJECT LOCATION (Areas impacted by Project)

City / Place MADISON	County BROWN	State WI	Congressional District 08
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24. ASSISTANCE PROGRAM (CFDA Program No. & Title) 66.802: Hazardous Substances Response Trust Fund	25. PROJECT PERIOD 10/01/90 - 09/30/97	26. BUDGET PERIOD 10/01/90 - 09/30/97
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27. COMMUNITY POPULATION (WWT Construction Grants Only) N/A	28. TOTAL BUDGET PERIOD COST \$1,491,349	29. TOTAL PROJECT PERIOD COST \$1,491,349
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FUNDS	FORMER AWARD	THIS ACTION	AMENDED TOTAL
30. EPA Amount This Action	\$1,317,728	\$136,549	\$1,454,277
31. EPA In-Kind Amount	0	0	0
32. Unexpended Prior Year Balance	0	0	0
33. Other Federal Funds	0	0	0
34. Recipient Contribution	36,786	286	37,072
35. State Contribution	0	0	0
36. Local Contribution	0	0	0
37. Other Contribution	0	0	0
38. Allowable Project Cost	\$1,354,514	\$136,835	\$1,491,349

39. FISCAL	Site Name	Document Control Number	FY	Approp.	Budget Organization	Program Element	Object Class	Site/Project	Cost Organization	Obligation / Deobligation
03)	BETTER BRITE RA	SBX046	96	T	5AOFJ	TFA	41.85	055LRD01		136,549

PART II - APPROVED BUDGET

SITE NAME: SUMMARY BUDGET

ASSISTANCE IDENTIFICATION: V 995102-01-5

TABLE A - OBJECT CLASS CATEGORY (Non-construction)	TOTAL APPROVED ALLOWABLE BUDGET PERIOD COST
1. PERSONNEL	\$162,281
2. FRINGE BENEFITS	55,438
3. TRAVEL	20,324
4. EQUIPMENT	0
5. SUPPLIES	5,225
6. CONTRACTUAL	1,186,683
7. CONSTRUCTION	0
8. OTHER	5,984
9. TOTAL DIRECT CHARGES	\$1,435,935
10. INDIRECT COSTS: RATE % BASE <u>SEE BUDGETS</u>	55,414
11. TOTAL (Share: Recipient <u>0.00%</u> Federal <u>0.00%</u>) <u>SEE PART II</u>	\$1,491,349
12. TOTAL APPROVED ASSISTANCE AMOUNT	\$1,454,277
TABLE B - PROGRAM ELEMENT CLASSIFICATION (Non-construction)	
1.	
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11.	
12. TOTAL (Share: Recipient _____ % Federal _____ %.)	
13. TOTAL APPROVED ASSISTANCE AMOUNT	
TABLE C - PROGRAM ELEMENT CLASSIFICATION (Construction)	
1. ADMINISTRATION EXPENSE	
2. PRELIMINARY EXPENSE	
3. LAND STRUCTURES, RIGHT-OF-WAY	
4. ARCHITECTURAL ENGINEERING BASIC FEES	
5. OTHER ARCHITECTURAL ENGINEERING FEES	
6. PROJECT INSPECTION FEES	
7. LAND DEVELOPMENT	
8. RELOCATION EXPENSE	
9. RELOCATION PAYMENTS TO INDIVIDUALS AND BUSINESS	
10. DEMOLITION AND REMOVAL	
11. CONSTRUCTION AND PROJECT IMPROVEMENT	
12. EQUIPMENT	
13. MISCELLANEOUS	
14. TOTAL (Lines 1 thru 13)	
15. ESTIMATED INCOME (if applicable)	
16. NET PROJECT AMOUNT (Line 14 minus 15)	
17. LESS: INELIGIBLE EXCLUSIONS	
18. ADD: CONTINGENCIES	
19. TOTAL (Share: Recipient _____ % Federal _____ %.)	
20. TOTAL APPROVED ASSISTANCE AMOUNT	

PART II - APPROVED BUDGET

SITE NAME: BETTER BRITE RA

ASSISTANCE IDENTIFICATION: V 995102-01-5

TABLE A - OBJECT CLASS CATEGORY (Non-construction)	TOTAL APPROVED ALLOWABLE BUDGET PERIOD COST
1. PERSONNEL	\$33,092
2. FRINGE BENEFITS	11,685
3. TRAVEL	1,060
4. EQUIPMENT	0
5. SUPPLIES	1,025
6. CONTRACTUAL	312,008
7. CONSTRUCTION	0
8. OTHER	1,242
9. TOTAL DIRECT CHARGES	\$360,112
10. INDIRECT COSTS: RATE <u>22.35</u> % BASE <u>S + FB</u>	10,600
11. TOTAL (Share: Recipient <u>10.00</u> % Federal <u>90.00</u> %.)	\$370,712
12. TOTAL APPROVED ASSISTANCE AMOUNT	\$333,640

TABLE B - PROGRAM ELEMENT CLASSIFICATION (Non-construction)	
1.	
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10.	
11.	
12. TOTAL (Share: Recipient _____ % Federal _____ %.)	
13. TOTAL APPROVED ASSISTANCE AMOUNT	

TABLE C - PROGRAM ELEMENT CLASSIFICATION (Construction)	
1. ADMINISTRATION EXPENSE	
2. PRELIMINARY EXPENSE	
3. LAND STRUCTURES, RIGHT-OF-WAY	
4. ARCHITECTURAL ENGINEERING BASIC FEES	
5. OTHER ARCHITECTURAL ENGINEERING FEES	
6. PROJECT INSPECTION FEES	
7. LAND DEVELOPMENT	
8. RELOCATION EXPENSE	
9. RELOCATION PAYMENTS TO INDIVIDUALS AND BUSINESS	
10. DEMOLITION AND REMOVAL	
11. CONSTRUCTION AND PROJECT IMPROVEMENT	
12. EQUIPMENT	
13. MISCELLANEOUS	
14. TOTAL (Lines 1 thru 13)	
15. ESTIMATED INCOME (if applicable)	
16. NET PROJECT AMOUNT (Line 14 minus 15)	
17. LESS: INELIGIBLE EXCLUSIONS	
18. ADD: CONTINGENCIES	
19. TOTAL (Share: Recipient _____ % Federal _____ %.)	
20. TOTAL APPROVED ASSISTANCE AMOUNT	

PART II - APPROVED BUDGET

SITE NAME: BETTER BRITE (RD)

ASSISTANCE IDENTIFICATION: V 995102-01-5

TABLE A - OBJECT CLASS CATEGORY (Non-construction)		TOTAL APPROVED ALLOWABLE BUDGET PERIOD COST
1. PERSONNEL		\$15,575
2. FRINGE BENEFITS		5,757
3. TRAVEL		850
4. EQUIPMENT		0
5. SUPPLIES		935
6. CONTRACTUAL		105,000
7. CONSTRUCTION		0
8. OTHER		1,090
9. TOTAL DIRECT CHARGES		\$129,207
10. INDIRECT COSTS: RATE <u>22.35</u> % BASE <u>S + FB</u>		4,768
11. TOTAL (Share: Recipient <u>0.00</u> % Federal <u>100.00</u> %)		\$133,975
12. TOTAL APPROVED ASSISTANCE AMOUNT		\$133,975
TABLE B - PROGRAM ELEMENT CLASSIFICATION (Non-construction)		
1.		
2.		
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9.		
10.		
11.		
12. TOTAL (Share: Recipient _____ % Federal _____ %.)		
13. TOTAL APPROVED ASSISTANCE AMOUNT		
TABLE C - PROGRAM ELEMENT CLASSIFICATION (Construction)		
1. ADMINISTRATION EXPENSE		
2. PRELIMINARY EXPENSE		
3. LAND STRUCTURES, RIGHT-OF-WAY		
4. ARCHITECTURAL ENGINEERING BASIC FEES		
5. OTHER ARCHITECTURAL ENGINEERING FEES		
6. PROJECT INSPECTION FEES		
7. LAND DEVELOPMENT		
8. RELOCATION EXPENSE		
9. RELOCATION PAYMENTS TO INDIVIDUALS AND BUSINESS		
10. DEMOLITION AND REMOVAL		
11. CONSTRUCTION AND PROJECT IMPROVEMENT		
12. EQUIPMENT		
13. MISCELLANEOUS		
14. TOTAL (Lines 1 thru 13)		
15. ESTIMATED INCOME (if applicable)		
16. NET PROJECT AMOUNT (Line 14 minus 15)		
17. LESS: INELIGIBLE EXCLUSIONS		
18. ADD: CONTINGENCIES		
19. TOTAL (Share: Recipient _____ % Federal _____ %.)		
20. TOTAL APPROVED ASSISTANCE AMOUNT		

TERMS AND CONDITIONS

THIS AMENDMENT IS IN RESPONSE TO THE RECIPIENT'S APPLICATION SUBMITTED SEPTEMBER 5, 1996.

THIS TERM AND CONDITION HAS BEEN MODIFIED AS FOLLOWS:

INDIRECT COST

The effective period of the recipient's current Federally approved indirect cost rate is from July 1, 1996 to June 30, 1997. For indirect costs incurred after this effective period and during the current assistance agreement budget period, the recipient will not charge nor claim for reimbursement any indirect costs until an acceptable indirect cost rate has been negotiated with the cognizant Federal agency. The recipient must submit a copy of the Indirect Cost Rate Negotiation Agreement to the EPA Region 5 Acquisition and Assistance Branch within 30 days after the indirect cost rate has been accepted, in order to be eligible to claim indirect costs against this assistance agreement.

ALL OTHER PREVIOUSLY CITED TERMS AND CONDITIONS REMAIN THE SAME.

SPECIAL CONDITIONS (continued)

PART IV

NOTE: The Agreement must be completed in duplicate and the Original returned to the Grants Administration Division for Headquarters awards and to the appropriate Grants Administration Office for State and local awards within 3 calendar weeks after receipt or within any extension of time as may be granted by EPA.
 Receipt of a written refusal or failure to return the properly executed document within the prescribed time, may result in the withdrawal of the offer by the Agency. Any change to the Agreement by the recipient subsequent to the document being signed by the EPA Award Official, which the Award Official determines to materially alter the Agreement, shall void the Agreement.

OFFER AND ACCEPTANCE

The United States of America, acting by and through the U.S. Environmental Protection Agency (EPA), hereby offers assistance/amendment to the WISCONSIN DNR ^{SEE PART II} for % of all approved costs incurred up to and not exceeding \$ 1,454,277 for the support of approved budget period effort described in application (including all application modifications) cited in Item 22 of this Agreement
ASSISTANCE AMOUNT
SUPERFUND PROGRAM, included herein by reference.
DATE AND TITLE

ISSUING OFFICE (Grants Administration Office)

ORGANIZATION / ADDRESS
 ACQUISITION-ASSISTANCE BRANCH
 US EPA, REGION 5, MC-10J
 77 W JACKSON BLVD
 CHICAGO, IL 60604-3590

AWARD APPROVAL OFFICE

ORGANIZATION / ADDRESS
 SUPERFUND DIVISION
 REGION 5, S-5J
 77 W JACKSON BLVD
 CHICAGO, IL 60604-3590

THE UNITED STATES OF AMERICA BY THE U.S ENVIRONMENTAL PROTECTION AGENCY

SIGNATURE OF AWARD OFFICIAL <i>William E. Munro</i>	TYPED NAME AND TITLE WILLIAM E. MUNO, DIRECTOR SUPERFUND DIVISION, REGION 5	DATE 9/30/96
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This agreement is subject to applicable U.S. Environmental Protection Agency statutory provisions and assistance regulations. In accepting this award or amendment and any payments made pursuant thereto, (1) the undersigned represents that he is duly authorized to act on behalf of the recipient organization, and (2) the recipient agrees (a) that the award is subject to the applicable provisions of 40 CFR Chapter I, Subchapter B and of the provisions of this agreement (Parts I thru IV), and (b) that acceptance of any payments constitutes an agreement by the payee that the amounts, if any found by EPA to have been overpaid will be refunded or credited in full to EPA.

BY AND ON BEHALF OF THE DESIGNATED RECIPIENT ORGANIZATION

SIGNATURE <i>George E. Meyer</i>	TYPED NAME AND TITLE	DATE 10/15/96
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George E. Meyer
Secretary

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

101 South Webster Street
Box 7921
Madison, Wisconsin 53707
TELEPHONE 608-266-2621
SOLID WASTE TELEFAX 608-267-2768
TDD 608-267-6897

August 4, 1993

File Ref: WID-560010118
Brown Co.
SW/SFND

Ms. Sue Coll
Wisconsin Project Officer
U.S. EPA, Region V, HSM9J
77 West Jackson Street
Chicago, IL 60604

Subject: Better Brite, C.A. No. V995102-01
Quarterly Report, April - June, 1993

Dear Ms. Coll:

Please find enclosed for your review, a summary of the 3rd quarter, fiscal year 1993 state activities conducted under the Better Brite Cooperative Agreement.

If there are any questions, please contact Mr. James McLimans at (608) 266-0830.

Sincerely,

for Paul P. Didier, P.E., Director
Bureau of Solid and Hazardous Waste Management

PPD/JMM/jm

cc: Mark Giesfeldt - SW/3
Doug Rossberg - LMD-SW
Gary Edelstein - SW/3

Jane Lemcke - SW/3
Terry Koehn - LMD-SW

SUPERFUND COOPERATIVE AGREEMENT
QUARTERLY PROGRESS REPORT
STATE LEAD SITE

Assistance ID number: V995102-01
Site name: Better Brite
Activity: RI/FS & RA
Reporting period: FY93, 3rd Quarter

WORK ACCOMPLISHED DURING REPORTING PERIOD FOR THIS SITE AND
ACTIVITIES:

1. EPA work on the SACM Like Remedial Action at both of the Better Brite sites was basically completed in late June, 1993. Soils were excavated from areas selected by EPA and disposed of. The collection systems were installed. Clay caps were placed over the collection systems and seeded (no topsoil was placed over the caps).
2. Confirmatory surface soil samples were collected in early May, 1993 by EPA from both the Zinc and the Chrome Shops and forwarded to the CLP for analysis. Analytical results have not been received to date. Screening samples were not collected at the Zinc Shop site as originally planned.
3. Recommendations regarding abandonment of existing monitoring wells at the Better Brite sites were provided to EPA by letter dated February 15, 1993. EPA elected to excavate around the wells rather than abandon them. The impacts to the surface seals etc. makes their future use as sampling points questionable.
4. An initial proposal for the second phase of the RI/FS was prepared by Simon-Hydro Search (HSI) and forwarded to the WDNR in February, 1993. Following this EPA advised WDNR that a major reduction in scope was required to meet budgetary limitations. EPA provided their suggestions to reduce the scope of the RI/FS to the WDNR by letter received on April 20, 1993. The WDNR was not in full agreement with a number of the suggestions made by EPA as outlined in a letter to EPA dated May 27, 1993. However, with the understanding that much of the proposed work would be performed later in the project, WDNR accepted many of the reductions. Negotiations proceeded with HSI to limit the scope and cost of the project. A meeting between the WDNR and HSI was held in this regard in Milwaukee on May 3, 1993.

5. A second proposal was prepared by HSI and submitted to the WDNR on May 18, 1993. This proposal included substantial reductions in scope resulting in a cost reduction of approximately \$265,000. The scope of the RI/FS was basically reduced to only address groundwater conditions. To keep the cost of the RI/FS down, a significant amount of work has been postponed to the RD stage. A third proposal was then provided by HSI on July 8, 1993 to address several requested modifications. It is anticipated that this proposal will be accepted with several possible changes.
6. D. Yeskis (EPA) contacted the WDNR regarding the installation of a boring in the general area of the Better Brite sites as part of a study of the Galena/Platteville aquifer. Comments on EPA's scope of work for this study were provided. The WDNR anticipates assisting EPA in this study when possible. Results from the study may prove useful in evaluating groundwater conditions at the Better Brite sites. The borehole is planned to be drilled outside the limits of site contamination.
7. Interim Action activities other than continued operation of the pretreatment plant, remain on hold. A preliminary cost estimate was prepared in anticipation of significantly increased operating costs for the pretreatment plant. The increased costs being due to increased volumes of water to be treated because of the recent collection system modifications.
8. The City of DePere continued to operate the pretreatment plant at the Chrome Shop, handling water from both the Chrome Shop and the Zinc Shop. A total of 538,900 gallons of water were treated during the quarter. 111,200 gallons of water were transferred from the Zinc Shop for treatment. Arrangements were made with the City of DePere to operate the pretreatment plant over several weekends to address the increased volume of water which resulted from the spring weather and EPA's excavation work.
9. Two transfer of filter cake from the pretreatment plant were completed on May 6, 1993 (20 drums) and June 4, 1993 (17 drums). Stabilization and disposal is to be performed by the Controlled Waste facility in Menomonee Falls, WI.

PROBLEMS AND DELAYS ENCOUNTERED THIS PERIOD:

The initiation of the SACM Like Action caused the postponement of the RI/FS to assess effects on the project plans. Current negotiations to limit the scope and cost of the RI/FS at EPA's request are in progress.

CORRECTIVE MEASURES TAKEN OR PLANNED:

Continuing to work with HSI to develop a new scope of work and schedule which will take into account the SACM Like action and EPA's request to limit the scope of the project.

ESTIMATED COST FOR CURRENT TASKS UNDERWAY OR JUST COMPLETED IN THIS REPORTING PERIOD:

RI/FS Activity

1. A contract for Phase 2 of the RI/FS project with HSI is being negotiated. HSI submitted their final invoice under the contract for Phase 1 activities on February 1, 1993.
2. State costs incurred: \$2670

RA Activity

1. City of De Pere costs incurred: \$22,026.13
2. State costs incurred : \$1770

ESTIMATED TIME AND FUNDS NEEDED TO COMPLETE REQUIRED WORK:

A reasonable estimate of the time or funds is currently not available. It is currently anticipated, based on HSI's latest proposal that the contractual costs for the reduced scope RI/FS will be \$633,000. A CA Amendment will be prepared and submitted.

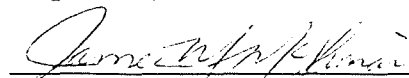
ACTUAL TIME AND FUNDS REMAINING:

- 1 Month and \$555,000

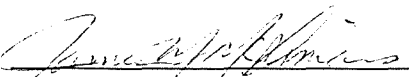
EXPLANATION OF ANY SIGNIFICANT DISCREPANCY/RATIONALE FOR ANY PLANNED FUNDING INCREASE REQUEST OR TIME EXTENSION REQUEST:

We have submitting a time extension request and a request for an increase of funding based on current EPA activities at the site and the latest proposal from Simon Hydro-Search.

Prepared by

 Date 8-4-93
Terry Koehn - Project Manager

Approved by

 Date 8-4-93
James McLimans - Coordinator

PROJECT SCHEDULE

Tasks/Deliverables	Original CA Approved Sched.	CA Approved Amended Schedule	Actual Completion Date
Data Summary (DNR)	1/1/91		6/17/91
Contractor Procurement	2/1/91		7/29/91
Preparation of Project Plans	8/1/91		4/15/92(draft)
Field Investigations	5/1/92		
Sample Analysis and Validation	7/1/92		
Data Evaluation	7/1/92		
Risk Assessment	7/1/92		
Treatability Study	to be determined		
Remedial Investigation Report	9/1/92		
Remedial Alternatives Development and Screening	11/1/92		
Detailed Analysis of Alternatives	1/1/93		
Feasibility Study Report	3/1/93		
Conceptual Design	6/1/93		

PERCENTAGE OF ACTIVITY SCHEDULED TO BE COMPLETED: 80%

PERCENTAGE OF ACTIVITY ACTUALLY COMPLETED: 20%

EXPLANATION OF SIGNIFICANT DIFFERENCE:

Delays associated with negotiations and the SACM like action remain.



George E. Meyer
Secretary

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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TDD 608-267-6897

JUL 28 1993

Mr. Valdas V. Adamkus, Regional Administrator
U.S. Environmental Protection Agency - Region V
77 West Jackson Blvd.
Chicago, IL 60604

Subject: Better Brite RI/FS Amendment Application
Cooperative Agreement No. V995102-01

Dear Mr. Adamkus:

We are sending this letter to request an amendment to our Better Brite Remedial Investigation/Feasibility Study cooperative agreement.

Specifically, we are requesting a project and budget period extension through December, 1994 and \$124,606 of additional funds. These changes are necessary in order to complete the RI/FS. We have enclosed justification for the requested changes as well as a completed Application for Federal Assistance to support this request.

Comments received from EPA Region V, on a draft application submitted earlier, have been incorporated in this final application.

If there are any questions, please contact James McLimans at (608) 266-0830.

Sincerely,

George E. Meyer
Secretary

Enclosure

cc: T. Burns - FN/1
T. Koehn - LMH/SW

M. Giesfeldt/J. Lemcke - SW/3
Sue Coll - EPA Region V

APPLICATION FOR FEDERAL ASSISTANCE

OMB Approval No. 0348-0043

1. TYPE OF SUBMISSION: <i>Application</i> <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Non-Construction	<i>Preapplication</i> <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction	2. DATE SUBMITTED	Applicant Identifier
		3. DATE RECEIVED BY STATE	State Application Identifier
		4. DATE RECEIVED BY FEDERAL AGENCY	Federal Identifier

5. APPLICANT INFORMATION

Legal Name Wisconsin Department of Natural Resources	Organizational Unit Bureau of Solid & Hazardous Waste Management
Address (give city, county, state, and zip code): P.O. Box 7921 Madison, WI 53707 Dane County	Name and telephone number of the person to be contacted on matters involving this application: (give area code) Paul P. Didier (608) 266-1327

6. EMPLOYER IDENTIFICATION NUMBER (EIN): <table border="1"><tr><td>3</td><td>9</td><td>—</td><td>6</td><td>0</td><td>0</td><td>6</td><td>4</td><td>3</td><td>6</td></tr></table>	3	9	—	6	0	0	6	4	3	6	7. TYPE OF APPLICANT: (enter appropriate letter in box) <input checked="" type="checkbox"/> A
3	9	—	6	0	0	6	4	3	6		

8. TYPE OF APPLICATION: <input type="checkbox"/> New <input type="checkbox"/> Continuation <input checked="" type="checkbox"/> Revision If Revision, enter appropriate letter(s) in box(es): <input checked="" type="checkbox"/> A <input type="checkbox"/> C A. Increase Award B. Decrease Award C. Increase Duration D. Decrease Duration Other (specify): _____	H. Independent School Dist. I. State Controlled Institution of Higher Learning J. Private University K. Indian Tribe L. Individual M. Profit Organization N. Other (Specify) _____
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9. NAME OF FEDERAL AGENCY: U.S. EPA, Region V
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10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: 6 6 — 8 0 2 TITLE: Superfund	11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT: Superfund - Better Brite RI/FS
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12. AREAS AFFECTED BY PROJECT (cities, counties, states, etc.): City of DePere, Brown County

13. PROPOSED PROJECT	14. CONGRESSIONAL DISTRICTS OF	
Start Date: 10/1/90	Ending Date: 12/31/94	a. Applicant: Second
		b. Project: Eighth

15. ESTIMATED FUNDING	16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS? a. YES. THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON DATE <u>9/6/90</u> b. NO. <input type="checkbox"/> PROGRAM IS NOT COVERED BY E.O. 12372 <input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW
a. Federal: \$124,606	
b. Applicant:	
c. State:	
d. Local:	
e. Other:	
f. Program Income:	17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT? <input type="checkbox"/> Yes If "Yes," attach an explanation. <input checked="" type="checkbox"/> No
g. TOTAL: \$124,606	

18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.

a. Typed Name of Authorized Representative George E. Meyer	b. Title Secretary	c. Telephone Number (608) 266-2121
d. Signature of Authorized Representative 	e. Date Signed 9/25/93	

INSTRUCTIONS FOR THE SF 424

This is a standard form used by applicants as a required facesheet for preapplications and applications submitted for Federal assistance. It will be used by Federal agencies to obtain applicant certification that States which have established a review and comment procedure in response to Executive Order 12372 and have selected the program to be included in their process, have been given an opportunity to review the applicant's submission.

- | Item: | Entry: | Item: | Entry: |
|-------|--|-------|--|
| 1. | Self-explanatory. | 12. | List only the largest political entities affected (e.g., State, counties, cities). |
| 2. | Date application submitted to Federal agency (or State if applicable) & applicant's control number (if applicable). | 13. | Self-explanatory. |
| 3. | State use only (if applicable). | 14. | List the applicant's Congressional District and any District(s) affected by the program or project. |
| 4. | If this application is to continue or revise an existing award, enter present Federal identifier number. If for a new project, leave blank. | 15. | Amount requested or to be contributed during the first funding/budget period by each contributor. Value of in-kind contributions should be included on appropriate lines as applicable. If the action will result in a dollar change to an existing award, indicate <i>only</i> the amount of the change. For decreases, enclose the amounts in parentheses. If both basic and supplemental amounts are included, show breakdown on an attached sheet. For multiple program funding, use totals and show breakdown using same categories as item 15. |
| 5. | Legal name of applicant, name of primary organizational unit which will undertake the assistance activity, complete address of the applicant, and name and telephone number of the person to contact on matters related to this application. | 16. | Applicants should contact the State Single Point of Contact (SPOC) for Federal Executive Order 12372 to determine whether the application is subject to the State intergovernmental review process. |
| 6. | Enter Employer Identification Number (EIN) as assigned by the Internal Revenue Service. | 17. | This question applies to the applicant organization, not the person who signs as the authorized representative. Categories of debt include delinquent audit disallowances, loans and taxes. |
| 7. | Enter the appropriate letter in the space provided. | 18. | To be signed by the authorized representative of the applicant. A copy of the governing body's authorization for you to sign this application as official representative must be on file in the applicant's office. (Certain Federal agencies may require that this authorization be submitted as part of the application.) |
| 8. | Check appropriate box and enter appropriate letter(s) in the space(s) provided:

— "New" means a new assistance award.

— "Continuation" means an extension for an additional funding/budget period for a project with a projected completion date.

— "Revision" means any change in the Federal Government's financial obligation or contingent liability from an existing obligation. | | |
| 9. | Name of Federal agency from which assistance is being requested with this application. | | |
| 10. | Use the Catalog of Federal Domestic Assistance number and title of the program under which assistance is requested. | | |
| 11. | Enter a brief descriptive title of the project. If more than one program is involved, you should append an explanation on a separate sheet. If appropriate (e.g., construction or real property projects), attach a map showing project location. For preapplications, use a separate sheet to provide a summary description of this project. | | |

BUDGET INFORMATION—Non-Construction Programs

SECTION A—BUDGET SUMMARY

Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. RI/FS	66.802	\$	\$	\$124,606	\$0	\$915,588
2.						0
3.						0
4.						0
5. TOTALS		\$0	\$0	\$124,606	\$0	\$915,588

SECTION B—BUDGET CATEGORIES

6. Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY				Total (5)
	(1) RI/FS	(2)	(3)	(4)	
a. Personnel	\$26,821	\$	\$	\$	\$26,821
b. Fringe Benefits	9,280				9,280
c. Travel	0				0
d. Equipment	0				0
e. Supplies	600				600
f. Contractual	79,675				79,675
g. Construction	0				0
h. Other	750				750
i. Total Direct Charges (sum of 6a-6h)	117,126	0	0	0	117,126
j. Indirect Charges	7,480				7,480
k. TOTALS (sum of 6i and 6j)	\$124,606	\$0	\$0	\$0	\$124,606
7. Program Income	\$0	\$	\$	\$	\$0

SECTION C—NON-FEDERAL RESOURCES

(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e) TOTALS
8. RI/FS	\$0	\$0	\$0	\$0
9.				0
10.				0
11.				0
12. TOTALS (sum of lines 8 - 11)	\$0	\$0	\$0	\$0

SECTION D—FORECASTED CASH NEEDS

	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal	\$80,000	\$20,000	\$20,000	\$20,000	\$20,000
14. Non-Federal	0	0	0	0	0
15. TOTAL (sum of lines 13 and 14)	\$80,000	\$20,000	\$20,000	\$20,000	\$20,000

SECTION E—BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT

(a) Grant Program	FUTURE FUNDING PERIODS (Years)			
	(b) First	(c) Second	(d) Third	(e) Fourth
16. RI/FS	\$44,606	\$	\$	\$
17.				
18.				
19.				
20. TOTALS (sum of lines 16 - 19)	\$44,606	\$0	\$0	\$0

SECTION F—OTHER BUDGET INFORMATION
(Attach additional Sheets if Necessary)

21. Direct Charges: See attached budget detail.	22. Indirect Charges: (Salary + Fringe Benefits) x 20.72%
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23. Remarks: The last A-128 audit was completed on 6/26/92 and it covered the 7/1/90 through 6/30/91 period. This report was submitted to the Department cognizant federal agency, the U.S. Department of Interior.

INSTRUCTIONS FOR THE SF-424A

General Instructions

This form is designed so that application can be made for funds from one or more grant programs. In preparing the budget, adhere to any existing Federal grantor agency guidelines which prescribe how and whether budgeted amounts should be separately shown for different functions or activities within the program. For some programs, grantor agencies may require budgets to be separately shown by function or activity. For other programs, grantor agencies may require a breakdown by function or activity. Sections A, B, C, and D should include budget estimates for the whole project except when applying for assistance which requires Federal authorization in annual or other funding period increments. In the latter case, Sections A, B, C, and D should provide the budget for the first budget period (usually a year) and Section E should present the need for Federal assistance in the subsequent budget periods. All applications should contain a breakdown by the object class categories shown in Lines a-k of Section B.

Section A. Budget Summary

Lines 1-4, Columns (a) and (b)

For applications pertaining to a *single* Federal grant program (Federal Domestic Assistance Catalog number) and *not requiring* a functional or activity breakdown, enter on Line 1 under Column (a) the catalog program title and the catalog number in Column (b).

For applications pertaining to a *single* program *requiring* budget amounts by multiple functions or activities, enter the name of each activity or function on each line in Column (a), and enter the catalog number in Column (b). For applications pertaining to multiple programs where none of the programs require a breakdown by function or activity, enter the catalog program title on each line in Column (a) and the respective catalog number on each line in Column (b).

For applications pertaining to *multiple* programs where one or more programs *require* a breakdown by function or activity, prepare a separate sheet for each program requiring the breakdown. Additional sheets should be used when one form does not provide adequate space for all breakdown of data required. However, when more than one sheet is used, the first page should provide the summary totals by programs.

Lines 1-4, Columns (c) through (g)

For new applications, leave Columns (c) and (d) blank. For each line entry in Columns (a) and (b), enter in Columns (e), (f), and (g) the appropriate amounts of funds needed to support the project for the first funding period (usually a year).

Lines 1-4, Columns (c) through (g) (continued)

For continuing grant program applications, submit these forms before the end of each funding period as required by the grantor agency. Enter in Columns (c) and (d) the estimated amounts of funds which will remain unobligated at the end of the grant funding period only if the Federal grantor agency instructions provide for this. Otherwise, leave these columns blank. Enter in Columns (e) and (f) the amounts of funds needed for the upcoming period. The amount(s) in Column (g) should be the sum of amounts in Columns (e) and (f).

For supplemental grants and changes to existing grants, do not use Columns (c) and (d). Enter in Column (e) the amount of the increase or decrease of Federal funds and enter in Column (f) the amount of the increase or decrease of non-Federal funds. In Column (g) enter the new total budgeted amount (Federal and non-Federal) which includes the total previous authorized budgeted amounts plus or minus, as appropriate, the amounts shown in Columns (e) and (f). The amount(s) in Column (g) should not equal the sum of amounts in Columns (e) and (f).

Line 5 — Show the totals for all columns used.

Section B. Budget Categories

In the column headings (1) through (4), enter the titles of the same programs, functions, and activities shown on Lines 1-4, Column (a), Section A. When additional sheets are prepared for Section A, provide similar column headings on each sheet. For each program, function or activity, fill in the total requirements for funds (both Federal and non-Federal) by object class categories.

Lines 6a-i — Show the totals of Lines 6a to 6h in each column.

Line 6j — Show the amount of indirect cost.

Line 6k — Enter the total of amounts on Lines 6i and 6j. For all applications for new grants and continuation grants the total amount in Column (5), Line 6k, should be the same as the total amount shown in Section A, Column (g), Line 5. For supplemental grants and changes to grants, the total amount of the increase or decrease as shown in Columns (1)-(4), Line 6k should be the same as the sum of the amounts in Section A, Columns (e) and (f) on Line 5.

INSTRUCTIONS FOR THE SF-424A (continued)

Line 7 — Enter the estimated amount of income, if any, expected to be generated from this project. Do not add or subtract this amount from the total project amount. Show under the program narrative statement the nature and source of income. The estimated amount of program income may be considered by the federal grantor agency in determining the total amount of the grant.

Section C. Non-Federal-Resources

Lines 8-11 — Enter amounts of non-Federal resources that will be used on the grant. If in-kind contributions are included, provide a brief explanation on a separate sheet.

Column (a) — Enter the program titles identical to Column (a), Section A. A breakdown by function or activity is not necessary.

Column (b) — Enter the contribution to be made by the applicant.

Column (c) — Enter the amount of the State's cash and in-kind contribution if the applicant is not a State or State agency. Applicants which are a State or State agencies should leave this column blank.

Column (d) — Enter the amount of cash and in-kind contributions to be made from all other sources.

Column (e) — Enter totals of Columns (b), (c), and (d).

Line 12 — Enter the total for each of Columns (b)-(e). The amount in Column (e) should be equal to the amount on Line 5, Column (f), Section A.

Section D. Forecasted Cash Needs

Line 13 — Enter the amount of cash needed by quarter from the grantor agency during the first year.

Line 14 — Enter the amount of cash from all other sources needed by quarter during the first year.

Line 15 — Enter the totals of amounts on Lines 13 and 14.

Section E. Budget Estimates of Federal Funds Needed for Balance of the Project

Lines 16 - 19 — Enter in Column (a) the same grant program titles shown in Column (a), Section A. A breakdown by function or activity is not necessary. For new applications and continuation grant applications, enter in the proper columns amounts of Federal funds which will be needed to complete the program or project over the succeeding funding periods (usually in years). This section need not be completed for revisions (amendments, changes, or supplements) to funds for the current year of existing grants.

If more than four lines are needed to list the program titles, submit additional schedules as necessary.

Line 20 — Enter the total for each of the Columns (b)-(e). When additional schedules are prepared for this Section, annotate accordingly and show the overall totals on this line.

Section F. Other Budget Information

Line 21 — Use this space to explain amounts for individual direct object-class cost categories that may appear to be out of the ordinary or to explain the details as required by the Federal grantor agency.

Line 22 — Enter the type of indirect rate (provisional, predetermined, final or fixed) that will be in effect during the funding period, the estimated amount of the base to which the rate is applied, and the total indirect expense.

Line 23 — Provide any other explanations or comments deemed necessary.

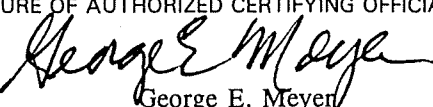
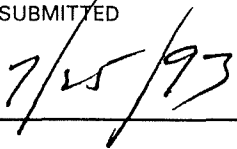
ASSURANCES — NON-CONSTRUCTION PROGRAMS

Note: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States, and if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§ 4728-4763) relating to prescribed standards for merit systems for programs funded under one of the nineteen statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§ 1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§ 6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§ 523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. 290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. § 3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply with the provisions of the Hatch Act (5 U.S.C. §§ 1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§ 276a-7), the Copeland Act (40 U.S.C. § 276c and 18 U.S.C. §§ 874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§ 327-333), regarding labor standards for federally assisted construction subagreements.

10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§ 1451 et seq.); (f) conformity of Federal actions to State (Clear Air) Implementation Plans under Section 176(c) of the Clear Air Act of 1955, as amended (42 U.S.C. § 7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended, (P.L. 93-523); and (h) protection of endangered species under the Endangered Species Act of 1973, as amended, (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§ 1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. 469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. 2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§ 4801 et seq.) which prohibits the use of lead based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act of 1984.
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL  George E. Meyer	TITLE Secretary
APPLICANT ORGANIZATION Wisconsin Department of Natural Resources	DATE SUBMITTED 

BETTER BRITE RI/FS AMENDMENT - COST DETAIL

PERSONNEL

<u>Approximate FTE</u>	<u>Class & Level</u>	<u>Salary</u>	<u>Cost</u>
0.75	Hydrogeologist Senior	\$35,761	\$26,821

FRINGE BENEFITS

Based on a rate of 34.6% of salary.

$$\$26,821 \quad X \quad 34.6\% = \quad \$9,280$$

TRAVEL

None \$0

SUPPLIES

Basic Supplies \$800/FTE x .75 FTE \$600

OTHER

Communications \$1,000/FTE X .75 FTE \$750

CONTRACTUAL

\$79,675

INDIRECT

Based on a rate of 20.72% of salary and fringe benefits

$$\$36,101 \quad X \quad 20.72\% = \quad \$7,480$$

GRAND TOTAL \$124,606

JUSTIFICATION FOR INCREASE

Additional resources are necessary to complete the Better Brite RI/FS for the following reasons:

1. This RI/FS involves two separate sites; the Better Brite Chrome Shop and the Better Brite Zinc Shop. These two sites were combined as one site for the Remedial Investigation/Feasibility Study because of their close proximity, related background and joint nomination to the National Priorities List. However, because there are two sites located approximately 3/4 of a mile apart, sampling, mapping, Quality Assurance Project Plan preparation, etc. will all involve more effort than typically required at a single site.
2. Both sites' physical settings present special problems that will make the RI/FS more difficult and expensive. The Chrome shop site is located in a residential neighborhood while the Zinc shop is located in a mixed residential light industrial neighborhood. This urban setting will require special measures to ensure contaminated media is controlled and contact with local residents is avoided. Also, most adjacent properties have buildings that must be worked around when sampling.
3. The RI/FS project was delayed several months due to EPA's implementation of a SACM like Remedial action at the site.

4. As we obtain more experience with state-lead fund financed Remedial Investigation/Feasibility Studies we have found that they are more difficult and expensive than we originally envisioned or budgeted for.

Our current budget includes \$690,000 for contractual activities. Of this we have already spent \$134,675 for completion of the RI/FS Work Plan and related documents leaving a balance of \$555,325. With the additional \$79,675 we are now requesting we will have \$635,000 for completion of the RI/FS. This is a significant amount for an RI/FS, however, we feel this amount is not unreasonable when compared to similar work conducted under the stringent Superfund requirements.

In addition to our increased contractual costs, we now estimate that our project manager will have to spend an additional 1500 hours above our original budget estimate, over the life of this project. Therefore, we are also requesting an increase of \$26,821 of personnel costs, \$9,280 of fringe benefit costs, \$600 of supplies costs, \$750 of other costs, and \$7,480 of indirect costs. The total increase we are requesting as a part of this amendment is \$124,606.

5-5-93



George E. Meyer
Secretary

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

101 South Webster Street
Box 7921
Madison, Wisconsin 53707
TELEPHONE 608-266-2621
SOLID WASTE TELEFAX 608-267-2768
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RECEIVED

MAY 04 1993

April 29, 1993

LMD SOLID WASTE

File Ref: WID-560010118
Brown Co.
SW/SFND

Ms. Sue Coll
Wisconsin Project Officer
U.S. EPA, Region V, HSM9J
77 West Jackson Street
Chicago, IL 60604

Subject: Better Brite, C.A. No. V995102-01
Quarterly Report, January - March, 1993

Dear Ms. Coll:

Please find enclosed for your review, a summary of the 2nd quarter, fiscal year 1993 state activities conducted under the Better Brite Cooperative Agreement.

We will be addressing the questions/concerns raised in your March 30, 1993 in a separate letter, to be sent in the near future.

If there are any questions, please contact Mr. James McLimans at (608) 266-0830.

Sincerely,

Paul P. Didier, P.E., Director
Bureau of Solid and Hazardous Waste Management

PPD/JMM/jm

cc: Mark Giesfeldt - SW/3
Doug Rossberg - LMD-SW
Gary Edelstein - SW/3

Jane Lemcke - SW/3
Terry Koehn - LMD-SW



SUPERFUND COOPERATIVE AGREEMENT
QUARTERLY PROGRESS REPORT
STATE LEAD SITE

Assistance ID number: V995102-01
Site name: Better Brite
Activity: RI/FS & RA
Reporting period: FY93, 2nd Quarter

WORK ACCOMPLISHED DURING REPORTING PERIOD FOR THIS SITE AND ACTIVITIES:

1. EPA EERB work on the SACM Like Remedial Action at the Zinc Shop is near completion. Soils have been excavated from the area selected by EPA and disposed of. A geomembrane liner was placed on the bottom of the excavation and collection pipes etc. installed. The excavation was then backfilled with pea gravel, followed by washed stone and covered with soil stockpiled from the excavation. A final cap remains to be installed.
2. Samples were collected by EPA from the bottom of the Zinc Shop excavation prior to its backfilling and sent for analysis using the CLP. The results of the analysis were received in March, 1993.
3. EPA EERB efforts have transferred to the Chrome Shop. Soil borings were completed to identify zones of significant contamination. The boring information is being used to select the area to be excavated. Excavation has begun, with soil disposal handled in the same manner as at the Zinc Shop.
4. Difficulties continued in arranging for treatment of excavated soils at the Controlled Waste facility in Menomonee Falls, WI. A significant portion of the contaminated soil is being shipped out of State for treatment and disposal.
5. Analytical results from the screening surface soil samples collected by EPA and their TAT personnel, in the vicinity of the Chrome Shop, were received from the EPA. The screening sample results indicate significant surface soil contamination in the area of the site proper and extending into the residential backyards.
6. Installation of two groundwater monitoring wells was performed in January, 1993, through EPA EERB,. As planned they were located between the Zinc Shop and De Pere's Grant Street municipal well. Samples of groundwater were collected in March, 1993. Analytical results from these samples indicated elevated chromium concentrations in the groundwater at the bedrock interface.

7. Two samples of water were collected from the City of De Pere's Grant St. municipal well during the past several months. EPA EERB collected a sample on November 20, 1992, the results of which were obtained by the WDNR in this quarter. The City of De Pere collected a second sample on February 2, 1993. For the parameters addressed, neither of the samples indicated the presence of contaminants related to the Better Brite sites.
8. Recommendations regarding abandonment of existing monitoring wells at the Better Brite sites were provided to EPA EERB by letter dated February 15, 1993, to facilitate their continuing work at the sites
9. A public meeting was held in De Pere on February 16, 1993 to present a review of past activities at the Zinc Shop and planned actions at the Chrome Shop.
10. An initial proposal for the second phase of the RI/FS was prepared by Simon-Hydro Search (HSI) and forwarded to the WDNR on February 24, 1993. This proposal attempted to account for the actions undertaken or in process at the sites. A meeting was held at HSI's office in Milwaukee, WI on March 31, 1993 to discuss the proposal. Representatives of HSI, WDNR and EPA were in attendance. At this time EPA notified WDNR that a major reduction in scope was required to meet budgetary limitations. EPA agreed to forward their recommendations for meeting their budgetary goals to the WDNR in writing. Negotiations with HSI are in progress to limit the scope of the project to a minimum which will produce an acceptable RI/FS.
11. Interim Action activities other than continued operation of the pretreatment plant, remain on hold. It is the WDNR's current understanding that recontouring of the residential backyards, adjacent to the Chrome Shop, is not going to be undertaken as part of the Interim Action.
12. The City of DePere continued to operate the pretreatment plant at the Chrome Shop throughout the quarter, handling water from both the Chrome Shop and the Zinc Shop. A total of 94,275 gallons of water were treated at the Chrome Shop during the quarter. 20,000 gallons of water were transferred from the Zinc Shop for treatment during the quarter.
13. A transfer of filter cake (11 drums) from the pretreatment plant was completed on February 17, 1993. Stabilization and disposal is to be performed at the Controlled Waste facility in Menomonee Falls, WI.
14. D. Linnear has returned to the position of EPA RPM for the project.

PROBLEMS AND DELAYS ENCOUNTERED THIS PERIOD:

The initiation of the SACM Like Action caused the postponement of the RI/FS to assess effects on the project plans. EPA's current request to limit the RI/FS is being considered in negotiations for the second phase contract.

CORRECTIVE MEASURES TAKEN OR PLANNED:

Continuing to work with HSI to develop a new scope of work and schedule which will take into account the SACM Like action and EPA's request to limit the scope of the project.

PROJECT SCHEDULE

Tasks/Deliverables	Original CA Approved Sched.	CA Approved Amended Schedule	Actual Completion Date
Data Summary (DNR)	1/1/91		6/17/91
Contractor Procurement	2/1/91		7/29/91
Preparation of Project Plans	8/1/91		4/15/92(draft)
Field Investigations	5/1/92		
Sample Analysis and Validation	7/1/92		
Data Evaluation	7/1/92		
Risk Assessment	7/1/92		
Treatability Study	to be determined		
Remedial Investigation Report	9/1/92		
Remedial Alternatives Development and Screening	11/1/92		
Detailed Analysis of Alternatives	1/1/93		
Feasibility Study Report	3/1/93		
Conceptual Design	6/1/93		

PERCENTAGE OF ACTIVITY SCHEDULED TO BE COMPLETED: 80%

PERCENTAGE OF ACTIVITY ACTUALLY COMPLETED: 20%

EXPLANATION OF SIGNIFICANT DIFFERENCE:

Delays associated with the SACM like action remain.

ESTIMATED COST FOR CURRENT TASKS UNDERWAY OR JUST COMPLETED IN THIS REPORTING PERIOD:

RI/FS Activity

1. See attached Monthly Reports from HSI for expenditures by task. A contract for Phase 2 of the RI/FS project with HSI is being negotiated. HSI submitted their final invoice under the contract for Phase 1 activities on February 1, 1993.
2. State costs incurred: \$3,500

RA Activity

1. City of DePere costs incurred: \$8,804
2. State costs incurred: \$2,000

ESTIMATED TIME AND FUNDS NEEDED TO COMPLETE REQUIRED WORK:

A reasonable estimate of the time or funds is currently not available.

ACTUAL TIME AND FUNDS REMAINING:

- 4 Months and \$555,000

EXPLANATION OF ANY SIGNIFICANT DISCREPANCY/RATIONALE FOR ANY PLANNED FUNDING INCREASE REQUEST OR TIME EXTENSION REQUEST:

We will be submitting a revised schedule and requesting a time extension after we receive a revised proposal from our contractor. These will be based on current EPA activities at the site.

Prepared by

for Terry Kocher

[Signature] Date 4-29-93
(Project Manager)

Approved by

[Signature] Date 4-29-93

Attachment: Contractor's Monthly Reports

T 2-5-93



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

101 South Webster Street
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January 28, 1993

File Ref: WID-560010118
Brown Co.
SW/SFND

Ms. Sue Coll
Wisconsin Project Officer
U.S. EPA, Region V, HSM9J
77 West Jackson Street
Chicago, IL 60604

RECEIVED
FEB 05 1993
LMD SOLID WASTE

Subject: Better Brite, C.A. No. V995102-01
Quarterly Report, October - December, 1993

Sue
Dear Ms. Coll:

Please find enclosed for your review, a summary of the 1st quarter, fiscal year 1993 state activities conducted under the Better Brite Cooperative Agreement.

In preparing this report we have attempted to follow the new report format that you provided to us. Please let us know if you have any suggestions regarding the format or content of this report.

If there are any questions, please contact Mr. James McLimans at (608) 266-0830.

Sincerely,

Paul

Paul P. Didier, P.E., Director
Bureau of Solid and Hazardous Waste Management

PPD/JMM/jm

- cc: Mark Giesfeldt - SW/3
- Jane Lemcke - SW/3
- Doug Rossberg - LMD-SW
- Terry Koehn - LMD-SW
- Gary Edelstein - SW/3



SUPERFUND COOPERATIVE AGREEMENT
QUARTERLY PROGRESS REPORT
STATE LEAD SITE

Assistance ID number: V995102-01
Site name: Better Brite
Activity: RI/FS & RA
Reporting period: FY93, 1st Quarter

WORK ACCOMPLISHED DURING REPORTING PERIOD FOR THIS SITE AND
ACTIVITIES:

- a. EPA EERB began work on the "SACM Like" Remedial Action at the Better Brite Zinc Shop in early September, 1992.
- b. As discussed at the September 3, 1992 meeting held at EPA's office in Chicago, the "SACM Like" action at the Zinc shop has consisted of soil excavation and its offsite treatment and disposal. Construction of a groundwater collection sump is planned upon completion of the soil excavation. Sheetpiling was installed for worker safety around three sides of the excavation.
- c. Excavated soils are disposed of dependant on analytical results from samples collected from each lift of the excavation. Heavily contaminated soils are handled as characteristic hazardous waste. They are sent offsite for treatment (stabilization and solidification) and landfill disposal as nonhazardous waste. Soils moderately impacted are sent to a local landfill for disposal as nonhazardous, special waste. Soils indicating minimal impact are stored onsite for placement in the excavation, above the collection sump.
- d. Difficulties were encountered by EPA EERB in arranging for treatment of excavated soils at the Controlled Waste facility in Menomonee Falls, WI. RCRA (State and Federal) was contacted in an attempt to have the facilities hours of operation extended to increase capacity at the facility to handle the wastes in State. These efforts were not successful for the activities at the Zinc Shop. A significant portion of the contaminated soil was shipped out of State for treatment and disposal.
- e. WDNR conferred with EPA EERB on the design of the groundwater collection sump for the Better Brite Zinc Shop. The design concepts provided should better meet State Solid Waste requirements.
- f. Work at the Chrome Shop is currently anticipated to begin shortly after the installation of the groundwater sump at the Zinc Shop rather than in the spring as originally planned.

- g. Remedial measures for the Chrome Shop were discussed with EPA. WDNR presented the option of utilizing in-situ soil stabilization/solidification as an alternative to excavation and landfilling. EPA has decided on the latter as it provides an opportunity to construct a groundwater collection sump and meets their guidance for using proven technology. A meeting was held between EPA and WDNR in Madison on November 19, 1992 to discuss alternatives and to familiarize WDNR management with current activities.
- h. Screening surface soil sampling was performed by EPA and their TAT personnel in the vicinity of the Chrome Shop during the week of November 16, 1992. The sample locations were identified by WDNR and EPA. They generally correspond to those identified in the project plans (SAP) prepared for the RI.
- i. Installation of two groundwater monitoring wells, through EPA EERB, is planned for January, 1993. The wells are to be located between the Zinc Shop and DePere's Grant Street municipal well. The wells and their locations were included in the RI project plans.
- j. Representatives of HSI were provided an opportunity to examine the Zinc Shop excavation on December 7, 1992. This visit allowed HSI to observe fracturing and general stratigraphy of the soils.
- k. WDNR provided EPA with assistance in obtaining access agreements from residents in the vicinity of the Chrome Shop for anticipated activities.
- l. A presentation was given to the City of DePere Public Works Board regarding recent and planned activities for both Better Brite Shops by the WDNR on December 7, 1992. A public meeting is anticipated for February, 1993 to present the work completed at the Zinc Shop and activities planned for the Chrome Shop.
- m. Interim Action (IA) activities, other than continued operation of the pretreatment plant, appear to have been put on hold until completion of the work associated with the "SACM Like" Action.
- n. Simon-Hydro Search submitted revised project plans to the WDNR and EPA for the performance of the RI/FS on October 13, 1992. These plans were based on the original scope of work and did not address potential modifications related to the "SACM Like" Action.
- o. The City of DePere is continuing to operate the pretreatment plant at the Chrome Shop. Approximately 624,400 gallons of contaminated groundwater have been treated since the City began operating the pretreatment plant in November, 1991. Approximately 187,700 gallons were treated during the October - December, 1992 quarter
- p. Approximately 47,850 gallons of contaminated groundwater have been transferred (16 shipments) from the Zinc Shop to the Chrome Shop for pretreatment during the October - December, 1992 quarter

- q. Transfers of filter cake for stabilization and disposal were performed on October 12 and December 10, 1992. Chemical Waste Management, Inc. was contracted to perform the transport, stabilization (Controlled Waste Div.) and disposal of this material. Several drums of filter cake transferred in July, 1992 were returned to the pretreatment plant due to the presence of free liquids. The liquids were removed and returned for treatment and disposal.
- r. D. Cozza has temporarily held the position of EPA RPM for the quarter. D. Linnear is to return to this position in January, 1993.

PROBLEMS AND DELAYS ENCOUNTERED THIS PERIOD:

The RI/FS project has been stalled due to EPA's implementation of a SACM like Remedial action at the site.

CORRECTIVE MEASURES TAKEN OR PLANNED:

We are currently working with our contractor to develop a new scope of work and schedule which will take into consideration the actions taken under the SACM like action.

PROJECT SCHEDULE

Tasks/Deliverables	Original CA Approved Schd.	CA Approved Amended Schedule	Actual Completion Date
Data Summary (DNR)	1/1/91		6/17/91
Contractor Procurement	2/1/91		7/29/91
Preparation of Project Plans	8/1/91		4/15/92(draft)
Field Investigations	5/1/92		
Sample Analysis and Validation	7/1/92		
Data Evaluation	7/1/92		
Risk Assessment	7/1/92		
Treatability Study	to be determined		
Remedial Investigation Report	9/1/92		
Remedial Alternatives Development and Screening	11/1/92		
Detailed Analysis of Alternatives	1/1/93		
Feasibility Study Report	3/1/93		
Conceptual Design	6/1/93		

PERCENTAGE OF ACTIVITY SCHEDULED TO BE COMPLETED: 80%

PERCENTAGE OF ACTIVITY ACTUALLY COMPLETED: 20%

EXPLANATION OF SIGNIFICANT DIFFERENCE:

Extensive delays were encountered during the period because of the SACM Response at the site.

ESTIMATED COST FOR CURRENT TASKS UNDERWAY OR JUST COMPLETED IN THIS REPORTING PERIOD:

RI/FS Activity

1. See attached Monthly Reports from Simon Hydro Search for expenditures by Task for the RI/FS.
2. State costs incurred: \$5,000

RA Activity

1. City of DePere costs incurred: \$11,624
2. State costs incurred: \$3,500

ESTIMATED TIME AND FUNDS NEEDED TO COMPLETE REQUIRED WORK:

Because of the many changes brought about by the SACM response we currently do not have a good estimate of time or funds needed to complete the required work.

ACTUAL TIME AND FUNDS REMAINING (USE BEST ESTIMATE ON FUNDS):

- 7 Months and \$594,000

EXPLANATION OF ANY SIGNIFICANT DISCREPANCY/RATIONALE FOR ANY PLANNED FUNDING INCREASE REQUEST OR TIME EXTENSION REQUEST:

We will be submitting a revised schedule and requesting a time extension after we receive a new proposal from our contractor. These will be based on current EPA activities at the site.

Prepared by

_____ Date _____
(Project Manager)

Approved by

_____ Date _____

Attachment: Contractor's Monthly Reports

K 11-9-92



Carroll D. Besadny
Secretary

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

101 South Webster Street
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November 3, 1992

File Ref: WID-560010118
Brown Co.
SW/SFND

Ms. Sue Coll
Wisconsin Project Officer
U.S. EPA, Region V, HSM9J
77 West Jackson Street
Chicago, IL 60604

Subject: Better Brite, C.A. No. V995102-01
Quarterly Report, July - September, 1992

Dear Ms. Coll:

Please find enclosed for your review, a summary of the 4th quarter, fiscal year 1992 state activities conducted under the Better Brite Cooperative Agreement.

Included you will find a list of our estimated expenditures, a narrative discussion of our accomplishments and a statement regarding schedule compliance. Please let us know if you have any suggestions regarding the format or content of this report.

If there are any questions, please contact Mr. James McLimans at (608) 266-0830.

Sincerely,

Paul P. Didier by EC

Paul P. Didier, P.E., Director
Bureau of Solid and Hazardous Waste Management

PPD/JMM/jm

- cc: Mark Giesfeldt - SW/3
- Jane Lemcke - SW/3
- Doug Rossberg - LMD-SW
- Terry Koehn - LMD-SW
- Gary Edelstein - SW/3



Printed on Recycled Paper

**QUARTERLY REPORT - BETTER BRITE
JULY THROUGH SEPTEMBER, 1992**

1. Estimated Expenditures:

Remedial Investigation/Feasibility Study

<u>Object Class</u>	<u>Last Quarter</u>	<u>Total to Date</u>
Personnel	\$ 3,000	\$ 38,000
Fringe Benefits	\$ 1,040	\$ 12,100
Travel	\$ 200	\$ 1,800
Equipment	\$ -0-	\$ -0-
Supplies	\$ 100	\$ 1,050
Contractual	\$ 11,431	\$ 116,638
Construction	\$ -0-	\$ -0-
Other	\$ 200	\$ 1,700
Indirect Costs	\$ 840	\$ 13,340
<u>Total</u>	<u>\$ 16,811</u>	<u>\$ 184,628</u>

Remedial Action

<u>Object Class</u>	<u>Last Quarter</u>	<u>Total to Date</u>
Personnel	\$ 2,000	\$ 6,700
Fringe Benefits	\$ 700	\$ 2,260
Travel	\$ 50	\$ 130
Equipment	\$ -0-	\$ -0-
Supplies	\$ 50	\$ 250
Contractual	\$ 10,800	\$ 37,650
Construction	\$ -0-	\$ -0-
Other	\$ 50	\$ 250
Indirect Costs	\$ 560	\$ 2,100
<u>Total</u>	<u>\$ 14,210</u>	<u>\$ 49,350</u>

2. Narrative:

- a. On June 26, 1992 EPA RPM, D. Linnear advised the WDNR of the possibility for conducting a remedial action at the Better Brite Site under the Superfund Accelerated Cleanup Model (SACM). This action was proposed to address soil contamination at the site prior to performing the RI/FS. The WDNR was requested to provide comments on this approach. In general, the WDNR advised the EPA that it was agreeable with this type of action.

- b. A meeting was held in Madison on July 9, 1992 to further discuss the SACM approach at the Better Brite Site and to present it to the WDNR's management. WDNR and EPA representatives were in attendance. At this time it became unclear if the proposed work at the Better Brite Site would be considered a SACM activity, a SACM-Like activity or a Removal Action.
- c. EPA provided a letter, dated August 7, 1992 describing, in general, the activities proposed for the Better Brite Site. The activities were presented as a Removal Action in this letter.
- d. A meeting was held at Simon Hydro Search's (HSI) office in Brookfield, WI, on August 6, 1992 to discuss activities proposed for the Better Brite Site.

Representatives of the WDNR and HSI were in attendance. The activities proposed under the Interim Action and Removal (SACM) Action were presented to HSI and their effects on the RI/FS were discussed. It was decided to continue with the preparation of the project plans, as originally scoped, as it was not appropriate to completely halt progress on the RI/FS and it was not possible to determine the full effects of the other proposed actions.

- e. On September 3, 1992 a meeting was held at EPA's office in Chicago, regarding the Removal (SACM) Action. Representatives of EPA (Remedial, Emergency, ATSDR, and QAS), the State of Wisconsin (WDNR, WDOH) and involved consultants (WW Eng., HSI) were in attendance or connected by telephone. In general, soil excavation and treatment followed by the construction of groundwater sumps was proposed.
- f. By early September EPA's Emergency Response personnel and contractors began work at the Zinc Shop. This work consisted of continued building decontamination and the breaking-up of the building's concrete slab. These activities were in preparation for demolition of the building and subsequent activities related to removal of soil contamination. Work at the Chrome Shop is tentatively scheduled for the spring.
- g. On September 5, 1992 a fire of unknown origin destroyed the Zinc Shop Building.

- h. Following the fire, efforts were made to evaluate the effects of the fire and the fire fighting activities. Wipe samples were collected from several of the homes in the vicinity of the Zinc Shop that were generally positioned downwind of the fire. Analytical results from these samples were not at levels of concern to the WDOH and ATSDR. A runoff sample was also collected on site. Chromium concentration in this water sample was low. E&K Hazardous Waste was contracted by EPA to collect the samples described.
- i. Other efforts following the fire included transfer of standing water from the Zinc Shop to the Chrome Shop for pretreatment, removal of building debris and disposal at Brown County East Landfill as nonhazardous waste (September 30, 1992) and tarping the area where the building's slab was previously broken-up. Several samples of the building debris had been collected and analyzed (TCLP) to determine if the material could be considered nonhazardous. E&K Hazardous Waste was contracted by EPA to transport the material for disposal.
- j. A letter (dated June 18, 1992) was provided to the WDNR from EPA's contractor (WW Engineering & Science) regarding activities proposed as part of the Interim Action at the Better Brite Chrome Shop. The activities proposed included the construction of an extension to the existing groundwater collection trench and recontouring the backyards of several nearby residents. The WDNR provided comments on the proposal by letter dated July 20, 1992. WDNR's consultant for the RI/FS (HSI) additionally prepared a letter commenting on the proposed Interim Action activities (dated July 23, 1992) which was also provided to EPA. Due to the proposed Removal (SACM) Action the performance of the remaining aspects of the Interim Action appear to be currently on hold.
- k. Efforts have been made to inform the residents near the two Better Brite Shops of the proposed activities. Representatives of the City of De Pere were also contacted regarding the plans. A public meeting is planned for the future.
- l. Project plans (Sampling and Analysis Plan, Data Management Plan, Quality Assurance Plan, and Health and Safety Plan) are to be resubmitted to the WDNR and EPA during the month of October, 1992. WDNR and EPA comments are to be addressed in the revised versions.
- m. Finalization of the Workplan, for conducting the second phase of the RI/FS, is currently on hold. A

significant portion of the workplan has been completed.

- n. The City of DePere is continuing to operate the pretreatment plant at the Chrome Shop. Approximately 437,000 gallons of contaminated groundwater have been treated since the City began operating the pretreatment plant in November, 1991. Approximately 102,350 gallons were treated during July, August and September 1992. Effluent quality remains within discharge limits.
- o. Approximately 22,000 gallons of contaminated groundwater from the Zinc Shop have been transferred (5 shipments) to the Chrome Shop for pretreatment during the months of July, August and September, 1991.
- p. The first transfer of filter cake for stabilization and disposal, was performed on July 15, 1992. Chemical Waste Management, Inc. was contracted to perform the transport, stabilization (Controlled Waste Div.) and disposal of this material. Chemical Waste Management has informed the WDNR that several of the drums of filter cake transferred will have to be returned to the pretreatment plant due to the presence of free liquids. The liquids will be removed and retreated. The return of these drums and a pick-up of all remaining drums at the site is tentatively scheduled for October, 1992.
- q. The use of magnesium hydroxide appears to have effectively removed the problem of free liquids in the filter cake. The improved ability to dewater the filter cake using the magnesium hydroxide produces a dryer more compact filter cake.
- r. D. Cozza (EPA) has been temporarily assigned as RPM to the project as D. Linnear has been given a temporary detail in another EPA program.

3. Schedule Compliance: We are currently a number of months behind the schedule outlined in the cooperative agreement. The initiation of the Removal (SACM) Action at the site has caused the postponement of the RI/FS until such time as the effects on the plans of the RI field work can be assessed. A revised schedule will have to be prepared to account for the current actions at the site.

R 8-5-92



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny
Secretary

101 South Webster Street
Box 7921
Madison, Wisconsin 53707
TELEPHONE 608-266-2621
TELEFAX 608-267-3579
TDD 608-267-6897

July 30, 1992

File Ref: WID-560010118
Brown Co.
SW/SFND

Ms. Sue Coll
Wisconsin Project Officer
U.S. E.P.A., Region V, HSM9J
77 West Jackson Street
Chicago, IL 60604

Subject: Better Brite, C.A. No. V995102-01
Quarterly Report, April - June, 1992

Dear Ms. Coll:

Please find enclosed for your review, a summary of the 3rd quarter, fiscal year 1992 state activities conducted under the Better Brite Cooperative Agreement.

Included you will find a list of our estimated expenditures, a narrative discussion of our accomplishments and a statement regarding schedule compliance. Please let us know if you have any suggestions regarding the format or content of this report.

If there are any questions, please contact Mr. James McLimans at (608) 266-0830.

Sincerely,

Paul P. Didier, P.E., Director
Bureau of Solid and Hazardous Waste Management

PPD/JMM/jm

cc: Mark Giesfeldt SW/3
Jane Lemcke SW/3
Doug Rossberg LMD-SW
Terry Koehn LMD-SW



**QUARTERLY REPORT - BETTER BRITE RI/FS
APRIL THROUGH JUNE, 1992**

1. Estimated Expenditures:

Remedial Investigation/Feasibility Study

<u>Object Class</u>	<u>Last Quarter</u>	<u>Total to Date</u>
Personnel	\$ 5,000	\$ 34,600
Fringe Benefits	\$ 1,730	\$ 12,000
Travel	\$ 300	\$ 1,600
Equipment	\$ -0-	\$ -0-
Supplies	\$ 200	\$ 1,100
Contractual	\$ 668	\$ 105,207
Construction	\$ -0-	\$ -0-
Other	\$ 200	\$ 1,500
Indirect Costs	<u>\$ 2,000</u>	<u>\$ 11,400</u>
Total	\$ 10,098	\$ 167,407

Remedial Action

<u>Object Class</u>	<u>Last Quarter</u>	<u>Total to Date</u>
Personnel	\$ 2,000	\$ 5,400
Fringe Benefits	\$ 700	\$ 1,900
Travel	\$ 50	\$ 100
Equipment	\$ -0-	\$ -0-
Supplies	\$ 20	\$ 50
Contractual	\$ 21,596	\$ 29,686
Construction	\$ -0-	\$ -0-
Other	\$ 50	\$ 50
Indirect Costs	<u>\$ 660</u>	<u>\$ 970</u>
Total	\$ 25,076	\$ 38,156

2. Narrative:

- a. Simon Hydro-Search, Inc (HSI) was notified that the Site Evaluation Report (SER) is considered complete and that this task has concluded.
- b. WDNR comments regarding the draft Sampling and Analysis Plan (SAP), Data Management Plan (DMP), Quality Assurance Plan (QAPP), and Health and Safety Plan (HSP) were submitted to HSI on May 29, 1992. EPA's comments, dated June 25, 1992, were forwarded to HSI on June 30, 1992. The above documents were submitted to the WDNR and EPA by April 15, 1992.
- c. Preparation of a Workplan, for conducting the second phase of the RI/FS, remains in progress. Finalization

of the Workplan and the associated Project Plans is currently on hold, pending decisions by EPA and WDNR regarding the implementation of Interim Action activities and the possibility of SACM activities at the site.

- d. Indemnification was obtained for HSI (Letter dated June 18, 1992) from the EPA for completion of the workplan. The approval also states that EPA will indemnify the contractor for the remainder of the RI/FS subject to and contingent upon finalization of the contract for such work.
- e. L. Bowman, of HSI, is no longer involved in the Better Brite Project. J. Fassbender is currently scheduled to act as RI Task Coordinator and Lead Oversight for both the Zinc Shop and the Chrome Shop.
- f. Received Site Analysis report on Better Brite as prepared through EPA's Environmental Monitoring Systems Laboratory in early May, 1992. A review of this report, evaluating historical aerial photographs, was performed to identify any modifications needed in the SAP.
- g. The City of DePere is continuing to operate the pretreatment plant at the Chrome Shop. Approximately 334,000 gallons of contaminated groundwater have been treated since November, 1991.
- h. The pretreatment plant's process has been modified to use magnesium hydroxide rather than sodium hydroxide. This change has providing a safer material to handle, a more controlled reaction and a more readily dewatered sludge. This change, coupled with the installation of the larger capacity filter press feed pump, has significantly reduced the amount of time required for pressing. A denser filter cake appears to be produced which should reduce the volume of material to be disposed of as hazardous waste. This should significantly reduce operating costs for the facility.
- i. Transfers of contaminated groundwater from the Zinc Shop to the Chrome Shop for pretreatment, were completed on April 29 and May 19, 1992.
- j. The first pick up of filter cake for stabilization and disposal, is currently scheduled for the first half of July, 1992. Chemical Waste Management, Inc has been contracted to perform this service.

3. Schedule Compliance: Currently, we are approximately ten months behind the schedule outlined in the cooperative agreement.



Carroll D. Besadny
Secretary

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

101 South Webster Street
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Madison, Wisconsin 53707
TELEPHONE 608-266-2621
TELEFAX 608-267-3579
TDD 608-267-6897

May 5, 1992

File Ref: WID-560010118
Brown Co.
SW/SFND

Ms. Sue Coll
Wisconsin Project Officer
U.S. E.P.A., Region V, HSM9J
77 West Jackson Street
Chicago, IL 60604

Subject: Better Brite, C.A. No. V995102-01
Quarterly Report, January - March, 1992

Dear Ms. Coll:

Please find enclosed for your review, a summary of the 2nd quarter, fiscal year 1992 state activities conducted under the Better Brite Cooperative Agreement.

Included you will find a list of our estimated expenditures, a narrative discussion of our accomplishments and a statement regarding schedule compliance. Please let us know if you have any suggestions regarding the format or content of this report.

If there are any questions, please contact Mr. James McLimans at (608) 266-0830.

Sincerely,

Paul P. Didier, P.E., Director
Bureau of Solid and Hazardous Waste Management

PPD/JMM/jm

cc: Mark Giesfeldt SW/3
Jane Lemcke SW/3
Doug Rossberg LMD-SW
→ Terry Koehn LMD-SW

**QUARTERLY REPORT - BETTER BRITE RI/FS
JANUARY THROUGH MARCH, 1992**

1. Estimated Expenditures:

Remedial Investigation/Feasibility Study

<u>Object Class</u>	<u>Last Quarter</u>	<u>Total to Date</u>
Personnel	\$ 5,000	\$ 28,600
Fringe Benefits	\$ 1,730	\$ 9,900
Travel	\$ 300	\$ 1,200
Equipment	\$ -0-	\$ -0-
Supplies	\$ 200	\$ 1,000
Contractual	\$ 25,884	\$ 61,478
Construction	\$ -0-	\$ -0-
Other	\$ 200	\$ 1,300
Indirect Costs	<u>\$ 2,000</u>	<u>\$ 10,600</u>
Total	\$ 35,314	\$ 114,078

Remedial Action

<u>Object Class</u>	<u>Last Quarter</u>	<u>Total to Date</u>
Personnel	\$ 2,000	\$ 3,500
Fringe Benefits	\$ 700	\$ 1,200
Travel	\$ 100	\$ 100
Equipment	\$ -0-	\$ -0-
Supplies	\$ 50	\$ 50
Contractual	\$ 8,090	\$ 8,090
Construction	\$ -0-	\$ -0-
Other	\$ 50	\$ 50
Indirect Costs	<u>\$ 660</u>	<u>\$ 970</u>
Total	\$ 11,650	\$ 13,960

2. Narrative:

- a. The Site Evaluation Report (SER) has been completed. Final WDNR comments were included in this version.
- b. A draft Sampling and Analysis Plan (SAP), Data Management Plan (DMP), Quality Assurance Plan (QAPP - following EPA's approved version of the model QAPP), and Health and Safety Plan (HSP) have been prepared by Hydro Search, Inc. (HSI) and submitted to the WDNR and EPA for review. WDNR personnel assisted in the development of the draft QAPP in an attempt to minimize costs. Review of these documents is in progress.

- c. Preparation of a WorkPlan, for conducting the second phase of the RI/FS, is in progress.
- d. The topographic map of the Better Brite area has been completed by Aero-Metric Eng., Inc.
- e. A Pre-QAPP meeting was held in Chicago on February 6, 1992. Representatives of the WDNR, HSI and EPA attended. It was determined during this meeting that the WDNR and HSI were provided with a version of the model QAPP that was not approved. This unapproved model QAPP necessitated revisions/modifications to be made on the draft QAPP originally prepared by HSI.
- f. A meeting was held with HSI on February 5, 1992 to discuss the original draft QAPP prior to The February 6 meeting with EPA. An additional meeting was conducted on March 11, 1992 to discuss preparation of the SAP and the Workplan for conducting the RI/FS field work. Representatives of HSI, WDNR and EPA were in attendance.
- g. Indemnification for HSI has been requested from the EPA. Documentation related to HSI's attempts to obtain environmental liability insurance were forwarded to EPA.
- g. Analytical results from samples collected at homes in the vicinity of the Better Brite Shops were received from the State Lab of Hygiene (sump water and wall chip samples). Letters were then sent to the home owners advising them of the results. Results of the analysis of a water sample collected from a private well located within two blocks of the Chrome Shop were also received and the home owner was notified of the results. Contaminants related to Better Brite were not detected in the well water sample.
- h. A detection of chromium was noted in the City of DePere's semi-annual sample of water from the Grant Street municipal well. This detection was at the detection limit of the analytical method used. A confirmation sample was then collected and analyzed for chromium, cyanide, additional metals and a VOC scan. A more sensitive analytical method (graphite furnace) was used in this chromium analysis. Neither chromium, cyanide nor VOC's were detected in the follow-up sample. The results of the other parameters were within acceptable limits.

- i. The City of DePere is continuing to operate the pretreatment plant at the Chrome Shop. Since taking over the operation in November, 1991 the City has treated approximately 196,000 gallons of contaminated groundwater.
- j. Several modifications were made to the pretreatment plant to provide a safer and more efficient operation, including covering the reaction tank. A recent breakdown of the filter press feed pump required replacement of the pump. This was replaced with a larger capacity pump that is providing a significant reduction in the amount of time required for pressing, thus, reducing operation costs.
- k. Arrangements have been completed for disposal of the filter cake produced by the pretreatment process. The waste will be disposed in-state as a solid waste, after stabilization to render it nonhazardous. It was determined that in-state disposal would be preferred to the significantly more expensive out of state disposal at a metals reclaiming facility.
- l. EPA-RCRA has been notified of changes in the Generator Status for the two shops to allow for transport of hazardous waste.

3. Schedule Compliance: Currently, we are approximately eight months behind the schedule outlined in the cooperative agreement.

F 1-7-92



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny
Secretary

101 South Webster Street
Box 7921
Madison, Wisconsin 53707
TELEPHONE 608-266-2621
TELEFAX 608-267-3579
TDD 608-267-6897

February 4, 1992

File Ref: WID-560010118
Brown Co.
SW/SFND

Ms. Sue Coll
Wisconsin Project Officer
U.S. E.P.A., Region V, HSM9J
77 West Jackson Street
Chicago, IL 60604

Subject: Better Brite, C.A. No. V995102-01
Quarterly Report, October - December, 1991

Sue
Dear Ms. Coll:

Please find enclosed for your review, a summary of the 1st quarter, fiscal year 1992 state activities conducted under the Better Brite Cooperative Agreement.

Included you will find a list of our estimated expenditures, a narrative discussion of our accomplishments and a statement regarding schedule compliance. Please let us know if you have any suggestions regarding the format or content of this report.

If there are any questions, please contact Mr. James McLimans at (608) 266-0830.

Sincerely,

Paul

Paul P. Didier, P.E., Director
Bureau of Solid and Hazardous Waste Management

PPD/JMM/jm

- cc: Mark Giesfeldt SW/3
- Doug Ballotti SW/3
- Doug Rossberg LMD-SW
- Terry Koehn LMD-SW

-
QUARTERLY REPORT - BETTER BRITE
OCTOBER THROUGH DECEMBER, 1991

1. Estimated Expenditures:

Remedial Investigation/Feasibility Study

<u>Object Class</u>	<u>Last Quarter</u>	<u>Total to Date</u>
Personnel	\$ 5,000	\$ 20,600
Fringe Benefits	\$ 1,730	\$ 7,550
Travel	\$ 300	\$ 1,200
Equipment	\$ -0-	\$ -0-
Supplies	\$ 200	\$ 900
Contractual	\$ 38,074	\$ 38,074
Construction	\$ -0-	\$ -0-
Other	\$ 200	\$ 900
Indirect Costs	<u>\$ 2,000</u>	<u>\$ 9,400</u>
Total	\$ 47,504	\$ 78,624

Remedial Action

<u>Object Class</u>	<u>Last Quarter</u>	<u>Total to Date</u>
Personnel	\$ 800	\$ 800
Fringe Benefits	\$ 280	\$ 280
Travel	\$ 100	\$ 100
Equipment	\$ -0-	\$ -0-
Supplies	\$ 50	\$ 50
Contractual	\$ -0-	\$ -0-
Construction	\$ -0-	\$ -0-
Other	\$ 50	\$ 50
Indirect Costs	<u>\$ 260</u>	<u>\$ 260</u>
Total	\$ 1,540	\$ 1,540

2. Narrative:

- a. The Draft Site Evaluation Report (SER), submitted by Hydro Search, Inc (HSI), was reviewed. WDNR and EPA comments were forwarded to HSI for inclusion in this report. A modified draft of the SER was forwarded to the WDNR for final comment and approval on December 5, 1991.
- b. HSI has begun work on the preparation of a Draft Sampling and Analysis Plan (SAP) and Draft Quality Assurance Project Plan (QAPP). Draft SAP and QAPP documents are to be available in January for reference at a Pre-QAPP meeting to be held in February, 1992.

- c. Analytical results from the samples collected during the survey of homes surrounding the Better-Brite shops are expected to be available in early 1992. A brief report regarding these results is to be prepared by the WDNR as well as notification of residents. Analytical results were received for a sump water sample, collected directly across 6th Street, from the Zinc Shop. Elevated levels were not observed for VOCs, chromium, nor cyanide.
- d. A Change Order to provide funding for the preparation of a topographic base map was submitted and approved. Preparation of the map is continuing. It is to be used in the development of the RI/FS Workplan.
- e. A report addressing private wells in the area of the Better Brite site, utilizing well construction forms, was completed by the WDNR for inclusion in the SER. Sampling of a private well identified on 7th Street, located within two city blocks of the Chrome Shop, was performed. Analytical results are expected in the near future.
- f. A brief report presenting results of the inspection of existing monitoring wells at the Better Brite shops was completed by the WDNR. This report was prepared for inclusion in the SER.
- g. Limited field work, as part of the Interim Action, was performed by EPA's contractors during December, 1991. Fencing and siding were installed at the Zinc Shop as well as performing some site clean-up. Access agreements were obtained from the impacted property owners adjacent to the Zinc Shop. EPA and WW Engineering and Science have elected to postpone installation of fencing and an extension of an existing water collection system at the Chrome Shop, tentatively until spring.
- h. The issue of installation of deep monitoring well(s), into the sandstone aquifer in the vicinity of DePere's Grant Street municipal well, as proposed by EPA, was determined by the WDNR as unacceptable at this time. The deep well(s) were proposed as part of the Interim Action. EPA has been notified of WDNR's determination.
- i. The contract negotiated by the WDNR and The City of DePere to operate the Pretreatment Plant was signed in November, 1991. City personnel are continuing the operation of the Pretreatment Plant following termination of EPA's Emergency Response Group's direct involvement at the site. Training was provided by

EPA's contractor prior to the City taking over the operation.

- j. Arrangements are in process toward disposal of sludge, which is currently being produced through the pretreatment process.

3. Schedule Compliance: Currently, we are approximately seven months behind the schedule outlined in the cooperative agreement.



Carroll D. Besadny
Secretary

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

101 South Webster Street
Box 7921
Madison, Wisconsin 53707
TELEPHONE 608-266-2621
TELEFAX 608-267-3579
TDD 608-267-6897

October 31, 1991

File Ref: WID-560010118
Brown Co.
SW/SFND

Sue
Ms. Sue Coll
Wisconsin Project Officer
U.S. E.P.A., Region V, 5HS/12
230 South Dearborn Street
Chicago, IL 60604

Subject: Better Brite RI/FS, C.A. No. V995102-01
Quarterly Report, July - September, 1991

Dear Ms. Coll:

Please find enclosed for your review, a summary of the 4th quarter, fiscal year 1991 state activities conducted under the Better Brite RI/FS Cooperative Agreement.

Included you will find a list of our estimated expenditures, a narrative discussion of our accomplishments and a statement regarding schedule compliance. Please let us know if you have any suggestions regarding the format or content of this report.

If there are any questions, please contact Mr. James McLimans at (608) 266-0830.

Sincerely,

Paul P. Didier, P.E., Director
Bureau of Solid and Hazardous Waste Management

PPD/tk

cc: Mark Giesfeldt SW/3
Sue Bangert SW/3
Darsi Foss SW/3
Jim McLimans SW/3
Doug Rossberg LMD-SW
Terry Koehn LMD-SW



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny, Secretary
Box 7921

Madison, Wisconsin 53707

TELEFAX NO. 608-267-3579

TDD NO. 608-267-6897

SOLID WASTE TELEFAX NO. 608-267-2768

File Ref: 4440

October 29, 1990

RECEIVED DNR
OCT 31 1990
LAKE MICHIGAN DISTRICT

Mr. Valdas V. Adamkus
Regional Administrator
U.S. Environmental Protection Agency - Region V
230 South Dearborn Street
Chicago, IL 60604

Attn: Financial Management Branch, Grants Management Section

Subject: Cooperative Agreement No. V995102-01

Dear Mr. Adamkus:

We are sending this letter to transmit our acceptance of Cooperative Agreement No. V995102-01. This cooperative agreement provides funding for conducting a Remedial Investigation/Feasibility Study at the Better Brite Superfund site.

Enclosed please find the signed original and two copies of the Cooperative Agreement Award.

Our thanks to Ms. Suzanne Coll and Mr. Tom Mateer, of your staff, for their support and assistance in obtaining this funding.

If there are any questions, please contact James M. McLimans at (608) 266-0830.

Sincerely,


C. D. Besadny
Secretary

Enclosure

cc: → D. Rossberg - LMD
T. Burns - Fn/1 (w/orig.)
M. Giesfeldt/S. Bangert - SW/3

U.S. ENVIRONMENTAL PROTECTION AGENCY
EPA ASSISTANCE AGREEMENT/AMENDMENT
PART I - ASSISTANCE NOTIFICATION INFORMATION

1. ASSISTANCE ID NO. V995102-01
2. LOG NUMBER
3. DATE OF AWARD SEP 28 1990
4. MAILING DATE OCT 05 1990

5. AGREEMENT TYPE		6. PAYMENT METHOD	
Cooperative Agreement	<input checked="" type="checkbox"/>	<input type="checkbox"/> Advance	<input type="checkbox"/> Reimbursement
Grant Agreement		<input checked="" type="checkbox"/> Letter of Credit <u>GS-13-0536</u>	
Assistance Amendment		7. TYPE OF ACTION	

8. RECIPIENT	Wisconsin Department of Natural Resources P.O. Box 7921 Madison, Wisconsin 53707		9. PAYEE Same as Block 8
	EIN NO.	CONGRESSIONAL DISTRICT	

39-6006436	Statewide	10. RECIPIENT TYPE State
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11. PROJECT MANAGER AND TELEPHONE NO. Paul Didier (608) 266-1327 (Same address as Block 8)	12. CONSULTANT (WWT Construction Grants Only) N/A
---	--

13. ISSUING OFFICE (City/State) Chicago, Illinois	14. EPA PROJECT/STATE OFFICER AND TELEPHONE NO. Suzanne Coll (5HSM) (312) 353-1257 State Relations Unit, SPMB U.S. Environmental Protection Agency 230 South Dearborn Street Chicago, Illinois 60604
--	---

15. EPA CONGRESSIONAL LIAISON & TEL. NO. Pat Gaskins (202) 382-5184	16. STATE APPL ID (Clearinghouse) N/A	17. FIELD OF SCIENCE 99	18. PROJECT STEP (WWT CG Only) N/A
--	--	----------------------------	---------------------------------------

19. STATUTORY AUTHORITY P.L. 96-510	20. REGULATORY AUTHORITY 40 CFR Parts 29, 30, 32, 33 and 35	21. STEP 2 + 3 & STEP.3 (WWT Construction Only)	
		a. Treatment Level	
		b. Project Type	N
		c. Treatment Process	A
		d. Sludge Design	

22. PROJECT TITLE AND DESCRIPTION
Remedial Investigation/Feasibility Study at Better Brite Superfund site.

23. PROJECT LOCATION (Areas Impacted by Project)

City/Place DePere	County Brown	State WI	Congressional District 8th
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24. ASSISTANCE PROGRAM (CFDA Program No. & Title) 66.802 Superfund	25. PROJECT PERIOD 10/01/90 - 07/31/93	26. BUDGET PERIOD 10/01/90 - 07/31/93
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27. COMMUNITY POPULATION (WWT CG Only) N/A	28. TOTAL BUDGET PERIOD COST \$790,982	29. TOTAL PROJECT PERIOD COST \$790,982
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FUNDS	FORMER AWARD	THIS ACTION	AMENDED TOTAL
30. EPA Amount This Action		\$790,982	
31. EPA In-Kind Amount			
32. Unexpended Prior Year Balance			
33. Other Federal Funds			
34. Recipient Contribution			
35. State Contribution			
36. Local Contribution			
37. Other Contribution			
39. Allowable Project Cost		\$790,982	

39. FISCAL	Program Element	FY	Appropriation	Doc. Control No.	Account Number	Object Class	Obligation/Deoblig. Amount
	TFA49A	90	6820X8145	SF0072	OTFA5AFL5L	41.85	783,982
	TFA49A	90	6820X8145	SE0149	OTFA05FL5L	41.85	7,000

TABLE A - OBJECT CLASS CATEGORY (Non-construction)		TOTAL APPROVED ALLOWABLE BUDGET PERIOD COST
1. PERSONNEL		\$ 53,220
2. FRINGE BENEFITS		16,764
3. TRAVEL		5,850
4. EQUIPMENT		-0-
5. SUPPLIES		1,580
6. CONTRACTUAL		690,000
7. CONSTRUCTION		-0-
8. OTHER		1,600
9. TOTAL DIRECT CHARGES		769,014
10. INDIRECT COSTS: RATE % BASE		21,968
11. TOTAL (Share: Recipient _____% Federal <u>100</u> %)		\$790,982
12. TOTAL APPROVED ASSISTANCE AMOUNT		\$
TABLE B - PROGRAM ELEMENT CLASSIFICATION (Non-construction)		
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12. TOTAL (Share: Recipient _____% Federal _____%)		
13. TOTAL APPROVED ASSISTANCE AMOUNT		\$
TABLE C - PROGRAM ELEMENT CLASSIFICATION (Construction)		
1. ADMINISTRATION EXPENSE		
2. PRELIMINARY EXPENSE		
3. LAND STRUCTURES, RIGHT-OF-WAY		
4. ARCHITECTURAL ENGINEERING BASIC FEES		
5. OTHER ARCHITECTURAL ENGINEERING FEES		
6. PROJECT INSPECTION FEES		
7. LAND DEVELOPMENT		
8. RELOCATION EXPENSES		
9. RELOCATION PAYMENTS TO INDIVIDUALS AND BUSINESSES		
10. DEMOLITION AND REMOVAL		
11. CONSTRUCTION AND PROJECT IMPROVEMENT		
12. EQUIPMENT		
13. MISCELLANEOUS		
14. TOTAL (Lines 1 thru 13)		
15. ESTIMATED INCOME (If applicable)		
16. NET PROJECT AMOUNT (Line 14 minus 15)		
17. LESS: INELIGIBLE EXCLUSIONS		
18. ADD: CONTINGENCIES		
19. TOTAL (Share: Recipient _____% Federal _____%)		
20. TOTAL APPROVED ASSISTANCE AMOUNT		\$

PART III-AWARD CONDITIONS

a. GENERAL CONDITIONS

The recipient covenants and agrees that it will expeditiously initiate and timely complete the project work for which assistance has been awarded under this agreement, in accordance with all applicable provisions of 40 CFR Chapter I, Subpart B. The recipient warrants, represents, and agrees that it, and its contractors, subcontractors, employees and representatives, will comply with: (1) all applicable provisions of 40 CFR Chapter I, Subchapter B, INCLUDING BUT NOT LIMITED TO the provisions of Appendix A to 40 CFP Part 30, and (2) any special conditions set forth in this assistance agreement or any assistance amendment pursuant to 40 CFR 30.425.

b. SPECIAL CONDITIONS

(For cooperative agreements include identification or summarization of EPA responsibilities that reflect or contribute to substantial involvement.)

1. Pursuant to EPA Order 1000.25, dated January 24, 1990, the recipient agrees to use recycled paper for all reports which are prepared as a part of this agreement and delivered to the Agency. This requirement does not apply to reports which are prepared on forms supplied by EPA. This requirement applies even when the cost of recycled paper is higher than that of virgin paper.
2. By accepting this award, the recipient agrees to comply with Section 129 of Public Law 100-590, the Small Business Administration Reauthorization and Amendment Act of 1988. Therefore, if the recipient awards a contract under this assistance agreement, it will utilize the following affirmative steps relative to Small Business in Rural Areas (SBRAs).
 - A) Placing SBRAs on solicitation lists;
 - B) Ensuring that SBRAs are solicited whenever they are potential sources;
 - C) Dividing total requirements when economically feasible, into small tasks or quantities to permit maximum participation by SBRAs;
 - D) Establishing delivery schedules, where the requirements of work will permit, which would encourage participation by SBRAs;
 - E) Using the services of the Small Business Administration and the Minority Business Development Agency of the U.S. Department of Commerce, as appropriate; and
 - F) Requiring the contractor, if it awards subcontracts, to take the affirmative steps in subparagraphs a. through e. of this condition.

b. SPECIAL CONDITIONS (Continued)

PART IV

NOTE: The Agreement must be completed in duplicate and the Original returned to the Grants Administration Division for Headquarters awards and to the appropriate Grants Administrations Office for State and local awards within 3 calendar weeks after receipt or within any extension of time as may be granted by EPA.

Receipt of a written refusal or failure to return the properly executed document within the prescribed time, may result in the withdrawal of the offer by the Agency. Any change to the Agreement by the recipient subsequent to the document being signed by the EPA Award Official which the Award Official determines to materially alter the Agreement shall void the Agreement.

OFFER AND ACCEPTANCE

The United States of America, acting by and through the U.S. Environmental Protection Agency (EPA), hereby offers assistance/amendment to the Wisconsin Department of Natural Resources

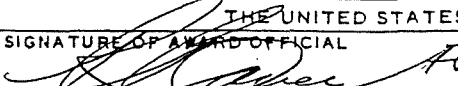
for 100 % of all approved costs incurred up to and not exceeding \$ 790,982

for the support of approved budget period effort described in application (including all application modifications)

Application for New CA included herein by reference.


ISSUING OFFICE (Grants Administration Office)	AWARD APPROVAL OFFICE
ORGANIZATION/ADDRESS Contracts and Grants Branch (5MCG) U.S. Environmental Protection Agency 230 South Dearborn Street Chicago, Illinois 60604	ORGANIZATION/ADDRESS Waste Management Division (5HSM) U.S. Environmental Protection Agency 230 South Dearborn Street Chicago, Illinois 60604

THE UNITED STATES OF AMERICA BY THE U.S. ENVIRONMENTAL PROTECTION AGENCY

SIGNATURE OF AWARD OFFICIAL	TYPED NAME AND TITLE	DATE
	Valdas V. Adamkus, Regional Administrator	SEP 28 1990

This Agreement is subject to applicable U.S. Environmental Protection Agency statutory provisions and assistance regulations. In accepting this award or amendment and any payments made pursuant thereto, (1) the undersigned represents that he is duly authorized to act on behalf of the recipient organization, and (2) the recipient agrees (a) that the award is subject to the applicable provisions of 40 CFR Chapter I, Subchapter B and of the provisions of this agreement (Parts I thru IV), and (b) that acceptance of any payments constitutes an agreement by the payee that the amounts, if any found by EPA to have been overpaid will be refunded or credited in full to EPA.

BY AND ON BEHALF OF THE DESIGNATED RECIPIENT ORGANIZATION

SIGNATURE	TYPED NAME AND TITLE	DATE
	C. D. Besadny, Secretary	10/24/90

10-9-91



Carroll D. Besadny
Secretary

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

101 South Webster Street
Box 7921
Madison, Wisconsin 53707
SOLID WASTE TELEFAX 608-267-2768
TELEFAX 608-267-3579
TDD 608-267-6897

OCT 7 1991

Mr. Valdas V. Adamkus
Regional Administrator
U.S. Environmental Protection Agency, Region V
230 S. Dearborn Street
Chicago, IL 60604

Attn: Contracts and Grants Branch

Subject: Cooperative Agreement No. V995102-01

Dear Mr. Adamkus:

We are sending this letter to transmit our acceptance of amendment No. 1 to the Better Brite Cooperative Agreement. This amendment provides remedial action funding for operation of the Better Brite pretreatment plant.

Enclosed please find the signed original and two copies of the Cooperative Agreement Amendment.

If there are any questions please contact James M. McLimans at (608) 266-0830.

Sincerely,

C. D. Besadny
Secretary

Enclosure

cc: T. Burns - FN/1 (w/ orig.)
M. Giesfeldt/S. Bangert - SW/3
→ T. Koehn - LMD

U.S. ENVIRONMENTAL PROTECTION AGENCY EPA ASSISTANCE AGREEMENT / AMENDMENT PART I - ASSISTANCE NOTIFICATION INFORMATION	1. ASSISTANCE ID NO. V 995102-01-1	2. LOG NUMBER 05-V -000
	3. DATE OF AWARD SEP 0 9 1991	4. MAILING DATE SEP 1 6 1991

5. AGREEMENT TYPE <input type="checkbox"/> Cooperative Agreement <input type="checkbox"/> Grant Agreement <input checked="" type="checkbox"/> Assistance Amendment	6. PAYMENT METHOD <input type="checkbox"/> Advance <input type="checkbox"/> Reimbursement <input checked="" type="checkbox"/> Letter of Credit ACH-0536 Send Payment Request to: FINANCIAL MANAGEMENT BRANCH
	7. TYPE OF ACTION REVISION INCR.

8. RECIPIENT WISCONSIN DNR P.O. BOX 7921 MADISON, WI 53707	9. PAYEE WISCONSIN DNR P.O. BOX 7921 MADISON, WI 53707
--	--

EIN NO. 396006436	CONGRESSIONAL DISTRICT ALL	10. RECIPIENT TYPE
-----------------------------	--------------------------------------	---------------------------

11. PROJECT MANAGER AND TELEPHONE NO. PAUL DIDIER (608) 266-1327	12. CONSULTANT (WWT Construction Grants only) N/A
---	---

13. ISSUING OFFICE (CITY / STATE) CONTRACTS AND GRANTS BRANCH US EPA, REGION 5 230 S DEARBORN ST CHICAGO, IL 60604	14. EPA PROJECT / STATE OFFICER AND TELEPHONE NO. SUZANNE COLL WASTE MANAGEMENT DIVISION 5-HSM-12, (312) 353-1257
---	---

15. EPA CONGRESSIONAL LIAISON & PHONE BARBARA BROOKS, (202) 382-5660	16. STATE APPL ID (Clearinghouse)	17. SCIENCE FIELD	18. PROJECT STEP (WWT Construction Grants Only) N/A
--	--	--------------------------	---

19. STATUTORY AUTHORITY CERCLA: SEC. 104 AMENDED BY SARA	20. REGULATORY AUTHORITY 40 CFR PARTS 31, 35 SUBPART O	21. STEP 2 + 3 & STEP 3 (WWT Construction Grants Only) a. Treatment Level b. Project Type N/A c. Treatment Process d. Sludge Design
--	---	--

22. PROJECT TITLE AND DESCRIPTION OPERATION	SUPERFUND - BETTER BRITE REMEDIAL ACTION PRETREATMENT PLANT
---	---

23. PROJECT LOCATION (Areas Impacted by Project)			
City / Place DEPERE	County BROWN	State WI	Congressional District 08

24. ASSISTANCE PROGRAM (CFDA Program No. & Title) 66.802: Hazardous Substance Response Trust Fund	25. PROJECT PERIOD 10/01/90 - 08/31/94	26. BUDGET PERIOD 10/01/90 - 08/31/94
---	--	---

27. COMMUNITY POPULATION (WWT Construction Grants Only) N/A	28. TOTAL BUDGET PERIOD COST \$1,123,666	29. TOTAL PROJECT PERIOD COST \$1,123,666
---	--	---

FUNDS	FORMER AWARD	THIS ACTION	AMENDED TOTAL
30. EPA Amount This Action	\$790,982	\$299,415	\$1,090,397
31. EPA In-Kind Amount	0	0	0
32. Unexpended Prior Year Balance	0	0	0
33. Other Federal Funds	0	0	0
34. Recipient Contribution	0	20,789	20,789
35. State Contribution	0	0	0
36. Local Contribution	0	12,480	12,480
37. Other Contribution	0	0	0
38. Allowable Project Cost	\$790,982	\$332,684	\$1,123,666

FISCAL	Program Element	FY	Appropriation	Doc. Control No.	Account Number	Object Class	Obligation / Deobligation
	(See continuation page)						

39. FISCAL (continued)

Site Name	Program Element	FY	Appropriation	Doc. Control Number	Account Number	Object Class	Obligation / Deobligation
SUMMARY BUDGET	01)						0
BETTER BRITE	02) TFAY9A	91	6820X8145	SC0011	1TFA5AFR5L	41.85	299,415

PART II - APPROVED BUDGET

SITE NAME: SUMMARY BUDGET

ASSISTANCE IDENTIFICATION: V 995102-01-1

Page 3 of 6

TABLE A - OBJECT CLASS CATEGORY (Non-construction)		TOTAL APPROVED ALLOWABLE BUDGET PERIOD COST
1. PERSONNEL		\$64,920
2. FRINGE BENEFITS		20,812
3. TRAVEL		6,215
4. EQUIPMENT		0
5. SUPPLIES		1,892
6. CONTRACTUAL		1,002,008
7. CONSTRUCTION		0
8. OTHER		1,990
9. TOTAL DIRECT CHARGES		\$1,097,837
10. INDIRECT COSTS: RATE <u>24.52</u> BASE <u>S + FB</u>		25,829
11. TOTAL (Share: Recipient <u>3.00</u> % Federal <u>97.00</u> %)		\$1,123,666
12. TOTAL APPROVED ASSISTANCE AMOUNT		\$1,090,397
TABLE B - PROGRAM ELEMENT CLASSIFICATION (Non-construction)		
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12. TOTAL (Share: Recipient _____ % Federal _____ %.)		
13. TOTAL APPROVED ASSISTANCE AMOUNT		
TABLE C - PROGRAM ELEMENT CLASSIFICATION (Construction)		
1. ADMINISTRATION EXPENSE		
2. PRELIMINARY EXPENSE		
3. LAND STRUCTURES, RIGHT-OF-WAY		
4. ARCHITECTURAL ENGINEERING BASIC FEES		
5. OTHER ARCHITECTURAL ENGINEERING FEES		
6. PROJECT INSPECTION FEES		
7. LAND DEVELOPMENT		
8. RELOCATION EXPENSE		
9. RELOCATION PAYMENTS TO INDIVIDUALS AND BUSINESS		
10. DEMOLITION AND REMOVAL		
11. CONSTRUCTION AND PROJECT IMPROVEMENT		
12. EQUIPMENT		
13. MISCELLANEOUS		
14. TOTAL (Lines 1 thru 13)		
15. ESTIMATED INCOME (if applicable)		
16. NET PROJECT AMOUNT (Line 14 minus 15)		
17. LESS: INELIGIBLE EXCLUSIONS		
18. ADD: CONTINGENCIES		
19. TOTAL (Share: Recipient _____ % Federal _____ %.)		
20. TOTAL APPROVED ASSISTANCE AMOUNT		

PART II - APPROVED BUDGET

SITE NAME: BETTER BRITE 9/01/91-8/31/94

ASSISTANCE IDENTIFICATION: V 995102-01-1

Page 4 of 6

TABLE A - OBJECT CLASS CATEGORY (Non-construction)	TOTAL APPROVED ALLOWABLE BUDGET PERIOD COST
1. PERSONNEL	\$11,700
2. FRINGE BENEFITS	4,048
3. TRAVEL	365
4. EQUIPMENT	0
5. SUPPLIES	312
6. CONTRACTUAL	312,008
7. CONSTRUCTION	0
8. OTHER	390
9. TOTAL DIRECT CHARGES	\$328,823
10. INDIRECT COSTS: RATE <u>24.52</u> BASE <u>S + FB</u>	3,861
11. TOTAL (Share: Recipient <u>10.00%</u> Federal <u>90.00%</u>)	\$332,684
12. TOTAL APPROVED ASSISTANCE AMOUNT	\$299,415
TABLE B - PROGRAM ELEMENT CLASSIFICATION (Non-construction)	
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10.	
11.	
12. TOTAL (Share: Recipient _____ % Federal _____ %.)	
13. TOTAL APPROVED ASSISTANCE AMOUNT	
TABLE C - PROGRAM ELEMENT CLASSIFICATION (Construction)	
1. ADMINISTRATION EXPENSE	
2. PRELIMINARY EXPENSE	
3. LAND STRUCTURES, RIGHT-OF-WAY	
4. ARCHITECTURAL ENGINEERING BASIC FEES	
5. OTHER ARCHITECTURAL ENGINEERING FEES	
6. PROJECT INSPECTION FEES	
7. LAND DEVELOPMENT	
8. RELOCATION EXPENSE	
9. RELOCATION PAYMENTS TO INDIVIDUALS AND BUSINESS	
10. DEMOLITION AND REMOVAL	
11. CONSTRUCTION AND PROJECT IMPROVEMENT	
12. EQUIPMENT	
13. MISCELLANEOUS	
14. TOTAL (Lines 1 thru 13)	
15. ESTIMATED INCOME (if applicable)	
16. NET PROJECT AMOUNT (Line 14 minus 15)	
17. LESS: INELIGIBLE EXCLUSIONS	
18. ADD: CONTINGENCIES	
19. TOTAL (Share: Recipient _____ % Federal _____ %.)	
20. TOTAL APPROVED ASSISTANCE AMOUNT	

TERMS AND CONDITIONS

1. AMENDMENTS

CA FOR CERCLA FUNDS FOR BETTER BRITE PRETREATMENT SYSTEM AS OUTLINED IN APPLICATION SUBMITTED 8/16/91.

2. FAIR SHARE TERMS AND CONDITIONS

The recipient must ensure to the fullest extent possible that at least 5% MBE and 3% WBE of Federal funds for prime contracts or subcontracts for supplies, construction, equipment or services are made available to organizations owned or controlled by socially and economically disadvantaged individuals and historically black colleges and universities, and that at least 5% MBE and 3% WBE of such funds are made available to organizations owned or controlled by women.

The recipient agrees, in the event of any contracting, to include in its bid documents a 5% MBE and 3% WBE "Fair Share" and require all of its prime contractors to include in their documents for subcontracts 5% MBE and 3% WBE "Fair Share" percentages.

The recipient also agrees to comply with the six affirmative steps of the "Fair Share" policy stated in 40 CFR 33.240, 31.36(e) or 35.680(a), as appropriate.

The State and/or recipient agrees to submit a SF-334 "MBE/WBE Utilization Under Federal Grants, Cooperative Agreements, and other Federal Financial Assistance", to the EPA award official beginning with the Federal fiscal year quarter the recipient awards its first contract and continuing until all contracts and subcontracts have been reported. These reports must be submitted to the award official within 30 days of the end of the Federal fiscal quarter (January 30, April 30, July 30 and October 30).

SPECIAL CONDITIONS (continued)

PART IV

NOTE: The Agreement must be completed in duplicate and the Original returned to the Grants Administration Division for Headquarters awards and to the appropriate Grants Administration Office for State and local awards within 3 calendar weeks after receipt or within any extension of time as may be granted by EPA.
 Receipt of a written refusal or failure to return the properly executed document within the prescribed time, may result in the withdrawal of the offer by the Agency. Any change to the Agreement by the recipient subsequent to the document being signed by the EPA Award Official, which the Award Official determines to materially alter the Agreement, shall void the Agreement.


OFFER AND ACCEPTANCE

The United States of America, acting by and through the U.S. Environmental Protection Agency (EPA), hereby offers assistance/amendment to the WISCONSIN DNR for See Part I % of all approved costs incurred up to and not exceeding \$ 1,090,397 for the support of approved budget period effort described in application (including all application modifications) cited in Item 22 of this Agreement
08/16/91 SUPERFUND - BETTER BRITE, included herein by reference.
 DATE AND TITLE

ISSUING OFFICE (Grants Administration Office)	AWARD APPROVAL OFFICE
ORGANIZATION / ADDRESS CONTRACTS AND GRANTS BRANCH US EPA, REGION 5 230 S DEARBORN ST CHICAGO, IL 60604	ORGANIZATION / ADDRESS REGIONAL ADMINISTRATOR US EPA, REGION 5 230 S DEARBORN STREET CHICAGO, IL 60604

THE UNITED STATES OF AMERICA BY THE U.S ENVIRONMENTAL PROTECTION AGENCY		
SIGNATURE OF AWARD OFFICIAL	TYPED NAME AND TITLE VALDAS V. ADAMKUS REGIONAL ADMINISTRATOR, RGN 5	DATE SEP 03 1991

This agreement is subject to applicable U.S. Environmental Protection Agency statutory provisions and assistance regulations. In accepting this award or amendment and any payments made pursuant thereto, (1) the undersigned represents that he is duly authorized to act on behalf of the recipient organization, and (2) the recipient agrees (a) that the award is subject to the applicable provisions of 40 CFR Chapter I, Subchapter B and of the provisions of this agreement (Parts I thru IV), and (b) that acceptance of any payments constitutes an agreement by the payee that the amounts, if any found by EPA to have been overpaid will be refunded or credited in full to EPA.

BY AND ON BEHALF OF THE DESIGNATED RECIPIENT ORGANIZATION		
SIGNATURE 	TYPED NAME AND TITLE C. D. Besadny, Secretary	DATE 10/2/91



Carroll D. Besadny
Secretary

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

101 South Webster Street
Box 7921
Madison, Wisconsin 53707
TELEPHONE 608-266-2621
TELEFAX 608-267-3579
TDD 608-267-6897

AUG 16 1991

File Ref: 4440

Mr. Valdas V. Adamkus, Regional Administrator
U.S. Environmental Protection Agency - Region V
230 S. Dearborn Street
Chicago, IL 60604

Attn: Financial Management Branch, Grants Management Section

Subject: Better Brite Remedial Action
Cooperative Agreement Application

Dear Mr. Adamkus:

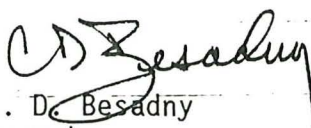
We are sending this letter to transmit our Cooperative Agreement application for CERCLA funds to operate the Better Brite Pretreatment System as a part of the continuing remedial action at that site.

Please note, we estimated that this pretreatment plant will need to be operated for a period of five years. However, because there is only \$300,000 available for this activity at this time our application and the attached cost summary are for the first 3.9 years of operation only. And, unless costs are significantly less than our estimates we will need to amend this cooperative agreement to increase funding prior to the end of the five years expected operation.

Comments received from EPA Region V, on a draft application submitted earlier, have been incorporated in this final application.

If there are any questions, please contact James McLimans at (608) 266-0830.

Sincerely,


C. D. Besadny
Secretary

Enclosure

cc: T. Burns - FN/1
M. Giesfeldt/S. Bangert - SW/3
→ T. Koehn - LMD
Sue Coll - EPA Region V

APPLICATION FOR FEDERAL ASSISTANCE

1. TYPE OF SUBMISSION: <i>Application</i> <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Non-Construction	<i>Preapplication</i> <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction	2. DATE SUBMITTED	Applicant Identifier
		3. DATE RECEIVED BY STATE	State Application Identifier
		4. DATE RECEIVED BY FEDERAL AGENCY	Federal Identifier

5. APPLICANT INFORMATION	
Legal Name: Department of Natural Resources	Organizational Unit: Bureau of Solid & Hazardous Waste Mgmt.
Address (give city, county, state, and zip code): P.O. Box 7921 Dane County Madison, WI 53707	Name and telephone number of the person to be contacted on matters involving this application (give area code) Paul P. Didier

6. EMPLOYER IDENTIFICATION NUMBER (EIN): <table style="width:100%; text-align: center;"> <tr> <td style="border: 1px solid black; width: 20px;">3</td> <td style="border: 1px solid black; width: 20px;">9</td> <td style="border: 1px solid black; width: 20px;">-</td> <td style="border: 1px solid black; width: 20px;">6</td> <td style="border: 1px solid black; width: 20px;">0</td> <td style="border: 1px solid black; width: 20px;">0</td> <td style="border: 1px solid black; width: 20px;">6</td> <td style="border: 1px solid black; width: 20px;">4</td> <td style="border: 1px solid black; width: 20px;">3</td> <td style="border: 1px solid black; width: 20px;">6</td> </tr> </table>	3	9	-	6	0	0	6	4	3	6	7. TYPE OF APPLICANT: (enter appropriate letter in box) A A. State B. County C. Municipal D. Township E. Interstate F. Intermunicipal G. Special District H. Independent School Dist. I. State Controlled Institution of Higher Learning J. Private University K. Indian Tribe L. Individual M. Profit Organization N. Other (Specify): _____
3	9	-	6	0	0	6	4	3	6		

8. TYPE OF APPLICATION: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision If Revision, enter appropriate letter(s) in box(es): <input type="checkbox"/> <input type="checkbox"/> A. Increase Award B. Decrease Award C. Increase Duration D. Decrease Duration Other (specify): _____	9. NAME OF FEDERAL AGENCY: U.S. EPA Region V
---	--

10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: <table style="width:100%; text-align: center;"> <tr> <td style="border: 1px solid black; width: 20px;">6</td> <td style="border: 1px solid black; width: 20px;">6</td> <td style="border: 1px solid black; width: 20px;">-</td> <td style="border: 1px solid black; width: 20px;">8</td> <td style="border: 1px solid black; width: 20px;">0</td> <td style="border: 1px solid black; width: 20px;">2</td> </tr> </table> TITLE: Hazardous Substance Response Trust Fund	6	6	-	8	0	2	11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT: Superfund - Better Brite Pretreatment Plant Operation
6	6	-	8	0	2		
12. AREAS AFFECTED BY PROJECT (cities, counties, states, etc.): City of De Pere Brown County							

13. PROPOSED PROJECT: Start Date: 10/1/91 Ending Date: 8/31/94	14. CONGRESSIONAL DISTRICTS OF: a. Applicant: Statewide b. Project: 8th
---	--

15. ESTIMATED FUNDING: <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:15%;">a. Federal</td> <td style="width:15%;">\$</td> <td style="width:40%; text-align: right;">299,415</td> <td style="width:10%; text-align: right;">.00</td> </tr> <tr> <td>b. Applicant</td> <td>\$</td> <td style="text-align: right;">20,789</td> <td style="text-align: right;">.00</td> </tr> <tr> <td>c. State</td> <td>\$</td> <td></td> <td style="text-align: right;">.00</td> </tr> <tr> <td>d. Local</td> <td>\$</td> <td style="text-align: right;">12,480</td> <td style="text-align: right;">.00</td> </tr> <tr> <td>e. Other</td> <td>\$</td> <td></td> <td style="text-align: right;">.00</td> </tr> <tr> <td>f. Program Income</td> <td>\$</td> <td></td> <td style="text-align: right;">.00</td> </tr> <tr> <td>g. TOTAL</td> <td>\$</td> <td style="text-align: right;">332,684</td> <td style="text-align: right;">.00</td> </tr> </table>	a. Federal	\$	299,415	.00	b. Applicant	\$	20,789	.00	c. State	\$.00	d. Local	\$	12,480	.00	e. Other	\$.00	f. Program Income	\$.00	g. TOTAL	\$	332,684	.00	16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS? a. YES THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON DATE <u>7/18/91</u> b. NO. <input type="checkbox"/> PROGRAM IS NOT COVERED BY E.O. 12372 <input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW
a. Federal	\$	299,415	.00																										
b. Applicant	\$	20,789	.00																										
c. State	\$.00																										
d. Local	\$	12,480	.00																										
e. Other	\$.00																										
f. Program Income	\$.00																										
g. TOTAL	\$	332,684	.00																										
17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT? <input type="checkbox"/> Yes If "Yes," attach an explanation. <input checked="" type="checkbox"/> No																													

18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT, THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED		
a. Typed Name of Authorized Representative C.D. Besadny	b. Title Secretary	c. Telephone number
d. Signature of Authorized Representative 		e. Date Signed 8/15/91

BUDGET INFORMATION — Non-Construction Programs

OMB Approval No. 0348-0044

SECTION A — BUDGET SUMMARY

Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Better Brite	66.802	\$	\$	\$ 299,415	\$ 33,269	\$ 332,684
2.						
3.						
4.						
5. TOTALS		\$	\$	\$ 299,415	\$ 33,269	\$ 332,684

SECTION B — BUDGET CATEGORIES

6 Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY				Total (5)
	(1)	(2)	(3)	(4)	
a. Personnel	\$ 11,700	\$	\$	\$	\$ 11,700
b. Fringe Benefits	4,048				4,048
c. Travel	365				365
d. Equipment	-0-				-0-
e. Supplies	312				312
f. Contractual	312,008				312,008
g. Construction	-0-				-0-
h. Other	390				390
i. Total Direct Charges (sum of 6a - 6h)	328,823				328,823
j. Indirect Charges	3,861				3,861
k. TOTALS (sum of 6i and 6j)	\$ 332,684	\$	\$	\$	\$ 332,684
7. Program Income	\$	\$	\$	\$	\$

Authorized for Local Reproduction

Standard Form 424A (4-88)
Prescribed by OMB Circular A-102

SECTION C - NON-FEDERAL RESOURCES

(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e) TOTALS
8. Better Brite RA	\$ 20,789	\$	\$ 12,480	\$ 33,269
9.				
10.				
11.				
12. TOTALS (sum of lines 8 and 11)	\$ 20,789	\$	\$ 12,480	\$ 33,269

SECTION D - FORECASTED CASH NEEDS

13. Federal	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
		\$ 76,773	\$ 19,194	\$ 19,193	\$ 19,193
14. NonFederal	8,531	2,132	2,133	2,133	2,133
15. TOTAL (sum of lines 13 and 14)	\$ 85,304	\$ 21,326	\$ 21,326	\$ 21,326	\$ 21,326

SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT

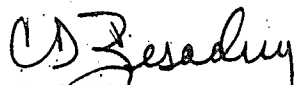
(a) Grant Program	FUTURE FUNDING PERIODS (Years)			
	(b) First	(c) Second	(d) Third	(e) Fourth
16.	\$ 76,773	\$ 76,773	\$ 69,096	\$
17.				
18.				
19.				
20. TOTALS (sum of lines 16 -19)	\$ 76,773	\$ 76,773	\$ 69,096	\$

SECTION F - OTHER BUDGET INFORMATION

(Attach additional Sheets if Necessary)

21. Direct Charges: See Attached Budget Detail	22. Indirect Charges: 24.52% of Salary & Fringe Benefits
23. Remarks	

10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§ 1451 et seq.); (f) conformity of Federal actions to State (Clear Air) Implementation Plans under Section 176(c) of the Clear Air Act of 1955, as amended (42 U.S.C. § 7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended, (P.L. 93-523); and (h) protection of endangered species under the Endangered Species Act of 1973, as amended, (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§ 1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. 469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. 2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§ 4801 et seq.) which prohibits the use of lead based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act of 1984.
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Secretary
APPLICANT ORGANIZATION Wisconsin Department of Natural Resources	DATE SUBMITTED 8/15/91



EPA Project Control Number

United States Environmental Protection Agency
Washington, DC 20460

Certification Regarding Debarment, Suspension, and Other Responsibility Matters

The prospective participant certifies to the best of its knowledge and belief that it and its principals:

- (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency;
- (b) Have not within a three year period preceding this proposal been convicted of or had a civil judgement rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
- (c) Are not presently indicted for or otherwise criminally or civilly charged by a government entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
- (d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State, or local) terminated for cause or default.

I understand that a false statement on this certification may be grounds for rejection of this proposal or termination of the award. In addition, under 18 USC Sec. 1001, a false statement may result in a fine of up to \$10,000 or imprisonment for up to 5 years, or both.

C. D. Besadny Secretary

Typed Name & Title of Authorized Representative

C. D. Besadny

Signature of Authorized Representative

8/15/91

Date

I am unable to certify to the above statements. My explanation is attached.

Better Brite Pretreatment Plant Operation

Scope of Work

The WDNR will, as a part of this cooperative agreement, assume responsibility for operation of this pretreatment system as of October 1, 1991 and continue operating the system until the final remedial action is complete.

Site Description/History

The Better Brite Site consists of two separate properties, approximately 3/4 of a mile apart, referred to as the Chrome Shop and the Zinc Shop. The two properties were nominated as one site, to the National Priorities List (NPL), on August 28, 1990, due to their proximity and similarities in the types of contaminants.

Metal plating operations were conducted at the Zinc Shop, located on South 6th St., from 1963 until 1989. Prior to the early 1970s chrome plating predominated at this shop with zinc plating being dominant after Better Brite Plating Co. moved its chrome operations to Lande St. (Chrome Shop). Plating operations were performed at the Chrome Shop from 1970 to 1986.

While the plants were in operation, the Wisconsin Department of Natural Resources (WDNR) documented numerous hazardous waste violations and spills at the facilities. During the course of the Chrome Shop's operations it is thought that over 20,000 gallons of plating solution leaked from in-ground plating tanks. Inspections by the WDNR (1980 through 1987) confirmed extensive chromium contamination at both shops. In a partial response to the problems at the Chrome Shop, the property owners constructed a groundwater collection system (french drain) and a berm to avoid surface water runoff. In 1988, the EPA allocated emergency funds to construct a groundwater pretreatment system and install an extraction well at the Chrome Shop. The groundwater pretreatment system was completed in October of 1990 and is now operational. Thus, contaminated water is treated prior to discharge to the DePere Wastewater Treatment Plant. EPA, additionally constructed a groundwater collection sump along the east side of the building at the Zinc Shop. Collected water is also treated through the Chrome Shop pretreatment system before discharge.

Pretreatment System Operation

Groundwater is thus, currently collected for treatment from the extraction well and french drain system constructed at the Chrome Shop as well as a collection sump installed at the Zinc Shop. Water from the Zinc Shop is hauled to the pretreatment plant by tank truck when the sump fills. The collected water is stored in a 5000 gallon fiberglass holding tank until enough is obtained to warrant treatment of a batch. The pretreatment plant generally consists of a metal sided building, situated at the Chrome Shop, which contains the above noted holding tank, a 5000 gallon fiberglass reaction tank, a sludge filter press and related equipment. Upon collection of sufficient water, contaminated with hexavalent chromium, the water is transferred to the reaction tank.

The first step in the treatment process is the addition of sulfuric acid to reduce the pH to approximately 3. Next, sodium bisulfite is added to produce an oxidation-reduction which changes the hexavalent chromium to a trivalent state. At this point sodium hydroxide is added until the pH is raised to approximately 8.5. A limited amount of a polymer is then added to aid in flocculent formation and the settling of the precipitate. The sodium hydroxide and the trivalent chromium forming a chromium hydroxide precipitate. The solids collect in the funnel shaped lower part of the reaction tank from which they are directed into the filter press to dewater the sludge for collection and then temporary storage in 55 gallon drums. The treated water, found above the settled precipitate in the reaction tank is decanted off and directed to a floor drain connected to the DePere sanitary sewer system. Any water collected from the dewatering process is directed back into the system for re-treatment prior to discharge.

The bluish colored chromium hydroxide sludge, in drums, is currently transferred to the Zinc Shop and stored within the on-site building. It is planned that the sludge will be shipped to a metals reclamation firm for beneficial reuse. Fixation of the sludge, and disposal in-state as a solid waste may represent an alternative disposal method.

Better Brite Pretreatment Plant Operation Cost Summary

PERSONNEL

<u>Approx. FTE</u>	<u>Class & Level</u>	<u>Salary</u>	<u>Cost</u>
0.39 *	Hydrogeologist 2	\$30,000	\$11,700

* 0.10 FTE/Year x 3.9 Years

FRINGE BENEFITS

Unemployment Comp.	1.20 %
Sick Leave Conversion	2.40
Income Continuation	0.15
Social Security	7.65
Life & Health Insur.	11.50
Retirement	<u>11.70</u>
	34.60 %

\$11,700 X 34.6% = \$4,048

TRAVEL

1 round trip from Green Bay to DePere/Month

Milage - 30 miles/trip x .26/mile x 12 Trips x 3.9 years = \$365

SUPPLIES

Office Supplies \$800/FTE x 0.39 FTE = \$312

CONTRACTUAL

Annual Cost of \$80,002* x 3.9 Years = \$312,008

* See attached contractual cost detail.

OTHER

Communications \$1,000/FTE x 0.39 FTE = \$390

Communications costs cover phones and mail. The estimated cost per workyear is based on past years experience.

INDIRECT

Based on a rate of 24.52% of salary and fringe benefits

\$15,748 X 24.52% = \$3,861

GRAND TOTAL \$332,684

Better Brite Pretreatment Plant Operation Annual Contractual Cost Detail

Cost of Labor

40 Hrs/Wk \$13/hr	\$27,040 ✓
Benefits 35%	<u>\$9,464</u> ✓
	\$36,504

Cost of Safety Training

Training \$750/person 3 persons -	\$2250 ¹	
Wages 40 hrs/person @ \$17.55/hr (incl. fringe) -	\$2106 ³	
Ann. Refresher \$160/person/yr x 3 persons x 4 years -	\$1920 ¹	
Wages 8 hrs/person @ \$17.55/hr (incl. fringe) x 3 persons x 4 years -	<u>\$1685</u> ³	
	\$7961/5 years =	<u>\$1,593</u>
* Training at Lakeshore Tech.		

Cost of Baseline Medicals

Medical \$500/person 3 persons -	\$1500 ²	
Wages 8 hrs/person @ \$17.55/hr -	\$ 422 ³	
	\$1922/5 years =	<u>\$385</u>

Cost of Power Etc.

Electricity \$100/month		\$1,200
Heat (Gas) \$70/month		<u>\$840</u>
Water & Sewer \$90/quarter		<u>\$360</u>
		\$2,400

Cost of Supplies

Sulfuric Acid \$25/drum 72 drums/year * 6/month		\$1,800
Sodium Hydroxide \$50/drum 54 drums/year * 4.5/month		\$2,700
Sodium Bisulfite \$100/drum 48 drums/year * 4/month		\$4,800
Polymer \$3/5gal 10 pails * 10/year		\$30
Drums \$50/drum 68 drums * 50 drums produced over 9 months (5.7 drums/month)		\$3,400
Oil		<u>\$100</u>
		\$12,830

Cost of Site Services

Grass Cutting \$25/time 10 times/year	\$250
Snow Plowing \$25/time 6 times/year	\$150
Garbage Disposal	<u>\$250</u>
	\$650

Cost of Repairs

* Does not include major equipment failures

\$2,500

Cost of Analysis

Laboratory Qtrly \$500/Qtr	\$2,000
On-Site/Batch \$4/batch 1 batch/day (\$4 x 5 days/week x 52 weeks)	\$1,040
Analytical TCLP 2 @ \$1500/time (\$1,500 x 2 ÷ 5 years)	<u>\$600</u>
	\$3,640

Cost of Transport

Water from Zinc to Chrome Shop \$400/haul 10 hauls/year	\$4,000
Resid. from Chrome to Zinc Shop \$200/haul 5 hauls/year	\$1,000
* E & K for hauling hazardous waste	
* Apx. 1/3 of drum/batch	
Resid. to Recycler \$900/trip 4 trips/yr	<u>\$3,600</u>
	\$8,600

Cost of Residual Recycling

\$150/drum 68 drums/yr	<u>\$10,200</u>
* If Recycled	

Cost of Final Treatment - Wastewater Treatment Plant

* Based on Volume to POTW

\$700

TOTAL (Annual Average)

\$80,002

Please note these are estimates of the actual costs only.



PROCUREMENT SYSTEM CERTIFICATION

Form Approved
OMB No. 2000-0453
Approval expires 10-31-87

APPLICANT'S NAME
State of Wisconsin
Department of Natural Resources

ASSISTANCE APPLICATION NUMBER

APPLICANT'S ADDRESS
P.O. Box 7921
Madison, WI 53707

SECTION I - INSTRUCTIONS

The applicant must complete and submit a copy of this form with each application for EPA Assistance. If the applicant has certified its procurement system to EPA within the past 2 years and the system has not been substantially revised, complete Part A in Section II, then sign and date the form. If the system has not been certified within the past 2 years, complete Part B, then sign and date the form.

SECTION II - CERTIFICATION

A I affirm that the applicant has within the past 2 years certified to EPA that its procurement system complies with 40 CFR Part 31 and that the system meets the requirements in 40 CFR Part 31. The date of the applicant's latest certification is:	MONTH/YEAR November 1989
--	-----------------------------

B Based upon my evaluation of the applicant's procurement system, I, as authorized representative of the applicant (Check one of the following)

1. CERTIFY that the applicant's procurement system will meet all of the requirements of 40 CFR Part 31 before undertaking any procurement action with EPA assistance

Please furnish citations to applicable procurement ordinances and regulations

(See attached State of Wisconsin Procurement Manual)

2. DO NOT CERTIFY THE APPLICANT'S PROCUREMENT SYSTEM. The applicant agrees to follow the requirements of 40 CFR Part 31, including the procedures in Appendix A, and allow EPA preaward review of proposed procurement actions that will use EPA assistance.

TYPED NAME AND TITLE
Carroll D. Besadny, Secretary
Wisconsin Dept. of Natural Resources

SIGNATURE
Carroll D. Besadny

DATE
10/30/89

Tommy G. Thompson
Governor

James R. Klauser
Secretary



Mailing Address:
Post Office Box 7868
Madison, WI 53707-7868

State of Wisconsin
Department of Administration

101 South Webster Street • Madison, Wisconsin

August 13, 1991

Ronald Semmann, Administrator
Office of Planning and Analysis
Department of Natural Resources
101 South Webster Street, 5th Floor
Madison, WI 53702

Hazardous Substance Response Trust Fund
(Superfund-Better Brite Pretreatment Plant
Operation), State Application Identifier
Number WI910719-201-N66802YY

Dear Mr. Semmann:

The Department of Administration has reviewed the above noted application for federal funding assistance. At the direction of the Governor of the State of Wisconsin, and pursuant to Wisconsin Statute 16.54, the Department is approving the application for submission to the federal funding authority. The application is in compliance with applicable state laws and is consistent with related state plans, programs and policies.

This letter constitutes compliance with the requirements for State Clearinghouse review under Presidential Executive Order 12372. Regional clearinghouses which have comments will send review letters directly to you.

The Department encourages favorable federal action on this grant application which will serve the needs of Wisconsin's citizens.

Sincerely,

A handwritten signature in cursive script, appearing to read 'J. R. Klauser for'.

James R. Klauser
Secretary

A copy of this letter must be transmitted to the federal granting agency with your application.



Carroll D. Besadny
Secretary

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

101 South Webster Street
Box 7921
Madison, Wisconsin 53707
TELEPHONE 608-266-2621
TELEFAX 608-267-3579
TDD 608-267-6897

July 29, 1991

File Ref: WID-560010118
Brown Co.
SW/SFND

Ms. Sue Coll
Wisconsin Project Officer
U.S. E.P.A., Region V, 5HS/12
230 South Dearborn Street
Chicago, IL 60604

Subject: Better Brite RI/FS, C.A. No. V995102-01
Quarterly Report, April - June, 1991

Dear Ms. ^{See} Coll:

Please find enclosed for your review, a summary of the third quarter, fiscal year 1991 state activities conducted under the Better Brite RI/FS Cooperative Agreement.

Included you will find a list of our estimated expenditures, a narrative discussion of our accomplishments and a statement regarding schedule compliance. Please let us know if you have any suggestions regarding the format or content of this report.

If there are any questions, please contact Mr. James McLimans at (608) 266-0830.

Sincerely,

Paul

Paul P. Didier, P.E., Director
Bureau of Solid and Hazardous Waste Management

PPD/tk

cc: Mark Giesfeldt SW/3
Sue Bangert SW/3
Darsi Foss SW/3
Jim McLimans SW/3
Doug Rossberg LMD-SW
Terry Koehn LMD-SW

QUARTERLY REPORT - BETTER BRITE RI/FS
APRIL THROUGH JUNE, 1991

1. Estimated Expenditures:

<u>Object Class</u>	<u>Last Quarter</u>	<u>Total to Date</u>
Personnel	\$ 4,600	\$ 10,480
Fringe Benefits	\$ 1,450	\$ 3,200
Travel	\$ 200	\$ 520
Equipment	\$ -0-	\$ -0-
Supplies	\$ 100	\$ 460
Contractual	\$ -0-	\$ -0-
Construction	\$ -0-	\$ -0-
Other	\$ 200	\$ 620
Indirect Costs	\$ 1,900	\$ 4,300
Total	\$ 8,450	\$ 19,580

2. Narrative:

- a. A detailed work proposal (for the first phase of the RI/FS including a cost estimate) and contract were negotiated with Hydro-Search, Inc. and finalized. Meetings in Milwaukee and Madison, WI, with representatives of Hydro-Search were conducted on April 10 and April 25, 1991.
- b. The contract and work proposal for the first phase of the RI/FS are in the process of being signed on behalf of the State of Wisconsin.
- c. The Proposed Plan for an Interim Action was finalized. State comments on the Proposed Plan were provided to EPA.
- d. The public meeting for the Interim Action Proposed Plan was held on May 9, 1991. Comments on the Press Release and Fact Sheet, associated with the Interim Action and Public Meeting, were provided to EPA.
- e. State comments on the Draft ROD for the Interim Action were provided to EPA on June 21, 1991.
- f. The ROD for the Interim Action was finalized. A State Concurrence Letter was provided to EPA.
- g. Briefing Memoranda were prepared for WDNR management, regarding both the Interim Action Proposed Plan and ROD.
- h. A request for additional funding through EPA was made for the RI/FS. This request was submitted to help assure proper performance of the investigation and to better reflect costs anticipated for the work.
- i. The State is currently in the process of developing a Cooperative Agreement and a State Superfund Contract regarding the Interim Action.

j. EPA's Emergency Response Branch elected to not pursue an agreement with the City of DePere for operation of the pretreatment plant, thus, the State is now in the process of negotiating with the City

3. Schedule Compliance:

We are currently six months behind the schedule outlined in the cooperative agreement.

We are currently waiting for execution of the contract with Hydro-Search, to allow work to begin on the first phase of the RI. Negotiations for the second phase (including performance of the RI field work and the FS) will begin upon final execution of the above contract.



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny
Secretary
Lake Michigan District Headquarters
1125 N. Military Avenue
P.O. Box 10448
Green Bay, Wisconsin 54307-0448

July 16, 1991

File Ref: WID-560010118
Brown Co.
SW/SFND

Ms. Sue Coll
Wisconsin Project Officer
U.S. E.P.A., Region V, 5HS/12
230 South Dearborn Street
Chicago, IL 60604

Subject: Better Brite RI/FS, C.A. No. V995102-01
Quarterly Report, April - June, 1991

Dear Ms. Coll:

Please find enclosed for your review, a summary of the Third Quarter, Fiscal Year 1991 State activities conducted under the Better Brite RI/FS Cooperative Agreement.

Included you will find a list of our estimated expenditures, a narrative discussion of our accomplishments and a statement regarding schedule compliance. Please let us know if you have any suggestions regarding the format or content of this report.

If there are any questions, please contact Mr. James McLimans at (608) 266-0830.

Sincerely,

Paul P. Didier, P.E., Director
Bureau of Solid and Hazardous Waste Management

PPD/tk

cc: Mark Giesfeldt	SW/3
Sue Bangert	SW/3
Darsi Foss	SW/3
Jim McLimans	SW/3
Doug Rossberg	LMD-SW
Terry Koehn	LMD-SW

**QUARTERLY REPORT - BETTER BRITE RI/FS
APRIL THROUGH JUNE, 1991**

1. Estimated Expenditures:

<u>Object Class</u>	<u>Last Quarter</u>	<u>Total to Date</u>
Personnel	\$	\$
T.Koehn Hours 241.5		
Fringe Benefits	\$	\$
Travel	\$	\$
Equipment	\$	\$
Supplies	\$	\$
Contractual	\$	\$
Construction	\$	\$
Other	\$	\$
Indirect Costs	\$	\$
<u>Total</u>	<u>\$</u>	<u>\$</u>

2. Narrative:

a. A detailed work proposal (for the first phase of the RI/FS including a cost estimate) and contract were negotiated with Hydro-Search, Inc. and finalized. Meetings in Milwaukee and Madison, WI, with representatives of Hydro-Search were conducted on April 10 and April 25, 1991.

b. The contract and work proposal for the first phase of the RI/FS are in the process of being signed on behalf of the State of Wisconsin.

c. The Proposed Plan for an Interim Action was finalized. State comments on the Proposed Plan were provided to EPA.

d. The public meeting for the Interim Action Proposed Plan was held on May 9, 1991. Comments on the Press Release and Fact Sheet, associated with the Interim Action and Public Meeting, were provided to EPA.

e. State comments on the Draft ROD for the Interim Action were provided to EPA on June 21, 1991.

f. The ROD for the Interim Action was finalized. A State Concurrence Letter was provided to EPA.

g. Briefing Memoranda were prepared for WDNR management, regarding both the Interim Action Proposed Plan and ROD.

h. A request for additional funding through EPA was made for the RI/FS. This request was submitted to help assure proper performance of the investigation and to better reflect costs anticipated for the work.

i. The State is currently in the process of developing a Cooperative Agreement and a State Superfund Contract regarding the Interim Action.

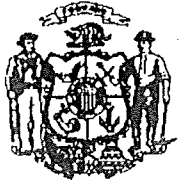
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3. Schedule Compliance:

We are currently six months behind the schedule outlined in the cooperative agreement.

- We are currently waiting for execution of the contract with Hydro-Search, to allow work to begin on the first phase of the RI. Negotiations for the second phase (including performance of the RI field work and the FS) will begin upon final execution of the above contract.

5-10-91



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny, Secretary
Box 7921
Madison, Wisconsin 53707
DNR TELEFAX NO. 608-267-3579
TDD NO. 608-267-6897
SOLID WASTE TELEFAX NO. 608-267-2768

May 7, 1991

File Ref: 4440

Ms. Sue Coll
Wisconsin Project Officer
U.S. EPA Region V, 5HS/12
230 South Dearborn St.
Chicago IL 60604

Subject: Better Brite RI/FS C.A. No. V995102-01
Quarterly Report, January - March, 1991

Dear Ms. Coll:

I have enclosed, for your review, a summary of the 2nd quarter, FY'91 state activities conducted under the Better Brite RI/FS Cooperative Agreement.

Included you will find a list of our estimated expenditures, a narrative discussion of our accomplishments, and a statement regarding schedule compliance. Please let us know if you have any suggestions regarding the format or content of this report.

If there are any questions, please contact James McLimans at (608) 266-0830.

Sincerely,

Paul P. Didier *PPD*

Paul P. Didier, P.E., Director
Bureau of Solid and Hazardous Waste Management

PPD /jm

Enclosure

cc: M. Giesfeldt/S. Bangert - SW/3
T. Koehn - LMD
C. VanDerLoop - SW/3

QUARTERLY REPORT - BETTER BRITE RI/FS
JANUARY THROUGH MARCH, 1991

1. Estimated Expenditures:

<u>Object Class</u>	<u>Last Quarter</u>	<u>Total to Date</u>
Personnel	\$ 3,500	\$ 4,000
Fringe Benefits	\$ 1,100	\$ 1,260
Travel	\$ 50	\$ 50
Equipment	\$ -0-	\$ -0-
Supplies	\$ 100	\$ 100
Contractual	\$ -0-	\$ -0-
Construction	\$ -0-	\$ -0-
Other	\$ 50	\$ 100
Indirect Costs	<u>\$ 1,400</u>	<u>\$ 1,650</u>
Total	\$ 6,200	\$7,160

2. Narrative:

- a. We scored applications submitted by interested consulting firms and developed a short list of preferred consultants.
- b. We requested proposals from our short list of firms and invited each of the firms in to make presentations.
- c. We selected Hydro-Search Incorporated as our number one firm.
- d. We met with Hydro-Search and requested a detailed proposal including costs.
- e. We again met with Hydro-Search to discuss the detailed proposal that was submitted.
- f. We began negotiating contract language with Hydro-Search.
- g. We reviewed and commented on the Interim Action proposed plan prepared by EPA's RPM.

3. Schedule Compliance: We are currently 1 month behind schedule.

Terry Koehn-LMD

State of Wisconsin

CORRESPONDENCE/MEMORANDUM

5-10-91

DATE: May 2, 1991
TO: State-lead Project Managers
FROM: Darsi Foss
SUBJECT: Planning for Community Relations Activities

FILE REF: 4440

As many of you know, Jim Leverance has temporarily left us. In his absence, we are trying to cope as best we can. Currently, we are trying to finalize an interim strategy to meet our community relations needs at our state-lead, fund-financed and enforcement sites. It would help if you would fill out the attached "generic" schedule for your state-lead site and return it to me by Monday, May 13. I have attached an example for those of you who cannot function without explicit directions.

Let me know if you have questions. Thanks.

cc:

Mark Giesfeldt
Sue Louisnathan
Terry Koehn - Better Brite
Steve Ales - Delevan
Mike Schmoller - Hechimovich & Sauk
Gary Edelstein - Lauer & Mauthe

Call to CVLP

5-13-91

she will check with
Foss & Leverance for
Info

Call to Foss

5-13-91

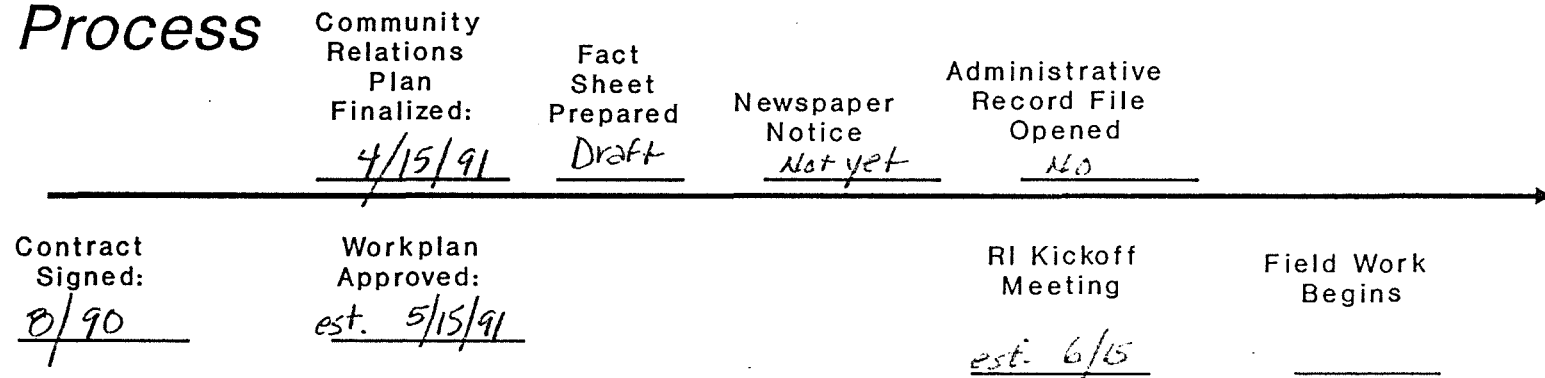
CVLP to be in touch
with her.

- state that Info Repos
will be at DePue Library.

Superfund Site Schedule for

Fred's Fill DIRT + Croissants

RI Process



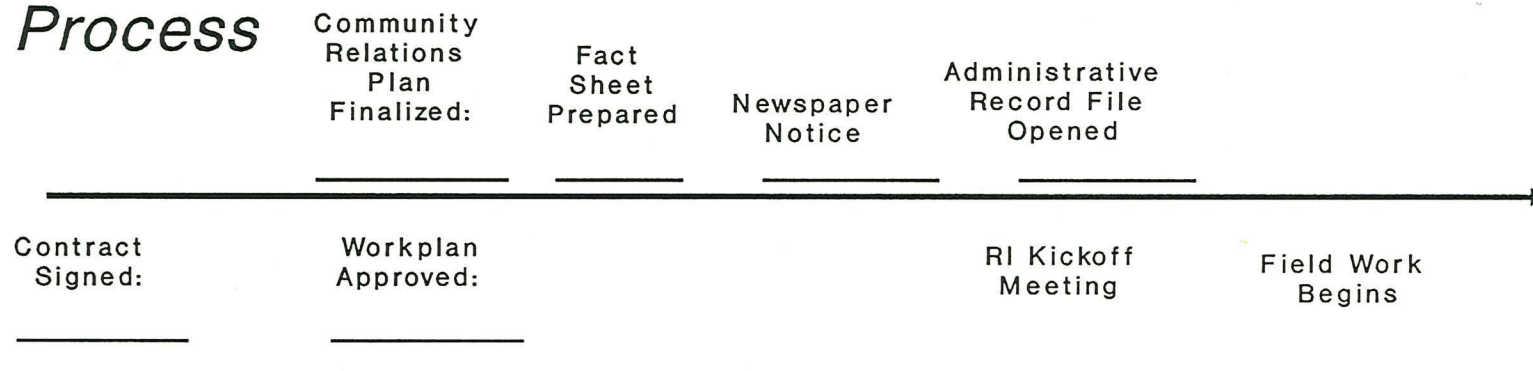
Information Repository
& Administrative Record File
Established? No

Where?
Spoke with librarians
in Mayville

Superfund Site Schedule for

Better Brute

RI Process

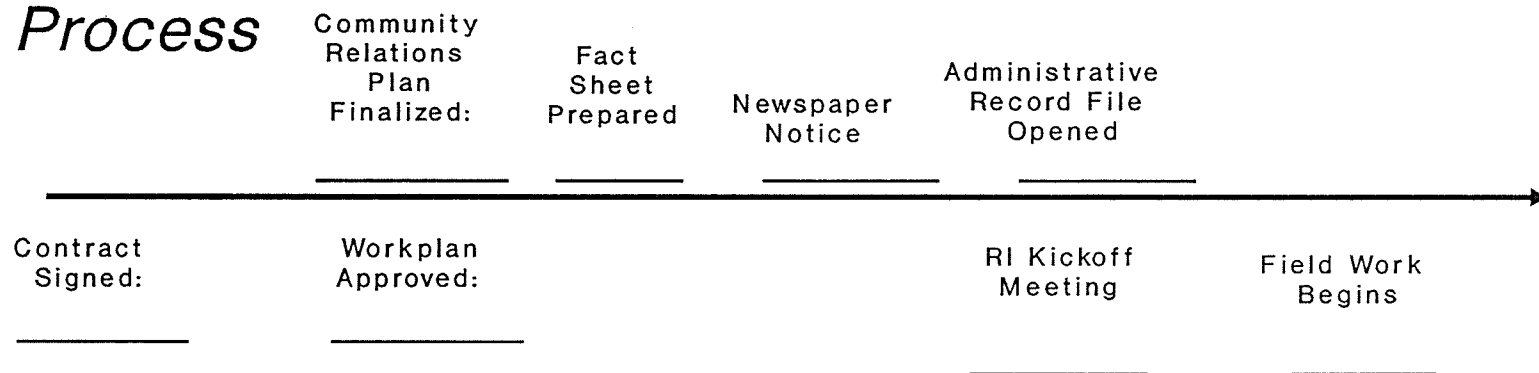


Information Repository
& Administrative Record File
Established?

Where?

Superfund Site Schedule for

RI Process



Information Repository
& Administrative Record File
Established?

Where?



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny, Secretary
Box 7921
Madison, Wisconsin 53707
DNR TELEFAX NO. 608-267-3579
TDD NO. 608-267-6897
SOLID WASTE TELEFAX NO. 608-267-2768

February 20, 1991

File Ref: 4440

Ms. Sue Coll
Wisconsin Project Officer
U.S. EPA Region V, 5HS/12
230 South Dearborn St.
Chicago IL 60604

Subject: Better Brite RI/FS C.A. No. V995102-01
Quarterly Report, October - December, 1990

Dear Ms. ^{Sue} Coll:

I have enclosed, for your review, a summary of the 1st quarter, FY'91 state activities conducted under the Better Brite RI/FS Cooperative Agreement.

Included you will find a list of our estimated expenditures, a narrative discussion of our accomplishments, and a statement regarding schedule compliance. Please let us know if you have any suggestions regarding the format or content of this report.

If there are any questions, please contact James McLimans at (608) 266-0830.

Sincerely,

A handwritten signature in cursive script that reads "Paul".

Paul P. Didier, P.E., Director
Bureau of Solid and Hazardous Waste Management

PPD /jm

Enclosure

cc: M. Giesfeldt/S. Bangert - SW/3
A. Weissbach - LMD

QUARTERLY REPORT - BETTER BRITE RI/FS
OCTOBER THROUGH DECEMBER, 1990

1. Estimated Expenditures:

<u>Object Class</u>	<u>Last Quarter</u>	<u>Total to Date</u>
Personnel	\$ 3,500	\$ 3,500
Fringe Benefits	\$ 1,100	\$ 1,100
Travel	\$ 50	\$ 50
Equipment	\$ -0-	\$ -0-
Supplies	\$ 100	\$ 100
Contractual	\$ -0-	\$ -0-
Construction	\$ -0-	\$ -0-
Other	\$ 100	\$ 100
Indirect Costs	\$ 1,400	\$ 1,400
Total	\$ 6,250	\$6,250

2. Narrative:

- a. We established a consultant selection committee.
- b. We published an invitation for professional consulting services in the Milwaukee Journal/Sentinel Legal Notices section and Western Builder (copy attached).
- c. We sent applications to interested consulting firms and responded to requests for additional information.
- d. We, and the University of Wisconsin State Laboratory of Hygiene, compiled all existing information pertaining to laboratory analysis of previously collected samples.

3. Schedule Compliance: We are currently 1 month behind schedule.



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny, Secretary
Box 7921

Madison, Wisconsin 53707

TELEFAX NO. 608-267-3579

TDD NO. 608-267-6897

SOLID WASTE TELEFAX NO. 608-267-2768

File Ref: 4440

September 20, 1990

Mr. Valdas V. Adamkus, Regional Administrator
U.S. Environmental Protection Agency - Region V
230 S. Dearborn Street
Chicago, IL 60604

Subject: Better Brite RI/FS
Cooperative Agreement Application

Dear Mr. Adamkus:

We are sending this letter to transmit our Cooperative Agreement application for CERCLA funds to complete a Remedial Investigation/Feasibility Study at the Better Brite Superfund site.

Comments received from EPA Region V, on a draft application submitted earlier, have been incorporated in this final application.

If there are any questions, please contact James McLimans at (608) 266-0830.

Sincerely,

C. D. Besadny
Secretary

Enclosure

cc: T. Burns - FN/1
M. Giesfeldt/S. Bangert - SW/3
→ D. Rossberg - LMD
P. Harder - AD/5
Sue Coll - EPA Region V

APPLICATION FOR FEDERAL ASSISTANCE

1. TYPE OF SUBMISSION: <i>Application</i> <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Non-Construction <i>Preapplication</i> <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction		2. DATE SUBMITTED 	Applicant Identifier 																												
3. DATE RECEIVED BY STATE 		State Application Identifier 																													
4. DATE RECEIVED BY FEDERAL AGENCY 		Federal Identifier 																													
5. APPLICANT INFORMATION																															
Legal Name: Department of Natural Resources		Organizational Unit: Bureau of Solid & Hazardous Waste Management																													
Address (give city, county, state, and zip code): PO Box 7921 Dane County Madison, WI 53707		Name and telephone number of the person to be contacted on matters involving this application (give area code) Paul P. Didier (608) 266-1327																													
6. EMPLOYER IDENTIFICATION NUMBER (EIN): 39 - 6006436		7. TYPE OF APPLICANT: (enter appropriate letter in box) A A. State B. County C. Municipal D. Township E. Interstate F. Intermunicipal G. Special District H. Independent School Dist. I. State Controlled Institution of Higher Learning J. Private University K. Indian Tribe L. Individual M. Profit Organization N. Other (Specify): _____																													
8. TYPE OF APPLICATION: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision If Revision, enter appropriate letter(s) in box(es): <input type="checkbox"/> <input type="checkbox"/> A. Increase Award B. Decrease Award C. Increase Duration D. Decrease Duration Other (specify): _____		9. NAME OF FEDERAL AGENCY: US EPA Region V																													
10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: 66 - 802 TITLE: Hazardous Substance Response Trust Fund		11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT: Superfund - Better Brite RI/FS																													
12. AREAS AFFECTED BY PROJECT (cities, counties, states, etc.): City of DePere Brown County																															
13. PROPOSED PROJECT: Start Date: 10/1/90 Ending Date: 7/31/93		14. CONGRESSIONAL DISTRICTS OF: a. Applicant: Statewide b. Project: 8th																													
15. ESTIMATED FUNDING: <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:15%;">a. Federal</td> <td style="width:15%;">\$</td> <td style="width:50%; text-align: right;">790,932</td> <td style="width:20%; text-align: right;">.00</td> </tr> <tr> <td>b. Applicant</td> <td>\$</td> <td></td> <td>.00</td> </tr> <tr> <td>c. State</td> <td>\$</td> <td></td> <td>.00</td> </tr> <tr> <td>d. Local</td> <td>\$</td> <td></td> <td>.00</td> </tr> <tr> <td>e. Other</td> <td>\$</td> <td></td> <td>.00</td> </tr> <tr> <td>f. Program Income</td> <td>\$</td> <td></td> <td>.00</td> </tr> <tr> <td>g. TOTAL</td> <td>\$</td> <td>790,982</td> <td>.00</td> </tr> </table>		a. Federal	\$	790,932	.00	b. Applicant	\$.00	c. State	\$.00	d. Local	\$.00	e. Other	\$.00	f. Program Income	\$.00	g. TOTAL	\$	790,982	.00	16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS? a. YES. THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON. DATE <u>9/6/90</u> b. NO. <input type="checkbox"/> PROGRAM IS NOT COVERED BY E.O. 12372 <input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW	
a. Federal	\$	790,932	.00																												
b. Applicant	\$.00																												
c. State	\$.00																												
d. Local	\$.00																												
e. Other	\$.00																												
f. Program Income	\$.00																												
g. TOTAL	\$	790,982	.00																												
17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT? <input type="checkbox"/> Yes If "Yes," attach an explanation. <input checked="" type="checkbox"/> No																															
18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT, THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED																															
a. Typed Name of Authorized Representative C. D. Besadny		b. Title Secretary	c. Telephone number																												
d. Signature of Authorized Representative 		e. Date Signed 9/20/90																													

BUDGET INFORMATION — Non-Construction Programs

SECTION A — BUDGET SUMMARY

Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Better Brite	66.802	\$	\$	\$ 790,982	\$	\$ 790,982
2.						
3.						
4.						
5. TOTALS		\$	\$	\$ 790,982	\$	\$ 790,982

SECTION B — BUDGET CATEGORIES

6 Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY				Total (5)
	(1)	(2)	(3)	(4)	
a. Personnel	\$ 53,220	\$	\$	\$	\$ 53,220
b. Fringe Benefits	16,764				16,764
c. Travel	5,850				5,850
d. Equipment	-0-				-0-
e. Supplies	1,580				1,580
f. Contractual	690,000				690,000
g. Construction	-0-				-0-
h. Other	1,600				1,600
i. Total Direct Charges (sum of 6a - 6h)	769,014				769,014
j. Indirect Charges	21,968				21,968
k. TOTALS (sum of 6i and 6j)	\$ 790,982	\$	\$	\$	\$ 790,982

7. Program Income	\$	\$	\$	\$	\$
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SECTION C - NON-FEDERAL RESOURCES

(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e) TOTALS
8. Better Brite RI/FS	\$	\$	\$	\$ - 0 -
9.				
10.				
11.				
12. TOTALS (sum of lines 8 and 11)	\$	\$	\$	\$ - 0 -

SECTION D - FORECASTED CASH NEEDS

13. Federal	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
	\$ 250,000	\$ 62,500	\$ 62,500	\$ 62,500	\$ 62,500
14. NonFederal	-0-				
15. TOTAL (sum of lines 13 and 14)	\$ 250,000	\$ 62,500	\$ 62,500	\$ 62,500	\$ 62,500

SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT

(a) Grant Program	FUTURE FUNDING PERIODS (Years)			
	(b) First	(c) Second	(d) Third	(e) Fourth
16.	\$ 270,000	\$ 270,982	\$	\$
17.				
18.				
19.				
20. TOTALS (sum of lines 16-19)	\$ 270,000	\$ 270,982	\$	\$

SECTION F - OTHER BUDGET INFORMATION

(Attach additional Sheets if Necessary)

21. Direct Charges: See attached budget detail	22. Indirect Charges: 31.39% of salary & fringe benefits
--	--

23. Remarks


ASSURANCES — NON-CONSTRUCTION PROGRAMS

Note: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States, and if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§ 4728-4763) relating to prescribed standards for merit systems for programs funded under one of the nineteen statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§ 1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§ 6101-6107), which prohibits discrimination on the basis of age;
- (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§ 523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. 290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. § 3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply with the provisions of the Hatch Act (5 U.S.C. §§ 1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§ 276a to 276a-7), the Copeland Act (40 U.S.C. § 276c and 18 U.S.C. §§ 874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§ 327-333), regarding labor standards for federally assisted construction subagreements.

10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§ 1451 et seq.); (f) conformity of Federal actions to State (Clear Air) Implementation Plans under Section 176(c) of the Clear Air Act of 1955, as amended (42 U.S.C. § 7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended, (P.L. 93-523); and (h) protection of endangered species under the Endangered Species Act of 1973, as amended, (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§ 1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. 469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. 2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§ 4801 et seq.) which prohibits the use of lead based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act of 1984.
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Secretary
APPLICANT ORGANIZATION Wisconsin Department of Natural Resources	DATE SUBMITTED 9/20/90

Assurances

1. This Agreement is subject to the procurement standards of Title 40 of the Code of Federal Regulations Part 35 Subpart 0.
2. In accepting this Cooperative Agreement, the recipient agrees to the following conditions for the letter of credit method of financing:
 - a) Cash drawdowns will occur only when needed for disbursements.
 - b) Timely reporting of cash disbursements and balances will be provided, as required by the EPA Letter of Credit Manual.
 - c) The same standards of timing and reporting will be imposed on the secondary recipients, if any.
 - d) When drawdown under the letter of credit occurs, the recipient will show on the voucher (Standard Form 5805) the Cooperative Agreement number, the appropriate EPA account number, and the drawdown amount applicable to each site/activity account. The eighth digit of the account is the code to the appropriate activity assignment:
 - J - Pre-remedial Activity
 - L - Remedial Investigation/Feasibility Study
 - N - Remedial Design
 - R - Remedial Action
 - S - Operation and Maintenance
 - e) When funds for a specific activity have been exhausted but the work under the activity has not been completed, the recipient may not draw down from another activity or site account without written permission from the EPA Award Official.
 - f) Funds remaining in an account after the completion of an activity may be either returned to EPA or adjusted to another activity or site, at EPA's discretion.
 - g) When an activity is completed, the recipient will submit a final Financial Status Report (Standard Form 269) within 90 days to the EPA Award Official.
 - h) Superfund recipients also must submit the SF 269 within 90 days after the close of each budget period. If the budget period is longer than one year the report must be submitted annually, based on the anniversary date of the award.

Failure on the part of the recipient to comply with the above conditions may cause the unobligated portions of the letter of credit to be revoked and the financing methods changed to a reimbursable basis.

3. In accordance with the section 2(d) of the Prompt Payment Act (PL 97-177), Federal funds may not be used by the recipient for the payment of interest penalties to contractors when bills are paid late, nor may interest penalties be used to satisfy cost sharing requirements. Obligations to pay such interest penalties will not be obligations of the United States.
4. No portion of this award may be used for lobbying or propaganda purposes as prohibited by 18 USC section 1913 or by section 607 (a) of Public Law 96-74.
5. The recipient agrees that it will not award any subagreements until the recipient has negotiated a fair share objective with EPA. The recipient agrees to submit to the EPA Award Officials a completed EPA Form 6005-1 within fifteen (15) days after the end of each Federal fiscal quarter following the recipient's or its contractor's first subagreement award. Reporting must continue for each Federal fiscal quarter thereafter until award of the last subagreement for the activity or tasks identified in the Cooperative Agreement.
6. CERCLA section 104(c) requires that CERCLA-funded actions provide a cost-effective response, balancing the need for protection of public health, welfare, and the environment against the availability of amounts from the fund to respond to other sites. If the State requests additional fund-financed response at the site, EPA will evaluate the request against available fund monies to determine whether it is appropriate. This Cooperative Agreement does not commit EPA to future funding for response actions at the site.
7. The EPA Remedial Project Manager or his/her designee will conduct periodic reviews and site inspections to evaluate project activities to assure compliance with applicable EPA requirement and regulations. The State Project Officer will assure that all project schedules and reporting requirement are met or that any changes are agreed to by EPA.
8. The State agrees to satisfy all Federal, State, and local requirements, including permits and approvals, necessary for implementing activities addressed in this Cooperative Agreement. The State will provide access to the site as well as all right-of-way and easements necessary to complete the response actions. The State will provide access to EPA employees and contractors at all reasonable times. The State may not approve any compensation to property owners without EPA approval.
9. The State agrees to submit progress reports to the EPA Cooperative Agreement Project Officer within thirty (30) days of the end of each Federal fiscal quarter. These reports shall include a summary of: estimated expenditures by object class for each activity, both to date and since the previous report; estimates (percentages) of work elements completed for each activity, including a description of the basis for the estimates; estimated variances (cost and time) expected at the project completion; and any significant finds, problems encountered, schedule compliance (including justification for non-compliance) and any additional funding needs.

10. This Agreement is intended to benefit only the State and EPA. It extends no benefit or rights to any party not a signatory to this agreement. In addition, EPA does not assume any liability to third parties with respect to losses due to bodily injury or property damages that exceed the limitations contained in the provisions of 28 USC sections 1346(b), 2671-2680. To the extent permitted by State law, the State does not assume liability to any third parties with respect to losses due to bodily injury or property damage.
11. If, during the period of performance of this Agreement, responsible parties agree to perform, or to pay for the performance of, any work elements included in the statement of work (SOW) for this agreement, EPA and the State agree to negotiate jointly any necessary modifications to this Agreement. If appropriate, this Agreement may be amended to adjust the State's letter of credit and the project SOW accordingly.
12. The State shall include the following, or equivalent, clauses in each subagreement for services or construction awarded under this Cooperative Agreement:
 1. The contractor shall not provide data generated or otherwise obtained in performance of its responsibilities under this contract to any party other than the State and Federal agencies and their authorized agents.
 2. The contractor shall not accept employment from any party other than State and Federal agencies for work directly related to the site(s) covered under this contract for a period of three years from termination of the contract, or until any litigation related to the site(s) is completed, whichever is longer, unless it has received a written release from this restriction from the contracting State agency, including an EPA concurrence.
 3. The contractor, upon request, shall provide witnesses and documentation of activities performed and costs incurred under this contract to State and Federal agencies during the period of performance and for three years from termination of the contract, or until any litigation related to the site(s) is completed, whichever is longer. The contractor shall be entitled to reasonable compensation for any such activities performed.
13. Any emergency response activities conducted pursuant to the National Contingency Plan, 40 CFR section 300.65 shall not be restricted by the terms of this Agreement. EPA and the State may jointly suspend or modify the remedial activities in the SOW of this Agreement during and subsequent to necessary emergency response actions.
14. Nothing contained in this Agreement shall be construed to create, either expressly or by implication, the relationship of agency between EPA and the State. Any standards, procedures, or protocols prescribed in this Agreement to be followed by the State during the performance of its obligations under this Agreement are to assure the quality of the final product of the actions contemplated by this Agreement, and do not constitute a right to control the actions of the State. EPA (including

its employees and contractors) is not authorized to represent or act on behalf of the State in any matter related to this agreement, and State (including its employees and contractors) is not authorized to represent or act on behalf of EPA in any matters related to this agreement. Neither EPA nor the State shall be liable for the contracts, acts, errors, or omissions of the agents, employees, or contractors of the other party entered into, committed, or performed with respect to or in the performance of this Agreement.

15. EPA and the State agree that, with respect to the claims that each may be entitled to assert against any third person (herein called the "responsible party", whether one or more) for reimbursement of any services, materials, monies, or other thing of value expended by EPA or the State for response activity at the site(s) described herein, neither EPA nor the State will enter into a settlement with, or initiate a judicial or administrative proceeding against, a responsible party for the recovery of such sums except after having given such notice in writing to the other party to this Agreement not less than thirty (30) days in advance of the date of proposed settlement or commencement of the proposed judicial or administrative proceedings. Neither party to this Agreement shall negotiate for nor collect reimbursement of any response costs on behalf of the other party, and authority to do so is hereby expressly negated and denied.
16. EPA and the State agree that they will cooperate and coordinate in efforts to recover their respective costs of response actions taken at the site described herein, including the negotiation of settlement and the filing and management of any judicial actions against potential third parties. This shall include coordination in the use of evidence and witnesses available to each in the preparation and presentation of any cost recovery action, excepting any documents or information which may be confidential; under the provisions of any applicable State or Federal law or regulation.
17. EPA and the State agree that judicial action taken by either party against a potentially responsible party pursuant to CERCLA for recovery of any sum expended in response actions at the site described herein shall be filed in the United States District Court for the judicial district in which the site described in the Agreement is located, or in such other judicial district of the United States District Court as may be authorized by section 113 of CERCLA, and agreed to in writing by the parties of this Agreement.
18. The award of this Agreement does not constitute a waiver of EPA's right to bring an action against any person or persons for liability under sections 106 or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), or any other statutory provision or common law.
19. Any recovery achieved by the State pursuant to settlement, judgement, or consent decree or any action against any of the responsible parties will be shared with EPA in proportion to EPA's contribution to the site response activities under CERCLA.

BETTER BRITE RI/FS - COST BREAKDOWN BY OBJECT CLASS

PERSONNEL

<u>Approximate FTE</u>	<u>Class & Level</u>	<u>Salary</u>	<u>Cost</u>
0.3	Environmental Eng. Advance 1	\$41,700	\$12,510
0.5	Hydrogeologist 3	\$31,700	\$15,850
0.4	Environmental Spec. 6	\$29,300	\$11,720
0.2	Administrative Assistant 4	\$32,900	\$6,580
<u>0.2</u>	Community Relations Officer	\$32,800	<u>\$6,560</u>
1.6			\$53,220

FRINGE BENEFITS

Based on a rate of 31.5% of salary.

$$\$53,220 \quad X \quad 31.5\% = \quad \$16,764$$

TRAVEL

4 round trips from Green Bay to Chicago @ \$500/trip	\$2,000
4 round trips from Madison to Chicago @ \$250/trip	\$1,000
45 round trips Green Bay to DePere @ \$5/Trip	\$225
15 round trips Madison to DePere @ \$50/trip	\$750
15 nights lodging @ 50/night	\$750
45 days of meals @ \$25/day	<u>\$1,125</u>
	\$5,850

SUPPLIES

Basic Supplies \$800/FTE x 1.6 FTE	\$1,280
Safety Supplies (tyvek suits, respirator cartridges, etc.)	<u>\$300</u>
	\$1,580

OTHER

Communications \$1,000/FTE X 1.6 FTE	\$1,600
--------------------------------------	---------

CONTRACTUAL

\$690,000

INDIRECT

Based on a rate of 31.39% of salary and fringe benefits

$$\$69,984 \quad X \quad 31.39\% = \quad \$21,968$$

GRAND TOTAL \$790,982

BETTER BRITE RI/FS COST ESTIMATES		ESTIMATED CONTRACTURAL COST	ESTIMATED STATE COSTS
TASK			
1	SUMMARY AND VALIDATION OF EXISTING DATA (WDNR ACTIVITY)	-0-	\$ 2,800
2	CONTRACTOR PROCUREMENT (WDNR ACTIVITY)	-0-	\$ 3,007
3	PROJECT PLANNING (SCOPING)	\$ 125,000	
3.1	EVALUATION OF EXISTING INFORMATION		
3.2	WORKPLAN PREPARATION		
3.3	ARAR'S CONSIDERATION		
3.4	PREPARATION OF PROJECT PLANS		
3.5	MONTHLY PROGRESS REPORTS		
3.6	QUARTERLY REPORTS	-0-	\$ 1,000
4	COMMUNITY RELATIONS (WDNR ACTIVITY)	-0-	\$ 6,975
5	FIELD INVESTIGATIONS	\$ 350,000	
5.1	PRE-INVESTIGATION CONSIDERATIONS		
5.2	HYDROGEOLOGIC INVESTIGATION		
5.3	SURFACE WATERS SEWERS AND WATER MAIN INVESTIGATION		
5.4	SOIL INVESTIGATION		
5.5	AIR INVESTIGATION		
5.6	BUILDING INVESTIGATION		
5.7	POST-INVESTIGATION EVALUATION		
5.8	TECHNICAL MEMORANDA		
6	SAMPLE ANALYSIS/VALIDATION	incl. in task 5	
7	DATA EVALUATION	incl. in task 5	
8	RISK ASSESSMENT	\$ 25,000	
9	TREATABILITY STUDIES	\$ 50,000	
10	RI REPORT(S)	\$ 50,000	
	TOTAL	\$600,000	\$55,000
11	REMEDIAL ALTERNATIVES DEVELOPMENT AND SCREENING	\$ 15,000	
12	DETAILED ANALYSIS OF ALTERNATIVES	\$ 25,000	
13	FS REPORT(S)	\$ 30,000	
14	CONCEPTUAL DESIGN	\$ 20,000	
	TOTAL	\$ 90,000	\$32,200
	TOTAL	\$690,000	\$100,982

Ac Sept 28 91

BETTER BRITE RI/FS SCHEDULE

* MONTHS FROM AWARD OF COOPERATIVE AGREEMENT

September 13, 1990

* ^{0 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34}
 TASK 1. DATA SUMMARY (DNR) -----|
 TASK 2. CONTRACTOR PROCUREMENT -----|

* 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34
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COMMUNITY RELATIONS(DNR) on-going

BETTER-BRITE SITE, DE PERE, WISCONSIN

STATEMENT OF WORK
SEPTEMBER 1990

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STATEMENT OF WORK

BETTER-BRITE SITE, DE PERE, WISCONSIN

PURPOSE

The purpose of the remedial investigation/feasibility study (RI/FS) is to investigate the nature and extent of contamination at the Better-Brite site and to develop and evaluate remedial alternatives, as appropriate. The contractor will furnish all necessary personnel, materials and services needed for, or incidental to, performing the RI/FS, except as otherwise specified herein. The contractor will conduct the RI/FS in accordance with the Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA (US EPA, October 1988) or other more recent and appropriate guidance.

For the purpose of this and future documents, the Better-Brite Chrome and Zinc Shops have been combined as one site because of their close proximity, related background and joint nomination to the National Priorities List on August 28, 1990. Following is a brief description and current status of each facility.

Better Brite - Chrome Shop (519 Lande Street, DePere)

Site Description

The site is located in a residential neighborhood and abuts residential property on three sides and an active railroad track to the east. The topography is generally flat except on the west and south property edges where it slopes deeply downward to the adjacent properties. Surface water flow off the site is generally to the south and west. Approximately 30-40 ft. of Lacustrine, reddish brown clay, overlays the dolomite bedrock surface. The soil permeability is low, (1×10^{-8}) but thought to have a secondary permeability due to fractures in the clay structure. The surface water table slopes to the west.

Site History

The site began chrome plating in the early 1970's and used four 18 to 22 ft. deep buried, vertical tanks and several above ground tanks in the plating process. Surface spills in 1978 and 1979 resulted in the construction of a shallow (15 ft.) groundwater extraction system around a small portion of the site. This groundwater collection system is still in operation to date and pumps approximately 2,000 gallons a day at the wettest times of the day.

In 1986 and 1987 the facility went through Federal Bankruptcy, Chapter 7, Reorganization, and later Chapter 11, Liquidation. It was around this time that it became apparent that the vertical, underground plating tanks had leaked an unknown quantity of plating solution and volatile organic cleaners directly into the groundwater system. The acting trustee at the time removed a portion of the concrete floor and portions of the underground tanks. It was at this time that the magnitude of the environmental problem became apparent. The Federal Superfund Emergency Response Section was called in and proceeded to remove all the waste material and contaminated soils from off-site.

In the fall of 1987, the Wisconsin Environmental Repair Fund, installed 4 observation wells and 3 bedrock wells at the site to investigate the extent of contamination. High chromium and Volatile Organic Compound (VOC) levels were found in both soil borings and groundwater samples on and off-site. In 1989, the building was removed by private contractor and the site was rezoned by the city to residential. The Environmental Repair Program constructed a clay cap and fenced the area of highest soil contamination at that time.

Currently, the bankruptcy court has allowed the trustee to abandon the property and ownership of the site is in question. The EPA Emergency Response Section is in the process of constructing a wastewater pretreatment system to collect and pretreat groundwater prior to discharge to the sanitary sewer. It is intended to have the system operational in the fall of 1990. The City of DePere and the DNR has signed a cooperative agreement for operation and maintenance of the system

for a 3 year period. This facility has been referred to the Department of Justice several times since 1979 for spill and hazardous waste violations but those efforts have not proven successful to date.

Better Brite - Zinc Shop - 315 S. 6th Street, DePere

Site Description

This site is located in a mixed residential and light industrial area approximately 3/4 of a mile from the Chrome Site on Lande Street. The site has residents located on three sides and a trucking company to the east side. The surface topography is generally flat with ground elevations around 602 ft. mean sea level (MSL). Surface water leaves the property to the north and east where it enters the Fox River approximately 1/4 mile away. Soils on the site consist of 3 ft. of Lacustrine silty clay with lenses and seams of more permeable silts and sands above the dolomite bedrock. The water table flows to the northwest and has a strong downward gradient. There is a municipal well located approximately 300 ft. to the northwest which is thought to influence flow in the shallow unconsolidated and the deeper bedrock aquifers.

Site History

The zinc plating shop has been in operation since 1963 and continued to operate until July of 1989. Prior to moving the chrome plate operation to Lande Street, this facility plated chrome in deep, vertical plating tanks similar to what was constructed at Lande Street. It is thought that these tanks were never properly abandoned but merely covered up with a concrete floor and continued to be a source of contamination. The facility has plated zinc primarily since the early 1970's, when the facility moved its chrome plating operation to Lande Street. The facility has a long history of poor operation and spills to the surrounding soils. Wastewater and clay solutions routinely leaked between the floor and sill plate of the building along the south and east walls. In 1986, the facility went through Federal Bankruptcy Court which eventually allowed the trustee to abandon the property. The status of the ownership of this property is also currently in question. In 1987, the Environmental Repair Fund installed 3 shallow water table observation wells and 3 deeper piezometers just above the bedrock. Sample results obtained from these wells showed the soil and groundwater around the building to be contaminated with heavy metals, cyanide, and VOCs. Chrome was found in the basement of the adjoining residence directly to the south of the facility.

In July, 1990, the EPA Emergency Response Section took action to containerize and ship all hazardous and solid waste off-site. A groundwater collection sump (20 ft. by 30 ft. by 15 ft. deep) was constructed along the east side of the building. The sump was placed in operation and approximately 4500 gallons of contaminated groundwater were pumped and are currently stored in fiberglass tanks within the Zinc plating building. Enforcement action through the Department of Justice for hazardous waste violations have resulted in the facility being found in violation of numerous hazardous waste NR 181 violations. The forfeitures in association with those violations are still being negotiated.

TASK 1 SUMMARY/VALIDATION OF EXISTING DATA (WDNR ACTIVITY)

The purpose of this section is to gather and determine if existing data (past sampling and analyses by the Wisconsin Department of Natural Resources (WDNR) and the United States Environmental Protection Agency (US-EPA) emergency response contractor) is acceptable for use in conjunction with the remaining tasks of this RI/FS investigation.

All existing information pertaining to laboratory analyses of previously collected samples including, but not limited to documentation of holding times, instrument calibration, internal standards performance, field and matrix spike/matrix spike duplicate analysis, and compound quantitation and reported detection limits, will be compiled by the WDNR and the University of Wisconsin Laboratory of Hygiene (LOH). This information will be submitted to the US-EPA's Central Regional Laboratory (CRL) where 25% of the data package from each sampling event will be reviewed pursuant to established US-EPA data assessment/validation protocols. CRL's data review will determine the useability of the data for its intended purpose and identify any qualifications or limitations that must be considered. This information will be summarized in a memorandum prepared by CRL. Five copies of the memorandum shall be submitted to both the WDNR and the US-EPA's Remedial Project Manager.

Existing Data Use Objectives

All existing site characterization information validated under this task is intended to be used by the contractor for the following objectives:

- A. Determination of the extent of contamination in the unconsolidated deposits near the site.
- B. Determination of soil properties in the unconsolidated deposits near the site for the purposes of identifying potential preferential contaminant flow paths.
- C. Determination of shallow groundwater quality near the site.
- D. Determination of the location of additional investigation activities (i.e., wells, borings, sampling, etc.).

TASK 2 CONTRACTOR PROCUREMENT (WDNR ACTIVITY)

Concurrent with task 1, the WDNR will follow appropriate contractor procurement procedures to hire a contractor to complete the remaining tasks.

TASK 3 PROJECT PLANNING (SCOPING)

Upon receipt of the Statement of Work the contractor shall begin planning the specific RI/FS activities that will need to be conducted.

subtask 3.1 Evaluation of Existing Information

As a part of this planning effort, the contractor will compile existing information and data into a **site background summary**. The data gathered during previous investigations will be reviewed and evaluated in accordance with the Existing Data Quality Objective listed under Task 1 above. Regional information will be obtained from available USGS and Wisconsin Geologic Natural History Survey reports. Existing site information to be reviewed will include, but not necessarily be limited to:

- A. WDNR files.
- B. US-EPA files.
- C. Aerial photographs.
- D. Historical water quality data.
- E. U.S. and Wisconsin Geological Survey files.
- F. Previous contractor files.

In addition to this literature search, at least one site visit will be used to confirm and/or update certain information, including but not limited to the following:

- A. Existing monitoring wells will be inspected to determine if they are functional. Well construction documentation for each well will be reviewed and compared to current NR141, Wisc. Admin. Code standards. Wells in bad disrepair will need to be abandoned in accordance with NR141 standards.
- B. Condition of the Zinc Shop building and operational character of the sump pit and holding tanks within the building.
- C. Condition and operational character of the french drain system and pretreatment unit at the Chrome Shop location.
- D. Existence of any visual contamination on or in nearby residential buildings and areas, ie. flooded or stained basements/yards.

- E. Location and status of municipal and private water supply wells.

The contractor will prepare a **Site Background Summary** that will include:

- A. Site background information.

- 1) Prepare a brief summary of the Better-Brite Zinc and Chrome site locations and pertinent area boundary features.
- 2) To the extent possible, describe the topography, hydrology, geology, soils, and hydrogeology on a regional and site specific basis.
- 3) Prepare a brief historical summary of the operations of the facilities.

- B. Nature and extent of problem.

Prepare a summary of the actual and potential on-site and off-site health and environmental effects. Include discussion of population in area potentially affected by release of contaminants from the site. Describe any reports of human or animal illnesses that may be related to the site. Emphasis should be placed on describing the threat or potential threat to public health and the environment.

- C. History of response actions.

Prepare a brief summary of previous response actions conducted by either local, state, federal or private parties, their technical reports, and their results (in tabular form). This summary should address any enforcement activities undertaken to identify responsible parties, compel private cleanup, and recover costs.

- D. Site map.

For ease of review, a separate map of each site location shall be prepared.

The contractor will prepare current site maps showing elevations and locations of all pertinent physical features and facilities. Such information is necessary for developing, screening, and selecting remedial actions as well as for the actual design and implementation of the remedial actions. The maps will show the location of all groundwater monitoring wells, and all sampling locations. Nearby sampled houses and yards should also be shown on the map. The monitoring wells shall be labeled in accordance with the current WDNR numbering system.

The contractor shall research the availability of existing topographic maps and plan sheets and use them if possible. Such maps may be available from the previous contractors, other local governments, utilities and local planning agencies.

Boundaries of adjacent land shall be researched and the owner of adjacent properties shall be indicated on the maps. Any water supply wells within a one mile radius of each of the sites will be identified and shown on the maps.

If necessary, a topographic survey of the sites limits shall be performed tying horizontal distances of appropriate physical features and facilities to the property boundary, and vertical elevations to National Geodetic Vertical Datum (Mean Sea Level). Accuracy will be to national map standards. A topographic map will be produced showing one foot contours and a scale of one inch = 50 feet. A 100 foot survey grid system will also be included on the map(s). These criteria may be modified to improve clarity and produce a map size that can be effectively used. Copies of the site maps reduced onto 8 1/2" by 11" paper should also be included. Typical features of facilities that will be included in the map are:

1. Locations of buildings, streams, ditches, railroad tracks, fences and other prominent fixtures on or adjacent to the site.
2. Locations of overhead and underground utilities on the site, in the public right of way and adjacent properties potentially affected by contamination from the site. Included should be storm sewer, sanitary sewer, water main, gas main, telephone, cable TV, and electrical lines.
3. Important features inside the site building (Zinc Shop) or former building (Chrome Shop), including tanks, floor drains/troughs and any identified sources of contamination.

E. Conceptual site model.

Develop a conceptual model of the site(s) that includes a description of the physical site conditions as to the geology, meteorology, hydrogeology and hydrology. All subsequent site investigation activities will refine and validate this model. The conceptual model will focus on the groundwater flow system and will be based on the depositional history, inferred recharge and discharge mechanisms, estimated topographic and hydraulic gradients and existing and past land use patterns.

F. Identification of data gaps.

Any data gaps in available information must be identified, recommendations made for additional sampling to fill in data gaps and a determination of the significance of the data gaps. The contractor shall develop the criteria for approval for what constitutes a significant data gap. At a minimum, that criteria will account for:

1. Changes in the physical nature of the site or physical features at the site since the existing data was collected.
2. Significant migration, dilution or attenuation of contaminants since the existing data was collected.
3. A lack of information on the horizontal or vertical extent of soil contamination over a large enough area of the site to preclude the development of feasible remedial alternatives.
4. A lack of information on an exposure route or routes that would preclude the development of feasible remedial alternatives.

subtask 3.2 Work Plan Preparation

The contractor shall prepare a detailed workplan based on this Statement of Work for the RI/FS. The work plan shall include an outline of proposed investigation activities, a time schedule, personnel and equipment requirements and the proposed budget with unit cost estimates. The work plan will be developed based on review of the existing information, meeting(s) with the WDNR, US-EPA, and site visit(s). The contractor shall submit five copies of the draft RI/FS workplan to the WDNR and the US-EPA for review and approval. A final RI/FS workplan shall be prepared that fully addresses all comments prepared by the WDNR and the US-EPA.

subtask 3.3 ARAR's Consideration

Upon receipt of the WDNR's list of general Wisconsin Applicable or Relevant and Appropriate Requirements (ARAR's), the contractor will consider potential ARAR's associated with the location and contaminants of the site and the potential response actions.

subtask 3.4 Preparation of Project Plans

The contractor shall prepare all necessary project plans for the RI. These project plans shall include the following:

A. A Sampling & Analysis Plan composed of:

1. Field Sampling Plan (FSP)

The FSP shall be prepared to address all field activities necessary to obtain additional site data. The FSP shall contain an evaluation explaining what additional data are required to adequately characterize the site, conduct a baseline risk assessment and support the evaluation of remedial technologies in the FS. The FSP will contain a statement of sampling objectives; specification of equipment; analyses of interest; sample types, location and frequency, and a schedule. The FSP must address all levels of the investigations as well as all types of investigations considered. The FSP will identify associated data that may be needed to evaluate alternatives for the feasibility study.

2. Quality Assurance Project Plan (QAPP)

The QAPP will be submitted as part of the work plan under Task 1, and must be approved by both the WDNR and the US-EPA's Quality Assurance Section prior to the start of the RI at the site. The purpose of the QAPP is to ensure that formal procedures are available for all activities affecting the quality of data collected. The contractor will plan for a pre - QAPP meeting with the WDNR, the US-EPA and the contractor. The contractor will prepare the QAPP utilizing the input provided at that meeting. For sample chemical analysis the contractor shall utilize US-EPA Contract Laboratory Program (CLP) laboratories.

The QAPP will be prepared according to the most recent US-EPA guidelines for preparing Quality Assurance Plans and other applicable U.S. EPA guidance, including the following:

- a. A project description (should be duplicated from the workplan).
- b. A project organization chart illustrating the lines of responsibility of the personnel involved in the sampling phase of the project.
- c. Quality assurance objectives for data such as the required precision and accuracy, completeness of data, representativeness of data, comparability of data, and the intended use of collected data.
- d. Sample custody procedures during sample collection, in the laboratory, and as part of the final evidence files.

- e. The type and frequency of calibration procedures for field and laboratory instruments, internal quality control checks, and quality assurance performance audits and system audits.
 - f. Preventative maintenance procedures and schedule and corrective action procedures for field and laboratory instruments.
 - g. Specific procedures to assess data precision, representativeness, comparability, accuracy, and completeness of specific measurement parameters.
 - h. Data documentation and tracking procedures.
- B. A **Data Management Plan** shall be developed and initiated by the contractor to document and track investigation data and results. The plan must identify and set up laboratory and data documentation materials and procedures, project file requirements, and project-related progress.
- C. A **Health and Safety Plan (HSP)** shall be prepared by the contractor. The contractor, their subcontractors and respective employees must comply with the HSP. The HSP shall be submitted as part of the work plan under Task 1, above. The purpose of the HSP is to assure that qualified personnel will be conducting the RI and to minimize the risks to personnel from chemical and physical hazardous during the course of work. A plan will be consistent with all applicable regulatory requirements contained in 20 CFR 1910.120(i)(2) - Occupational Health and Safety Administration, Hazardous Waste Operations and Emergency Response, Interim Rule December 19, 1986; US-EPA Order 1440.2 - Health and Safety Requirements for Employees Engaged in Field Activities; US-EPA Order 1440.3 - Respiratory Protection; US-EPA Occupational Health and Safety Manual; and US-EPA Interim Standard Operating Procedures (September, 1982).

The plan should provide a site background discussion and describe personnel responsibilities, protective equipment, health and safety procedures and protocols, decontamination procedures, personnel training, and type and extent of medical surveillance. The plan should identify problems or hazards that may be encountered and how these are to be addressed. Procedures for protecting third parties, such as visitors or the surrounding community, should also be addressed. **Standard operating procedures for ensuring worker safety should be referenced and not duplicated in the HSP.**

subtask 3.5 Monthly Progress Reports

The contractor will prepare **monthly progress reports** to describe the technical progress of all activities the contractor is responsible for. The reports and all deliverables must be submitted to the WDNR Project Manager (PM). The reports shall include the following information:

1. Identification of site and activity.
2. Status of work at the site and progress to date.
3. Percentage of completion.
4. Difficulties encountered during the reporting period.
5. Actions being taken to rectify problems.
6. Activities planned for the next month.
7. Changes in personnel.
8. Actual expenditures including fee and direct labor hours expended for this period.
9. Cumulative expenditures (including fee) and cumulative direct labor hours.
10. Projection of expenditures for completing the project, including an explanation of any significant variation from the forecasted target.
11. A graphic representation of proposed versus actual expenditures (plus fee) and comparison of actual versus target direct labor hours. A projection to completion will be made for both.

The monthly progress report will list target and actual completion dates for each task element including project completion and provide an explanation of any deviation from the milestones in the work plan schedule.

subtask 3.6 Quarterly Report (WNR Activity)

The WNR-PM will prepare Cooperative Agreement Quarterly Reports for submittal to the US-EPA Wisconsin Project Officer.

TASK 4 COMMUNITY RELATIONS (WNR ACTIVITY)

The WNR will prepare, for review and approval by US-EPA, a community relations plan (CRP) for this site from available background information which also includes interviews with residents and public officials in the community. This RI/FS community relations plan shall incorporate and utilize information gathered for the CRP prepared by the US-EPA for the Superfund Removal Actions that occurred at the site in June of 1990.

The plan shall include:

- A. A site description and area map.
- B. Site history.
- C. Key community concerns and level of interest.
- D. Mailing list that includes nearby and interested residents, public interest groups and elected officials.
- E. Schedule of community relation activities for the site.

Dates for plan development will be determined.

TASK 5 FIELD INVESTIGATIONS

subtask 5.1 Pre-investigation Considerations

Prior to starting any site investigations, the contractor will assess site conditions to determine potential categories for source control and/or off-site remedial actions. The contractor will identify preliminary remedial technologies providing detail sufficient to ensure that site investigation will develop a data base adequate for the evaluation of alternatives during the FS. Examples of questions to be answered are:

- 1. Source Control Action
 - a. What containment technologies appear feasible to prevent further contamination of groundwater?
 - b. Does reclamation appear to be a viable option?
 - c. Does on-site treatment appear to be a viable option, and if so, what category of treatment should be investigated (i.e., biological, physical, chemical, thermal, etc.)?
 - d. Will substances migrate or continue to migrate off-site if no action is taken? If only source control measures are taken?
 - e. What actions appear feasible to prevent and/or minimize direct contact with contaminants and exposure to dusts (interior and exterior dusts)?

2. Off-Site Action

- a. Does the apparent volume of contaminated groundwater make investigation or treatment impracticable?
- b. What technologies are available to treat the identified contaminants at the site?
- c. What technologies exist to effectively remove off-site contaminated materials (i.e., sewer sediments, etc.)?
- d. Will the off-site contamination continue to pose a threat if no action is taken?

The contractor will conduct only those site investigations necessary to characterize the site and its actual or potential hazard to public health and the environment. The investigations, along with the previously gathered data, should result in data of adequate technical content to screen and assess remedial alternatives developed in Task 11, below, support the detailed analysis of alternatives during the FS and develop a risk assessment under Task 8, below.

subtask 5.2 Hydrogeologic Investigation

Pursuant to an approved work plan under subtask 3.2, the contractor will develop and implement a program to evaluate groundwater flow patterns and the extent and the effects of groundwater contamination. The program will determine the present and potential extent of groundwater contamination within the unconsolidated deposits and within the bedrock aquifer(s) and evaluate the suitability of the site for on-site containment systems and/or selective treatment/removal of waste material. The investigation will be carried out in accordance with current WDNR requirements for well installation, sampling and modeling. The hydrogeologic study will further evaluate the subsurface geology and characteristics of all water bearing formations of concern. In addition, information will be gathered to fill in any gaps identified in task 2 above. This study will define the site hydrostratigraphy, controlling geologic features, zones of preferential groundwater transmission, and the distribution of hydraulic head(s). The results of this study will be combined with existing site data described in the preliminary site evaluation report, to define the groundwater flow patterns and to predict the vertical and lateral extent of contaminant migration.

Selected water supply wells in the area are also expected to be investigated. Where necessary and possible, and in accordance with the results of the Activities 1, existing functional wells will be utilized for site sampling in this phase. It is also expected that where necessary, all utility trenches will be investigated as routes for contamination migration in the unconsolidated deposits.

subtask 5.3 Surface Waters, Sewers and Water Main Investigation

Pursuant to an approved work plan under subtask 3.2, the contractor will develop and implement a program to determine the extent and/or potential for contamination of surface waters, foundation drains, storm sewer discharges, discharges into sanitary sewers, and possible migration into water mains should a negative pressure exist. This work will be coordinated with the appropriate local authorities, and the necessary permission obtained from them to conduct appropriate sampling. Where appropriate, work routinely performed by local officials (ie. video taping of sewers to identify cracks) will not be duplicated. The necessary water, sediment, storm sewer, sanitary sewer and water main sampling and/or soil or water sampling in and around such structures (ie. the use of test pits) will be collected. Provisions will be made to collect samples during and/or after a precipitation or snow melt event.

Subtask 5.4 Soil Investigation

Pursuant to an approved work plan under subtask 3.2, the contractor will develop and conduct a program to determine to extent of contamination of surface and subsurface soils in and around the site and sediments within any nearby water bodies which may have been affected by the site. This process may overlap with certain aspects of the hydrogeologic study (ie. characteristics of soil strata are relevant to both the transport of contaminants by groundwater and to the location of contaminants in the soil; cores from groundwater monitoring wells may serve as soil samples). A sampling program should be developed and conducted to determine the horizontal and vertical extent of contaminated soils based on the findings of subtask 3.1. The investigation will include any necessary background soil sampling to determine the natural concentration of inorganics in the area.

subtask 5.5 Air Investigation

Pursuant to an approved work plan under subtask 3.2, the contractor will develop and implement a program to determine the extent and potential for air contamination due to contaminated dusts entering the atmosphere from the site. The program should address the potential for chromium contaminated dust to enter the atmosphere, local wind patterns, and degree of hazard based on containment ability of the facility.

subtask 5.6 Building Investigation

As recent sampling was conducted for a Preliminary Health Assessment performed at the site, efforts in regard to the need for this sampling will be to supplement any data gaps identified by the Agency of Toxic Substances and Disease Registry and the Wisconsin Department of Health. Pursuant to an approved work plan under subtask 3.2, the contractor will develop and implement a program to determine the extent of contamination in the interior of residential buildings adjacent to the site.

In regard to the building investigation of the Zinc Shop, sampling efforts should concentrate on defining the levels of contaminants in the interior surfaces which would be used to select the remedial action for this building. Removal and disposal of this building may be required to completely address contamination beneath the building.

subtask 5.7 Post-Investigation Evaluation

Either during or following the site investigations, the contractor will assess the investigation results and recommend preliminary technologies likely to apply to the site problem. They will provide the basis for developing detailed alternatives and the cost effectiveness analysis during the FS. The work during the remedial investigation will generally be limited to the following:

1. Recommending types of remedial technologies appropriate to the site conditions.
2. Recommending whether or not to remove some or all of the waste for off-site treatment, storage or disposal.
3. Determining the capability of groups of waste with other wastes and materials considered as part of potential remedial actions (i.e., slurry walls, collection trenches or pipes, etc.).
4. Recommending alternatives for treatment, storage or disposal for each category of compatible wastes.
5. Recommending any bench or pilot treatability studies that may be pertinent to the site.

subtask 5.8 Technical Memoranda

The contractor shall submit succinct technical memoranda to the WDNR and the US-EPA for each subtask 5.2 through 5.7. Subtask memoranda shall be combined where appropriate and cost effective. The memoranda will include:

- Description of the subject activities.
- A plot of actual sampling locations along with corresponding sample numbers.
- All sample identification information.
- Summary tables of analytical results.
- any valid and appropriate recommendations under subtask 5.7.

The technical memoranda will be submitted no later than three (3) weeks after receipt of analytical data. Five (5) copies shall be sent to each the WDNR and the US-EPA.

TASK 6 SAMPLE ANALYSIS/VALIDATION

The contractor will develop a data management system including field logs, sample management and tracking procedures, and document control and inventory procedures for both laboratory data and field measurements to ensure that the data collected during the investigation are of adequate quality quantity to support the risk assessment and the FS.

Collected data should be validated at the appropriate field or laboratory Quality Control levels to determine whether it is appropriate for its intended use. Task management and quality controls will be provided by the contractor. The contractor will incorporate information from this task into the RI/FS report appendices.

TASK 7 DATA EVALUATION

Date collected during task 5 will be evaluated to fill specific data gaps identified in Task 3.F (Site Background Summary).

The contractor will analyze all site investigation data and present the results of the analyses in an organized and logical manner so that the relationships between site investigation results for each medium are apparent. The contractor will prepare a summary that describes (1) the concentrations of contaminants at and near the site, (2) the number, locations, and types of nearby populations and activities; and (3) the potential transport mechanism and the expected fate of the contaminant in the environment.

TASK 8 RISK ASSESSMENT

The contractor shall conduct a baseline risk assessment to assess the potential human health and environmental risks posed by the site in the absence of any remedial action. This effort will involve four components: contaminant identification, exposure assessment, toxicity assessment, and risk characterization.

- A. Contaminant Identification - The contractor will review available information on the hazardous substances present at the site and identify the major contaminants of concern. Contaminants of concern should be selected based on they intrinsic toxicological properties because they are present in large quantities, and/or because they are currently in, or potentially may migrate into, critical exposure pathways (e.g., drinking water).
- B. Exposure Assessment - The contractor will identify actual or potential exposure pathways, characterize potentially exposed populations, and evaluate the actual or potential extent of exposure.

- C. Toxicity Assessment - The contractor will provide a toxicity assessment of those chemicals found to be of concern during site investigation activities. This will involve an assessment of the types of adverse health or environmental effects associated with chemical exposures, the relationships between magnitude of exposures and adverse effects, and the related uncertainties for contaminant toxicity, (e.g. weight of evidence for a chemical's carcinogenicity).
- D. Risk Characterization - The contractor will integrate information developed during the exposure and toxicity assessments to characterize the current or potential risk to human health and/or the environment posed by the site. This characterization should identify the potential for adverse health or environmental effects for the chemicals of concern and identify any uncertainties associated with contaminant(s), toxicity(ies) and/or exposure assumptions.

TASK 9 TREATABILITY STUDIES

The contractor will conduct any necessary bench and pilot scale testing or modeling studies required to evaluate the effectiveness of remedial technologies and establish engineering criteria. The contractor will submit a separate work plan for any proposed work under this task to the WDNR and the US-EPA for review and approval.

TASK 10 RI REPORT(S)

The contractor shall prepare a thorough analysis and summary of all site investigations and the results. The objective of this task will be to ensure that the investigation data is sufficient in quality and quantity to meet the goals of the RI and support the FS. This summary shall incorporate all technological memoranda and discussions on preliminary remedial technologies and shall be presented to the WDNR and the US-EPA as a **Draft Remedial Investigation Report** for review and approval. WDNR and US-EPA Comments on the draft shall be addressed in the final document.

Results and data from all site investigations must be organized and presented logically so that the relationships between site investigations for each medium are apparent.

A. Data Analysis

The contractor will analyze all site investigation data and develop a summary of the type and extent of contamination at the site. The summary will describe the extent of contamination (qualitative/quantitative) in relation to background levels indicative for the area.

B. Risk Assessment

C. Application to Preliminary Technologies

The contractor will analyze the results of the site investigations in relation to preliminary technologies developed in subtask 5.8. Data supporting or rejecting types of remedial technologies, compatibility of wastes and construction materials and other conclusions should be presented.

TASK 11 REMEDIAL ALTERNATIVES DEVELOPMENT AND SCREENING

The contractor will develop a range of distinct, hazardous waste management alternatives that will remediate or control any contaminated media (soil, surface water, ground water, sediments) remaining at the site, as deemed necessary in the RI, to provide adequate protection of human health and the environment. The potential alternatives should encompass, as appropriate, a range of alternatives in which treatment is used to reduce the toxicity, mobility, or volume of wastes but vary in the degree to which long-term management of residuals or untreated waste is required, one or more alternatives involving containment with little or no treatment; and a no-action alternative. Alternatives that involve minimal efforts to reduce potential exposures (e.g., site fencing, deed restrictions) should be presented as "limited action" alternatives.

The following steps will be conducted to determine the appropriate range of alternatives for this site:

Establish Remedial Action Objectives and General Response Actions - Based on existing information, site-specific remedial action objectives to protect human health and the environment should be developed. The objectives should specify the contaminant(s) and media of concern, the exposure route(s) and receptor(s), and an acceptable contaminant level or range of levels for each exposure route (i.e., preliminary remediation goals).

Preliminary remediation goals should be established based on readily available information (e.g., RfDs) or chemical-specific ARARs (e.g., MCLs). The contractor should meet with the WDNR to discuss the remedial action objectives for the site. As more information is collected during the RI, the contractor, in consultation with the WDNR and the US-EPA, will refine remedial action objectives as appropriate.

General response actions will be developed for each medium of interest defining contaminant, treatment, excavation, pumping, or other actions, singly or in combination to satisfy remedial action objectives. Volumes or areas of media to which general response actions may apply shall be identified, taking into account requirements for protectiveness as identified in the remedial action objectives and the chemical and physical characteristics of the site.

Identify and Screen Technologies - Based on the developed general response actions, hazardous waste treatment technologies should be identified and screened to ensure that only those technologies applicable to the contaminants present, their physical matrix, and other site

characteristics will be considered. This screening will be based primarily on a technology's ability to effectively address the contaminants at the site, but will also take into account a technology's implementability and cost. The contractor will select representative process options, as appropriate, to carry forward into alternative development. The contractor will identify the need for treatability testing (as described under Task 9) for those technologies that are probable candidates for consideration during the detailed analysis.

Configure and Screen Alternatives - The potential technologies and process options will be combined into media-specific or sitewide alternatives. The developed alternatives should be defined with respect to size and configuration of the representative process options; time for remediation; rates of flow or treatment; spatial requirements; distances for disposal; and required permits, imposed limitations, and other factors necessary to evaluate the alternatives. If many distinct, viable options are available and developed, a screening of alternatives will be conducted to limit the number of alternatives that undergo the detailed analysis and to provide consideration of the most promising process options. The alternatives should be screened on a general basis with respect to their effectiveness, implementability, and cost. The contractor will meet with the WDNR to discuss which alternatives will be evaluated in the detailed analysis and to facilitate the identification of action-specific ARARs.

The following considerations must be used as a basis for the initial screening:

A. Environmental Protection

Only those alternatives that satisfy the response objectives, that effectively minimize or mitigate actual or potential harm to public health, welfare, or the environment and that are in compliance with federal, state or local environmental and health statutes (ARAR's) shall be considered further. Source control alternatives shall achieve adequate control of source materials. Off-site alternatives shall minimize or mitigate the threat of harm to public health, welfare, and the environment.

B. Environmental Effects

Alternatives posing significant adverse environmental effects will be excluded.

C. Costs

Total costs will include the cost of implementing the alternative and the cost of operation and maintenance. The cost of operation and maintenance shall be computed on a present worth basis for a 30 year period.

D. Implementability and Reliability

Alternatives that may prove extremely difficult to implement, will not achieve the remedial objectives in a reasonable time period, or rely on unproven technologies will be eliminated.

TASK 12 DETAILED ANALYSIS OF ALTERNATIVES

The contractor will evaluate the alternative remedies that pass through the initial screening in Task 11. Alternative evaluations shall be preceded by a detailed development of the remaining alternatives.

A. Development of Remaining Alternatives

The development of the remaining feasible remedial alternatives shall include at a minimum:

- 1) Description of appropriate treatment and disposal technologies.
- 2) Special engineering considerations required to implement the alternatives (i.e., pilot treatment facility, additional studies to proceed with final remedial design, etc.).
- 3) Environmental impacts and proposed methods and associated costs, for mitigating any adverse effects.
- 4) Operation, maintenance and monitoring requirements of the remedy.
- 5) Off-site disposal needs and transportation plans.
- 6) Temporary storage requirements.
- 7) Safety requirements for remedial implementation (including both on-site and off-site health and safety considerations).
- 8) A description of how the alternative could be phased into individual operable units. The description should include a discussion of how various operable units of the total remedy could be implemented individually or in groups, resulting in a significant improvement to the environment or savings in costs.
- 9) A description of how the alternative could be segmented to allow implementation of differing phases of the alternative.

- 10) A review of any off-site facilities required by the WDNR to ensure compliance with applicable regulations.

B. Analysis of Alternatives

The contractor will conduct a detailed analysis of alternatives which will consist of an individual analysis of each alternative against a set of evaluation criteria and a comparative analysis of all options against the evaluation criteria with respect to one another.

The evaluation criteria are as follows:

- 1) **Overall Protection of Human Health and the Environment** addresses whether or not a remedy provides adequate protection and describes how risks posed through each pathway are eliminated, reduced, or controlled through treatment, engineering controls, or institutional controls.
- 2) **Compliance with ARAR's** addresses whether or not a remedy will meet all of the applicable or relevant and appropriate requirements of other Federal and State environmental statutes and/or provide grounds for invoking a waiver.
- 3) **Long-Term Effectiveness and Permanence** refers to the ability of a remedy to maintain reliable protection of human health and the environment over time once cleanup goals have been met.
- 4) **Reduction of Toxicity, Mobility, or Volume Through Treatment** is the anticipated performance of the treatment technologies a remedy may employ.
- 5) **Short-term Effectiveness** addresses the period of time needed to achieve protection and any adverse impacts on human health and the environment that may be posed during the construction and implementation period until cleanup goals are achieved.
- 6) **Implementability** is the technical and administrative feasibility of a remedy, including the availability of materials and services needed to implement a particular option.
- 7) **Cost** includes estimated capital and operation and maintenance costs, and net present worth costs.
- 8) **Support Agency Acceptance*** addresses the technical or administrative issues and concerns the support agency may have regarding each alternative.
- 9) **Community Acceptance*** addresses the issues and concerns the public may have to each of the alternatives.

*These criteria will be addressed in the Record of Decision (ROD) once comments on the RI/FS report and proposed plan have been received and will not be included in the RI/FS report.

C. Preferred remedy

The preferred remedy will be described within a chapter of the FS report. The preferred remedy will meet the following criteria and findings:

- 1) The alternative will be protective of human health and the environment.
- 2) The alternative will attain all ARARs (or health based levels established through risk assessments when ARARs do not exist or are waived) that have been identified for the site.
- 3) The alternative will be cost effective, providing a level of protection that cannot be achieved by less costly methods.
- 4) The alternative will utilize treatment technologies and permanent solutions to the maximum extent practicable as determined by technological feasibility, availability, and cost effectiveness.

The preferred remedy will reflect the preferences for remedies that:

- 1) Involve treatment that significantly reduces the toxicity, mobility, or volume of hazardous constituents as a principal element.
- 2) Minimize the requirement for long-term management of residuals.

An alternative that is preferred, but does not meet the Federal or State Public health or environmental ARARs, will be selected only when:

- 1) The alternative is an interim remedy and will become part of a more comprehensive final remedy that will meet the Federal and State ARARs.
- 2) Compliance with the ARAR will result in a greater risk to human health and the environment than the alternative options.
- 3) Compliance with the requirement is technically impractical.
- 4) The alternative will attain a standard of performance that is equivalent to that required under the otherwise applicable standard, requirement, or limitation through the use of another method or approach.

- 5) The State has not consistently applied or demonstrated the intent to consistently apply the requirement at other similar facilities across the state.

The evaluation of alternatives to select the appropriate remedy will, in addition to meeting the required findings in Section 300.68(h)(a) of the NCP and reflecting the preferences in Section 300.68(h)(2) of the NCP, also consider and weigh the full range of factors in Section 30.68(e)(2) of the NCP. The selected alternative will represent the best balance of the evaluation criteria.

TASK 13 FS REPORT(S)

Monthly contractor reporting requirements for the FS as the same as those specified in the RI under subtask 3.5.

The contractor shall submit five copies of a **draft** FS report presenting the results of tasks 11 and 12 to both the WDNR and the US-EPA for review and approval. Support data, information, and calculations will be included in appendices to the report. A **final** report shall be prepared that fully addresses all comments prepared by the the WDNR and the US-EPA. Five copies of the final FS report shall be submitted to both the WDNR and the US-EPA. Additional copies of the final report will also be compiled and distributed to other individuals identified by the WDNR.

TASK 14 CONCEPTUAL DESIGN

The contractor will prepare a conceptual design of the remedial alternative selected by the WDNR in consultation with the US-EPA. The conceptual design will include, but is not limited to, the engineering approach including implementation schedule, special implementation requirements, institutional requirements, phasing and segmenting considerations, preliminary site and facility layouts, budget cost estimate (including operation and maintenance costs), implementing the safety plan including cost impact on implementation. Any additional information required as the basis for the completion of the final remedial design will also be included.

Tommy G. Thompson
Governor
James R. Klauser
Secretary



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State of Wisconsin
Department of Administration

101 South Webster Street • Madison, Wisconsin

September 17, 1990

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Superfund RI/FS-Better Brite,
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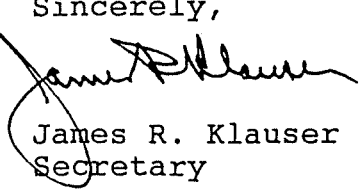
Dear Ms. Harder:

The Department of Administration has reviewed the above noted application for federal funding assistance. At the direction of the Governor of the State of Wisconsin, and pursuant to Wisconsin Statute 16.54, the Department is approving the application for submission to the federal funding authority. The application is in compliance with applicable state laws and is consistent with related state plans, programs and policies.

This letter constitutes compliance with the requirements for State Clearinghouse review under Presidential Executive Order 12372. Regional clearinghouses which have comments will send review letters directly to you.

The Department encourages favorable federal action on this grant application which will serve the needs of Wisconsin's citizens.

Sincerely,


James R. Klauser
Secretary

A copy of this letter must be transmitted to the federal granting agency with your with your application.