



## DEPARTMENT OF UTILITIES

WASTEWATER DIVISION • CENTRAL BUILDING MAINTENANCE DIVISION

2006 East Newberry Street • Appleton, WI 54915

414/832-5945 • 414/832-5514 • FAX 414/832-5949

September 16, 1997

Erin E. Potts  
Site Manager, N.W. Mauthe Superfund Site  
CH2MHILL  
P. O. Box 2090  
Milwaukee, WI 53201 - 2090

**RE: Non-Compliance with Permit Requirements for "Bypass-of-Treatment" at Mauthe Groundwater Remediation Site**

Dear Ms. Potts:

I just received the August discharge report for the N.W. Mauthe Superfund Site in Appleton (dated September 11, 1997, received in my office September 15, 1997). My last contact with your staff regarding the *possibility of bypassing pretreatment facilities* was at 8:10 a.m. on August 29, 1997 when I spoke with Chris Liethen. Ms. Liethen informed me of a ball valve failure on the treatment vessel discharge outlet and that the wet well levels were climbing. We had quite a lengthy discussion on this system failure and my concern that an automated system failure should never preclude manual operation alternatives. Ms. Liethen explained that manual treatment did not seem possible at this point due to some confusion on the responsibilities of the subcontractor maintaining the site.

We agreed that the worst case would be groundwater from this Superfund remediation site backing-up into the area homes because of this mechanical breakdown. All of the positive steps in establishing credibility and goodwill with the area residents would be jeopardized. I reiterated that my first preference would be for the subcontractor or CH2MHILL staff to handle manual batch treatment of the groundwater collecting and NOT BYPASS during this time. However, if there were no other alternatives the groundwater should come to the POTW instead of residential basements.

The following points were made:

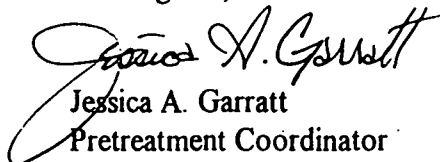
- ▶ 1. Conduct in-house testing and for Cr+6 with split samples to go to a certified laboratory for Cr, total, analyses to corroborate compliance with Local Limits for Chromium during bypass event. [Your report states this has been / is being complied with.]
- ▶ 2. Provide written report on problem, start of bypass, and the return to normal treatment operation (*this requirement is standard permit criteria and is fully detailed in the Industrial User Permit # 97 - 21, p. 13 of 19: NOTIFICATION OF BYPASS*) [This has not been complied with.]

- ▶ 3. Develop a contingency plan to handle automated systems' failures in the future to maintain treatment capabilities for this batch system at all times. This is now a required corrective action for this facility. *A Manual Operation Mode Action Plan* must be submitted to this office within thirty (30) days of the date of this letter. A letter documenting SITE OPERATOR training for Manual Plant Operation has been conducted will be required no later than December 31, 1997. It was never assumed that a groundwater remediation site where there are no production process wastestreams and where all handling is completely contained and the treatment chemistry is essentially fundamental; that you would have any need to bypass with the exception of facility wide power failures.

Your August report indicated that you initiated bypassing on August 29; the day I spoke with Ms. Liethen. Your report makes no notification that you have corrected the problem with the valve or returned to appropriate treatment operations. I realize this was an unanticipated failure with a facility so new and so well planned. That makes this more frustrating to see a lack of diligence in following-up this event with adequate reporting and assurances that this won't cause treatment bypass in the future. Systems do fail, regardless of the level of contingency planning. In this case it was a failure that should not have lead to bypassing since no continuous flow comes from this facility. The fact that this is an EPA designated Superfund remediation site requires even more diligent efforts to comply with environmental safeguards.

If you have any questions regarding my concerns please contact me at (920) 832 - 5945.

Best regards,

  
Jessica A. Garratt  
Pretreatment Coordinator  
Laboratory Manager

c: D. Leaf, Director of Utilities  
J. Peterson / USEPA Region V