

FID 230 004500
ERR/ERP
Kenosha Co.



November 17, 1994

Ms. Pamela A. Mylotta, Hydrogeologist
Environmental Repair Program
State of Wisconsin Department of Natural Resources
4041 North Richards Street
Milwaukee, WI 53212

**RE: Request for Variance, Landfill Disposal of Soil
From Unsaturated Portions of Sumps 7 and 8 and
Associated Trench Excavations
Chrysler Corporation, Kenosha Main Plant
Triad Engineering Project No. W943324.8**

Dear Ms. Mylotta:

On behalf of Chrysler Corporation (Chrysler), Triad Engineering Inc. (Triad) is requesting a variance for landfill disposal of soil which was excavated from above the watertable depth at Sumps 7 and 8 and associated trench excavations at the Chrysler Kenosha Main Plant (see attached Figure). Based on laboratory results of soil samples collected, approximately 200 cubic yards of soil were excavated, stockpiled on, and covered with visquien at the site during September 1994.

Waste characterization soil samples were collected from a depth of approximately 2.0 feet at three locations within the soil pile and composited. Sampling was accomplished using a clean stainless steel trowel and mixing bowl. Sampling tools were decontaminated prior to sampling by washing in a laboratory grade detergent solution and rinsing with distilled water. The soil samples were placed in appropriate laboratory-supplied sample containers, immediately placed on ice in a sample cooler and submitted under chain-of-custody to a state certified laboratory (Swanson Environmental, Inc.). The soil samples were analyzed for volatile organic compounds (VOCs: EPA Method 8021), diesel range organics (DRO: Wisconsin DNR Modified DRO Method), gasoline range organics (GRO: Wisconsin DNR Modified GRO method), and Waste Management, Incorporated protocol D-4 analytes as requested by Pheasant Run Recycling and Disposal Facility (RDF). The Protocol D-4 analytes include flash point, free liquids, chlorine, pH, total polychlorinated biphenols (PCBs) and selected Toxicity Characteristic Leachate Procedure (TCLP), volatiles, semivolatiles and lead.

Based on the attached laboratory analytical results, DRO was detected at concentration of 2,170 milligrams per kilogram (mg/kg), which is above the landfill acceptance limit of 2,000 mg/kg for DRO. No other protocol D-4 constituents were detected at levels which exceed current solid waste landfill acceptance criteria. However, please note that total PCBs were detected at a concentration of 2.3 mg/kg.

325 east chicago street
milwaukee, wisconsin 53202
414/291-8840
fax: 414/291-8841



Ms. Pamela A. Mylotta
November 17, 1994
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Based on the relatively small quantity (approximately 200 cubic yards) of soil and the amount of concrete and metal debris present in the stockpiled soil, landfill disposal appears to be the most appropriate and least expensive option. However, due to the detected DRO concentration above the landfill acceptance limit and apparent low concentrations of PCBs, a written variance from the Wisconsin Department of Natural Resources is required by the landfill prior to acceptance of the soils for disposal. Therefore, we are requesting a written variance to allow Chrysler to dispose of the soils at WMI Pheasant Run RDF in Bristol, Wisconsin. The soil is tentatively scheduled to be transported to Pheasant Run during November 1994. The WMI Project Manager is:

Ms. Barbara Schmitt
Pheasant Run Recycling & Disposal Facility
19414 60th Street
Bristol, Wisconsin 53104
Phone: (414) 857-7956
Fax: (414) 857-6461

We appreciate your immediate attention to this matter. If you have any questions, please do not hesitate to call.

Sincerely,

TRIAD ENGINEERING INC.

Richard J. Binder, CPG, CGWP
Project Manager

TRIAD ENGINEERING INC.

Ross M. Creighton
Hydrogeologist

RJB:klb
W943324\943224.8\943324-C

Enclosure

cc: Mr. Greg Rose/Chrysler - Environmental and Energy Affairs
Mr. Jack Bugno/Chrysler - Kenosha Main Plant
Ms. Lori Bowman/Triad

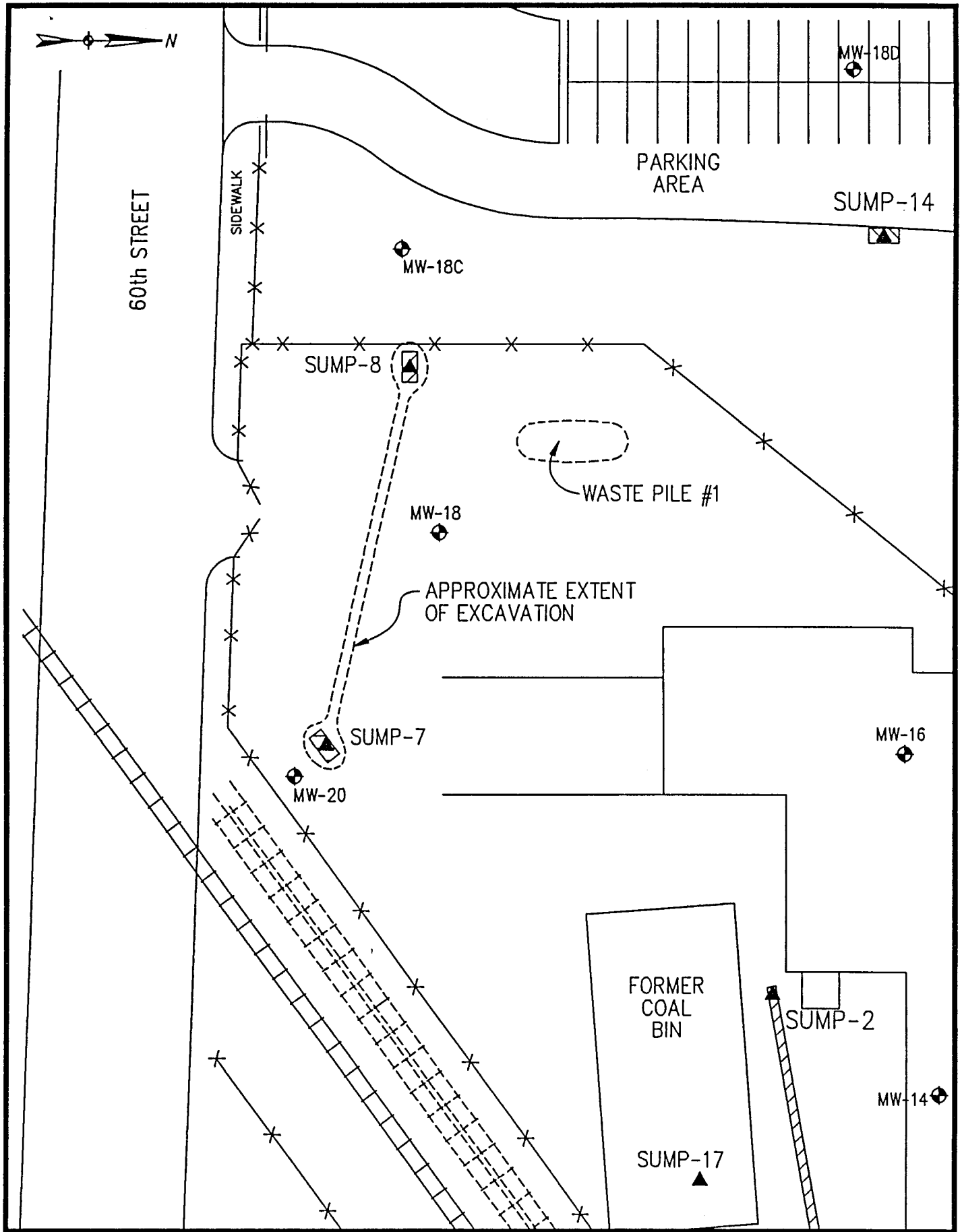


FIGURE 1
CHRYSLER KENOSHA MAIN PLANT
WASTE PILE NO. 1 EXCAVATION/LOCATION

SWANSON ENVIRONMENTAL INC.



ANALYTICAL REPORT

Date: 10/11/94

SEI Project Number: WL12147

Client Project: Chrysler Sump

Project Number: 943324-8

Report For: Triad Engineering, Inc.
325 East Chicago Street
Milwaukee, WI 53202

Attn: Mr. Ross Creighton

Certified By: _____

A handwritten signature in cursive script, appearing to read "Clark J. Crosby".

Clark J. Crosby
Laboratory Manager

SWANSON ENVIRONMENTAL INC.

ANALYTICAL REPORT

Report Date: 10/11/94
Project: Chrysler Sump

To: Triad Engineering, Inc.
 325 East Chicago Street
 Milwaukee, WI 53202

SEI Project: WL12147
Date Received: 09/20/94
Your Reference: 943324-8

Attn: Mr. Ross Creighton

Reference: AA08564

Collected: 09/20/94

Sample Point: Waste Pile #1

Analyte	Method	Units	Analyzed	PQL	Result
Wet Chemistry					
Flashpoint	ASTM D93-85	Degrees F	09/27/94	70	>140
Free Liquids	SW846-9095		09/27/94		None
Chlorine	ASTM D808	%	09/21/94	0.01	0.03 SF
pH	SW846-9045	Units	09/28/94		8.24
PCBs					
PCBs, Total	SW846-8080	mg/Kg	10/04/94	1.0	2.3 D
Volatile Organic Compounds					
Benzene	SW846-8021	mg/Kg	09/26/94	0.003	ND
Bromobenzene	SW846-8021	mg/Kg	09/26/94	0.003	ND
Bromochloromethane	SW846-8021	mg/Kg	09/26/94	0.003	ND
Bromodichloromethane	SW846-8021	mg/Kg	09/26/94	0.003	ND
Bromoform	SW846-8021	mg/Kg	09/26/94	0.003	ND
Bromomethane	SW846-8021	mg/Kg	09/26/94	0.003	ND
n-Butylbenzene	SW846-8021	mg/Kg	09/26/94	0.03	0.41 D
sec-Butylbenzene	SW846-8021	mg/Kg	09/26/94	0.004	ND
tert-Butylbenzene	SW846-8021	mg/Kg	09/26/94	0.003	ND
Carbon tetrachloride	SW846-8021	mg/Kg	09/26/94	0.003	ND
Chlorobenzene	SW846-8021	mg/Kg	09/26/94	0.003	ND
Chlorodibromomethane	SW846-8021	mg/Kg	09/26/94	0.003	ND
Chloroethane	SW846-8021	mg/Kg	09/26/94	0.003	ND
Chloroform	SW846-8021	mg/Kg	09/26/94	0.003	0.012
Chloromethane	SW846-8021	mg/Kg	09/26/94	0.003	ND
2-Chlorotoluene	SW846-8021	mg/Kg	09/26/94	0.003	ND

SWANSON ENVIRONMENTAL INC.

ANALYTICAL REPORT

Reference: AA08564

Collected: 09/20/94

Sample Point: Waste Pile #1

Analyte	Method	Units	Analyzed	PQL	Result
4-Chlorotoluene	SW846-8021	mg/Kg	09/26/94	0.003	ND
1,2-Dibromo-3-chloropropane	SW846-8021	mg/Kg	09/26/94	0.003	ND
1,2-Dibromomethane	SW846-8021	mg/Kg	09/26/94	0.003	ND
Dibromomethane	SW846-8021	mg/Kg	09/26/94	0.003	ND
1,2-Dichlorobenzene	SW846-8021	mg/Kg	09/26/94	0.003	ND
1,3-Dichlorobenzene	SW846-8021	mg/Kg	09/26/94	0.003	ND
1,4-Dichlorobenzene	SW846-8021	mg/Kg	09/26/94	0.003	ND
Dichlorodifluoromethane	SW846-8021	mg/Kg	09/26/94	0.003	ND
1,1-Dichloroethane	SW846-8021	mg/Kg	09/26/94	0.003	0.002 J
1,2-Dichloroethane	SW846-8021	mg/Kg	09/26/94	0.003	ND
1,1-Dichloroethene	SW846-8021	mg/Kg	09/26/94	0.003	ND
cis-1,2-Dichloroethene	SW846-8021	mg/Kg	09/26/94	0.003	0.010
trans-1,2-Dichloroethene	SW846-8021	mg/Kg	09/26/94	0.004	0.011
1,2-Dichloropropane	SW846-8021	mg/Kg	09/26/94	0.003	ND
1,3-Dichloropropane	SW846-8021	mg/Kg	09/26/94	0.003	ND
2,2-Dichloropropane	SW846-8021	mg/Kg	09/26/94	0.004	ND
1,1-Dichloropropene	SW846-8021	mg/Kg	09/26/94	0.003	ND
cis-1,3-Dichloropropene	SW846-8021	mg/Kg	09/26/94	0.003	ND
trans-1,3-Dichloropropene	SW846-8021	mg/Kg	09/26/94	0.003	ND
Ethylbenzene	SW846-8021	mg/Kg	09/26/94	0.003	0.032
Hexachlorobutadiene	SW846-8021	mg/Kg	09/26/94	0.004	ND
Isopropylbenzene	SW846-8021	mg/Kg	09/26/94	0.003	0.020
p-Isopropyltoluene	SW846-8021	mg/Kg	09/26/94	0.003	0.016
Methylene chloride	SW846-8021	mg/Kg	09/26/94	0.10	0.63 D
Naphthalene	SW846-8021	mg/Kg	09/26/94	0.004	ND
n-Propylbenzene	SW846-8021	mg/Kg	09/26/94	0.003	0.027
Styrene	SW846-8021	mg/Kg	09/26/94	0.003	ND
1,1,1,2-Tetrachloroethane	SW846-8021	mg/Kg	09/26/94	0.003	ND
1,1,2,2-Tetrachloroethane	SW846-8021	mg/Kg	09/26/94	0.003	ND
Tetrachloroethene	SW846-8021	mg/Kg	09/26/94	0.003	ND
Toluene	SW846-8021	mg/Kg	09/26/94	0.003	0.008
1,2,3-Trichlorobenzene	SW846-8021	mg/Kg	09/26/94	0.003	ND
1,2,4-Trichlorobenzene	SW846-8021	mg/Kg	09/26/94	0.003	ND

SWANSON ENVIRONMENTAL INC.

ANALYTICAL REPORT

Reference: AA08564

Collected: 09/20/94

Sample Point: Waste Pile # /

Analyte	Method	Units	Analyzed	PQL	Result
1,1,1-Trichloroethane	SW846-8021	mg/Kg	09/26/94	0.003	ND
1,1,2-Trichloroethane	SW846-8021	mg/Kg	09/26/94	0.003	ND
Trichloroethene	SW846-8021	mg/Kg	09/26/94	0.003	0.027
Trichlorofluoromethane	SW846-8021	mg/Kg	09/26/94	0.003	ND
1,2,3-Trichloropropane	SW846-8021	mg/Kg	09/26/94	0.003	ND
1,2,4-Trimethylbenzene	SW846-8021	mg/Kg	09/26/94	0.005	ND
1,3,5-Trimethylbenzene	SW846-8021	mg/Kg	09/26/94	0.003	0.021
Vinyl Chloride	SW846-8021	mg/Kg	09/26/94	0.003	ND
o-Xylenes	SW846-8021	mg/Kg	09/26/94	0.003	0.049
m & p Xylenes	SW846-8021	mg/Kg	09/26/94	0.003	ND
WDNR-LUST Organics					
WDNR-DRO	WDNR-DRO	mg/Kg	10/03/94	50	2170 WB
DRO Extraction-Sonication		Date Extracted			09/21/94
WDNR Modified GRO	WDNR-GRO	mg/Kg	09/22/94	5	47
TCLP Metals					
Lead, TCLP	SW846-6010	mg/L	09/26/94	0.05	0.07
TCLP Semi-Volatile Compounds					
Cresol, Total	SW846-8270	mg/L	10/06/94	0.4	ND
2,4-Dinitrotoluene	SW846-8270	mg/L	10/06/94	0.1	ND
Hexachlorobenzene	SW846-8270	mg/L	10/06/94	0.1	ND
Hexachlorobutadiene	SW846-8270	mg/L	10/06/94	0.4	ND
Hexachloroethane	SW846-8270	mg/L	10/06/94	0.4	ND
Nitrobenzene	SW846-8270	mg/L	10/06/94	0.4	ND
Pyridine	SW846-8270	mg/L	10/06/94	5	ND
Pentachlorophenol	SW846-8270	mg/L	10/06/94	0.4	ND
2,4,5-Trichlorophenol	SW846-8270	mg/L	10/06/94	0.4	ND
2,4,6-Trichlorophenol	SW846-8270	mg/L	10/06/94	0.4	ND
TCLP Volatile Organic Compounds					
Benzene	SW846-8021	mg/L	09/30/94	0.01	ND
Carbon tetrachloride	SW846-8021	mg/L	09/30/94	0.01	ND
Chlorobenzene	SW846-8021	mg/L	09/30/94	0.01	ND
Chloroform	SW846-8021	mg/L	09/30/94	0.02	ND
1,4-Dichlorobenzene	SW846-8021	mg/L	09/30/94	0.01	ND

ANALYTICAL REPORT

Reference: AA08564

Collected: 09/20/94

Sample Point: Waste Pile #1

Analyte	Method	Units	Analyzed	PQL	Result
1,2-Dichloroethane	SW846-8021	mg/L	09/30/94	0.01	ND
1,1-Dichloroethylene	SW846-8021	mg/L	09/30/94	0.01	ND
Methyl ethyl ketone	SW846-8021	mg/L	09/30/94	0.5	ND
Tetrachloroethylene	SW846-8021	mg/L	09/30/94	0.01	ND
Trichloroethylene	SW846-8021	mg/L	09/30/94	0.01	ND
Vinyl chloride	SW846-8021	mg/L	09/30/94	0.02	ND

SHADED AREA FOR LAB USE ONLY:

CHAIN OF CUSTODY RECORD

CLIENT / COMPANY ORDERING TEST TRIAD ENGINEERING		PROJECT / SITE NAME W943324-8 CHRYSLER SUMP INSTALLATION		# OF CONTAINERS	MATRIX CODE	TESTS REQUESTED (✓)										OTHER SAMPLE RELATED REMARKS
SAMPLERS: (Signature) <i>Trig Mendenhall</i>		CLIENT PROJECT # W943324-8	PROJECT # →			<div style="display: flex; justify-content: space-between;"> GRO (W/DNR MODIFIED) DRO (W/DNR MODIFIED) IS VOC'S (2021) TCLP - PROTOCOL D-4 </div>										
LAB #	COLLECTION		DESCRIPTION OF COLLECTION SITE	#	SO											
	DATE	TIME														
5364	9-20-94	0730	WASTE PILE (7-8) #1	10	50	2	2	1	1	4						
MATRIX CODES: DW = Drinking Water SL = Sludge GW = Ground Water SO = Soil WW = Waste Water OT = Other			FIELD COMMENTS: U - DENOTES UNSATURATED SOIL. S - DENOTES SATURATED SOIL			IN CASE WE HAVE ANY QUESTIONS, SWANSON ENVIRONMENTAL SHOULD CALL: Name ROSS CREIGHTON RICK BINDER Phone (414) 291-8890										

LAB RESERVES THE RIGHT TO RETURN UNUSED PORTIONS OF SAMPLES TO CLIENT.

RELINQUISHED BY: (Signature) <i>Trig Mendenhall</i>	RECEIVED BY: (Signature) <i>Ray Koval</i>	DATE 9-20	TIME 11:47	LAB COMMENTS
RELINQUISHED BY: (Signature) <i>Ray Koval</i>	RECEIVED FOR LABORATORY BY: (Signature) <i>Paul Curran</i>	DATE 9-20	TIME 12:45	SHIPPING CONDITIONS: (Check One) <input checked="" type="checkbox"/> Iced <input type="checkbox"/> Ambient TEMPERATURE: 4 °C

INSTRUCTIONS ON BACK