



Chrysler Corporation  
Featherstone Road Center

June 6, 1995

Ms. Pamela Mylotta  
Environmental Repair Project Manager  
State of Wisconsin Department of Natural Resources  
4041 N. Richards Street  
P.O. Box 12436  
Milwaukee, WI 53212

**RE: Solid Waste Storage Exemption for Stockpiled Soils  
Chrysler Corporation – Kenosha Engine Plant**

Dear Ms. Mylotta:

Per our telephone conversation of May 22, 1995, Chrysler Corporation (Chrysler), respectfully requests an exemption, under NR 500.08(4), Wisconsin Administrative Code (WAC), to the Solid Waste Storage requirements of NR 500 - 522, WAC. This letter demonstrates that the exemption will not cause environmental pollution as defined in s. 144.01(3) Statutes. Approximately 20,000 yards of stockpiled soil is the result of construction and expansion at the Chrysler facility. Stockpiled soil has been grouped by area of origin (Figure 1), separated into various pile designations (Figure 2), sampled for volatile organic compounds, and diesel and gasoline range organics (Figure 3, Table 1), and classified for soil content (Figure 4). The soil is scheduled to be treated and/or disposed within the next two months. An evaluation of remedial treatment and disposal options will be submitted under separate cover to the WDNR at a later date.

The request for exemption is based on laboratory analytical results (Figure 3, Table 1), current temporary storage on a relatively impermeable surface (concrete) and the criteria set forth in NR 502.04, WAC. The NR 502.04, WAC, criteria are addressed below.

The stockpiled soil is not located within:

- 1,000 feet of any navigable lake, pond, or flowage;
- 300 feet of any navigable river or stream;
- a floodplain;
- 1,000 feet of the nearest edge of the right-of-way of any state trunk highway, interstate or federal aid primary highway, or the boundary of any public park; or
- 1,200 feet of any public or private water supply well.

In addition, the stockpiled soil will not cause:

- A significant adverse impact on wetlands;
- A significant adverse impact on critical habitat areas;

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- A detrimental effect on any surface water;
- A detrimental effect on groundwater quality, or exacerbate an attainment or exceedance of any preventive action limit or enforcement standard at a point of standards application as defined in ch. NR 140;
- The migration and concentration of explosive gases in any facility structures, or in the soils, or in the air at or beyond the facility property boundary in excess of 25% of the lower explosive limit for such gases of any time; or
- The emissions of any hazardous air contaminants exceeding the limitations for those substances contained in s. NR 445.03, WAC.

Chrysler appreciates your time and attention to this matter. If you have any questions or require additional information, please do not hesitate to call.

Sincerely,

CHRYSLER CORPORATION



Curtis Chapman  
Environmental Specialist

CC:mo

W943324\943324.21\943324-A

cc: Mr. Ken Hein\WDNR  
Mr. Jack Bugno\Chrysler  
Mr. Rick Binder\Triad

TABLE 1  
SOIL PILE CHARACTERIZATION  
SUMMARY OF DETECTED VOLATILE ORGANIC COMPOUNDS IN SOILS  
CHRYSLER CORPORATION  
KENOSHA MAIN PLANT, KENOSHA, WISCONSIN

SAMPLE ID.	DATE COLLECTED	U.S. EPA METHOD	LAB IDENTIFICATION <sup>1)</sup>	SAMPLE RESULTS (micrograms per kilogram)																										(milligrams per kilogram)											
				BENZENE	p-BUTYLBENZENE	m-BUTYLBENZENE	tert-BUTYLBENZENE	CHLOROBENZENE	1,2-DICHLOROBENZENE	1,3-DICHLOROBENZENE	1,4-DICHLOROBENZENE	1,1-DICHLOROETHANE	1,2-DICHLOROETHANE	1,1-DICHLOROETHENE	cis-1,2-DICHLOROETHENE	trans-1,2-DICHLOROETHENE	ETHYL BENZENE	HEXACHLOROBUTADIENE	ISOPROPYLBENZENE	p-ISOPROPYLTOLUENE	METHYLENE CHLORIDE <sup>2)</sup>	METHYL TERT-BUTYL ETHER	NAPHTHALENE	p-PROPYL BENZENE	TETRACHLOROETHENE	TOLUENE	1,2,3-TRICHLOROBENZENE	1,2,4-TRICHLOROBENZENE	1,1,1-TRICHLOROETHANE	1,1,2-TRICHLOROETHANE	TRICHLOROETHENE	1,2,4-TRIMETHYLBENZENE	1,3,5-TRIMETHYLBENZENE	VINYL CHLORIDE	m & p-XYLENE	o-XYLENE	DRO	GRO			
1D	3/30/95	8260A	50403020	<5	18	<5	<5	<5	<5	<5	<5	<5	<5	120	<5	<5	<5	<5	<5	<5	<5	<5	<5	7.9	10	<5	<5	<5	5.3	420	35	<5	<5	<10	<5	<5	24	<10			
2E	3/30/95	8260A	50403021	<5	12	<5	<5	<5	<5	<5	<5	<5	<5	54	<5	<5	<5	<5	<5	<5	<5	<5	<5	8.4	16	<5	<5	<5	8.8	440	34	<5	<5	<10	<5	<5	21	<10			
5E	3/30/95	8260A	50403022	<5	14	<5	<5	<5	13	<5	18	<5	<5	150	<5	<5	<5	<5	<5	<5	<5	<5	<5	20	11	<5	<5	<5	6.5	540*	7.6	<5	<5	<10	<5	<5	35	<10			
4A	3/30/95	8260A	50403023	5.7	<5	<5	<5	<5	<5	<5	<5	<5	<5	630	<5	<5	<5	<5	<5	<5	<5	<5	6.5	7.2	<5	<5	42	<5	150	8.4	<5	<5	<10	<5	<5	10	<10				
1B2	3/30/95	8260A	50403024	42	<5	<5	<5	<5	19	61	68	<5	<5	1100*	<5	<5	<5	<5	11	<5	<5	<5	6.5	6.6	<5	<5	<5	<5	8.6	13	<5	<5	<10	<5	<5	480	<10				
6B	3/30/95	8260A	50403025	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	9.7	<5	<5	<5	<5	10	<5	<5	<5	6.6	6.8	<5	<5	<5	<5	17	<5	<5	<5	<5	<5	<5	730	<10				
6F	3/30/95	8260A	50403026	5.7	14	<5	<5	<5	<5	<5	<5	<5	<5	170	<5	<5	<5	<5	<5	<5	<5	<5	6.8	6.8	<5	<5	<5	<5	<5	17	<5	<5	<5	<5	<5	<5	730	<10			
MeOH																																									
Blank	3/30/95	NA	50403027	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<10	
7B	4/5/95	8260A	50407049	<5	4.4	<5	<5	<5	<5	<5	<5	<5	<5	930*	13	<5	<5	<5	<5	<5	<5	<5	<5	6.8	11	10	<5	<5	<5	42	<5	<5	<5	<10	<5	<5	<10	<5	<10		
7F	4/5/95	NA	50407050	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1600	NA		
9E	4/5/95	8260A	50407052	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	1400*	180	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	370	<5	<5	<5	<10	<5	<5	<10	<5	<10		
9G	4/5/95	NA	50407053	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1200	NA		
10G	4/5/95	8260A	50407054	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	9100*	200	<5	<5	<5	<5	55	<5	<5	<5	19	19	31	<5	<5	11000*	<5	<5	<5	<5	<10	<5	<5	<10	14			
11B	4/5/95	8260A	50407055	<5	<5	<5	<5	<5	18	100	8.8	<5	<5	2500*	51	<5	<5	<5	<5	<5	<5	<5	5.1	<5	91	790*	85	<5	960*	<5	<5	<5	<10	<5	<5	<10	<5	<10			
12B	4/5/95	8260A	50407056	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	160	<5	<5	<5	<5	<5	<5	<5	4.9	<5	9.1	<5	<5	<5	240*	<5	<5	<5	<5	<5	<5	<10	<5	1700	<10			
13A	4/5/95	8260A	50407057	6.1	<5	<5	<5	<5	27	170	140	<5	<5	1400*	21	<5	<5	<5	<5	<5	<5	5.2	<5	6.2	<5	130	1100*	52	<5	280*	<5	<5	<5	<5	<10	<5	<5	150	<10		
13C	4/5/95	NA	50407058	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	970	NA			
14A	4/5/95	8260A	50407059	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	3600*	140	<5	<5	<5	<5	50	<5	<5	<5	<5	<5	<5	<5	8.0	<5	16	<5	<5	<5	<5	<10	<5	580	<10			
15B	4/5/95	NA	50407060	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	3700	NA		
15E	4/5/95	8260A	50407061	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	1000*	32	<5	<5	<5	<5	110	<5	1.4	<5	6.5	8.5	9.7	16	<5	<5	1300*	<5	<5	<5	<10	<5	<5	440	<10			
11C	4/5/95	8260A	50407062	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<10	<5	1500	<10				
16A	4/5/95	8260A	50410001	<5	7.3	<5	<5	<5	<5	<5	<5	<5	<5	110	<5	<5	<5	<5	<5	210	<5	<5	<5	<5	<5	5.8	<5	35	12	<5	<5	<5	<10	<5	<5	1700	<10				
17E	4/5/95	8260A	50410002	<5	7.4	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	310	<5	<5	<5	18	<5	<5	8.2	<5	<5	<5	<5	<5	<5	<5	19	6.3	790	<10				
18F	4/5/95	8260A	50410003	<5	13	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	1300	<5	11	<5	<5	<5	12	5.2	<5	<5	11	<5	<5	<5	<5	<5	<5	440	15				
19F	4/5/95	8260A	50410004	<5	23	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	6.7	280	<5	17	<5	12	7.4	19	5.9	<5	29	<5	<5	<5	<10	<5	<5	160	14				
20E	4/5/95	8260A	50410005	<5	44	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	14	100	<5	29	<5	<5	<5	<5	<5	<5	<5	30	11	<5	<5	<5	<5	1700	14				
21E	4/5/95	8260A	50410006	<5	34	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	17	880	<5	33	5.1	<5	<5	<5	<5	<5	<5	31	<5	<5	<5	<5	<5	<5	960	18			
22E	4/5/95	8260A	50410007	<5	5.9	11	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	450	<5	<5	<5	6.6	<5	<5	93	<5	7.6	35	20	<5	10	<5	<5	43	<10					
23F	4/5/95	8260A	50410008	<5	50	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	7.8	35	380	<5	28	<5	19	<5	<5	5.3	<5	8.5	19	<5	<5	<5	<5	<5	1200	11				
24F	4/5/95	8260A	50410009	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	610	<5	<5	<5	<5	370	50	1700	<5	<5	<5	<5	<5	<5	<5	220	<5	<5	<5	<5	<5	<5	4900	80				
25E	4/5/95	8260A	50410010	<5	6.9	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	260	<5	8.9	<5	<5	<5	<5	<5	<5	<5	8	<5	<5	<5	<5	<5	<5	870	28				
26E	4/5/95	8260A	50410011	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	350	<5	<5	<5	<5	160	<5	<5	<5	<5	<5	<5	<5	<5	<5	5.9	<5	<5	<5	<5	<5	<5	890	12				
28E	4/7/95	8260A	50410014	<5	34	<5	<5																																		

TABLE 1  
SOIL PILE CHARACTERIZATION  
SUMMARY OF DETECTED VOLATILE ORGANIC COMPOUNDS IN SOILS  
CHRYSLER CORPORATION  
KENOSHA MAIN PLANT, KENOSHA, WISCONSIN

SAMPLE I.D.	DATE COLLECTED	U.S. EPA METHOD	LAB IDENTIFICATION <sup>(1)</sup>	SAMPLE RESULTS (micrograms per kilogram)																										(milligrams per kilogram)								
				BENZENE	n-BUTYLBENZENE	sec-BUTYLBENZENE	tert-BUTYLBENZENE	CHLOROBENZENE	1,2-DICHLOROBENZENE	1,3-DICHLOROBENZENE	1,4-DICHLOROBENZENE	1,1-DICHLOROETHANE	1,2-DICHLOROETHANE	1,1-DICHLOROETHENE	GA-1,2-DICHLOROETHENE	PARA-1,2-DICHLOROETHENE	ETHYL BENZENE	HEXACHLOROBUTADIENE	ISOPROPYLBENZENE	p-ISOPROPYLTOLUENE	METHYLENE CHLORIDE <sup>(2)</sup>	METHYL TERT BUTYL ETHER	NAPHTHALENE	n-PROPYL BENZENE	TETRACHLOROETHENE	TOLUENE	1,2,3-TRICHLOROBENZENE	1,2,4-TRICHLOROBENZENE	1,1,1-TRICHLOROETHANE	1,1,2-TRICHLOROETHANE	TRICHLOROETHENE	1,2,4-TRIMETHYLBENZENE	1,3,5-TRIMETHYLBENZENE	VINYL CHLORIDE	m & p-XYLENE	o-XYLENE	DRO	GRO
52B	4/10/95	8260A	50411007	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	110	9	12	<5	340	<5	950	<50	<5	<5	<5	<5	<5	<5	<5	<5	520	25	340	<5	16	6.5	230	47
49D	4/10/95	8260A	50411008	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	1300	13	<5	<5	<5	<5	1600	<50	<5	<5	<5	<5	<5	<5	<5	3000	<5	<5	<5	<10	<5	13	29	
51E	4/10/95	8260A	50411009	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	6.6	<5	<5	<5	<5	820	<50	<5	<5	<5	<5	<5	<5	<5	47	<5	<5	<5	<5	<5	<5	<10	47	
48C	4/10/95	8260A	50411010	<5	<5	<5	<5	<5	17	<5	<5	<5	<5	<5	1400	22	<5	<5	<5	1600	<50	<5	<5	<5	17	<5	<5	5000	<5	<5	<5	<5	<5	<5	<5	<10	28	
54B	5/9/95	8260A	50510035	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<10	<5	1100	14		
55D	5/9/95	8260A	50510036	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<10	<5	11	13		
56A	5/9/95	8260A	50510037	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<10	<5	<10	<10		
57A	5/9/95	8260A	50510038	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	6.2	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	10	6.3	<5	<5	<10	<5	10	<10		
58E	5/9/95	8260A	50510039	<5	12	5.1	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	90	<5	<5	<5	<5	<5	<5	<5	<5	<5	35	17	<5	<10	5.1	1900	31			
59E	5/9/95	8260A	50510040	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<10	<5	1900	<10		
60C	5/9/95	8260A	50510041	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	17	<5	<5	<5	<5	<5	<5	<5	<5	7.7	15	<5	11	<5	300	220			
61A	5/9/95	8260A	50510042	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<10	<5	21	21			
MeOH Blank	5/9/95	NA	50510043	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<10	

\* The analyte concentration was found to be outside of the established linear range of quantitation for this compound. The reported value is an approximation only.

(1) Analysis Performed by Midwest Analytical Services, Inc., (MAS), Metropolitan Center for High Technology, 2727 Second Avenue, Detroit, Michigan 48201 (WDNR Lab Id No. 999941580).

(2) Detected methylene chloride concentrations are not believed to be representative of actual soil samples. VOC soil samples were inadvertently packaged and shipped with DRO soil samples which had been preserved with methylene chloride. It is believed that the VOC soil samples were contaminated with methylene chloride during shipping.

NA - Not Analyzed

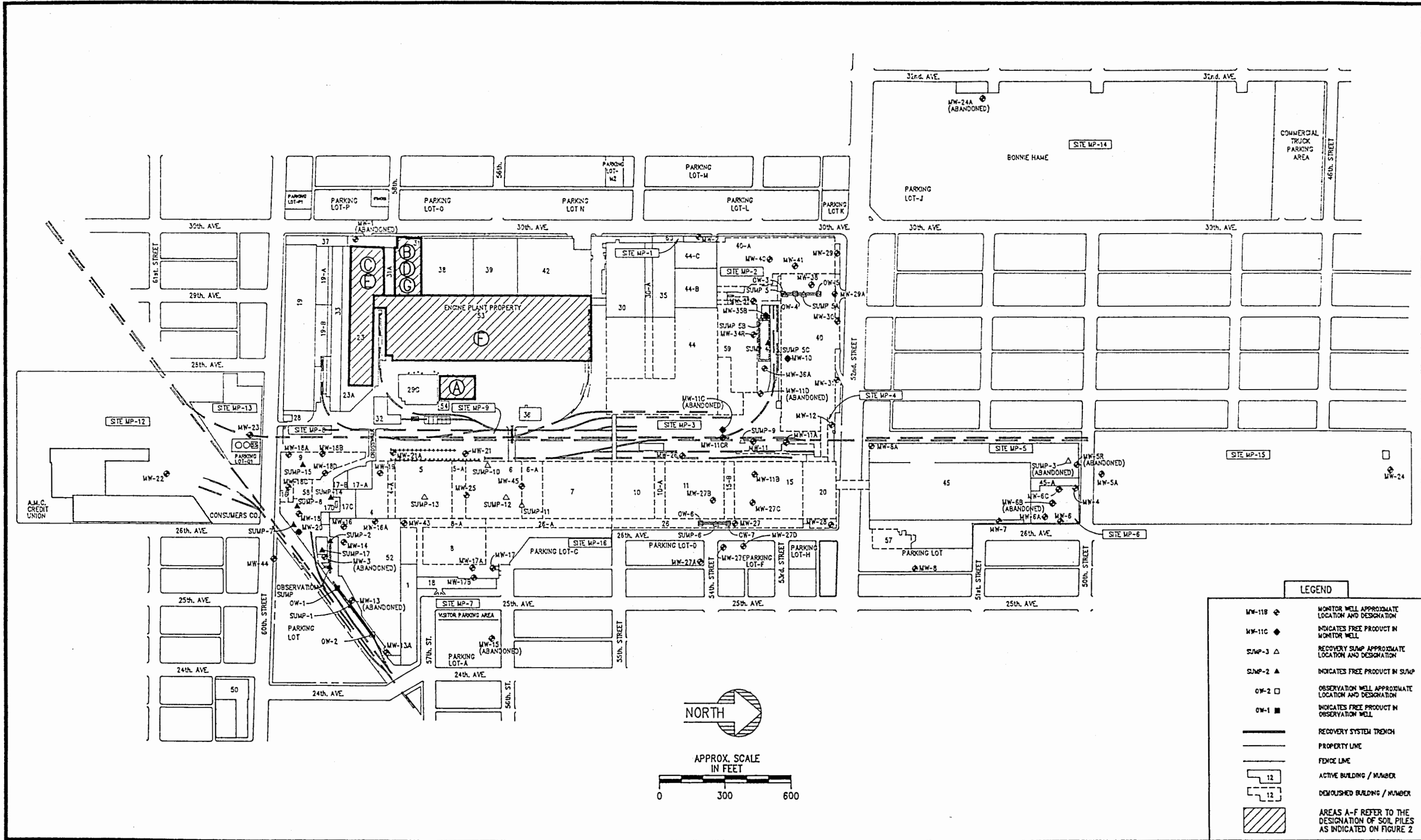
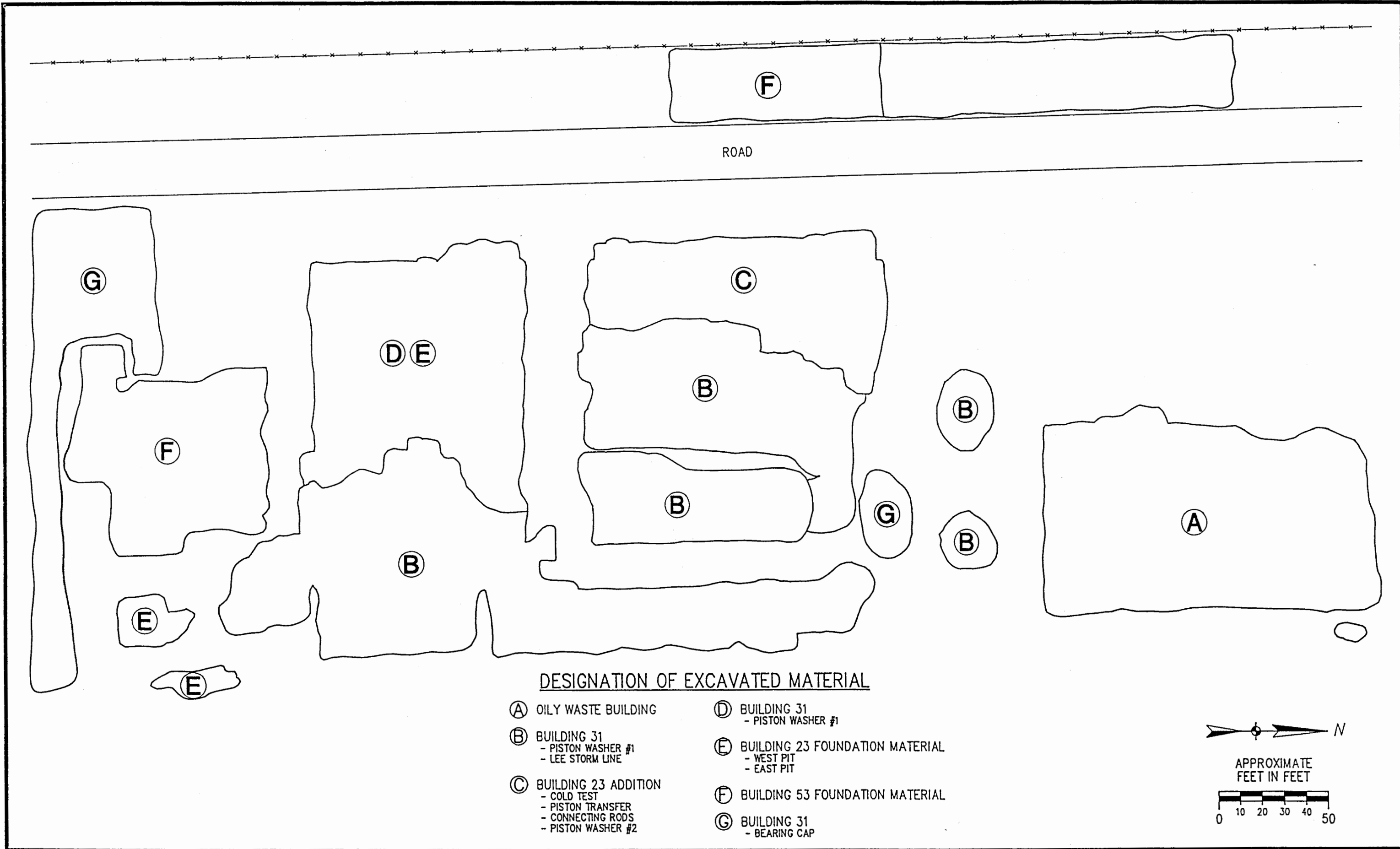
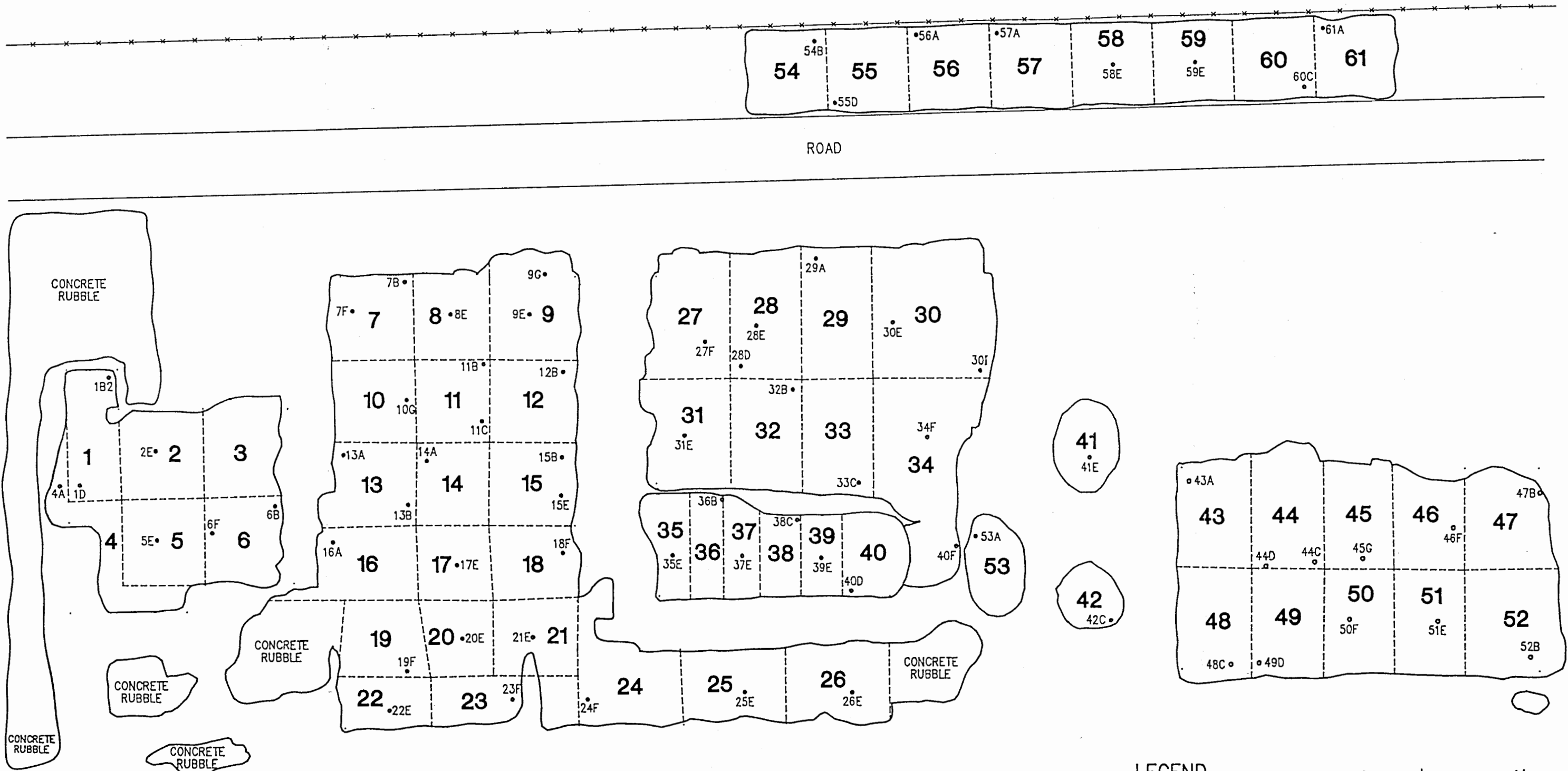


FIGURE 1  
CHRYSLER KENOSHA ENGINE  
AND MAIN PLANT  
FACILITY LAYOUT

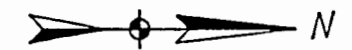


**FIGURE 2**  
CHRYSLER KENOSHA ENGINE  
AND MAIN PLANT  
SOIL PILE DESIGNATIONS



**LEGEND**

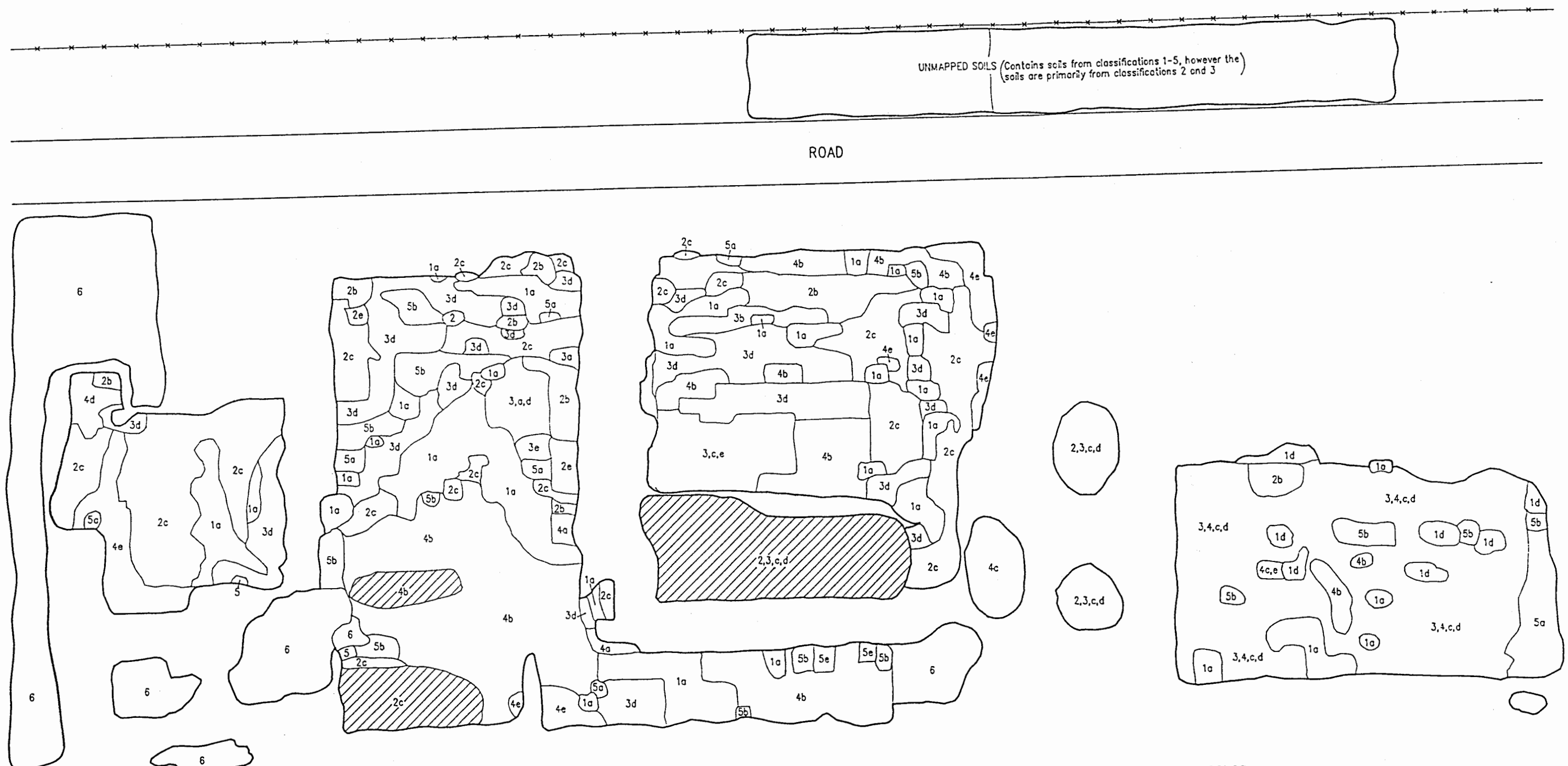
- 11 SECTOR LOCATION AND DESIGNATION
- 48C • SAMPLE LOCATION AND IDENTIFICATION



APPROXIMATE FEET IN FEET




**FIGURE 3**  
CHRYSLER KENOSHA ENGINE AND MAIN PLANT  
SOIL PILE SECTORS AND SAMPLE LOCATIONS



UNMAPPED SOILS (Contains soils from classifications 1-5, however the soils are primarily from classifications 2 and 3)

ROAD

**LEGEND**

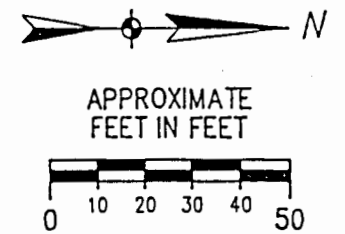
 AREAS APPROXIMATELY 8 TO 10 FEET HIGH, ALL OTHER AREAS ARE APPROXIMATELY 5 FEET HIGH

**SOIL CLASSIFICATION:**

- 1 = FINE SAND - SILTY, FINE GRAINED, WELL SORTED SANDS, MAY CONTAIN ANGULAR, DOLOMITIC, FINE GRAINED GRAVELS.
- 2 = SILTY SAND AND GRAVEL - SILTY SAND, SOME FOUNDRY SLAGS, FEW GRAVELS, FEW BAKED FOUNDRY SANDS FINE TO COARSE GRAVEL SIZE.
- 3 = CLAY LUMPS, SILTS AND SANDS - SOME CLAY LUMPS MIXED WITH SILTS, SANDS, TRACE TO FEW GRAVELS AND TRACE WOOD FRAGMENTS.
- 4 = SILTY CLAYEY SANDS - SILTY SANDS/SANDY SILTS, TRACE TO FEW CLAYS, TRACE TO FEW GRAVELS, MAY CONTAIN RUSTY NAILS, TRACE WOOD, TRACE BRICKS AND TRACE TO FEW FOUNDRY MATERIALS.
- 5 = SAND AND GRAVEL - SILTY SANDS MIXED WITH SOME ANGULAR, DOLOMITIC, FINE GRAINED GRAVELS.
- 6 = CONCRETE RUBBLE

**SOIL COLOR:**

- a = LIGHT BROWN
- b = BROWN
- c = RUSTY BROWN
- d = BROWNISH GREY
- e = DARK BROWN/BLACK



**FIGURE 4**  
**CHRYSLER KENOSHA ENGINE AND MAIN PLANT SOIL CLASSIFICATIONS**