



FID 246077260
ERR/ERP
DZA CO.

OUTBOARD MARINE CORPORATION

100 Sea-Horse Drive
Waukegan, Illinois 60085-2195
Phone 708/689-6200

27 July 1994

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

RE: *Transmittal by Ecolab PRP Committee
Revised Work Plan
Former Ecolab Facility Remediation Project
Mequon, WI*

VIA OVERNIGHT DELIVERY

Dear Ms. Mylotta:

As a representative of the Ecolab PRP Committee, I am submitting two copies of the revised work plan for soil remediation at the former Ecolab site for your approval. The PRP Committee is in the process of updating waste disposal approvals and obtaining contractor proposals to implement the work plan, which will take two to four weeks. Once these are received and a contractor is selected, the PRP Committee would like to proceed with the project. I would appreciate a short letter confirming that the plan meets the Department of Natural Resources' requirements. Please contact me at 708/689-5228 if you have any comments or questions on the plan.

Sincerely,

Tricia Sutton
Environmental Affairs Specialist

enclosures

cc (with encl.):
Tim Mulholland - SW/3, DNR
Madhukar S. Shirke, Cermatics, Inc.

cc (w/out encl.):
L.E. Keller, OMC
D. Vitale, OMC

**WORK PLAN
FORMER ECOLAB FACILITY REMEDIATION PROJECT
MEQUON, WI**

**PREPARED BY:
ECOLAB PRP COMMITTEE**

**PREPARED FOR:
STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL REPAIR PROGRAM**

July 28, 1994

1.0 INTRODUCTION

The purpose of this work plan is to respond to the requirement for additional soil removal. The Ecolab PRP Committee proposes to supply the necessary materials and supervision to remove and dispose of the PCB (decachlorobiphenyl) contaminated soil, located in a designated 30 foot by 35 foot area at the Cermatics (old Ecolab site) facility on 10014 North Wasaukee Road, Mequon, Wisconsin 53092. Figure 1 shows the location of the facility. Figure 2 presents a sketch depicting the area of interest and the sample locations.

The tasks involved in the completion of this project will include:

- 1 Notification.
- 2 Soil excavation, removal, and disposal.
- 3 Soil sampling.
- 4 Documentation.
- 5 Reporting.

The PRP Committee will be requesting bids and selecting a remediation contractor concurrently with review of the revised work plan by the Department of Natural Resources (DNR). Following approval of the work plan by DNR, the PRP Committee will authorize its contractor to proceed in accordance with this plan. In addition, the contractor will have a health and safety plan for all activities onsite during the remediation.

Ms. Tricia Sutton of Outboard Marine Corporation (OMC) will oversee and manage the documentation and reporting for the PRP committee. Questions and correspondence regarding this work plan or the activities described in it should be directed to her at:

Outboard Marine Corporation
190 Seahorse Drive
Waukegan, IL 60085
708/689-5228

2.0 PROJECT HISTORY

Ecolab, Inc. was operated by Mr. Peter Rasmussen in the 1970's to 1980's as a wax recycling operation. Refer to Figure 1 for the facility's location. During the 1980's, various portions of the operations and equipment were sold or transferred to other entities and the processing of wax stopped.

During 1987, a law firm representing Ecolab, Inc. contacted former customers who

sent foundry wax to the facility for recycling and expressed concern about the presence of large quantities of such wax at the International Technologies and Products, Inc. (ITEP) facility at 10014N 124W Wasaukee Road, Mequon, Wisconsin. Ecolab indicated its beliefs that the wax contained regulated levels of polychlorinated biphenyls (PCBs) and that the wax remained the property of the former customers. Ecolab requested the customers acknowledge ownership and responsibility for the materials and remove them from the property.

The State of Wisconsin Department of Natural Resources (DNR) contacted selected former Ecolab customers in August to September 1987 requesting that they (as generators) assist Mr. Rasmussen in segregating and properly disposing of any wax containing detectable levels of PCBs. During 1988, the former customers met a number of times, formed a "potentially responsible parties" (PRP) committee, and began participating in remedial investigation and cleanup activities. In a December 22, 1988 letter, the DNR indicated that, upon removal and disposal of the stored wax onsite and satisfactory completion of any necessary soil cleanup by the PRPs, the DNR would not initiate future enforcement actions or other cost recovery actions against the PRPs because of the stored wax. The DNR indicated it would provide a final cleanup acceptance letter to the PRPs.

CBC Environmental Services (CBC) sampled the wax materials and arranged for disposal and general cleanup of the materials for the PRP committee during 1989. While most of the wax materials were containerized or in large blocks, there was an area of approximately 30 feet by 35 feet in dimension where fine wax chips were visually evident in the soil (Figure 2). The DNR required removal and disposal of the soil and wax chips from the area and sampling of the underlying soil. CBC completed this work in June of 1989. The results indicated that levels of aroclor PCBs were not detected in four of the samples and were between 5 to 9 ppm in the other six samples. Levels of decachlorobiphenyl in the samples ranged from 2.7 to 460 ppm. The area was resampled twice (in November 1989 and in September 1990) to verify the results. Based on the results, DNR determined that there was residual decachlorobiphenyl in the soil and that additional contaminated soil needed to be removed from the site.

Wax recycling is no longer conducted at the facility. The current operator, Cermatics, Inc., operates a permitted hazardous waste storage and solvent recycling operation on the property. Cermatics is subject to corrective action requirements for several solid waste management units as a condition of its permit, including the remediation of additional PCB contaminated soil described in this plan.

3.0 SCOPE OF WORK

The activities to be conducted and procedures to be followed are described below for each work task.

Task 1: Notification

The PRP committee will notify the local DNR authorized agent and state DNR in writing at least 5 business days prior to commencement of remedial activities. The PRP committee will be responsible for completing the soil sampling, documentation, and reporting. The contractor will provide workers trained for hazardous site work and will conduct the work in accordance with OSHA 1920.120. The contractor will be responsible for identifying any local ordinances governing remediation and disposal.

Task 2: Excavation, Removal, and Disposal

1. Prior to excavation:
 - a. Utilities and obstructions in the vicinity of the work area will be located and visibly marked.
 - b. Access to the active work area will be restricted by roping off, marking with stakes and/or flagging, or other means to identify the boundaries clearly.
2. The soil will be excavated and placed into an approved DOT container(s) for shipment.
3. Soil will be excavated from the 30 foot by 35 foot area in shallow 'lifts' of a few inches each, until there is no visual evidence of contamination (refer to Task 3). Then samples will be collected from the base of the excavation. Prior to sampling, the excavation area will be inspected visually for signs of contamination, such as the presence of wax chips.
4. Photographic documentation of the excavation, removal, and condition of the soil will be taken.
5. The soil will be transported by:
Chemical Waste Management
W124 N9451 Boundary Road
Menomonee Falls, WI 53051
6. Chemical Waste Management will be responsible for the permitting, manifesting, transportation, and disposal of the soil at its Emelle, Alabama facility.

Task 3: Soil Sampling

The following procedure shall be followed by the sampling technician:

1. Collect one soil sample from nine sample locations across the base of the 30 foot by 35 foot excavation area in a 3 by 3 grid point pattern (Figure 2). Select one location for collection of a duplicate.
2. Collect soil samples as follows:
 - a. Use metal trowel, spoon, scoop, or hand auger to obtain soil directly from the excavation area.
 - b. Obtain portions of soil from an approximate one square foot area at the sample point location and mix the soil thoroughly in a metal bowl.
 - c. Collect soil directly from the backhoe or loader bucket in conditions which prevent safely entering the excavation.
 - d. Place soil into wide-mouth sample containers made of glass or inert material with Teflon® or equivalent lined caps.
3. Clean tools thoroughly between all sampling points with a soap water wash, clean water rinse, solvent (i.e., hexane) rinse, and air drying.
4. Sample handling:
 - a. Label samples prior to or immediately after collection with an identification number, date and time sampled, and the initials of the person collecting the sample.
 - b. Seal samples immediately following collection.
 - c. Chill samples immediately.
 - d. Follow chain-of-custody procedures.
 - e. Ship to the laboratory as soon as possible.
5. Laboratory analysis:
 - a. Samples will be analyzed by a DNR certified laboratory by EPA method 8080 for PCBs (aroclor) and decachlorobiphenyl.
 - b. The selected laboratory and certification qualifications will be submitted to DNR with notifications described in Task 1 at least five business days prior to commencement of the work.
6. Debris/Cleanup materials handling:
 - a. Contain water and hexane cleaning liquids separately during work.
 - b. Allow hexane to evaporate.
 - c. Place any contaminated/non-reusable supplies (including Tyvek® suits, gloves, boots, toweling, plastic, etc.) and cleaning materials in the containers with the soil for disposal upon completion of the work.

Task 4: Documentation

Following completion of excavation, sampling, and analysis, the PRP committee will prepare a report documenting the work completed and results for submittal to DNR. At a minimum, the report shall contain the following items:

1. Site Background Information in Narrative Form, including:
 - a. Site owner and address.
 - b. Name and address of excavation contractor and any consultants used for sampling or oversight.
 - c. Description of past and present property use.
 - d. A summary of results of previous investigations.
 - e. Legal description of the site (quarter/quarter section, township, range).
2. Map showing location of site relative to nearby towns, streets, or major highways.
3. Site layout showing the location of:
 - a. Buildings.
 - b. Location of soil sampling points.
 - c. Areal extent of excavation and depth below grade.
 - d. Map scale (1" = 10').
 - e. North arrow.
 - f. Title.
 - g. Name of map maker.
4. Tabulated field and analytical data showing:
 - a. Laboratory results for each sample and field readings where applicable.
 - b. Location of each sample or field reading keyed to site layout.
 - c. Depth at which each sample was taken.
 - d. Relative moisture content of sample.
5. Copies of:
 - a. Laboratory analyses.
 - b. Chain-of-custody forms.
 - c. Photographs (either color prints, color reprints, or color photocopies).
6. Field Observations:
 - a. Soil type, USCS classification.
 - b. Excavation depth and lateral extent.

7. Soil sampling procedures and techniques including:
 - a. Sample collection.
 - b. Equipment cleaning method.
 - c. Sample preservation method.

8. Soil Disposal:
 - a. Name and address of firm transporting and disposing of the soil.
 - b. Method of transportation.
 - c. Method of disposal.
 - d. Quantity of soil removed/disposed.
 - e. Copies of Hazardous Waste Manifests and EPA generator I.D. number.
 - f. Final disposition of the soil.

Task 5: REPORTING

The documentation report will be sent to:

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

A copy of the report will be sent to:

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101 S. Webster
Madison, WI 53707-7921

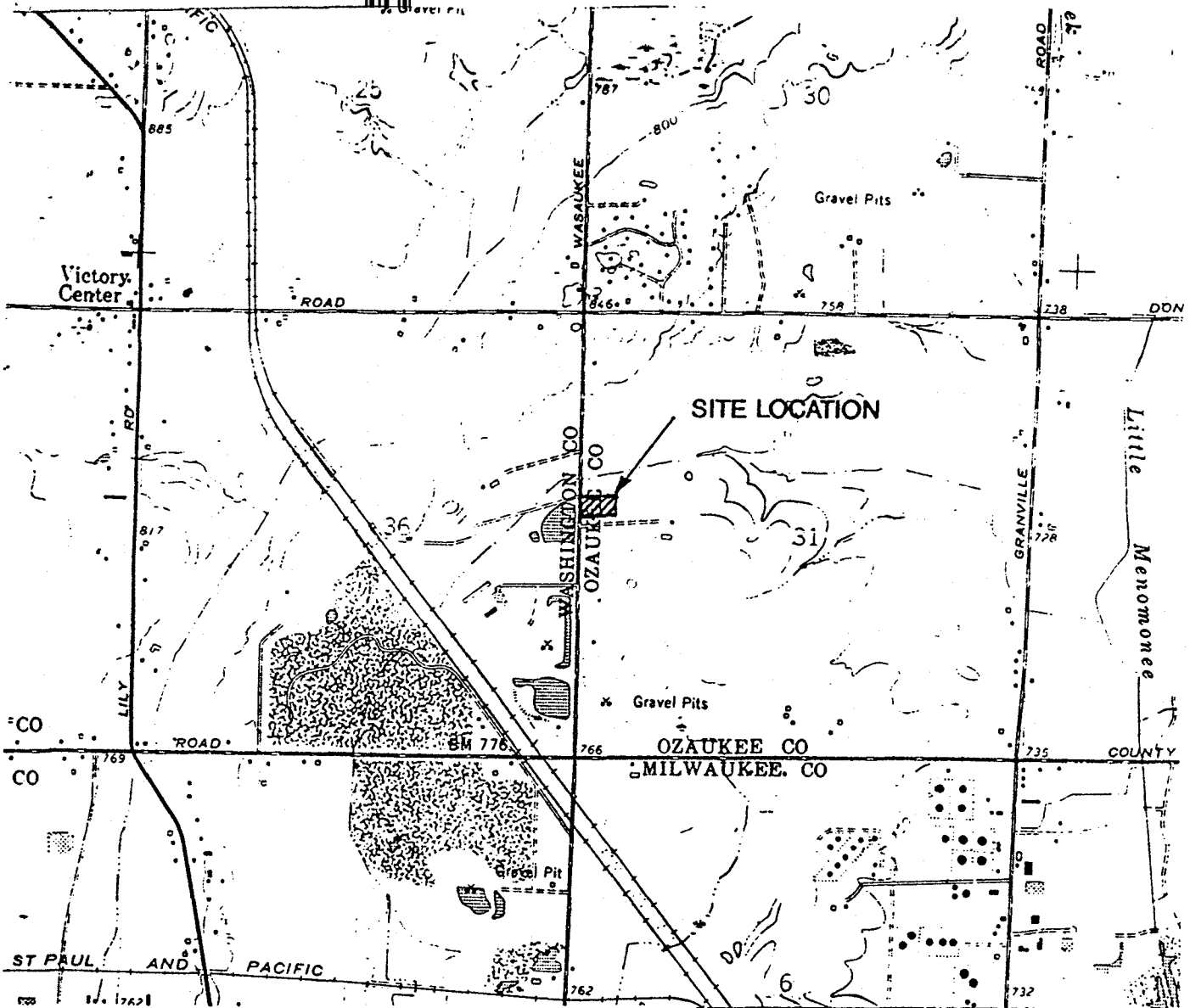
Madhukar S. Shirke
Cermatics, Inc.
10014 N. Wasaukee Road
Mequon, WI 53092

4.0 PROJECT COMPLETION

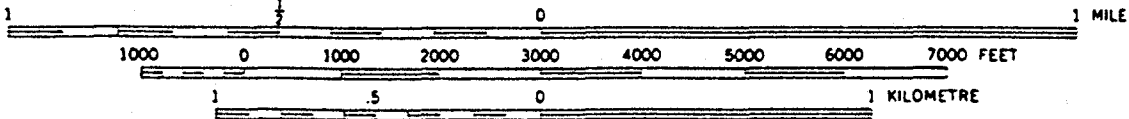
The PRP Committee understands that the remediation will be subject to a generic PCB cleanup guideline for the State of Wisconsin of 5 ppm based on an internal DNR memorandum from Paul Didier to Lyman Wible dated February 17, 1987. If levels of PCB (including decachlorobiphenyl) are present in the post-excavation soil samples above the 5 ppm level, the PRP Committee will work with DNR to determine what further actions, if any, will be required. If the levels present in the samples are less than 5 ppm, the remediation will be considered complete. At such time, the DNR has indicated it will provide the PRP Committee written acceptance of the cleanup and will release the committee members from future enforcement or cost recovery actions for the site related to the wax.

Once the cleanup is accepted, clean soil or gravel may be used to backfill the area, if desired by the property owner/operator.

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SCALE 1:24 000



CONTOUR INTERVAL 10 FEET
 NATIONAL GEODETIC VERTICAL DATUM OF 1929



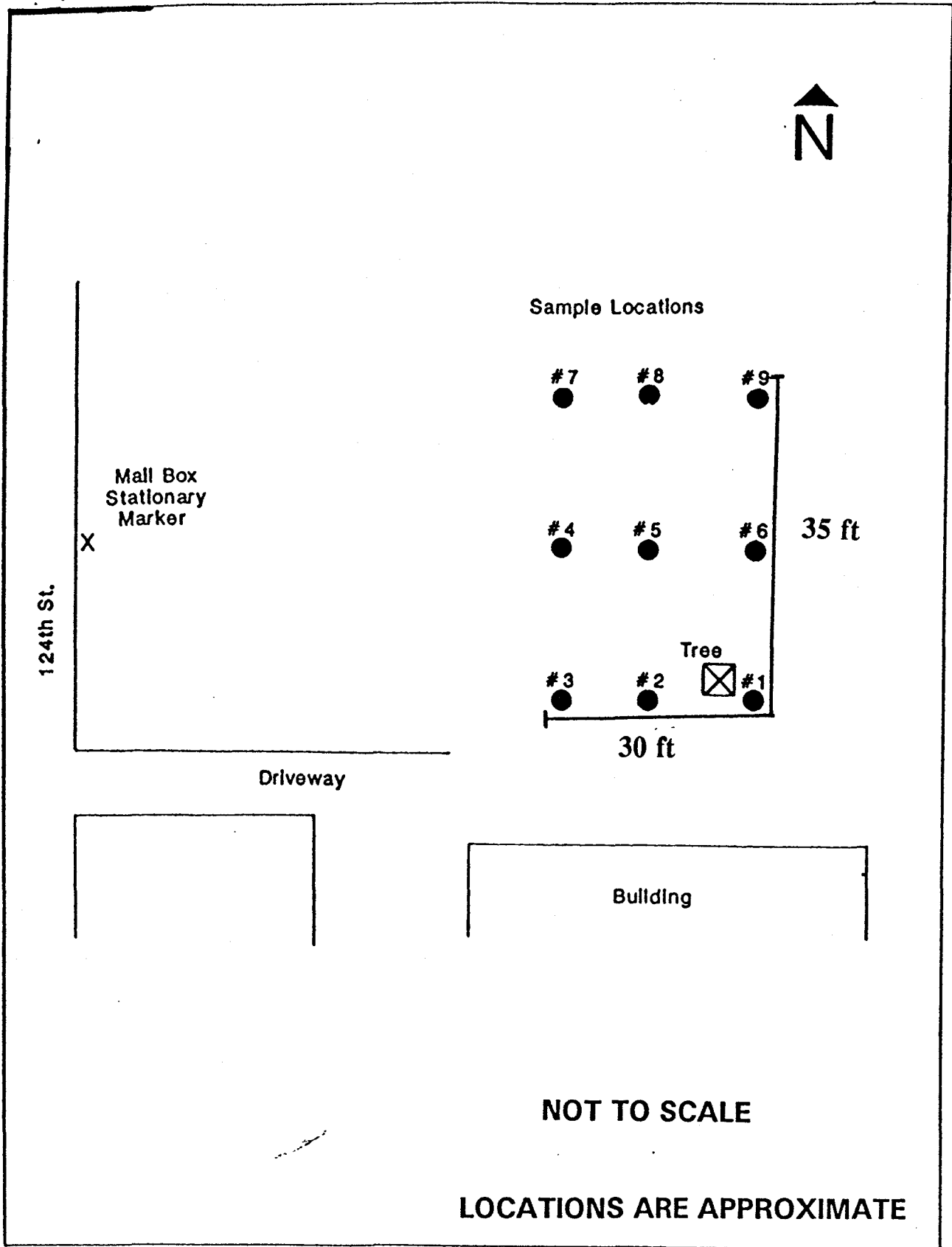
QUADRANGLE LOCATION

BASE MAP SOURCE: USGS MENOMONEE FALLS, WISCONSIN 7.5 MINUTE QUADRANGLE



REV	PROJECT: CM181225	DATE: 2/04/94	CERMATIC INC. MEQUON, WISCONSIN
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Northern Environmental Hydrologists • Engineers • Geologists			SITE LOCATION AND LOCAL TOPOGRAPHY

FIGURE 1



NOT TO SCALE

LOCATIONS ARE APPROXIMATE

Figure 2. ECOLAB Site Sample Locations

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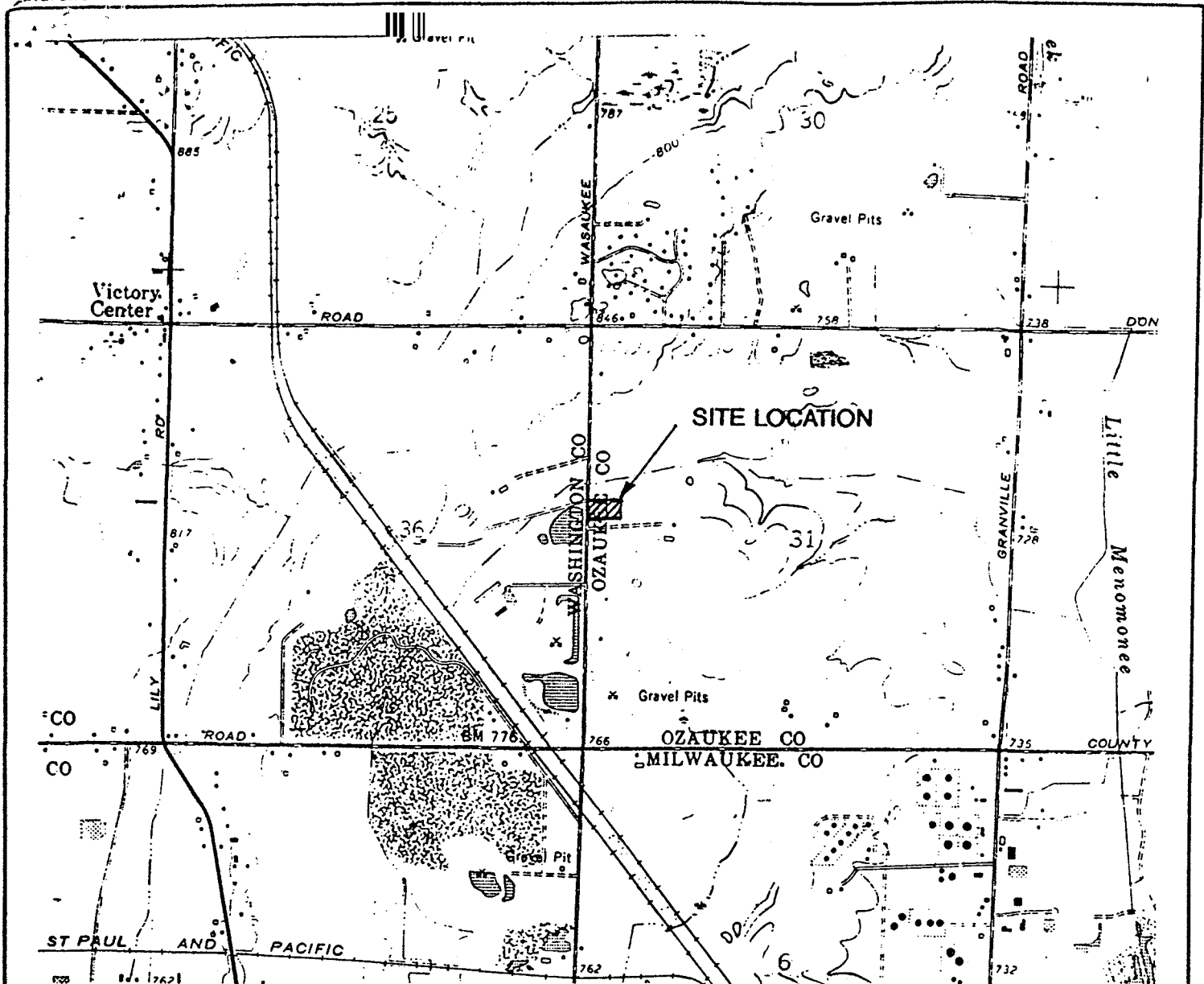
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4.0 PROJECT COMPLETION

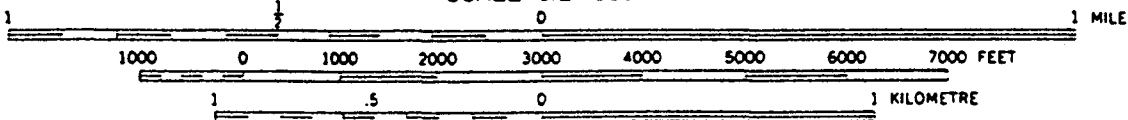
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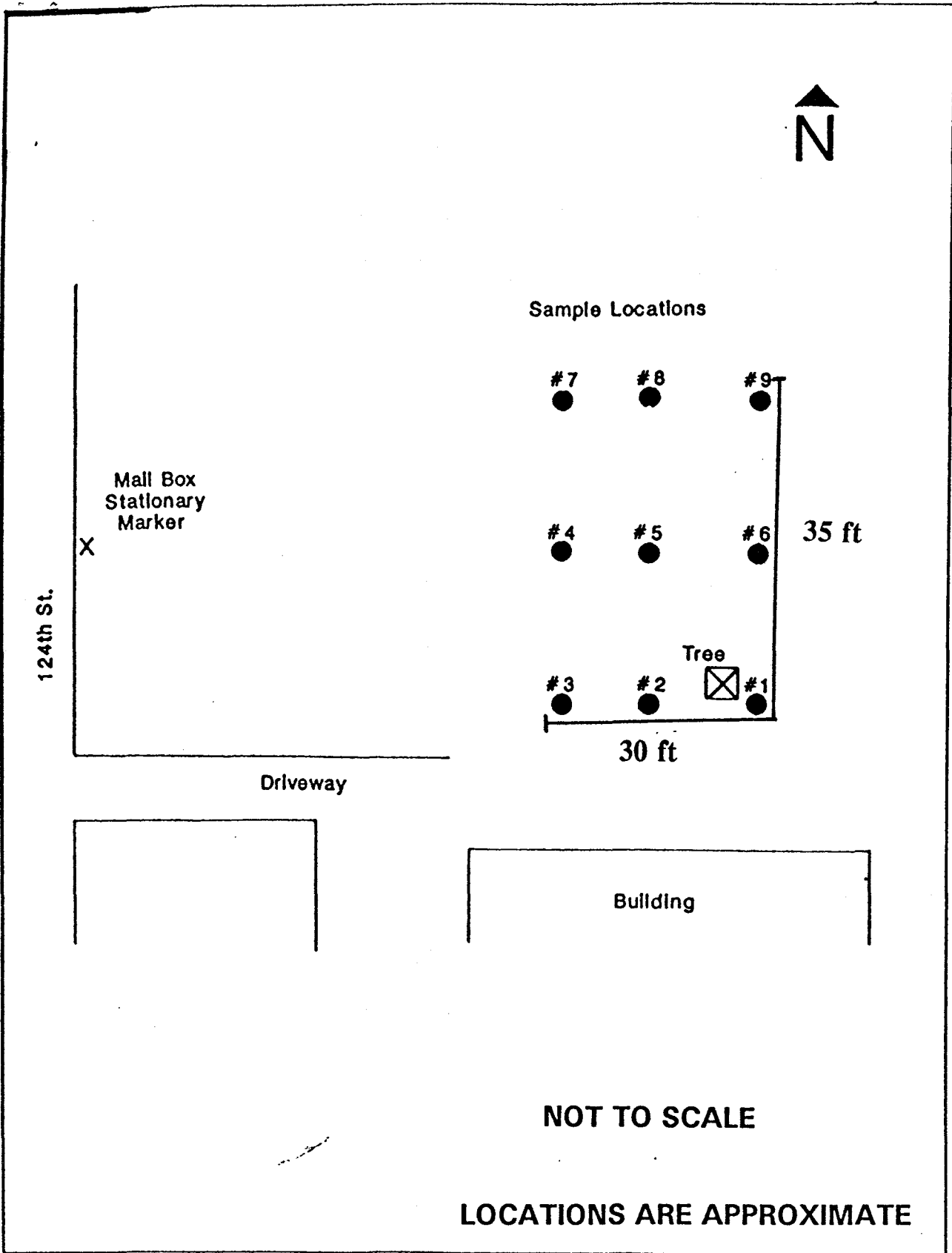
QUADRANGLE LOCATION

BASE MAP SOURCE: USGS MEMONONEE FALLS, WISCONSIN 7.5 MINUTE QUADRANGLE



REV.	PROJECT: CMI181225	DATE: 2/04/94	CERMATIC INC. MEQUON, WISCONSIN
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Northern Environmental Hydrologists • Engineers • Geologists			SITE LOCATION AND LOCAL TOPOGRAPHY

FIGURE 1



NOT TO SCALE

LOCATIONS ARE APPROXIMATE

Figure 2. ECOLAB Site Sample Locations