



FID 246077260
EAR/ERP
Ozaukee Co.

OUTBOARD MARINE CORPORATION

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20 September 1994

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

RE: *Previous Locations of Trailers and Site Cleanup Activities
Former Ecolab Facility Remediation Project
Mequon, WI*

VIA OVERNIGHT DELIVERY

Dear Ms. Mylotta:

On behalf of the Ecolab PRP Committee, I am responding to your questions related to the former Ecolab remediation which were raised in our telephone conversation last month, including areas being addressed by the committee, original locations of wax materials, and soil samples taken. Note that the PRP committee has concluded that the area where the trailers were originally located in Mequon had been fully addressed once the trailers and wax materials were removed from the Ecolab facility in 1989. The PRP Committee has focussed further assessment on the area where spilled wax materials were present at the time wax materials were removed in 1989.

I have reviewed OMC and DNR files, reviewed an aerial photograph from 1985 of the site, and spoken with Mr. Rasmussen and several current and former Outboard Marine Corporation (OMC) employees who were involved in the early phases of the project. Based on this effort, I am able to provide you the following information in response to your questions.

PRP COMMITTEE ACTIVITIES

The PRP Committee formed voluntarily during 1988 in response to contacts from the owner of Ecolab (Mr. Peter Rasmussen) and the Wisconsin Department of Natural Resources (DNR) to selected former customers of Ecolab, Inc. regarding potential responsibility for materials present at two facilities associated with the defunct business. Ecolab had operated a wax reclamation operation, had sold off portions of the equipment/operations to another business who operated at Ecolab's former Mequon location, and had residual processed and unprocessed materials in two locations. Some of the material contained polychlorinated biphenyls (PCB), including decachlorobiphenyl (DCB), a less common non-Aroclor PCB which is wax-like and solid at normal temperatures. Specifically, there were wax materials outside and in two trailers at the last operating location of the Ecolab business in Mequon, Wisconsin (10014 North Wausaukee

Road) and wax materials contained in one trailer at another property owned by Mr. Rasmussen in Menomonee Falls, Wisconsin (N56 W16997 Silver Spring Road, at 186th Street and Silver Spring; sometimes called the 'Valley View' site in file records).

The PRP Committee agreed to stabilize and/or remediate the sites in accordance with a work plan presented to DNR at a December 12, 1988 meeting and approved by DNR in a letter dated December 22, 1988. The work plan included:

- Waste material disposal, specifically:
 - (1) the wax stored inside two trailers at the Mequon site, including drummed material in the first (more northern) trailer and the boxes of reportedly reprocessed wax in the second (southern) trailer,
 - (2) the wax stored in one trailer at the Menomonee Falls site, (note that at this site, all material was contained within the trailer), and
 - (3) other wax debris stored outside at the Mequon site (the loose drums and the blocks of wax material outside of the trailers, mainly on pallets).
- Soil assessment/remediation at the Mequon site, specifically the soil area stained with loose chips of wax (in a gravel covered area where drums and blocks had been staged).

In May to June 1989, a contractor hired by the PRP Committee packaged, removed, transported, and disposed of the wax materials listed above. In addition, the contractor decontaminated the three trailers and excavated soil from an approximate 30 foot by 35 foot area north and west of a tree at the Mequon site. Soil samples were collected in the area of the excavation in 1989 and residual levels of PCB/DCB were detected. The area was resampled twice in 1990 to verify the results. After resampling and further discussions with DNR, it was determined that additional soil remediation was needed to meet cleanup objectives.

There were approximately 300 drums of wax associated with Northern Precision which were reported as PCB-free which were not handled by the committee. These drums were generally labelled with 'FRE' or 'S' codes. Mr. Rasmussen submitted a notarized affidavit regarding these drums dated December 7, 1988, a copy of which is present in DNR files. These drums were removed from the site by others.

ORIGINAL LOCATION OF MEQUON TRAILERS

DNR questioned where the trailers were originally located before work began at the Mequon site. An April 1985 aerial photograph from the Southeastern Wisconsin Regional Planning Commission shows two trailers located side by side, across the driveway to the north of what appears to be currently called the 'regulated hazardous waste container storage unit'. I can not

make out the tree on the aerial photograph, but the location of the trailers relative to the buildings appears to confirm that they were east of the tree. Attachment 1 is a copy of the portion of the aerial photograph showing the site and trailers.

OMC representatives (including Mr. Steve Otto, a former employee) first went to the sites in March 1987. At that time, the trailers were reportedly in their original locations. Attachment 2 is a sketch showing a side by side orientation of the two trailers at Mequon, with about 9 feet of distance and drums between them. According to Steve Otto in a recent telephone conversation, the trailers were next to each other in the orientation shown on the sketch and were located just north of the driveway. He did not recall their location relative to the tree but recalled that the trailers were across (north) from a building on-site. Although photographs were noted as being taken at that time, I have not been able to locate them in the files. The trailer to the south contained 'reclaimed' wax (which was in boxes). The trailer to the north was locked during the 1987 visit. Later in 1988, the north trailer was shown to contain drums of wax (some of which were reported in OMC notes from the time to have been the uncontained wax outside which was placed in drums and put in the north trailer).

I spoke with Mr. Peter Rasmussen on the telephone about the Mequon site. He indicated that originally the trailers were side by side near where the edge of the driveway is now located, just to east and possibly slightly south of the tree box (because drive/roadway was extended/widened later). The trailers were moved prior to September 1988, apparently to facilitate consolidation and removal of materials. His recollection confirms what others have said about the trailer locations.

Other OMC employees were on-site in 1988 and again in 1989 after the trailers had been moved and photos show their locations to the west of the tree box, including during removal/cleanup (June 1989). Refer to Attachments 3 and 4 for copies of trailer photos from 1988 and 1989. (Note that at that time, the drums attributed to Northern Precision were stacked along the gravel drive across from the current hazardous waste storage unit.)

LOCATION OF BLOCK WAX & DRUMS OUTSIDE OF TRAILERS

DNR wanted to verify where wax materials and drums of wax had been located outside of trailers (uncontained). Photos in DNR files from June 1987 show some drums at the west end of the trailers and a group of drums to the north of what appears to be a portion of the tree (in the upper right corner of the photo at the bottom left of the page; Attachment 5). OMC file notes from 1987 indicate approximately 72 drums were present between the trailers at that time. Steve Otto recalled that most of the material outside was within 20 feet of the trailers.

Attachment 6 includes photos showing the location of loose drums and bulk wax outside during the 1988 site visit, including the area where uncontained wax had previously been located (top photo). This location appears to be north and a bit west of the tree, in the same general area as shown in the DNR photos and within the 30 foot by 35 foot area where soil removal work has been conducted. According to OMC notes from the 1988 site visit, the uncontained wax had

been placed in drums and put into the trailer to the north.

In 1989 at the time of removal/disposal, a group of drums and block wax were located in the area near the tree, basically in the same area as in 1988 and 1987. Attachment 7 shows photos of block wax and drums to the north and west of the tree in 1989. This group of material is also somewhat visible relative to the trailers and the tree in Attachments 3 and 4.

Overall, it appears that the drums and bulk wax materials which were not contained in the trailers were located just northwest of the tree (in the area which was excavated later due to spilled wax on the ground). Wax was spilled or evident on the ground during removal only adjacent to the bulk wax/drums shown on Attachments 6 and 7. Some miscellaneous drums were initially between and adjacent to the trailers but were later consolidated and put inside one of the trailers.

SOIL REMOVAL AND SAMPLING

DNR collected samples in 1987 at three soil sites (SS-1, SS-2, SS-3) near the original locations of the trailers on the Mequon site with no PCB/DCB detected. Attachment 8 shows the approximate locations of the samples on a site sketch.

Based on the December 1988 letter from DNR approving the PRP Committee's removal/cleanup work plan, sampling was to be done where there was evidence of spilled wax. As stated above, this was the area where loose drums and bulk wax were stored to north of the tree at the Mequon site. Soil was excavated from this area in 1989 after the wax material was removed. Attachment 9 includes photos showing the area of soil excavation to north of the tree. This area is approximately 30 feet wide by 35 feet long, as shown on Attachments 10 and 11. Samples were collected in a 3 by 3 grid pattern across the excavation area and included locations near the doors of the trailers at that time in 1989 (Attachment 10). The sampling was felt to cover all areas of concern to DNR in its December 1988 letter. The area was resampled in November 1989 and no PCB was detected, however, review of the chromatograms revealed that the tests were not run for a sufficient time to assure that DCB would have eluted. The area was resampled again for PCB/DCB in September 1990 and Attachment 11 shows the sample locations. This last sampling confirmed that residual levels of PCB/DCB were present in the soil.

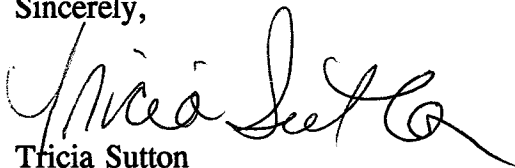
UPCOMING SOIL EXCAVATION AND SAMPLING

Based on the non-detect DNR sample results in 1987 in the area where the trailers were originally located at Mequon, the PRP committee had understood that area had been fully addressed to DNR's satisfaction once the trailers and wax material had been removed. Based on visual evidence of spilled wax in 1988-1989, the PRP committee has focussed sampling in the area of the tree box and the excavation at Mequon.

As you are aware, the PRP Committee submitted a work plan to remove additional soil from the 30 foot by 35 foot area and resample. The committee has selected Residuals Management Technology, Inc. (RMT) to conduct the work. Contract work on-site will be done by RTE, Inc. of Lombard, IL. I expect work may begin in early October. I will contact you with a more exact date when I have the contractor's schedule.

The PRP Committee understood that once this work was complete, DNR would issue a final cleanup acceptance letter to indicate that it will not initiate future enforcement actions or other cost recovery actions against the PRPs related to the wax previously stored on the sites. I would appreciate your input if DNR has concerns other than those addressed in the soil removal/sampling work plan which you recently approved verbally. Please contact me at 708/689-5228 if you have any comments or questions.

Sincerely,



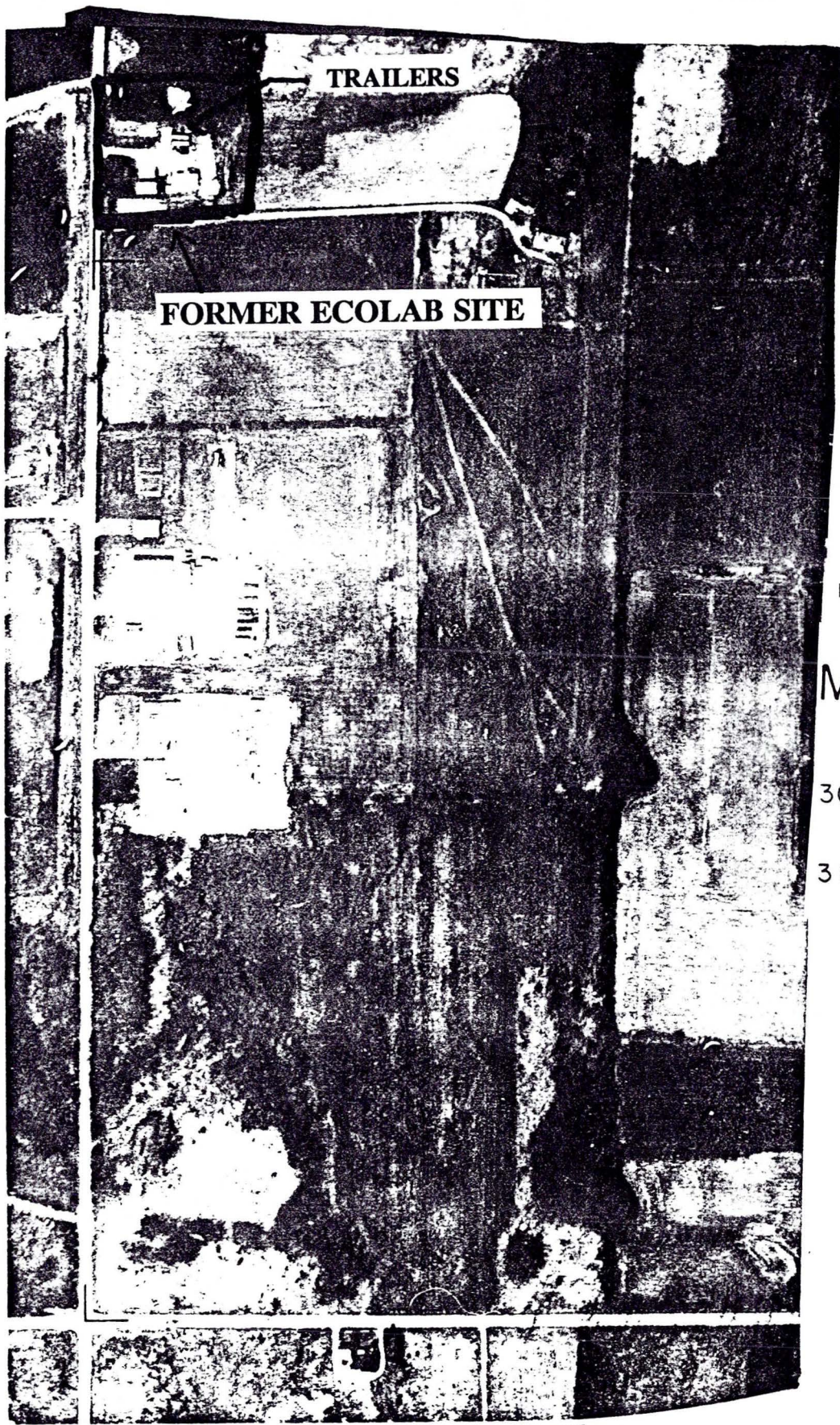
Tricia Sutton
Environmental Affairs Specialist

enclosures

c: Tim Mulholland - WI DNR, SW/3
Madhukar S. Shirke, Cermatics, Inc.

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ATTACHMENT 1 - AERIAL PHOTOGRAPH



1" = 400'

MEQUON

30	2	1	2	1	29
	3	4	3	4	
31	2	1	2	1	32
	4	3	4		

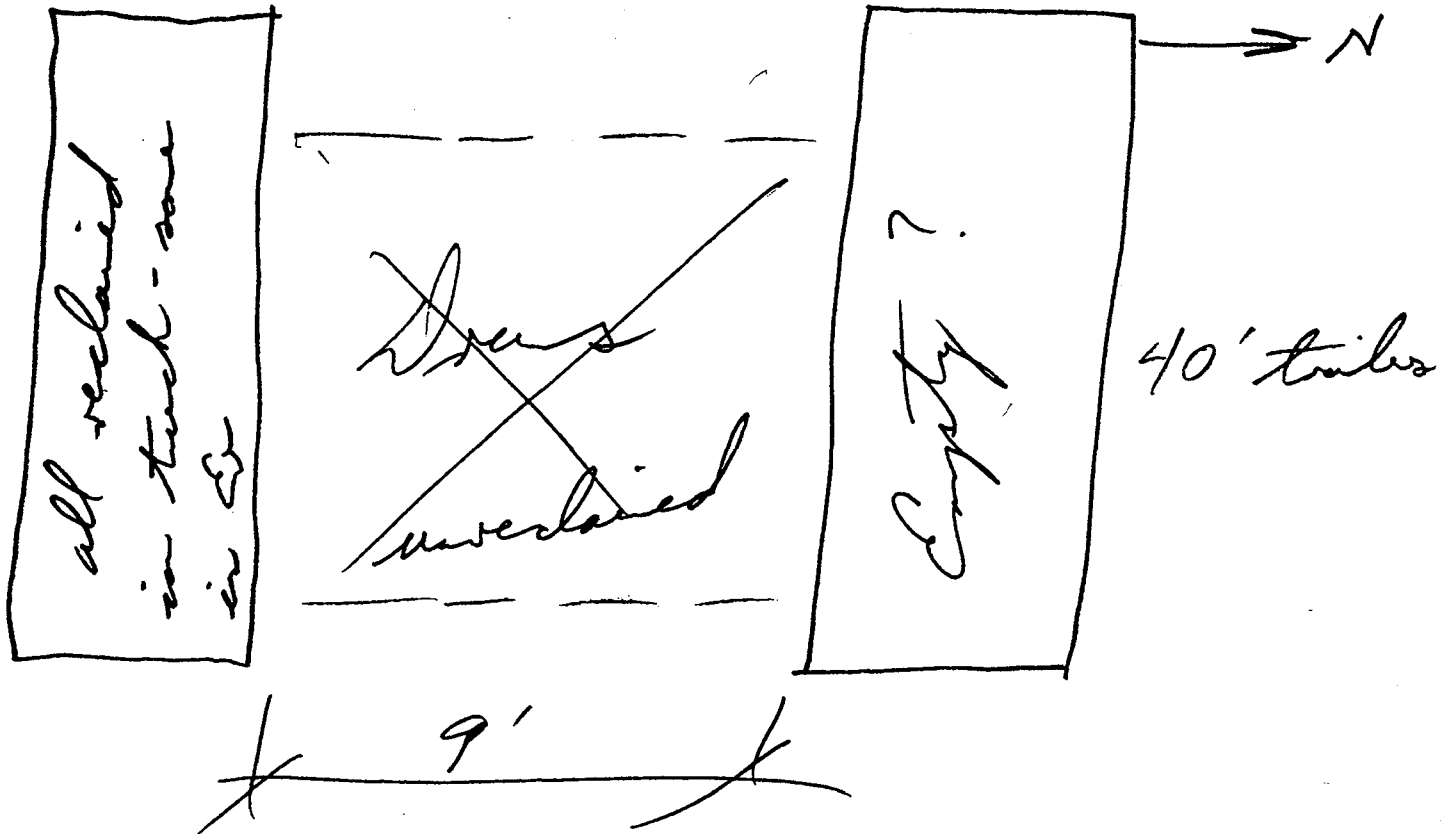
T 9 N
R 21 E

FROM: Southeastern Wisconsin Regional Planning Commission
April 1985

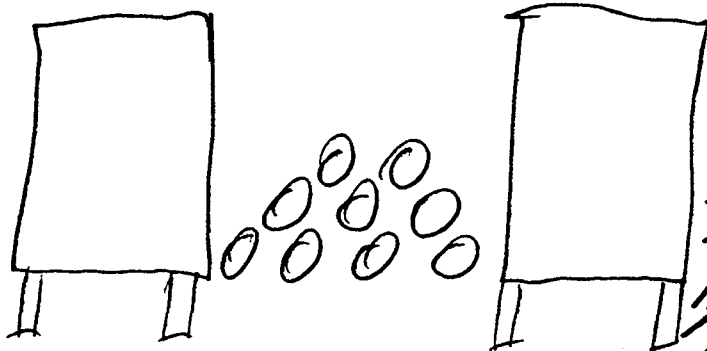
ATTACHMENT 2 - TRAILER LOCATIONS 1987

Site visit @ Coobab 3-6-87
Ray took pictures

Approx 72 doors between trailers

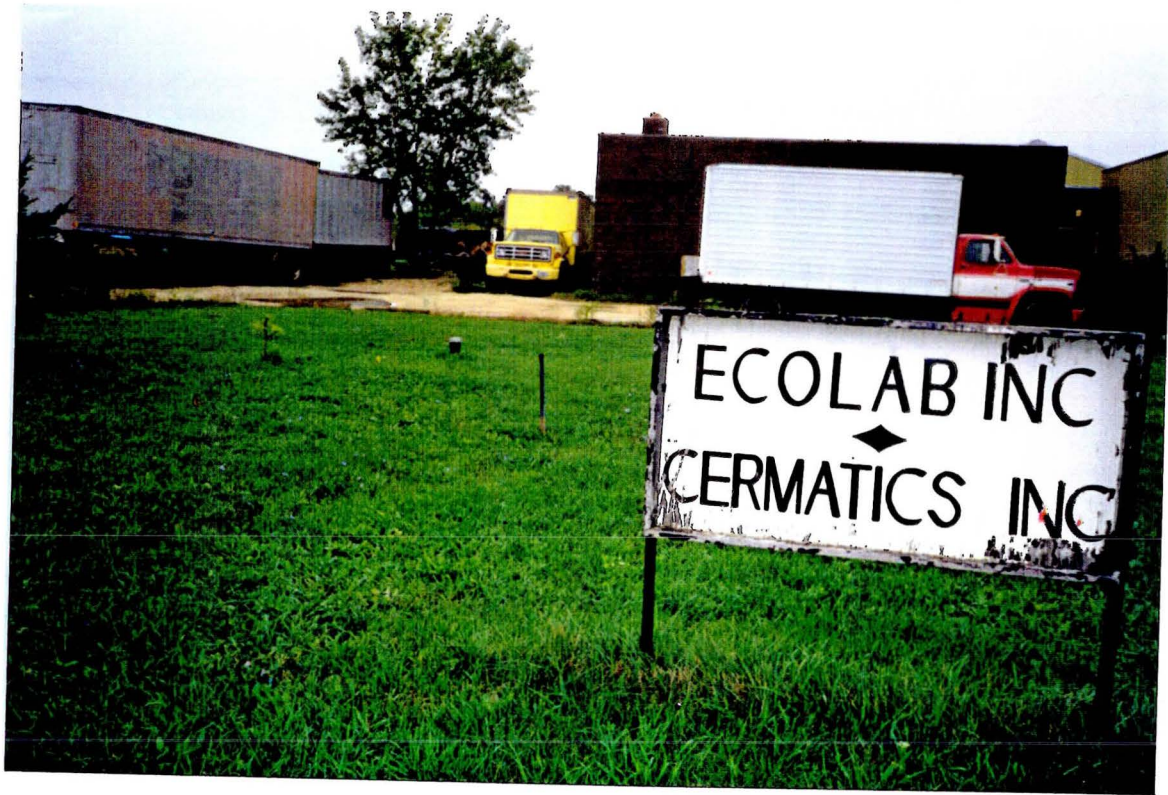


Ken Wallace - ITAP notify when
a perishes



Impression of P.T.
Sierra to clean up
problem without threat of
legal interference. Sierra in
his belief the wolf belonged
to E - not trying to pin
problem on an innocent party.
Wanted to work in a cooperative
effort to solve problem.

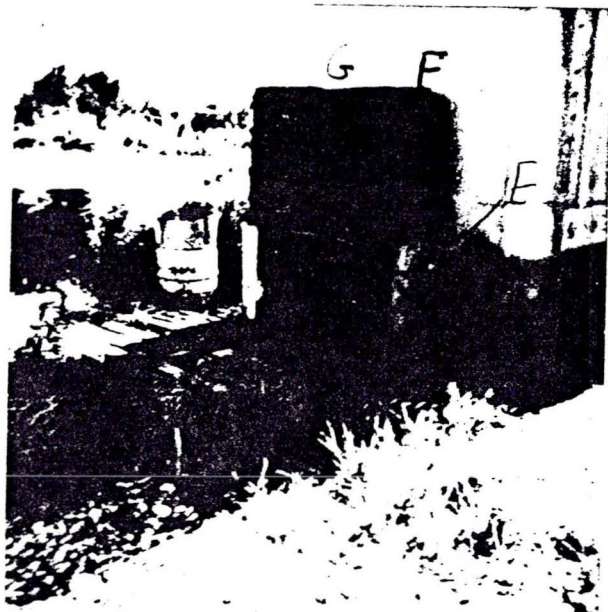
Attachment 3 - Photos of Trailers from 1988



Attachment 4 - Photos of Trailers from 1989



Attachment 5 - DNR File Photos of Drum Locations from 1987



E, F, G



Drum A E →



Drum C



Drum D

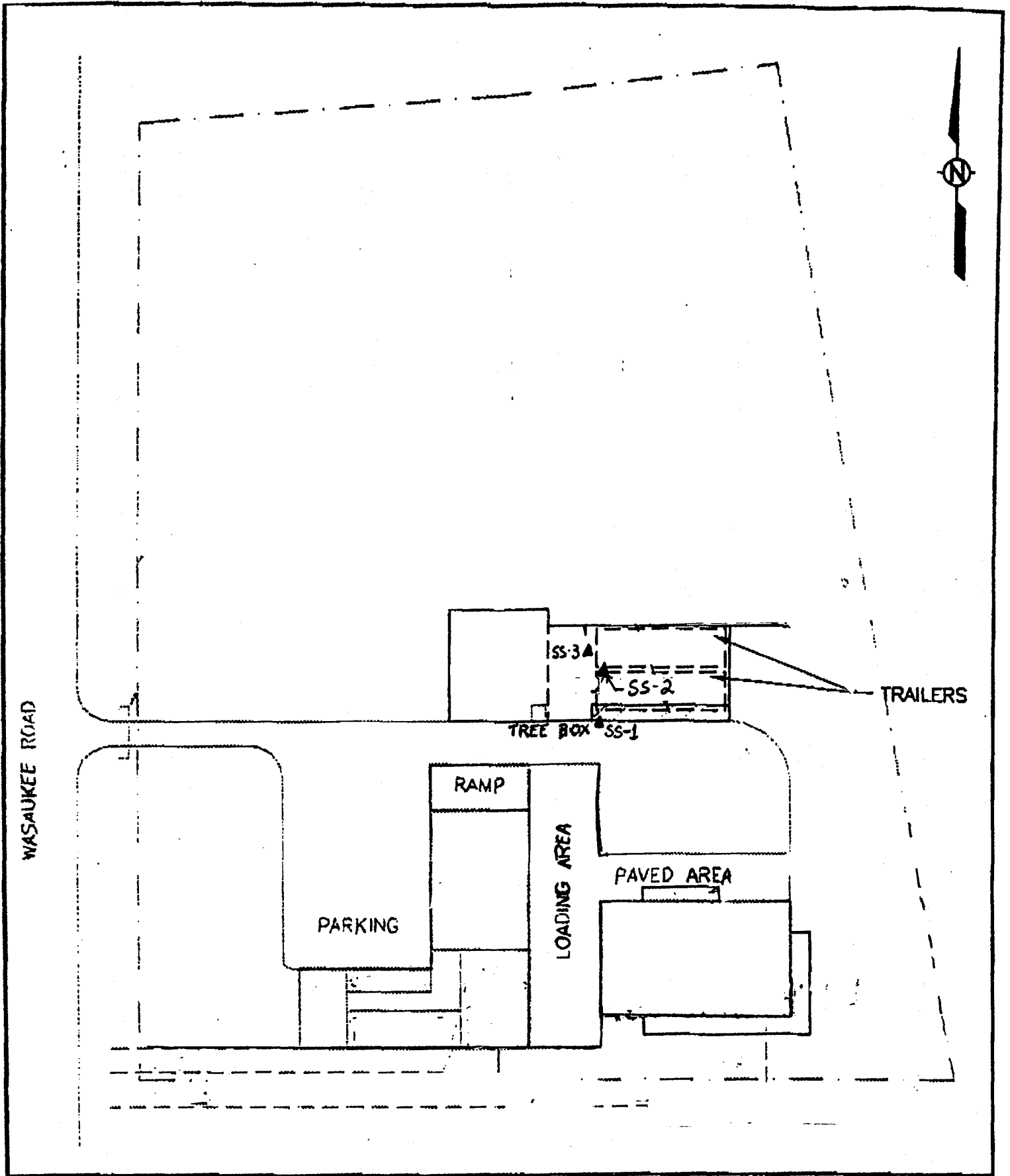
Attachment 6 - Photos of Drums and Wax from 1988



Attachment 7 - Photos of Wax and Drums in 1989



Attachment 8 - Approximate Locations of the DNR Soil Samples in 1987



Attachment 9 - Photos of Soil Excavation Area (1989)



Attachment 10 - Soil Sample Locations (1989)

Mequon, WI

S. DelPizzo, B. Benoit - C
 G. Lenzi - C
 P. Mulotta - C

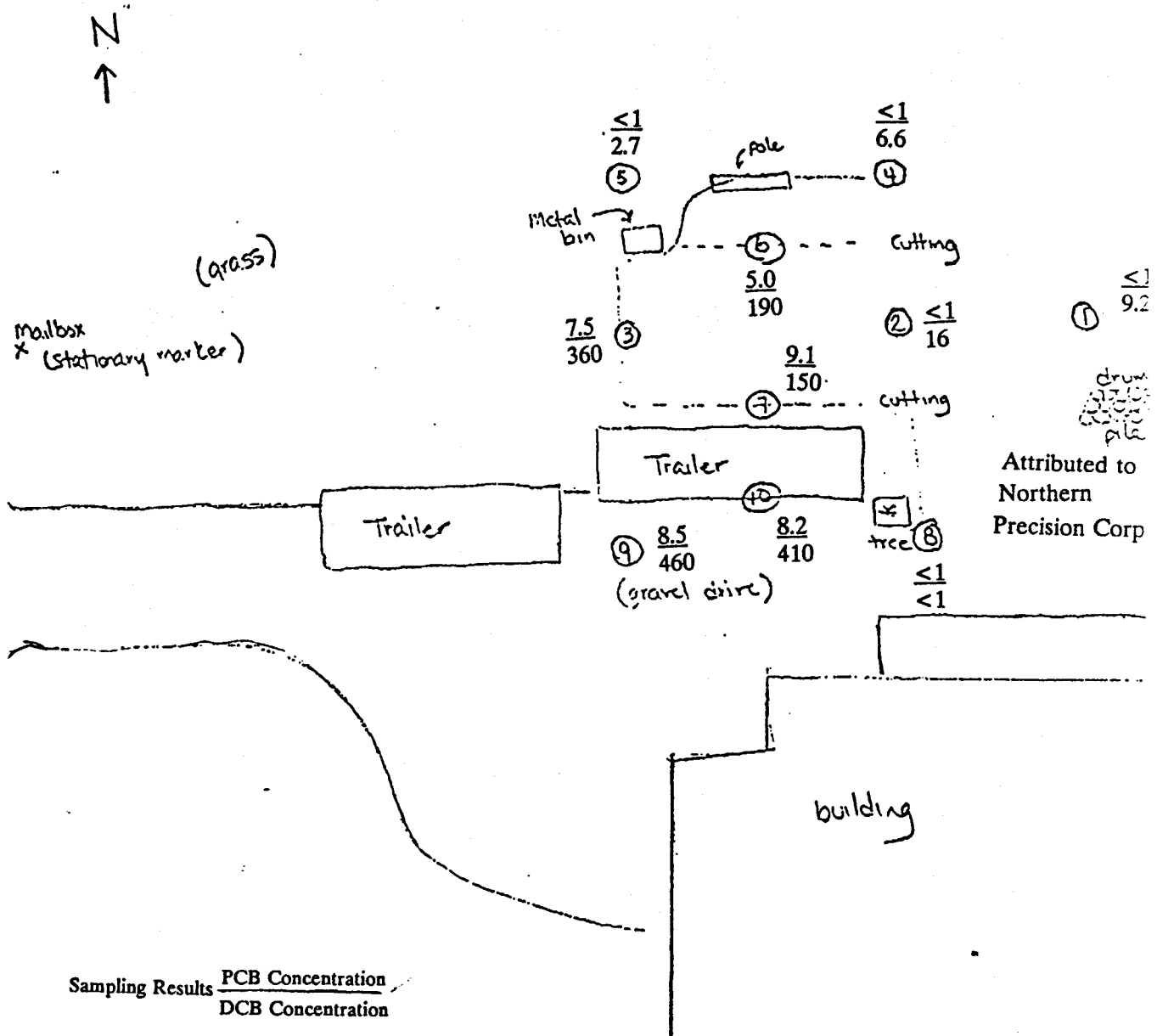


Figure 9.

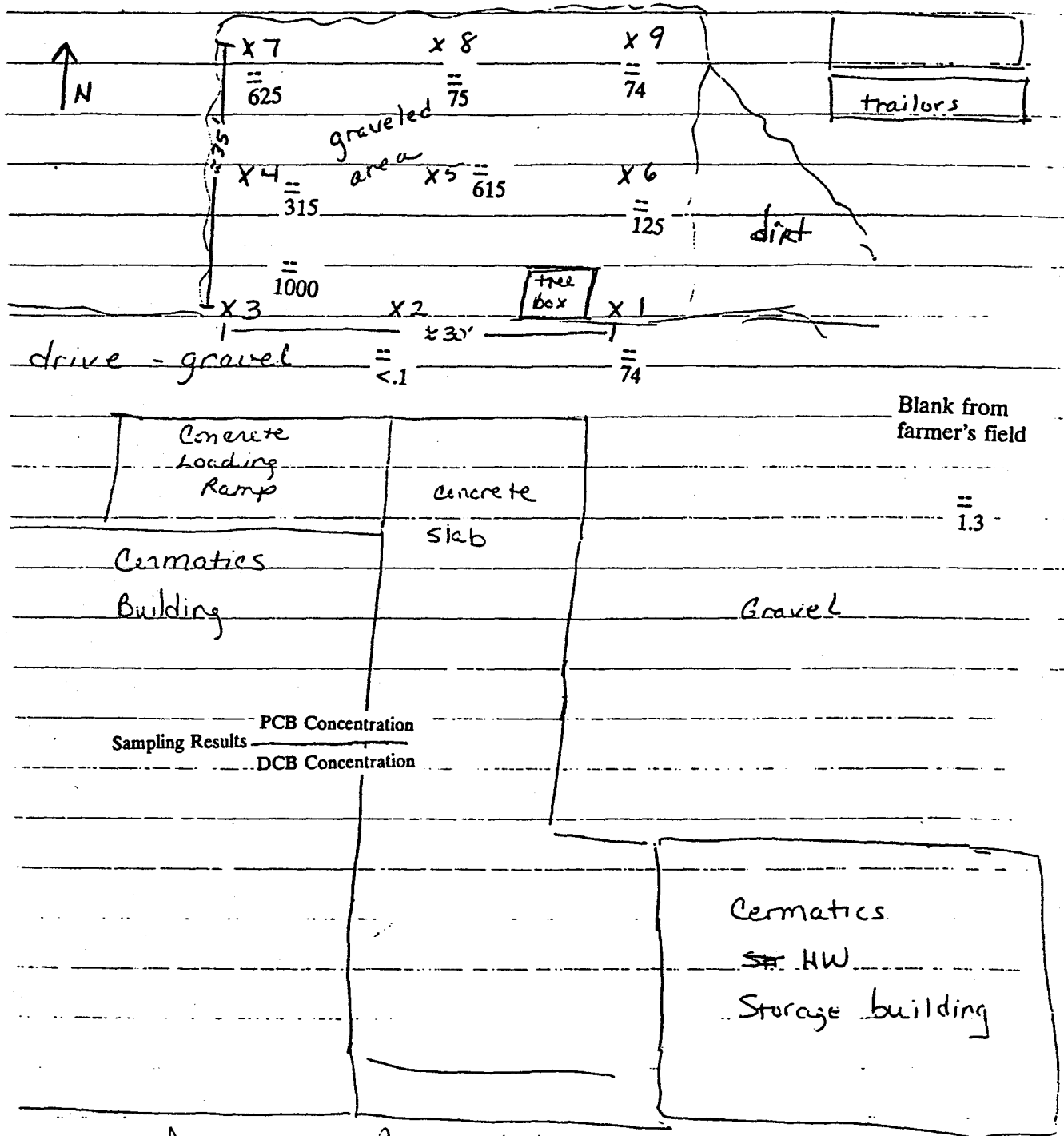
Sketch of Facility with Approximate Sampling Locations and Results - June 9, 1989

Attachment 11 - Soil Sample Locations (1990)

8/9/90 -

Ecobat/Cermatics Site layout - Not to scale

Sample points - X



Drawn by Pam Mylotta, 19

Figure 11. Approximate Sample Locations and Results - September 9, 1990