

## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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February 2, 2005

WDNR FID#246046350 BRRTS#0246529481

Bombardier Recreation Products 10101 Science Drive Sturtevant, WI 53177

Subject: Ecolab wax reclamation facility, 10014 N. Wasaukee Road, Mequon, Wisconsin

To Whom It May Concern:

In December 2003, the US Environmental Protection Agency (EPA) performed a site assessment at the former Ecolab wax reclamation facility located at 10014 N. Wasaukee Road, Mequon, Wisconsin. The focus of the assessment was to investigate polychlorinated biphenol (PCB)/decachlorobiphenol (DCB) and volatile organic compounds (VOC) contamination. Near surface soil samples (from 1-4 feet) identified DCB at each of 12 sample locations. DCB concentrations ranged from a low of 2 parts per million (ppm) to 1,870 ppm. Nine of the 12 samples also detected the PCB Arochlor 1260 at concentrations ranging from a low of .09 ppm to 31 ppm.

Wisconsin Department of Natural Resources records show that Outboard Marine Corporation (OMC) was a former customer of Ecolab and a member of the potentially responsible party (PRP) committee of former Ecolab customers that voluntarily formed in 1987. The group was assembled to address disposal of wax materials containing PCBs that had been improperly disposed of at the property. The PRP group disposed of drums containing wax in 1989 and excavated and disposed of material containing wax chips from the property in 1989, 1990 and 1994. OMC was one of the major customers of Ecolab and also took the lead in coordinating the PRP group cleanup efforts.

Given that there is PCB/decachlorobiphenol contamination remaining in the soil, the Wisconsin Department of Natural Resources requested previous Ecolab PRP group members to attend a meeting to discuss additional soil investigation/remediation at this site. This meeting took place on September 29, 2004 and was attended by representatives for the companies listed on the attached attendance list. A copy of the letter sent to PRP group members, the site summary that was read at the meeting, and a list of PRP group members who have been contacted is also enclosed.

At this time, four of the former PRP group members have indicated their willingness to participate in a preliminary investigation of the PCB contamination at the EcoLab site. They have requested the Department to contact other EcoLab customers in order to share costs related to any response actions. Accordingly, since the Department understands that Bombardier Motor Corporation bought out OMC, we believe you may share the responsibility to address contaminants at this site.



The Department requests that you inform the Department of your willingness to participate in renewed PCB cleanup activities at the EcoLab site. Please respond to me by March 2, 2005. You may contact me at (920) 892-8756 ext. 3025 with questions or concerns regarding this letter.

Sincerely, Nancy DRyan

Nancy D. Ryan, Hydrogeologist Remediation and Redevelopment

Cc: SER site file

Atty. Deborah Johnson, DNR Legal Services

Atty. Ned Witte, Foley & Lardner

**Enclosures**