

CORRESPONDENCE/MEMORANDUM

Edelstein
STATE OF WISCONSIN

Date: September 15, 1981

File Ref: 4400

To: File - Freeman Chemical Co. - Saukville (Saukville Wells Case)

From: Gary Edelstein - SW/3 *GAE*

Subject: Summary of 9/9/81 Meeting

As a result of the phone contacts Paul Didier had about Freeman's plant in Virginia, this meeting was called. We discussed the incinerator and other related topics concerning the air, solid waste and WPDES programs. Attending were:

Don Theiler - AIR/3
Dean Packard - AIR/3
Dale Ziege - AIR/3
Wolfgang Klassen - SED/AIR
Brian Barbieur - WW/2
Mike Witt - WW/2
Pat Hennessy - SED/WW
Bill Rock - SW/3
Gary Edelstein - SW/3
Skip Glor - SED/SW

The discussion began with background information given by representatives of the three programs. Information from the files was discussed, as well as the results of recent inspections. From these discussions it was determined that:

1. The incinerator is now taking waste from Virginia.
2. The WPDES inspection found no violations, although dye testing was not performed. Concern was voiced over the transfer of materials (pouring) as being a potential groundwater pollution source, and that yard drainage to the "dry pond" on the site could be a source of pollution (see Pat Hennessy/Frank Schultz memo of September 4, 1981).
3. Air pollution staff have not performed a compliance inspection for more than two years. Previous milestones were complaint investigations regarding odors and smoke from the incinerator. No violations of NR 154 have been documented to date. EPA had asked for information.
4. The well pollution case was being handled by EPA, solid waste and water supply staff. The last set of samples were taken in June, with no results available yet. Previous results found extremely low levels of organics in Saukville well #2. An unused, unabandoned hi-cap well on the Laubenstein property (formerly N. Signal Co.) was found to have higher levels of organics by EPA. A well in a

cemetery south of Freeman was also sampled. The Laubenstein and Cemetery wells both have water that smells similar to the odors emitted at Freeman Chemical. EPA has sent their field investigation team (FIT) to the area to work on a proposed groundwater monitoring plan. We have not seen the results of that study yet.

Past disposal of solid and hazardous waste was discussed, including an illegal landfill, an open pit burning area and spillage at the site.

Based on the above discussions, the following courses of action were agreed upon:

1. Dye testing may still be performed.
2. Another air pollution compliance inspection will be performed, because of the new information and the time elapsed since the last one. Jim Reyburn (SW-SED) will accompany as an observer. Air pollution permitting may be necessary because of the new wastes being taken, which may change emissions, a new incinerator is apparently on order, or per NR 154.19, the burning toxic and hazardous waste may be causing a public health concern, depending on what is being burned.

Wolf Klassen will talk to Bob Winnie and will coordinate a district report on the situation at Freeman that describes the past and current regulatory and environmental status of the facility for all programs. Wolf will be the prime district contact on the site, while Gary Edelstein will be the prime central office contact. This report is expected to be a key tool in future dealings with Freeman.

3. Further regulatory action under the solid/hazardous waste program will include the processing of a variance under NR 181, and possibly another interim standards inspection (one was previously performed by EPA). Although a variance could be granted somewhat automatically, it is possible to give this facility close scrutiny during the variance process. How the regulatory program will be implemented and its relationship to the wells case will be decided later. Bill Rock and Gary Edelstein emphasized that the groundwater/wells case must be considered the most important environmental concern, and Freeman must be approached carefully by all department staff so that they cooperate with the department, and we avoid an adversarial relationship. It may be necessary at some point to ask Freeman to perform groundwater monitoring to better identify the extent of the problem.

GE:d1w/1485R

cc: Participants
Dan Wilson - WS/2
Chad Czarkowski - WS/SED
Keven Kessler - WS/2
Dave Degenhart - SW/3
Thomas Kroehn - ADM/5