

7/23/85

Freeman Chemical Corp.
WID 980 615 439
Railroad Street
Saukville, Wisconsin 53080

Facility Contact: Russell Cerk
414/284-5541

Permit Status: Permit application under review at WI DNR.

The Freeman Part B application is for storage and treatment of ignitable solvent and listed wastes. On-site storage for material generated on-site and off-site will consist of 4 - 6500 gal tanks, 240 - 55 gal liquid drums, 600 - 55 gal drums of solids and 2 - 12 cu. yard containers of ash. The maximum fuel feed and solids feed to the proposed incinerator is 480 lbs/hr and 900 lbs/hr, respectively.

Summary and Corrective Action Review:

Freeman Chemical has submitted the requested Certification Regarding Potential Releases From Solid Waste Management Units. This Certification identified the existence of an on-site disposal pit used from 1952 to 1965 for discarding reaction water. This practice, and subsequent organics contamination of local municipal wells, is further documented in a USEPA Region V FIT PA/SI report. Site history and off-site contamination is further described in the attached Executive Summary.

As a result of reported well contamination in the area, Freeman has voluntarily implemented a hydrogeological investigation program aimed at characterizing subsurface conditions at and surrounding the facility. The investigation has as a preliminary goal the establishment of a dewatering system capable of reducing off-site impacts of hazardous constituent releases.

Recommendations:

Given the ongoing effort on the part of Freeman in investigating and remediating the documented contamination problem, WI DNR recommends an approach consisting of continuing negotiated action by the facility combined with a compliance schedule inclusion in the final Part B permit. Final permit issuance should be withheld pending development of a detailed compliance schedule as part of the FY '86 grant commitment. After subsequent review of available investigative results, detailed corrective action requirements can be developed.

This is an environmentally significant facility.

RCRA FACILITY REVIEW FOR SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: FREEMAN CHEMICAL CORP.
EPA ID NUMBER: WID 980 615 A39
LOCATION (CITY, STATE): SAUKVILLE, WI
DATE OF INSPECTION: LAST GFSI - MAY 13, 1985
INSPECTOR(S): VIC PAPPAS
TITLE(S): WI DNR - SOUTHEAST DISTRICT
FACILITY REPRESENTATIVES PRESENT: _____

1. Based on a review of State records, describe any land disposal units that have ever had a State permit for managing municipal or industrial (non-hazardous) waste at this site. Summarize the information which is available to indicate whether the waste may contain hazardous constituents and whether the unit may be leaking.

THERE ARE NO PERMITTED LAND DISPOSAL UNITS AT THIS FACILITY LAND
DISPOSAL OF WASTES CONTAINING HAZARDOUS CONSTITUENTS DID OCCUR
FROM 1952 TO 1965, AS DOCUMENTED IN THE USEPA
FIT PA/SI REPORT.

2. Based on a review of State records, describe any incinerators or other solid waste management units at this site (other than those treatment, storage and disposal units that have interim status) for which a State air pollution control permit has been issued. Summarize the information which is available to indicate whether the waste may contain hazardous constituents, and whether and whether the emissions from the unit may contain hazardous constituents.

3. Based on a review of State records (including CERCLA 103(c) notifications, complaints from the public, etc.) describe any known, suspected or likely releases of hazardous constituents to the environment from solid waste management units, except those spills not related to a specific unit, which were properly reported and cleaned up.

THE OPEN DUMPING OF GLYCOL-CONTAINING WASTEWATER ON-SITE
FROM 1952 TO 1965 CONSTITUTES A RELEASE OF HAZARDOUS
CONSTITUENTS TO THE ENVIRONMENT.

4. Based on State records, describe any permitted injection wells at this facility and indicate whether injected the wastes may contain hazardous waste or hazardous constituents. Summarize the information which is available to indicate whether hazardous constituents may be escaping to the environment through improperly constructed or managed injection wells.

NO INJECTION WELLS AT THIS FACILITY.

5. Did you see any of the following solid waste management units or evidence of prior existence of such a unit at the facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN THE PART B APPLICATION

	<u>YES</u>	<u>NO</u>
• Landfill	_____	_____/____
• Surface Impoundment	_____	_____/____
• Land Farm	_____	_____/____
• Waste Pile	_____	_____/____
• Incinerator	_____	_____/____
• Storage Tank (Above Ground)	_____	_____/____
• Storage Tank (Underground)	_____	_____/____
• Container Storage Area	_____	_____/____
• Injection Wells	_____	_____/____
• Wastewater Treatment Units	_____	_____/____
• Transfer Stations	_____	_____/____
• Waste Recycling Operations	_____	_____/____
• Waste Treatment, Detoxification	_____	_____/____
• Other _____	_____	_____/____

6. If there are "Yes" answers to any of the items in Number 5 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available. You may simply reference the owner or operator's "Certification Regarding Potential Releases from Solid Waste Management Units" if the description contained therein appears to be accurate.

(N.A.)

7. If previous inspection reports indicated the presence of solid waste management units other than those described above, what is known about them?

N.A.

8. Describe other information about existing or closed solid waste management units at this facility that should be considered in determining whether there may be a continuing release of hazardous waste or hazardous constituents from solid waste management units.

THE USEPA IV FIR PA/SI IS THE AUTHORITY REFERENCE REGARDING PAST AND/OR CONTINUING RELEASES OF HAZARDOUS CONSTITUENTS.

Fred Swed / Ed Lynch
Typed or Printed Name - State Permit Writers

State FMP Coordinator - Ed Lynch

Edward K Lynch P.E.
Signature - State Permit Writer

7/23/85
Date

Name of Preparer: F. SWED

Date: JULY 15, 1985

Model Facility Management Plan

1. Facility Name: FREEMAN CHEMICAL CORP.

2. Facility I.D. Number: WID 980 615 439

3. Owner and/or Operator: FREEMAN CHEM. CORP.

4. Facility Location: RAILROAD ST.
Street Address

SAUKVILLE DENAUKEE WI 53080
City County State Zip Code

5. Facility Telephone (if available): (414) 284-5541

6. Interim Status or Permitted Hazardous Waste Units and Capacities of Each Unit:

<u>Type of Units</u>	<u>Years of Operation</u> (indicate active or closed)		<u>Size or Capacity</u>
<input checked="" type="checkbox"/> Storage in Tanks or Containers	CONTAINERS	~ 6600.	gal.
<input checked="" type="checkbox"/> Incinerator	TANKS	~ 13000.	gal.
<input type="checkbox"/> Landfill	INCINERATOR	~ 0.45	TONS / yr.
<input type="checkbox"/> Surface Impoundment			
<input type="checkbox"/> Waste Pile			
<input type="checkbox"/> Land Treatment			

7. Interim Status or Permitted Hazardous Waste Process(es) and Capacities of Each

<u>Type of Process</u>	<u>Years in Operation</u>		<u>Capacity</u>
TANK TREATMENT	ACTIVE	4	gal/day

8. Permit Application Status:

Initial Part B Submission Date: REC'D BY DNR 3/3/83

Completed Application Submission Date: NOT YET COMPLETE

Notice of Deficiency Date(s): APR. 22, 1983

JAN. 23, 1984

AUG. 13, 1984

9. Identification of Hazardous Waste Generated, Treated, Stored or Disposed at the Facility:

<u>Type of Waste</u>	<u>Quantity</u>	<u>Generated, Treated, Stored or Disposed</u> <u>(note appropriate categories)</u>
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SEE PART A APPLICATION



10. Date Questionnaire Re Solid Waste Management Units sent out APR 22 1985

11. Date response to Questionnaire received by DNR 5 JULY 1985

12. Review of Response indicates: (check one)

- Solid Waste Management Units exist (other than previously identified RCRA units)
- No Solid Waste Management Units exist (other than previously identified RCRA units)
- It is unclear from review of questionnaire whether or not any solid Waste Management Units exist
- Respondent indicates that does not know if any Solid Waste Management Units exist

13. If the response to question 12 is that Solid Waste Management Units exist, than check one of the following:

- Releases of hazardous waste or constituents have occurred or are thought to have occurred
- Releases of hazardous waste or constituents have not occurred
- It is not known whether a release of hazardous waste or constituents has occurred

14. Description of All Available Monitoring Data for Facility:

<u>Type of Data</u>	<u>Date</u>	<u>Author</u>	<u>Summary of Results or Conclusions</u>
G.W. MONITORING DATA ON-SITE, ADJACENT PROP AND CITY OF SAUKVILLE MUNICIPAL WELLS	SINCE 1983 (SEVERAL REPORTS ON FILE)	FACILITY'S CONSULTANT/ CONTRACTOR	THERE <u>IS</u> EVIDENCE OF A RELEASE RESULTING FROM DISPOSAL OF ESTERS AT FACILITY.

15. Description of Enforcement Status:

<u>Type of Action</u>	<u>Date</u>	<u>Local, State or Federal</u>	<u>Result or Status</u>
ON-GOING INVESTIGATION BY FACILITY IS VOLUNTARY.			
GFSI NOTICE OF NON-COMPLIANCE ISSUED	MAY 13, 1985		

16. Description of Any Complaints from Public:

<u>Source of Complaint</u>	<u>Date</u>	<u>Recipient</u>	<u>Subject and Response</u>
IN 1979, SAUKVILLE'S WELLS WERE FOUND TO BE CONTAMINATED,			

17. Description of All Inspection Reports for Facility:

<u>Date of Inspection</u>	<u>Inspector (Local, State, Federal)</u>	<u>Conclusions or Comments</u>
MAY 13, 1985	VIC PAPPAS - WI DNR SOUTHWEST DISTRICT	AREAS OF NON - COMPLIANCE: NO OPERATING LOG INCINERATOR NOT USING AUX. FUEL RESUBMIT UPDATED PART A NEW CLOSURE PLAN

18. During inspection of this facility did the inspector note any evidence of past disposal practices not currently regulated under RCRA such as piles of waste or rubbish, ponds or surface impoundments that might contain waste or active or inactive landfills?

Yes - give date if inspection and describe observation

PAST DISPOSAL PRACTICES HAVE BEEN DOCUMENTED
BY THE PAST REPORT

No

Don't know

19. Do inspection reports indicate observations of discolored soils or dead vegetation that might be caused by a spill, discharge or disposal of hazardous wastes or constituents?

Yes - indicate date of report and describe observations

No

Don't know

20. Do inspection reports indicate the presence of any tanks at the facility which are located below grade and could possibly leak without being noticed by visual observation?

_____ Yes - date of inspection and describe information in report

_____ No

_____ Don't know

21. Does a groundwater monitoring system exist at the facility? YES

22. If answer to question ²¹ 21 is yes, is the groundwater system capable of monitoring both regulated RCRA units and other Solid Waste Management Units? _____

Explain - SYSTEM WAS NOT DESIGNED ACCORDING TO RCRA STANDARDS, BUT WOULD BE CAPABLE OF DETECTING RELEASES FROM ON-SITE DISPOSAL PRACTICES

23. Is the groundwater monitoring system in compliance with applicable RCRA groundwater monitoring standards? _____

If no, explain deficiency _____

SEE ABOVE

24. Describe all information on facility subsurface geology or hydrogeology available.

<u>Type of Information</u>	<u>Author</u>	<u>Date</u>	<u>Summary of Conclusions</u>
SOME GENERAL SUBSURFACE	INFORMATION	AVAILABLE	IN FIT PAST REPORT.

25. Did the facility submit a 103(c) notification pursuant to CERCLA?

Yes Date of Notification _____
 No

26. If answer to 22 is yes, briefly summarize content of that notification.
 (waste management units identified, type of waste concerned)

27. Has a CERCLA Preliminary Assessment/Site Investigation (PA/SI) been completed for this facility?

Yes
 No

28. If answer to question 27 is yes, briefly describe conclusions of the PA/SI focusing on types of environmental contamination found, wastes and sources of contamination.

FROM 1952 TO 1965 APPROXIMATELY 50 gpd OF GLYCOL-CONTAINING
WASTEWATER WAS DUMPED IN AN OPEN PIT ON SITE. CONTAMINATION
OF MUNICIPAL WELL BELIEVED TO RESULT FROM THIS PRACTICE
LOCALIZED G.W. CONTAMINATION CONFIRMED BY VOLUNTARY
MONITORING PROGRAM BY FACILITY

29. If available, having reviewed the CERCLA notification, RCRA Part A and RCRA Part B, it appears that:

RCRA and CERCLA units are same at this facility
 RCRA and CERCLA units are clearly different units
 There is an overlap between the RCRA and CERCLA units
 (some are the same, some are different)

30. The facility is on the National Priorities List or a proposed update of the List

Yes - indicate NPL or update
 No (HAS BEEN SCORED THOUGH, 33.43)

31. Description of Any Past Releases or Environmental Contamination:

<u>Type/Source of Release</u>	<u>Date</u>	<u>Material Released</u>	<u>Quantity</u>	<u>Response</u>
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SEE ITEM # 28

32. Identification of Reports or Documentation Concerning Each Release Described in Item 14.

<u>Title/Type of Report</u>	<u>Date</u>	<u>Author</u>	<u>Recipients</u>	<u>Contents</u>
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USEPA IV FIT PA/SI	12/3/84		ECOLOGY & ENVIRONMENT, INC.	
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33. Highlight any information gaps in the file - describe any plans to obtain additional needed information.

- BETTER DEFINITION OF WASTE DISPOSED OF
- ADDITIONAL INVESTIGATION AND REMEDIAL ACTION TO BE PROVIDED BY FACILITY

Recommendation for Regional Approach to the Facility: Rank in order of appropriateness for this Facility one through seven

- 1 Permit Compliance Schedule
- Corrective Action Order (may include compliance schedule)
- Other Administrative Enforcement
- Judicial Enforcement
- 2 Referral to CERCLA for Federally Financed or Enforcement Activity
- 1 Voluntary/Negotiated Action (ON-GOING)
- State Action

(CONTINGENT UPON FINAL SCORING. ALSO SINCE FACILITY IS COOPERATING, FEDERAL FINANCING IS UNLIKELY)

Brief narrative in explanation of selection of ranking: SINCE FACILITY HAS VOLUNTARILY UNDERTAKEN A HYDROGEOLOGICAL ASSESSMENT AND REMEDIATION PROGRAM IT IS BELIEVED THAT PERMITTING PROCEED, WITH INCLUSION OF A COMPLIANCE SCHEDULE IN THE FINAL PERMIT.

If Permit Alternative is Selected: Projected Schedule

Date of Part B Submission: 3/3/83

Date of Completeness Check: SEVERAL DURING '83 - '85

Date for Additional Submissions (if required): "

Date of Completion of Technical Review: EXPECTED SUMMER, FALL 1985

Completion of Draft Permit/Permit Denial: ?

Public Notice for Permit Decision: ?

Date of Hearing (if appropriate): ?

Date for Final Permit or Denial Issuance: WINTER 1985 ??

Description of any corrective action provisions to be included in permit -
PERMIT COMPLIANCE SCHEDULE SHOULD ADDRESS FREEMAN'S ONGOING HYDROGEOLOGICAL ASSESSMENT AND PLANS FOR REMEDIAL ACTION.

If Corrective Action Order Alternative is Selected:

Estimated Date for Order Issuance: _____

Description of Provisions of the Order to be Completed by Facility: _____

Description of Compliance Schedule to be Contained in Order: _____

If Other Administrative Enforcement Action is Selected:

Projected Date for Issuance of the Order: _____

Description of Provisions of the Order: _____

If Judicial Enforcement Alternative Selected:

Date of Referral to Office of Regional Counsel: _____

If Referral to CERCLA for Action Selected:

Date of Referral to CERCLA Sections: _____

If Voluntary/Negotiated Action Alternative if Selected:

Date of Initial Contact with Facility: _____

Description of Goals of Contact or Discussions with
Facility: _____

Date for Termination of Discussions if Not Successful:

Date of Finalization of Settlement if Negotiation Successful:

If State Action Alternative is Selected:

Date for Referral to State: _____

State Contact: _____

EXECUTIVE SUMMARY

SITE NAME: FREEMAN CHEMICAL CORPORATION

ERRIS #: WID 980615439

LOCATION: Railroad Street
Saukville, WI 53080
Ozaukee County

HISTORY OF SITE: Freeman Chemical Corporation is an active TSD, which is involved in the manufacturing of polyester and urethane resins. They also manufacture various esters for the paint and coatings industry. This site has been listed on ERRIS due to its possible association with the contamination of the public water supply wells in Saukville, Wisconsin.

During the early 1950's, it was suggested by the State of Wisconsin Board of Health to dispose of untreated reactor distillate rejects from the plants resin and varnish manufacturing to the ground for soil absorption in the vicinity of the plant. Approximately 25 gallons per day for an unknown period of time was allegedly disposed of in this manner. This waste was highly acidic and contained an appreciable amount of suspended oil. A seepage pit located on the plant property may have been used for this disposal technique (this pit has since been covered). This process, however, was stopped during the 1960's, when the company hired a private contractor to haul and dispose of their by-products. Several incinerators were eventually installed by the plant to help in the disposal of their wastes. An off-site incinerator located directly southwest from the plant was constructed (date of initial operation is unknown) and used until approximately 1972 when it was ultimately shut down by the company. The plant still operates a liquid and solid incinerator on-site.

Chemical analysis by EPA of water samples collected from wells surrounding Freeman Chemical Company indicated the presence of benzene, trichloroethylene, toluene, xylene and other organic chemical compounds. The site has also been implicated in violation of hazardous waste regulations adopted under Subtitle C of the Resource Conservation and Recovery Act (RCRA). A Determination of Substantial Hazard due to contaminated water wells involving the site has also been made by EPA.

Aerial photography analyses covered a 31-year period and included the years 1950, 1964, 1971, and 1981. Analysis focused on locating and identifying possible sources of contamination to the aquifer that supplies drinking water to the Town of Saukville. Specifically, the photography was examined for such sources as: direct dumping on the ground near or within the Freeman facility, disposal into gravel pits or municipal dumps, disposal into the river, incinerator disposal with attendant contamination, and burial.

By 1981, an old seepage pit was located on Freeman plant property. This pit, suspected to have been used for direct ground disposal of wastes from plant operations, was developed sometime between 1971 and 1981.

AREA DESCRIPTION: Freeman is located on the southwest limits of the Village of Saukville, (pop. 3949). The Milwaukee River is a few blocks to the east of the site and the residents use water from the municipal well system. Two wells have been disconnected from the system, and June 1981 sampling showed well #1 and #4 to not be contaminated.

INSPECTION PRIORITY: HIGH

This rating has been based on the priority that was given to the Saukville Wells Case which was scored by EPA at 23.01. Traces of organic chemicals have been detected and odor problems have occurred in a public water supply well and two unused wells in this Ozaukee County community. Disposal practices by Freeman over the past twenty plus years suggests this facility as a possible source of contamination.

COMMENTS: In addition to District file documentation, U.S. EPA did a study analyzing this site in November 1982 which provides excellent aerial photographs of the area since 1950.

SITE INSPECTION CONTACT PERSON: James Schmidt, Environmental Specialist
P.O. Box 12436
Milwaukee, WI 53212
(414) 562-9648

COMPLETED BY: Elizabeth Duchelle, Environmental Specialist
P.O. Box 12436
Milwaukee, WI 53212
(414) 562-9650

May 9, 1984