4/8/86

RCRA PRELIMINARY ASSESSMENT
NARRATIVE SUMMARY

SITE NAME: Freeman Chemical Company

EPA ID. NO.: WID 980615439

LOCATION: Railroad Street
Saukville, Ozaukee County, Wisconsin

OVERVIEW:

Freeman Chemical Company manufactures alkyd, polyester, and urethane synthetic resin at the Saukville plant. The resins are used in paints and varnishes, in molded polyester parts, and for insulation and sealing materials. The plant has been operating since 1948, and has periodically been expanded. Attachment 1 is a general location map of the facility.

From 1952-65, waste reaction acid water was discharged to a shallow seepage pit. Upon closure, the pit was filled and is currently covered with asphalt. No chemical analysis of the reaction water is available from the years of wastewater discharge to the seepage pit. Sampling of the reaction water performed in 1981 showed the waste water contained 27 ppm ethyl benzene, 110 ppm toluene, and 55 ppm phenol. Evaporation of this waste in an incinerator began in 1965.

Freeman Chemical has submitted several different RCRA Part B permit applications, because of changes in hazardous waste storage and incineration proposals. The most recent Part B application was received by the Wisconsin Department of Natural Resources (WDNR) on January 15, 1986. This Part B proposes storage and incineration of 625,000 gallons of F003 wastes (spent nonhalogenated solvents, including xylene and ethyl benzene) and 1,000,000 gallons of D001 wastes (ignitable) per year. The Part B application will not be reviewed by WDNR because Wisconsin has received final authorization for its hazardous waste management program. A Feasibility Report and Plan of Operation for hazardous waste incineration and a Feasibility Report for hazardous waste storage were called in by WDNR on December 12, 1985, and are due by June 30, 1986. Freeman Chemical has been operating under a WDNR interim license since December 6, 1985. The license permits incineration of F003 and D001 waste and storage of hazardous waste in 200 drums, one 40 cu.yd. lugger box, one 7,200 gallon tank, and one 12,000 gallon tank.

Freeman Chemical was notified by EPA of its corrective action responsibilities under HSWA in a letter dated April 22, 1985. EPA received a response from Freeman Chemical on June 20, 1985. The response reported the presence of the previously mentioned seepage pit and associated releases of reaction water and spent solvents from this pit. An initial screening by WDNR found that Freeman Chemical was environmentally significant, and WDNR prepared a facility management plan. The initial screening and facility management plan were transmitted to EPA on July 26, 1985.

Five different waste streams are generated on site:

1. Solvents (F003 and D001): Rinse solvent, consisting of xylene and other hydrocarbons, and process solvents, including xylene and toluene. These waste solvents are blended and incinerated.

2. Reaction Water (D001): This waste is generated during resin production and includes the solvents toluene, ethyl benzene, and xylene.

3. Clean up Wastes (U-listed waste): Produced by small spills of U-listed waste throughout the plant. These hazardous wastes are disposed of off site.

4. Waste Resins (F001): Test samples, rejected resins, and filter cake.

5. Incinerator Ash: The ash from the present incinerator is disposed of off site. The proposed incinerator will burn only liquids and will not generate ash.

Groundwater contamination has been documented ~~that~~ at this facility and in the Village of Saukville. In 1979, municipal well #2 was disconnected from the public water supply because organic compounds such as benzene, toluene, trichloroethylene, and xylene were detected. Freeman Chemical is believed to be one of the sources of this contamination. Another source of the contamination, particularly the trichloroethylene, is believed to be from spills at the Laubenstein property, west of Freeman Chemical. A 1985 hydrogeologic study by Hatcher Incorporated details the extent of contamination and provides recommendations for remedial action. Specific conclusions and recommendations of the report are discussed later in this narrative.

UNIT DESCRIPTION:

Incineration: Two separate incinerators are currently in use for solid incineration and solvent-acid water incineration. Reaction water has occasionally been spilled at the current incinerator location. The amount of waste released is unknown. A new liquid injection incinerator was proposed in the most recent Part B application. This incinerator will only burn waste solvents and reaction water. The wastes will be piped directly to the incinerator from adjacent storage tanks.

Tank Storage: Several tanks currently store reaction water and waste solvent prior to incineration. The tanks are above ground and are located inside a building. Three underground tanks have been used for storage of gasoline, diesel fuel, and caustics (see attachment 2 for location of tanks). Releases from tanks or during loading and unloading have probably occurred. The proposed incinerator will use six storage tanks, each with an 8,500 gallon capacity, which will be located adjacent to the new incinerator.

Container Storage: Barrel storage historically has been scattered throughout the facility. Small releases have been reported from these areas in the Hatcher investigation. It is not known if all of the barrel storage areas stored hazardous waste. Containerized hazardous wastes currently are stored adjacent to the present incinerator. The most recent Part B proposes to store hazardous waste for less than 90 days in a warehouse separated from the incinerator.

Seepage Pit: From 1948 to 1952, waste reaction water was charged directly to the Milwaukee River. Beginning in 1952, and continuing until 1965, reaction water was discharged to a seepage pit located on the west end of the facility (see attachment 2). The exact location of this pit has not been determined and the site is presently covered by asphalt. The pit may have extended down to the top of the dolomite, which is about 15 feet below the surface in this area.

POLLUTANT DISPERSAL:

The primary pollutant dispersal pathway is via movement of water in the subsurface through the unsaturated zone and below the water table. Detailed information on hydrogeology is presented in the February 1986 Hatcher report. Bedrock at the site consists of the Niagara dolomite, which also serves as a local aquifer. Surficial glacial deposits covering the dolomite average about 15 feet thick (see attachment 3) and consist of soil or fill, silty sand, dense clay, and glacial till.

Attachment 4 shows a water table map for summer 1985. Groundwater flow was generally to the southeast toward the Milwaukee River. However, along the west property boundary groundwater flow was westward. Attachment 5 is a map showing groundwater head values within the dolomite aquifer. A local groundwater high is present below the facility in the dolomite, with radial groundwater flow away from the high. Attachment 6 shows a difference in head between the water table and the dolomite aquifer. The difference is smallest in the area of the groundwater mound. However, at all locations the head in the dolomite is less than in the glacial deposits, indicated that downward movement of groundwater is occurring and that the area serves as a recharge zone.

KNOWN OR SUSPECTED RELEASES:

Accidental spillage of waste streams, resins, and raw materials have occurred at Freeman Chemical throughout the life of the facility. Attachment 2 shows the facility layout and the potential sources of groundwater contamination.

The seepage pit that operated from 1952-65 is a source of known releases of reaction water. This pit may have provided a direct conduit for hazardous constituents to reach the dolomite. Other known releases include spills of reaction water at the incinerator site, at least one underground pipeline leak, and product and raw material spills at the railroad sliding. It is suspected that releases have occurred in numerous barrel storage areas and at the tank sites. The Interim Remedial Investigation Report by Hatcher Incorporated notes that at least one of the buildings has a sump that is constructed at or close to the top of the dolomite, which could provide a pathway for contamination. In addition, at least two tanker spills have occurred at the tanker parking areas. These spills resulted in overland flow of Freeman property and onto a school yard to the north. Freeman responded by removing sod and excavating soil.

Groundwater contamination has been well documented at the Freeman Chemical site. Attachment 7 shows the location of monitoring wells at the facility. An odor survey of the glacial deposits performed during augering and coring yielded the results displayed in Attachment 8. The five areas of strongest

odor are located near the (1) tank farm; (2) off site in school yard area (associated with tanker spills); (3) near several buried tanks; (4) at the site of the seepage pit; (5) and in the extreme southwest corner of the property, near the train tracks and a container storage area.

Chemical analyses of groundwater samples taken in November 1985, showed that contamination in the glacial deposits is greatest west of the line connecting shallow piezometers 4a, 7, 8, and 16. These piezometers showed either no contamination or trace amounts of methylene chloride. Within the zone of high contamination, shallow piezometer 6a showed high levels of toluene, ethyl benzene, benzene, trans-1,2-dichloroethylene, and shallow piezometer 14a had high levels of xylene and ethyl benzene. To the west of the site, near the Laubenstein warehouse, high concentrations of trichloroethylene were detected in shallow wells, in addition to detects of some of the organic chemicals present at Freeman Chemical. The trichloroethylene is not believed to originate from Freeman Chemical, because the company reports that trichloroethylene has never been used at its Saukville facility. However, reports indicate that trichloroethylene has been previously used at the Laubenstein property during operation of the Northern Signal Company.

Contamination is present in all the upper dolomite piezometers, except Well 22. The highest level of contamination is found in Well 21, which shows high levels of benzene, toluene, and ethyl benzene, and Private Well 8, which has a very high level of trichloroethylene (2000 ug/l) and lesser amounts of other volatile organics.

A pump test on private Well 8, which extends into the deep dolomite aquifer, indicated that trichloroethylene is present in the deep aquifer in this area. Trichloroethylene was continuously detected over the entire five day test period.

TARGET POPULATION:

Freeman Chemical is located within the Village of Saukville. The 1985 population estimate by the Wisconsin Department of Administration is 3631. Saukville takes all of its water from the Niagara dolomite aquifer. The wells extend down to about 500 feet of depth. Municipal well #2 has not been used for drinking water since 1979, due to the volatile organic contamination discussed previously. Wells #1 and #4 are currently supplying the village with drinking water. See attachment 1 for the location of the municipal wells.

RECOMMENDATIONS: WDNR believes that corrective action needs to be taken at Freeman Chemical. Several preliminary recommendations for remedial action have been proposed in the Hatcher report. The three goals proposed are: control of present contamination sources; decontamination of soil and groundwater through in-situ treatment; and limiting the off site migration of contaminated groundwater. To control present contaminations sources, Hatcher proposes the following action: removal of unused buried tanks; excavation of the seepage pit; modification of all floor sumps to protect against spills, removal of the existing tank farm and removal or flushing of all buried raw material pipes; paving of all locations at the site where spills are likely to occur and appropriate collection and analysis of runoff (a WPDES plan review is in progress for this proposal); construction of a new tank farm with spill control; and sealing of an old on site well.

For prevention of pollutant migration in the glacial deposits, Hatcher proposed that the sediments be dewatered using three PVC Ranny drains (see attachment 9). Attachment 10 shows the proposed location of these drains. The collected water will be air stripped of volatiles and discharged to the local POTW. It is estimated that eight gpm will be collected with this design.

To control pollutant migration in the dolomite aquifer, Hatcher proposes to pump water from wells in the upper dolomite and air strip the extracted water before using it as cooling water. In addition, to reverse groundwater flow away from the municipal wells, Hatcher recommends that municipal wells #1 and #2 be removed from service indefinitely and that one or more deep dolomite wells on or near the site be pumped. This water will be used as cooling water and will replace water currently taken from municipal well #2. Municipal well #3, which is currently shut down due to faulty well casing, should be recased and returned to service to replace the loss of well #1.

WDNR tentatively supports the recommendations for remedial action proposed by Hatcher Incorporated, subject to completion of the Department's review. WDNR also recommends that a RCRA consent agreement be drafted and signed to insure that the appropriate remedial action is carried out.

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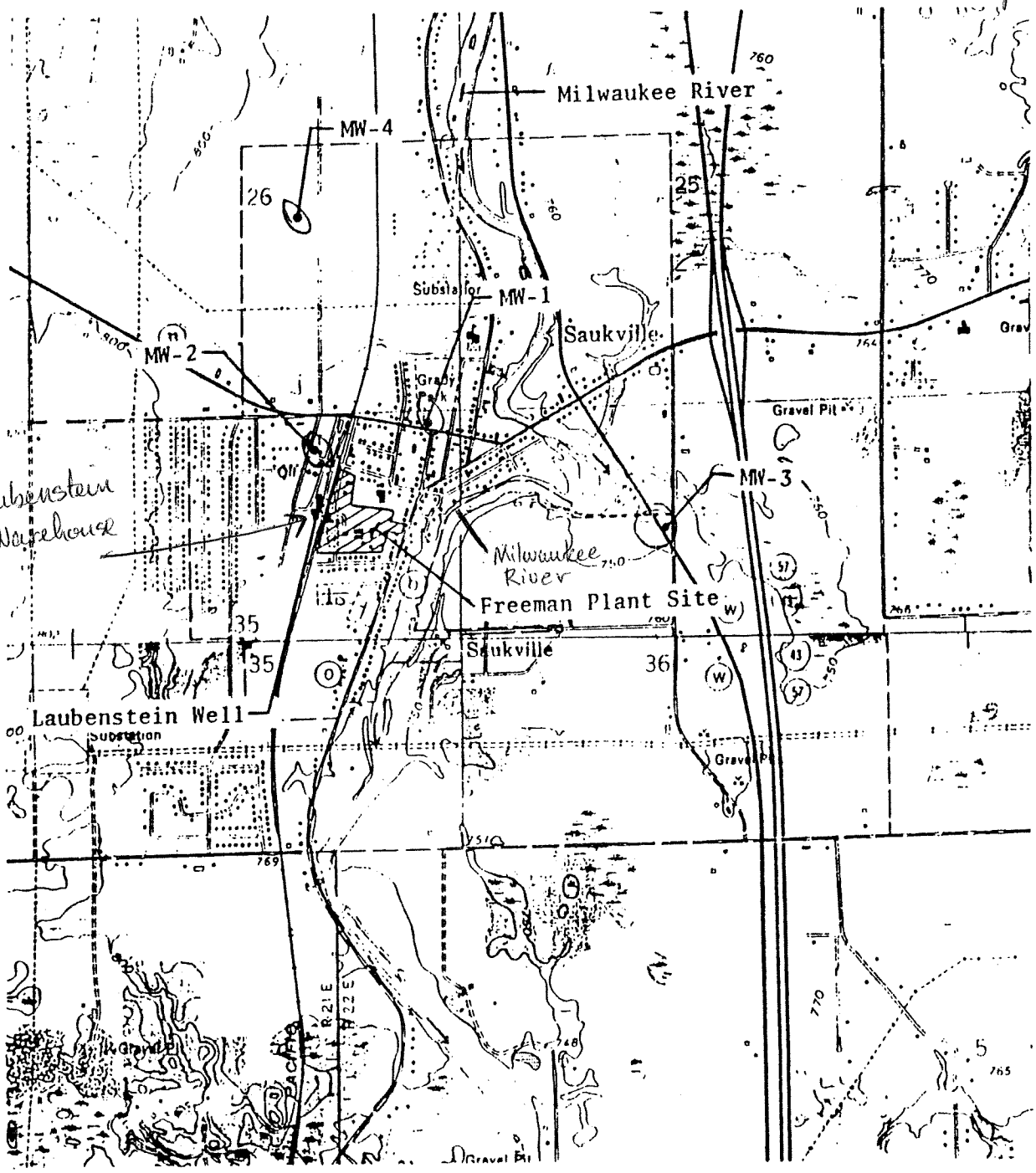
Attachment 1 Location Map showing Freeman Chemical Co. and Municipal Wells.



SCALE 1 24 000

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

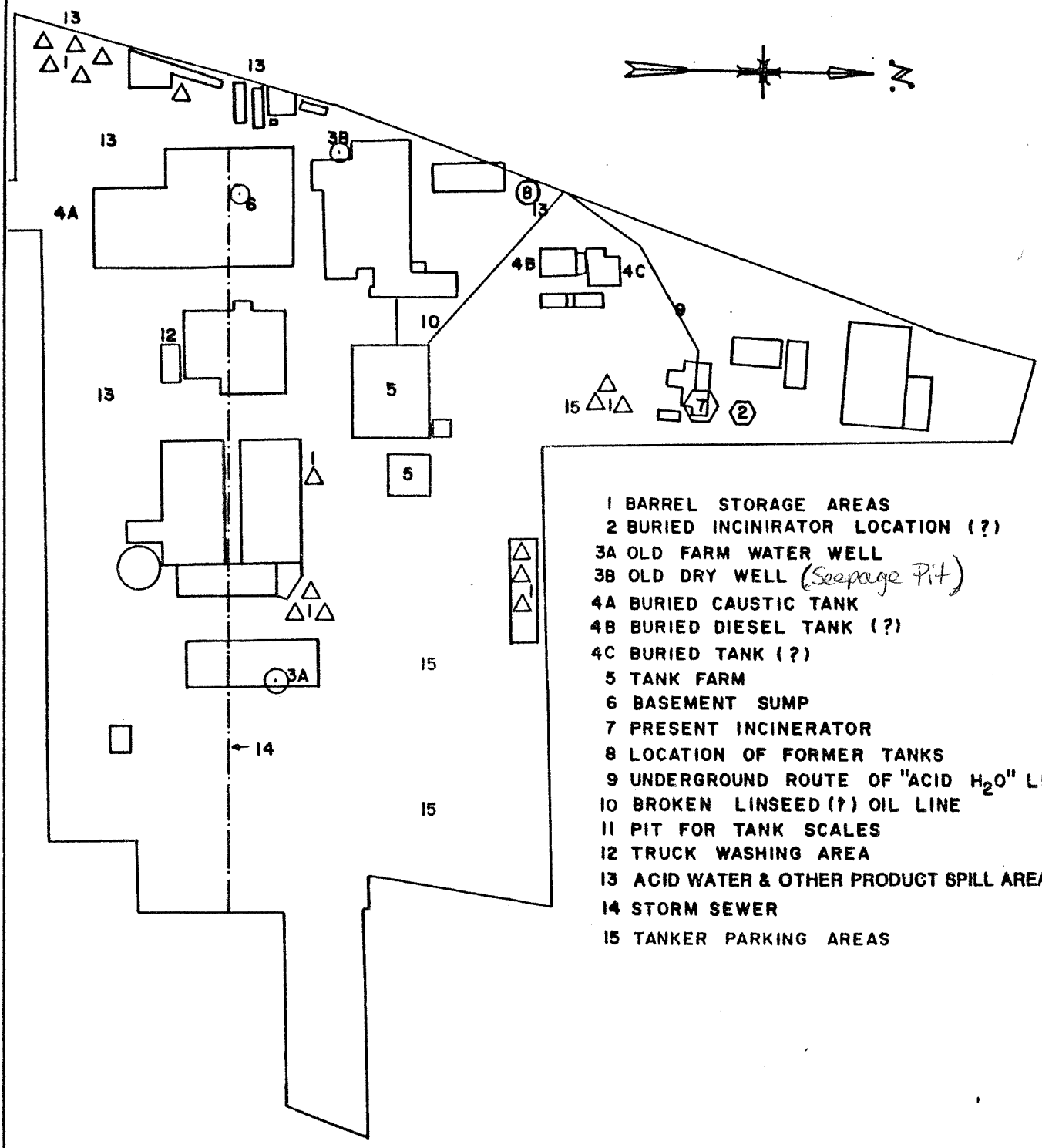
1 KILOMETER

CONTOUR INTERVAL 10 FEET

NATIONAL GEODETIC VERTICAL DATUM OF 1929

UTM GRID AND 1976 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

Attachment 2



1 BARREL STORAGE AREAS
2 BURIED INCINIRATOR LOCATION (?)
3A OLD FARM WATER WELL
3B OLD DRY WELL (Seepage Pit)
4A BURIED CAUSTIC TANK
4B BURIED DIESEL TANK (?)
4C BURIED TANK (?)
5 TANK FARM
6 BASEMENT SUMP
7 PRESENT INCINERATOR
8 LOCATION OF FORMER TANKS
9 UNDERGROUND ROUTE OF "ACID H_2O" LINE
10 BROKEN LINSEED (?) OIL LINE
11 PIT FOR TANK SCALES
12 TRUCK WASHING AREA
13 ACID WATER & OTHER PRODUCT SPILL AREAS
14 STORM SEWER
15 TANKER PARKING AREAS

FIGURE 17

SOME POTENTIAL SOURCES OF GROUNDWATER CONTAMINATION

1" = ± 145'

Attachment 3

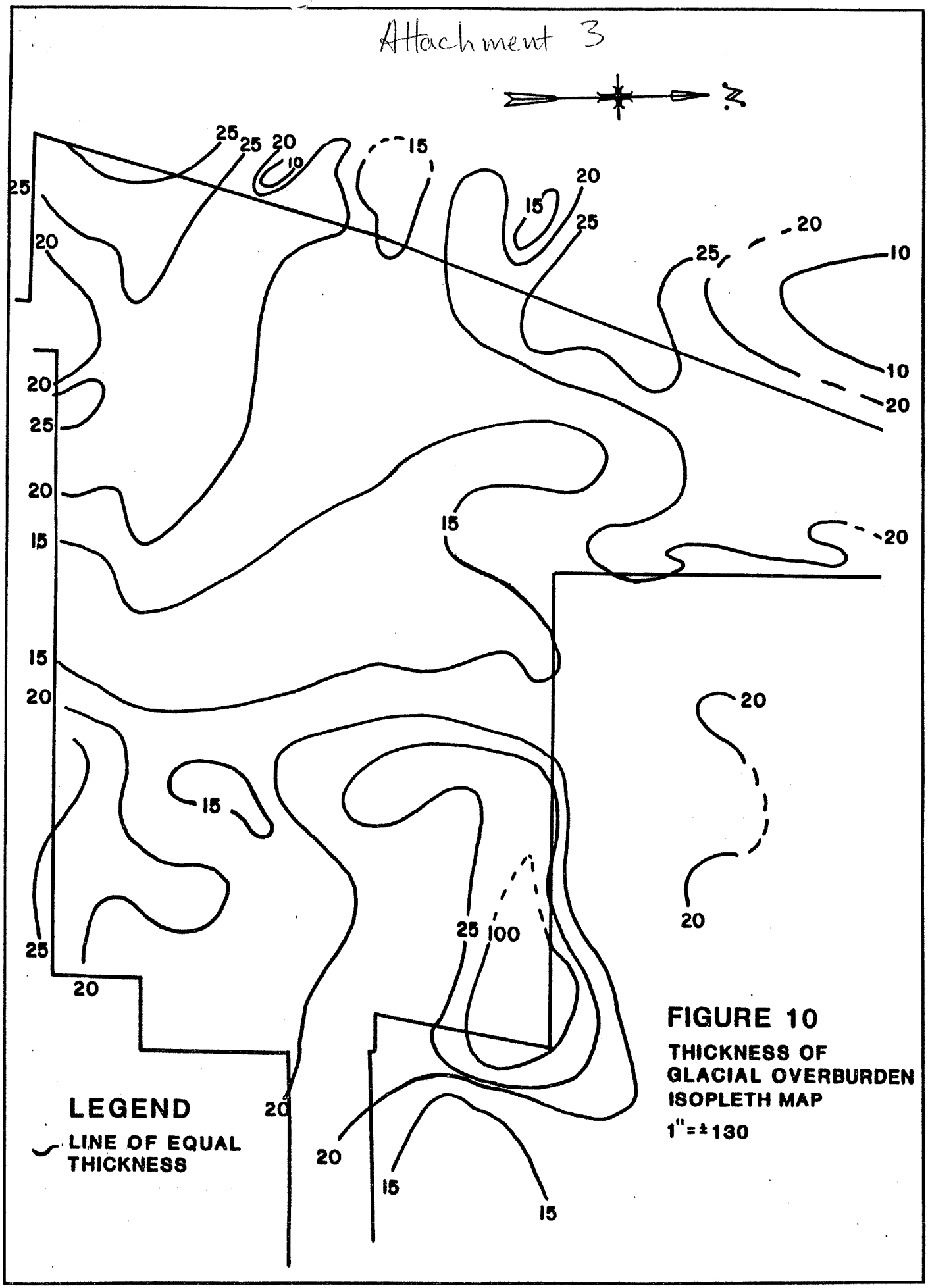
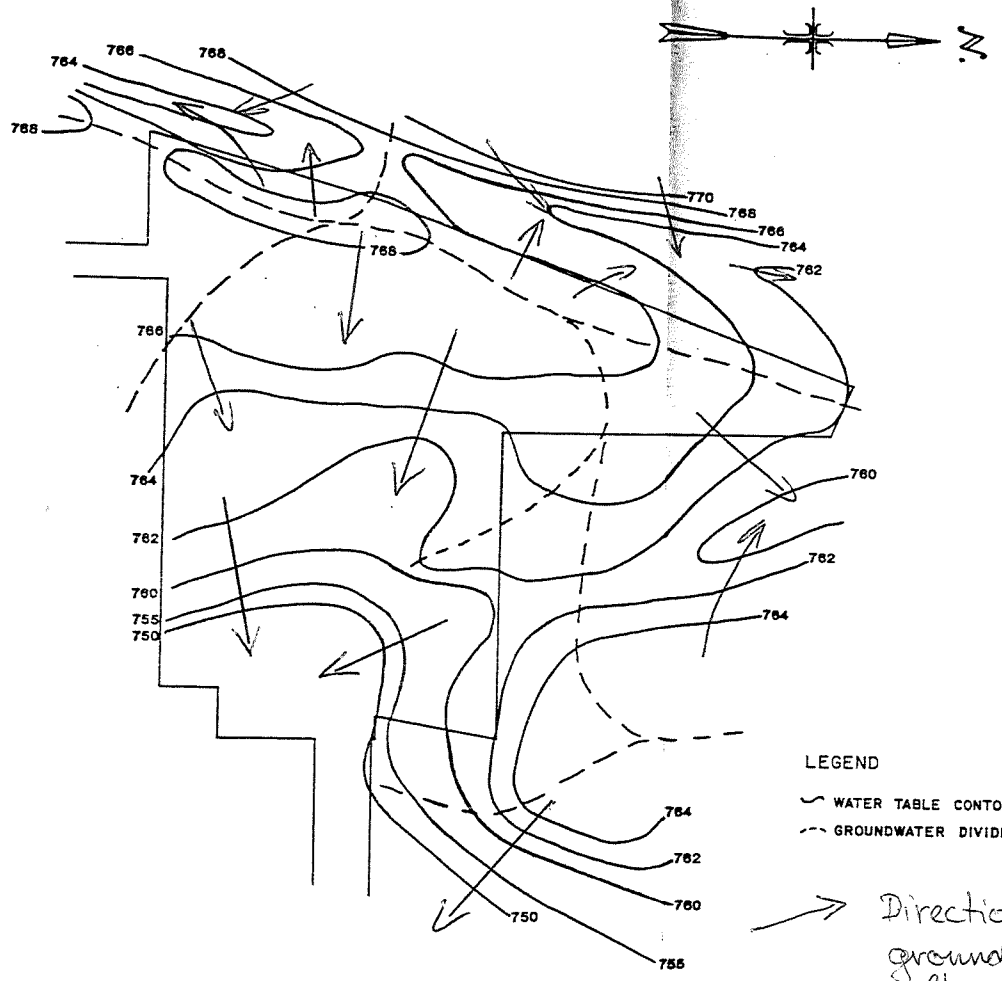


FIGURE 10

THICKNESS OF GLACIAL OVERBURDEN ISOPLETH MAP

1" = ± 130

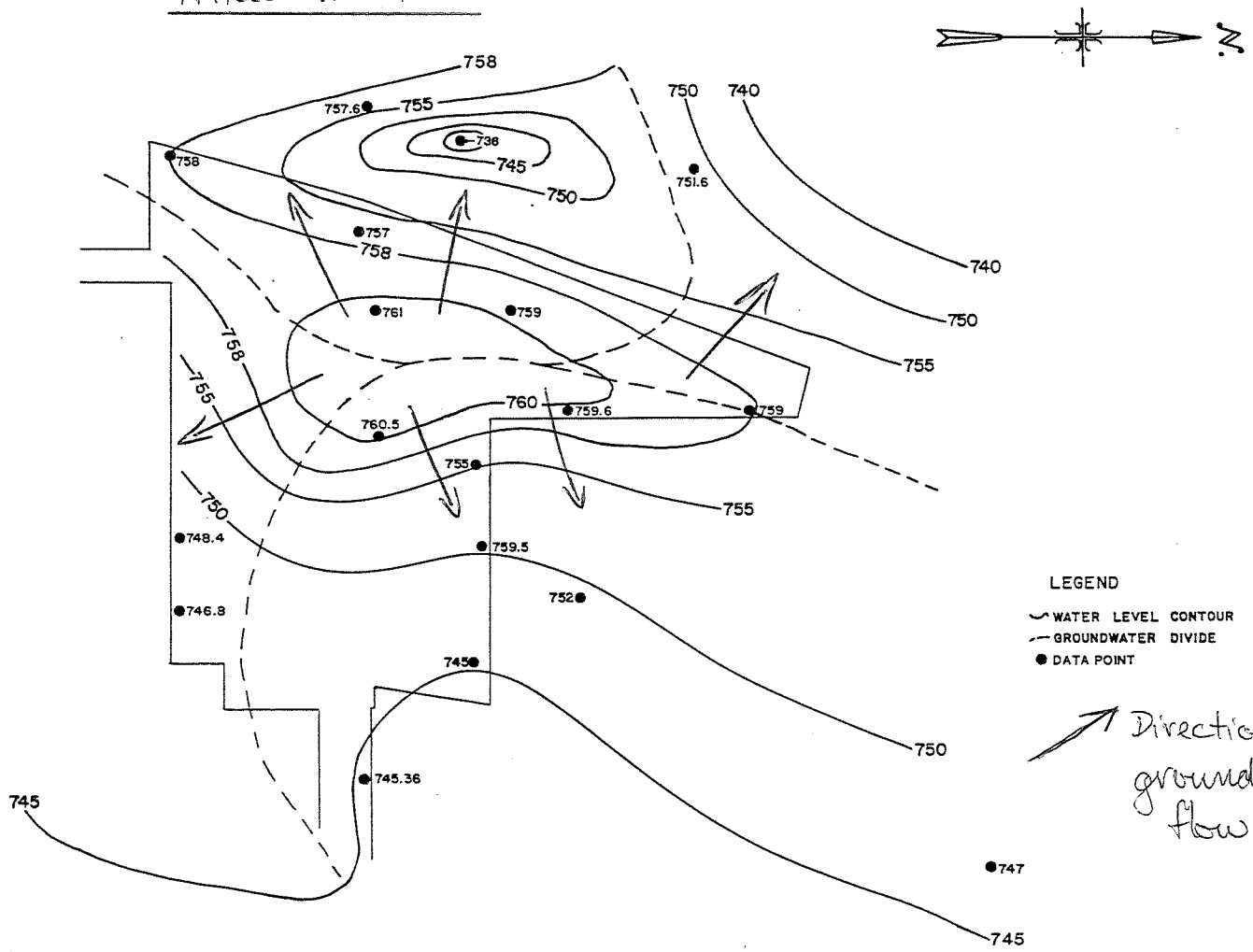
Attachment 4



Arrows added by WDNR

	Job No.: 0001-003	Hatcher Incorporated RICHMOND, VIRGINIA	Date: February 1986 Scale: 1"=±182'	Water Table Map Summer 1985 Drawing No.: / Figure No.: 13

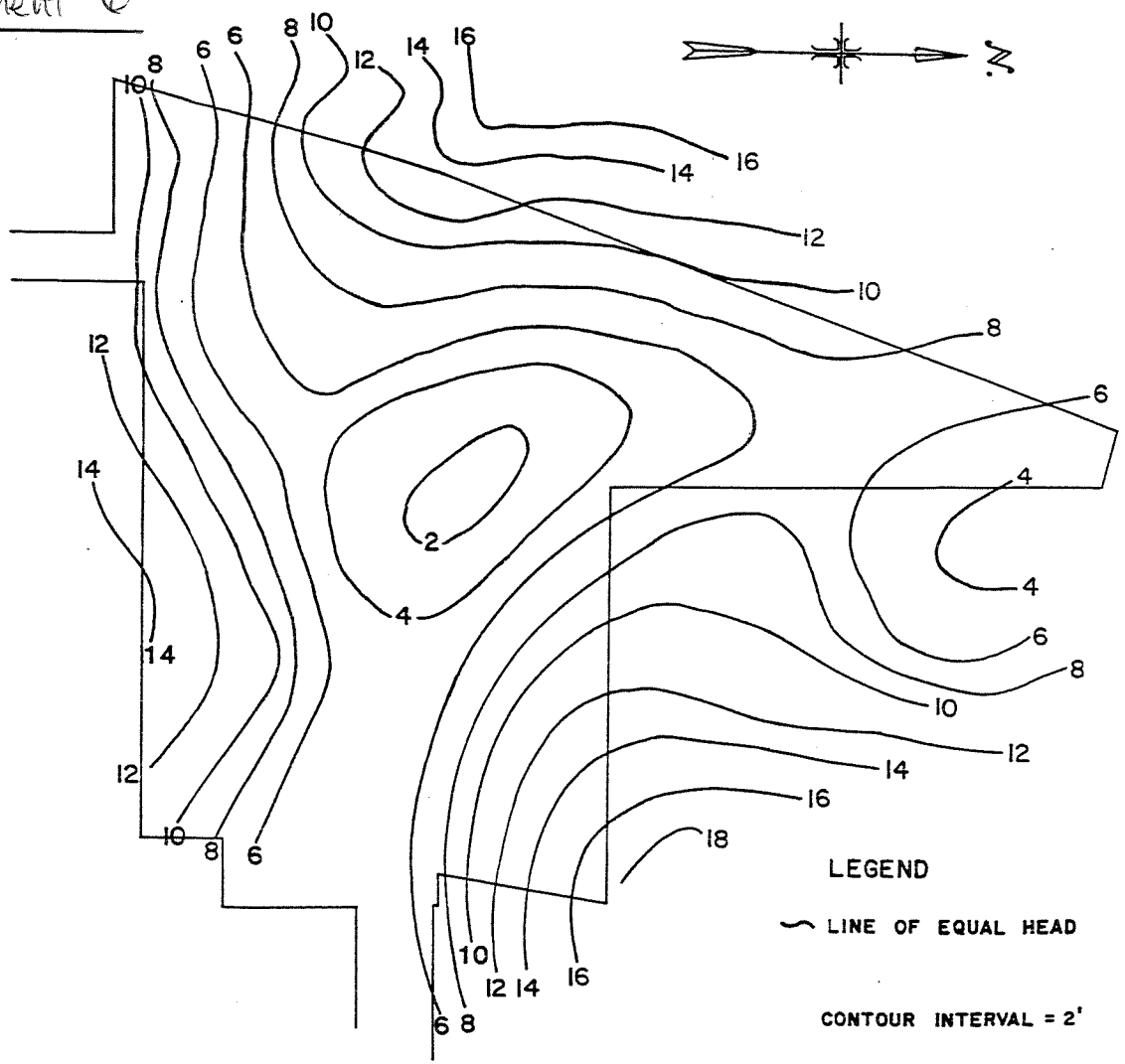
Attachment 5



Arrows added by WDNR

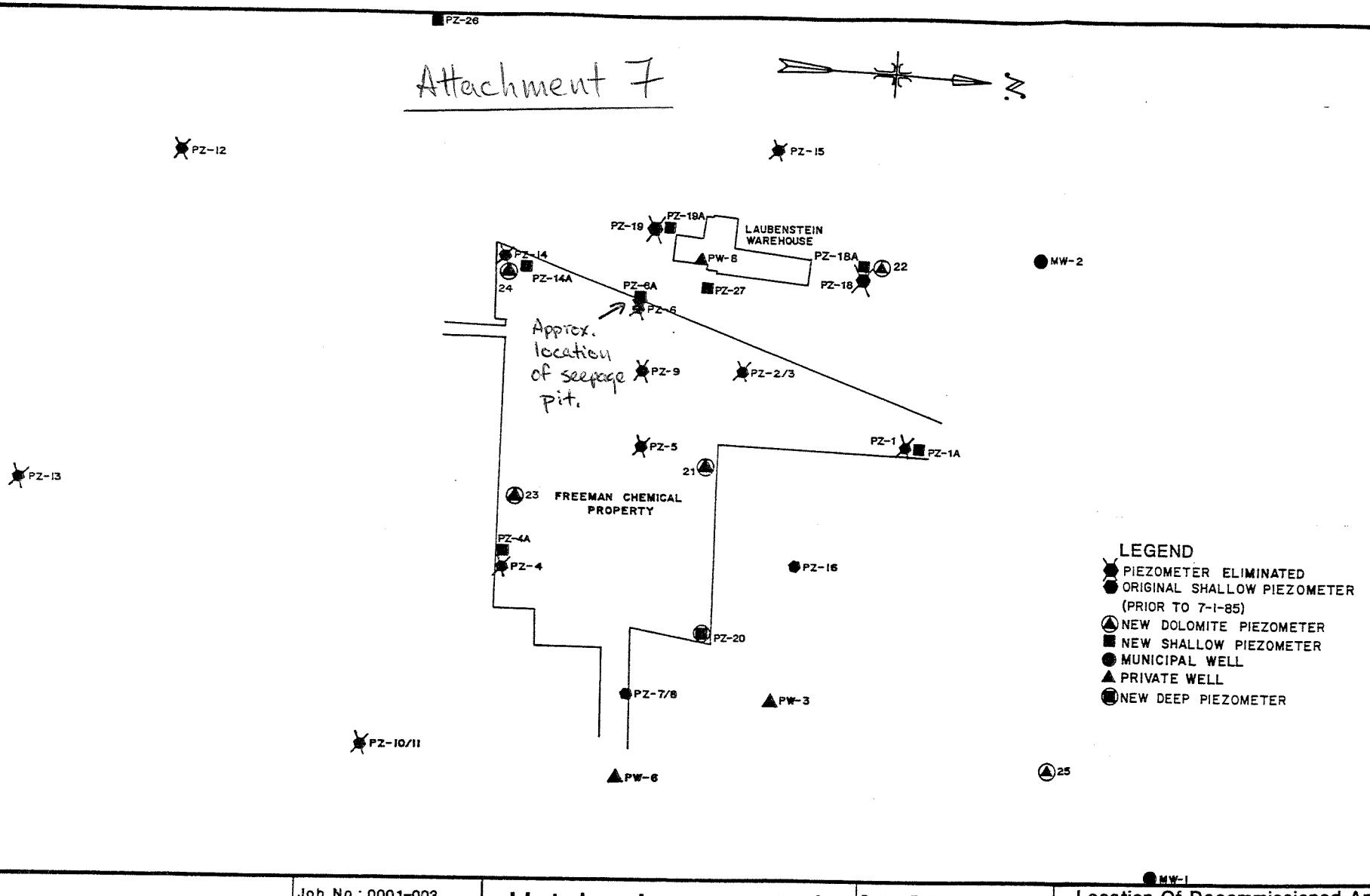
	Job No.: 0001-003	Hatcher Incorporated RICHMOND, VIRGINIA	Date: February 1986	DOLOMITE CONSOLIDATED WATER LEVEL MAP-SUMMER 1985	
			Scale: 1" = ± 182'	Drawing No.:	Figure No.: 15

Attachment 6



	Job No.: 0001-003	Hatcher Incorporated RICHMOND, VIRGINIA	Date: February 1986 Scale: 1"=±130'	Difference In Head Between Water Table And Dolomite Aquifer Drawing No.: / Figure No.: 16

Attachment 7



	Job No.: 0001-003	Hatcher Incorporated RICHMOND, VIRGINIA	Date: February 1986	Location Of Decommissioned And Other Monitoring Wells	
			Scale: 1"= 200'	Drawing No.:	Figure No.: 1

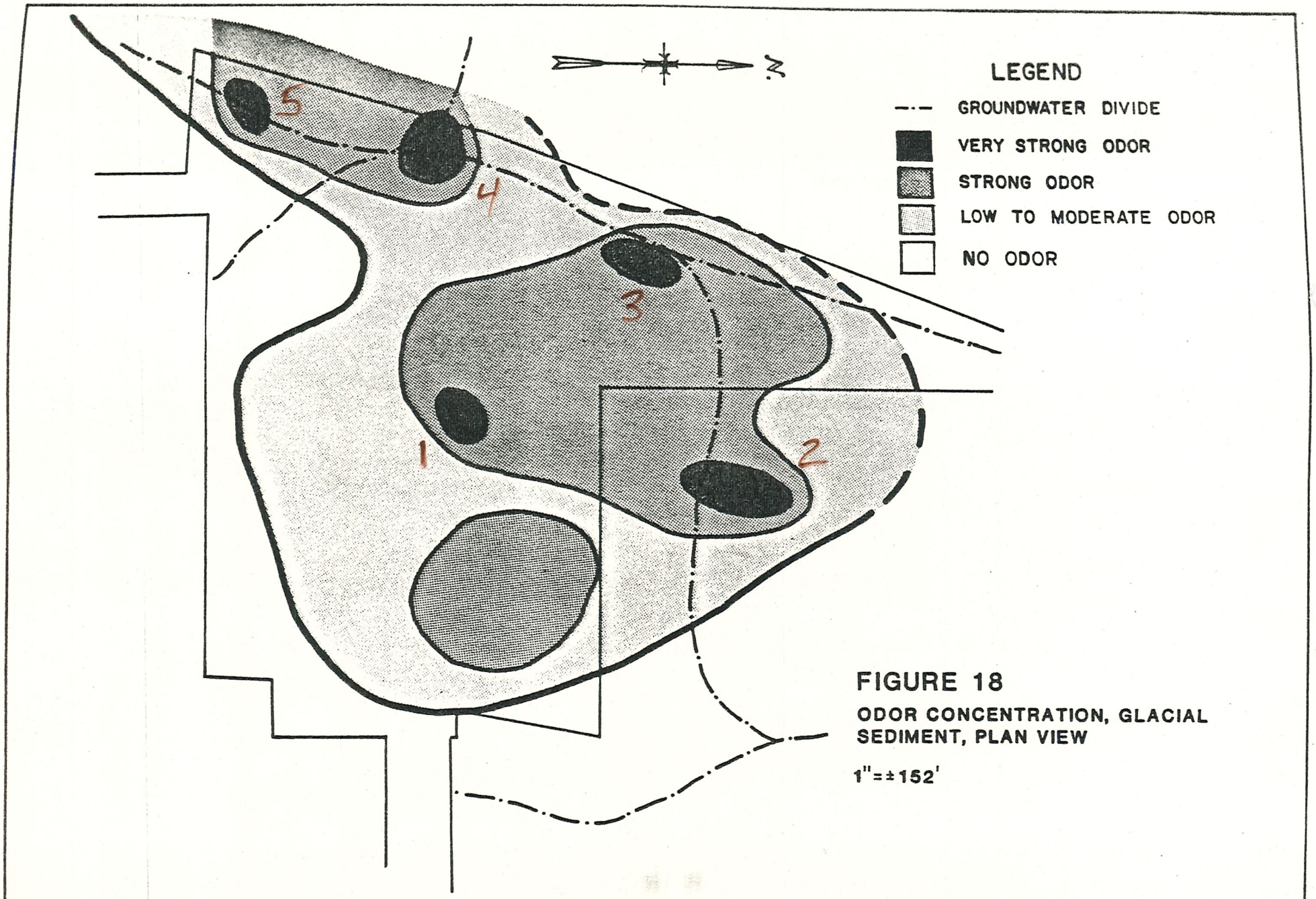


FIGURE 18

ODOR CONCENTRATION, GLACIAL SEDIMENT, PLAN VIEW

1"=±152'

Attachment 8

Attachment 9

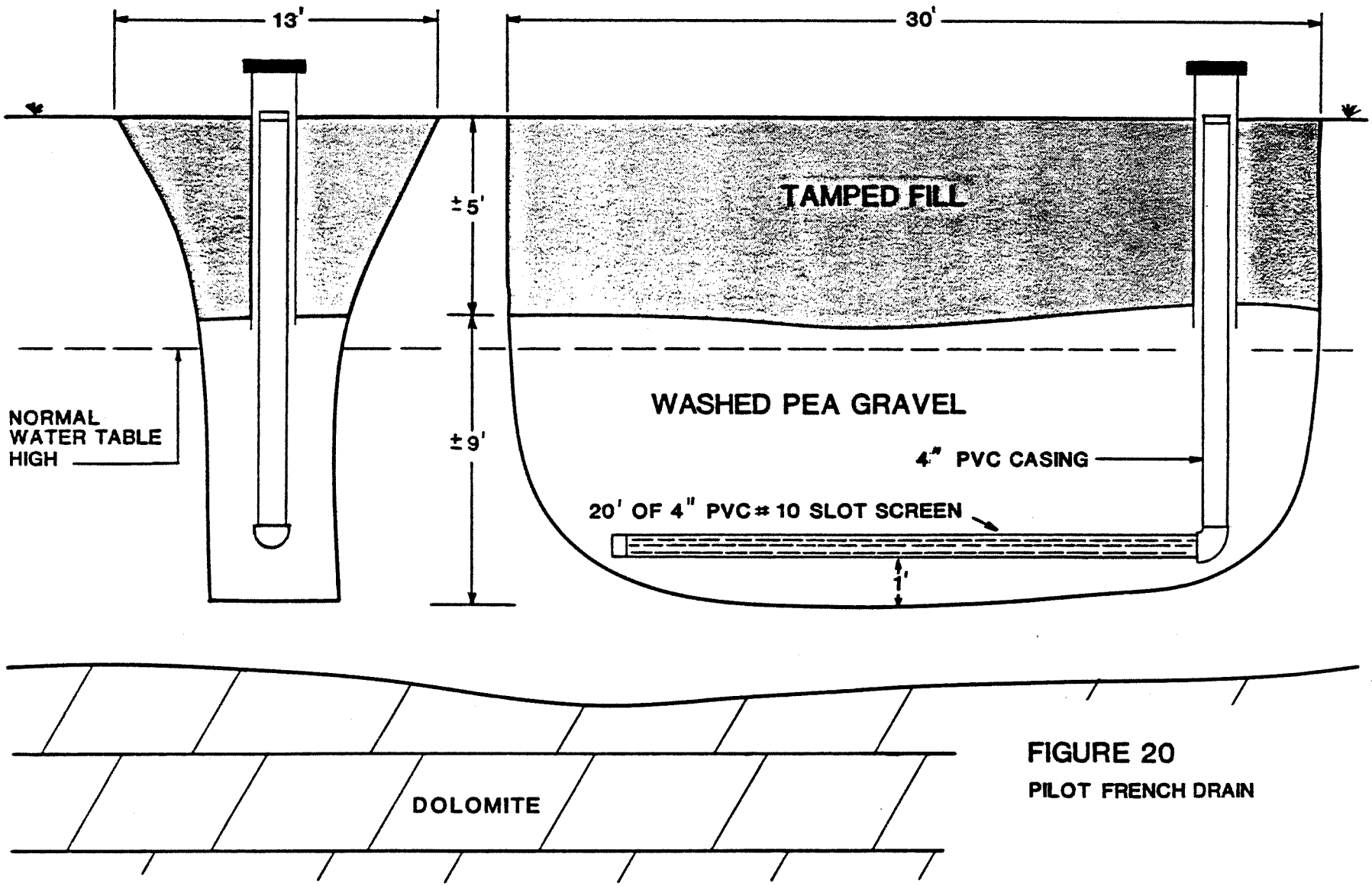
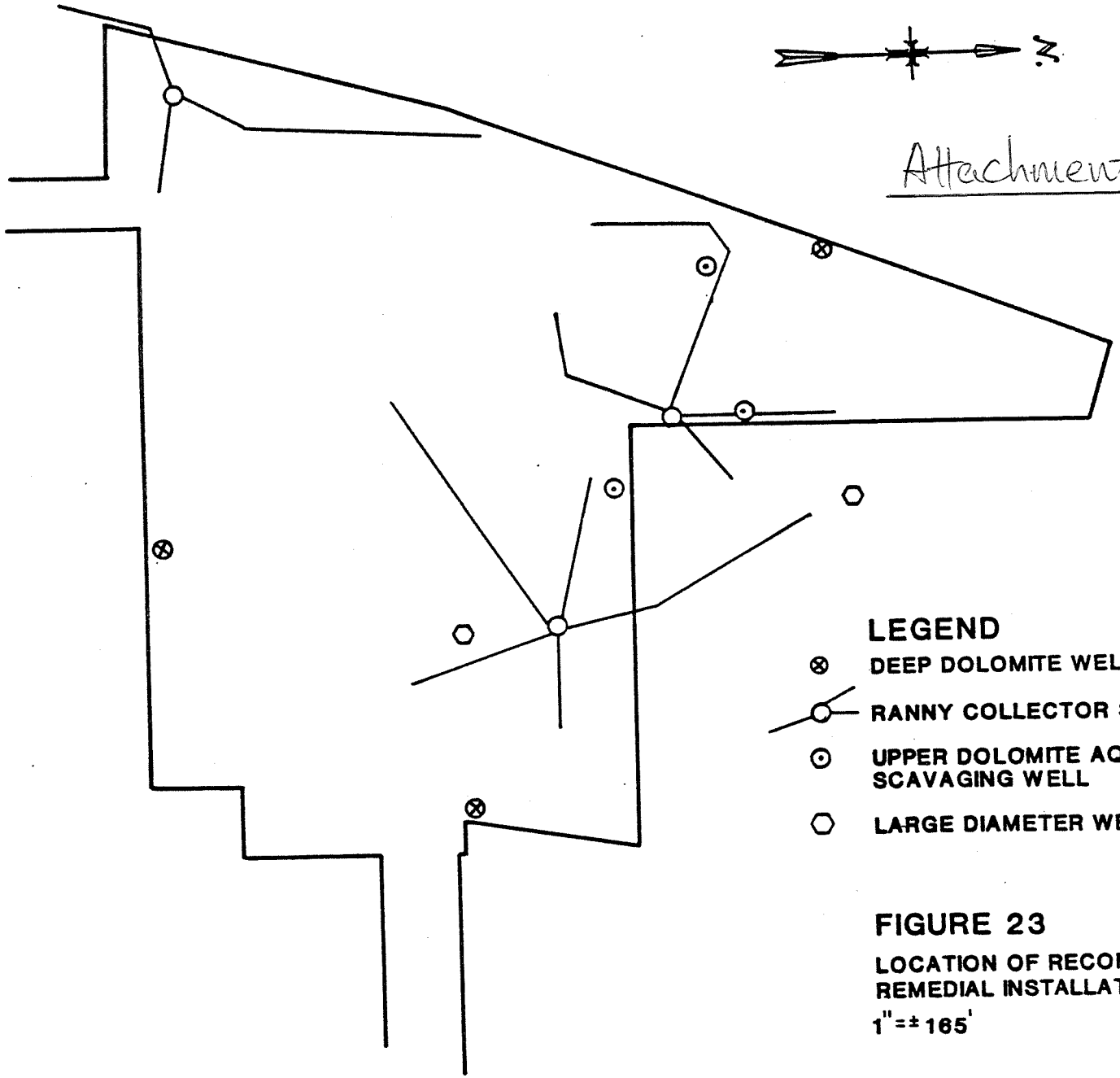


FIGURE 20
PILOT FRENCH DRAIN



Attachment 10

FIGURE 23

LOCATION OF RECOMMENDED REMEDIAL INSTALLATIONS

1" = ± 165'

Exhibit 3-2

Checklist for Ground Water Releases

Seepage Pit (Closed)

Identifying Releases	Yes	No
1. Potential for Ground Water Releases from the Unit		
o Unit type and design.		
- Does the unit type (e.g., land-based) indicate the potential for release?	X	—
- Does the unit have engineered structures (e.g., liners, leachate collection systems, proper construction materials) designed to prevent releases to ground water?	—	X
o Unit operation		
- Does the unit's age (e.g., old unit) or operating status (e.g., inactive, active) indicate the potential for release?	X	—
- Does the unit have poor operating procedures that increase the potential for release?	X	—
- Does the unit have compliance problems that indicate the potential for a release to ground water?	X	— N/A
o Physical condition		
- Does the unit's physical condition indicate the potential for release (e.g., lack of structural integrity, deteriorating liners, etc.)?	X	—
o Locational characteristics		
- Is the unit located on permeable soil so the release could migrate through the unsaturated soil zone?	X	—
- Is the unit located in an arid area where the soil is less saturated and therefore a release has less potential for downward migration?	—	X
- Does the depth from the unit to the uppermost aquifer indicate the potential for release?	X	—
- Does the rate of ground water flow greatly inhibit the migration of a release from the facility?	—	X
- Is the facility located in an area that recharges surface water?	X	—

Exhibit 3-2 (continued)

Checklist for Ground Water Releases

	Yes	No	
o Waste characteristics			
- Does the waste in the unit exhibit high or moderate characteristics of mobility (e.g., tendency not to sorb to soil particles or organic matter in the unsaturated zone)?	X	—	
- Does the waste exhibit high or moderate levels of toxicity?	X	—	
2. Evidence of Ground Water Releases			
o Existing ground-water monitoring systems			
- Is there an existing system?	X	—	
- Is the system adequate?	X	—	
- Are there recent analytical data that indicate a release?	X	—	
o Other evidence of ground water releases			
- Is there evidence of contamination around the unit (e.g., discolored soils, lack of or stressed vegetation) that indicates the potential for a release to ground water?	—	X	No visual evidence
- Does local well water or spring water sampling data indicate a release from the unit?	X	—	
Determining the Relative Effect of the Release on Human Health and the Environment			
1. Exposure Potential			
o Conditions that indicate potential exposure			
- Are there drinking water well(s) located near the unit?	X	—	
- Does the direction of ground water flow indicate the potential for hazardous constituents to migrate to drinking water wells?	X	—	

Attachment 25 Revised 1/31/86
DNR Rec'd 4/3/86

Facility name: Freeman Chemical Co.
EPA ID # WID 980615439
Name of Preparer: C. Einberger
Date: 7 April 1986

Preliminary Assesment Report

The questions constituting this Preliminary Assesment (P.A.) Report must be filled out prior to completion of recommendation elements of the Plan. The purpose of this P.A. is to provide a summary documentation of the State and/or U.S. EPA review of available information on the subject facility. **The intent is that a comprehensive file review will be conducted** as the basis for selection of the recommended approach to a given facility. If the P.A. is completed by State personnel, questions referring to available data reference information in State files; for Federal personnel the reference is to Federal files. Where questions refer to "all" available data or information and such material is columinous, the response should indicate that files are voluminous, and then reference most telling information, for example, groundwater contaiminants found frequently or at extremely high concentrations should be specifically listed, and information most directly supporting recommended approach to facility should be described. If no information is available in facility files, the response should so indicate. It is also anticipated that this P.A. may be updated periodically as more information becomes available.

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

Type of Units	Size or Capacity	Active or Closed
X Storage in Tanks or Containers	Containers ~ 6600 gal Tanks ~ 13000 gal	Active
X Incinerator	Incinerator ~ 0.45 tons/hr	
___ Landfill		
___ Surface Impoundment		
___ Waste Pile		
___ Land Treatment		
___ Injection Wells		
___ Others (Specify)		

2. Permit Application Status:

- ☐ completeness review underway
- ☐ technical review underway
- ☒ complete and technically adequate
- ☐ draft permit public noticed
- ☐ final permit issued

3. Sources of data used in developing this document:

- ☒ RCRA Part A & B permit application
- ☒ Certification Regarding Potential Releases Solid Waste Management Units
- ☒ Interim Status inspection Reports/Information from Letters of Warning and Compliance Orders
- ☐ Exposure Information Report
- ☐ Other RCRA submittals: ACL submissions, closure plans, post-closure permit applications, etc
- ☒ CERCLA PA/SI Reports
- ☐ CERCLA Hazard Ranking System (HRS) Information
- ☐ CERCLA RI/FS Studies
- ☒ CERCLA 103(c) Notifications (check this even if the absence of a notification was verified)
- ☐ Aerial Photography
- ☐ USGS data: maps, geological atlas, monitoring well data
- ☐ USDA Soil Conservation Service maps/data
- ☐ Graphic Exposure Modelling System
- ☒ State Hazardous Waste Management Permit files/ inspection reports
- ☒ State Wastewater Treatment Discharge Permit files/inspection reports

- [X] State Air Permit files/inspection reports
- [ ] TSCA Inspection Reports
- [ ] OSHA Inspection Reports
- [ ] Municipal/Country/City Public Health Agencies
- [X] Local Well Drillers
- [ ] State/Country Road Commissions
- [ ] Utilities
- [ ] Local Airports/Weather Bureaus
- [ ] Naturalist/Environmental Organizations
- [X] Employees
- [ ] Colleges/Universities
- [ ] Interviews with local residents
- [ ] Public Notice

4. The facility is on the National Priorities List or proposed update of the List or proposed update of the List or ERRIS list

_____ Yes - indicate List or update

_____ No

__X__ Yes - ERRIS list

~~Prior to completion of the Recommendation portion of the Facility Management Plan, the attached Appendix must be completed.~~

Description of Enforcement Status:

5. Type of Action | Date | Local, State or Federal | Result or Status

No enforcement action is in progress at this time. It is recommended that a RCRA consent agreement be drafted jointly by EPA and WDNR.

6. Review of Response to Solid Waste Management Questionaire indicates: (check one)

__X__ Solid Waste Management Units exist (other than previously identified RCRA units)

_____ No Solid Waste Mangement Units exist (other than previously identified RCRA units)

_____ It is unclear from review of questionaire whether or not any Solid Waste Management Units exist

_____ Respondent indicates that does not know if any Solid Waste Management Units exist

7. If the response to question ~~9~~ 6 is that Solid Waste Management Units exist, then check one of following:

__X__ Releases of hazardous waste or constituents have occurred or are thought to have occurred

_____ Releases of hazardous waste or constituents have not occurred

_____ Releases of hazardous waste or constituents have occurred or are thought to have occurred but have been adequately remedied

_____ It is not known whether a release or hazardous waste or constituents has occurred

8. Description of Any Complaints from Public:

Source of Complaint	Date	Recipient	Subject and Response
Public complaints have been received by WDNR regarding contamination of the Sauk ville municipal wells. In addition, intermittant complaints about chemical odors by local residents have been received by WDNR.			

9. Description of All Inspection Reports for Facility:

Date of Inspection	Inspector (Local, State, Federal)	Conclusions or Comments
July 23, 1985	State	Areas of non-compliance noted by May 13, 1985 inspection have been corrected.
May 13, 1985	State	Non-compliance: - No operating log - Incinerator not using auxiliary fuel
(other earlier inspections in WDNR files)		

10. 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, injection wells, ponds or surface impoundments that might contain waste or active or inactive landfills?

_____ Yes- give date if inspection and describe observation

_____

_____

_____

__X__ No _____ Don't know

11. 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 constituent?

_____ Yes - indicate date of report and describe observations

_____

_____

__X__ No

_____ Don't know

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

__X__ Yes - date of inspection and describe information in report

See "Summary - 1985, Interim Remedial Investigation's Report" by Hatcher Incorporated

_____ No

_____ Don't know

13. Does a groundwater monitoring system exist at the facility? Yes

14. If an answer to question ~~8~~ 13 is yes, is the groundwater system capable of monitoring both regulated RCRA units and other Solid Waste Management Units? Yes

Explain - Groundwater monitoring is a part of remedial investigations at this site.

15. Is the groundwater monitoring system in compliance with applicable RCRA groundwater monitoring standards? N/A

If no, explain deficiency Not required for these RCRA units (tank & container storage, and incineration)

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

	Type of Information	Author	Date	Summary of Conclusions
①	Interim Report of Hydrogeologic Assessment	Olver Inc.	June 20, 1984	Groundwater levels, analysis of gw. chemistry
②	Final Report of Hydrogeo. Assessment	Olver Inc	Jan. 10, 1985	Pump test program, analysis of gw. data.
③	Summary - 1985 Interim Remedial Investigations	Hatcher, Inc.	Feb. 28, 1986	See PA narrative Preliminary remedial measures proposed

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

____ Yes Date of Notification _____

X No

18. If answer to ~~12~~ 17 is yes, briefly summarize content of that notification. (waste management units identified, type of waste concerned)

N/A

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

X Yes

_____ No

20. If answer to question ~~14~~ 19 is yes, briefly describe conclusions of the PA/SI focusing on types of environmental contaimination found, wastes and sources of contaimination.

In 1979, one of Saukville's municipal wells was found to be contaminated. Freeman Chemical is suspected of being one of the sources. The site has monitoring wells & piezometers showing groundwater contamination (benzene, xylene, toluene, etc.)

21. If available, having reviewed the CERCLA notification, RCRA Part A and RCRA Part B, it appears that: (CERCLA Unit refers to units or area of concern in CERCLA response activity)

_____ RCRA and CERCLA units are same at this facility

X 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)

CERCLA file info. focuses on the seepage pit, which is not a RCRA unit.

22. Description of Any Past Releases or Environmental Contamination:

Type/Source of Release	Date	Material Released	Quantity	Response
Seepage Pit	1952-65	Reaction Water (with ethyl benzene, toluene, phenol, and other compounds)	25-50 gpd (?)	Remedial Investigation in Progress. Report recently submitted.
Spills from incinerator loading, underground piping, barrel storage, tanks, sumps have been documented or suspected	Various dates	Reaction Water, Resins, Raw materials	Unknown Quantity	Invest in Progres

23. Identification of Reports or Documentation Concerning Each Release Described in Item ~~17~~ 22.

Title/Type of Report	Date	Author	Recipients	Contents
See #16				
Also see WDNR files.				

24. Highlight any information gaps relating to the existence of solid waste management units additional needed information.

- Improved documentation of amounts and types of releases.
- More information on what hazardous constituents have been released at Freeman, is needed.
- Trichloroethylene contamination is not centered on the Freeman Chem. site. It appears to be from the Laubenstein property (west of Freeman Chem.); More information on history of Laubenstein site would be useful.

25. SUMMARY

List the solid waste management units at this facility (other than tanks and container storage areas for holding wastes with no hazardous constituents):

Unit	Are hazardous constituents present in the waste (yes/no)?	Is it reasonable to suspect a release (yes/no)?	Next Step (a) site investigation workplan (b) plan of study for remedial investigation (c) corrective action plan (d) no further action required
1. Incinerators	Yes	Yes	Corrective action
2. Tank Storage	Yes	Yes	Corrective action
3. Container Storage	Yes	Yes	Corrective action
4. Seepage Pit	Yes	Yes	corrective action
5.			
6.			
7.			
8.			
9.			
10.			

Complete and attach the "Assesment of Unit" form for each unit with "yes" answers in both of the first two columns.

26. Summary of exposure potential

Yes	No	
* ☒	☐	Public ~~is now~~ drinking water contamination with wastes from the facility; * Contaminated wells have been removed from the public water supply.
☐	☐	Public is at risk of exposure through direct contact to wastes contained at or releasing from the facility; and
☐	☐	Public is at risk from exposure from breathing hazardous wastes releasing from the RCRA facility.
☐	☐	The following information is needed to determine whether the public is at risk:

_____

_____

_____

☐	☐	The solid waste management units at this facility do not appear to present a threat to public health at this time.

27. Based on my review of this Preliminary Assesment, it is hereby

☐ approved

☐ not approved

Signature: _____ Date: _____
(EPA Staff)

Assessment of Unit

Description of Unit: Incinerators

Identification of Hazardous Waste Generated, Treated, Stored or Disposed at the Unit: (may attach Part A or permit list or reference those documents if listing of wastes is exceptionally long - in that case, to complete this question list wastes of greatest interest and/or quantity and note that additional wastes are managed)

Type of Waste	Quantity	Generated, a treated, Stored or Disposed (note appropriate categories)
Reaction water (D001)		
Waste solvents (F003 & D001) (xylene, toluene, and other hydrocarbons)	Approx. .45 tons/hr capacity	Treated
Incinerator Ash		

Assessment of Unit

Description of Unit: Tank Storage

Identification of Hazardous Waste Generated, Treated, Stored or Disposed at the Unit: (may attach Part A or permit list or reference those documents if listing of wastes is exceptionally long - in that case, to complete this question list wastes of greatest interest and/or quantity and note that additional wastes are managed)

Type of Waste	Quantity	Generated, a treated, Stored or Disposed (note appropriate categories)
Reaction Water (D001)	13,000 gal	Stored
Waste Solvents (F003 & D001)		

Assessment of Unit

Description of Unit: Container Storage

Identification of Hazardous Waste Generated, Treated, Stored or Disposed at the Unit: (may attach Part A or permit list or reference those documents if listing of wastes is exceptionally long - in that case, to complete this question list wastes of greatest interest and/or quantity and note that additional wastes are managed)

Type of Waste	Quantity	Generated, a treated, Stored or Disposed (note appropriate categories)
Reaction water (D001)	6,600gal	Stored
Waste Solvents (F003 & D001)		

Assessment of Unit

Description of Unit: Seepage Pit

Identification of Hazardous Waste Generated, Treated, Stored or Disposed at the Unit: (may attach Part A or permit list or reference those documents if listing of wastes is exceptionally long - in that case, to complete this question list wastes of greatest interest and/or quantity and note that additional wastes are managed)

Type of Waste	Quantity	Generated, a treated, Stored or Disposed (note appropriate categories)
Reaction Water (with benzene, toluene, phenol, and other organic chemicals)	(?) 25-50 gpd reported (operated from 1952-65)	Disposed