



State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES

*Julius*  
*file*  
Carroll D. Besadny  
Secretary

BOX 7921  
MADISON, WISCONSIN 53707

June 10, 1987

File Ref: 4430

Mr. Russell L. Cerk  
Vice-President, Manufacturing  
Freeman Chemical Corporation  
P.O. Box 247  
Port Washington, WI 53074

SUBJECT: Modification of Soils Handling Plan

Dear Mr. Cerk:

We have received and reviewed Hatcher Inc.'s proposal to modify the soil handling plan. The proposal is to eliminate laboratory VOC verification based on the correlation with Hnu measurements. Soil would be considered reclaimed when the Hnu measurement was less than 25 ppm. The present plan requirements call for:

- 1) at least 5 Hnu measurements per batch
- 2) if any concentration is greater than 10 ppm, the batch is remixed and retested
- 3) for every 20 samples measured with an Hnu meter, 1 sample is collected for lab testing to ensure that the total VOC concentration is less than 10 ug/g.

The submitted data shows that Hnu observations of 0 to 16 ppm generally correspond to VOC concentrations near the detection limit (0.5 ppm). Little VOC data is available for Hnu concentrations between 15 and 25 ppm.

Until VOC data is collected for Hnu concentrations between 15 and 25 ppm, we suggest the following modification to the soils handling plan:

- 1) soils with Hnu readings of 0 to 15 ppm would not need VOC testing
- 2) soils with Hnu readings of 15 to 25 ppm would be subject to VOC testing (1 VOC sample per 20 Hnu observations)
- 3) if any sample of a batch exceeds 25 ppm, the batch would be remixed and resampled

If you have any questions, please call Mark Tusler (608) 266-5798.

Sincerely,

*Richard E. O'Hara*

Richard E. O'Hara, Chief  
Hazardous Waste Management Section  
Bureau of Solid Waste Management

REO:mt

cc: Ted Bosch - SED  
Roger Hatcher/James Knauss - Hatcher Inc.  
Chuck Slaustas - EPA Region V - 5HS/JCK/12  
Marian Barnes - EPA Region V - 5HE/JCK/12

→ Trusler

O.K.

Thanks

Proceed to final typing

~~Rich~~

REO

6/8/87

I looked at data Hatcher originally sent in the Freeman Soils Handling Plan and in Hatcher's request to modify the plan (the modification asked to eliminate VOC testing for Hnu readings below 25 ppm).

Based on the data (figure attached figure) I'm comfortable with eliminating the testing for Hnu readings between 0 and 15 ppm. There's not much data for the <sup>15-25 ppm</sup> range so I'd like to continue with VOC testing for soils in this range.

I talked with Ted Bosch and it's okay with him.

I'm still trying to reach Jim Krauss of Hatcher  
Mark Trusler 6/8/87

# Hnu/VOC Correlation

