



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Freeman Corp Act

Carroll D. Besadny, Secretary
Box 7921
Madison, Wisconsin 53707
TELEFAX NO. 608-267-2768
TDD NO. 608-267-6897

March 31, 1990

File Code: 4430

Mr. Robert Smith (5HR-12)
RCRA Enforcement
U.S. EPA, Region V
230 S. Dearborn Street
Chicago, Illinois 60604

SUBJECT: ~~Freeman Chemical Corporation Annual Report~~

Dear Mr. ^{Bob} Smith:

The Department has received and reviewed the document entitled "Freeman Chemical Corporation, Saukville, Wisconsin, 1989 Annual Report" which was prepared by Hatcher-Sayre, Inc. on behalf of Freeman Chemical Corporation. The document was dated January 22, 1990 and was received on February 7, 1990.

On the whole, the report is acceptable. I have some specific suggestions that I would like addressed in the next annual report. These suggestions will help clarify the report.

1. Contour Plots (Appendices A,C and E) - The contour plots should show the well locations and well results for each well used to generate the contour plot. Well names should be provided on the contour plot or provided as a transparent overlay (one overlay for glacial wells, one for dolomite wells). (I have suggested the use of an overlay because it looks like the plots have been generated by Surfer software. This is the best contouring package I have worked with but it cannot provide two values (the well name and well result) for each well location.)
2. Appendix B should be subdivided (with specific tabs) into the following groupings: glacial, shallow dolomite and deep dolomite.

The report has made a recommendation of revising the quarterly sampling to semiannual sampling. In reviewing the trend plots, I agree that we do not need such frequent monitoring for most of the wells. I'd propose revising all of the quarterly wells to semiannual with the exception of wells 30, MW-1, MW-2 and MW-3 remain on a quarterly sampling program.

The report also made a recommendation of changing the analytical method from 624 to 602 for many of the monitoring locations. This change is acceptable.