



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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Ozaukee  
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Mr. Robert Dean Smith 5HRE-8J  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Blvd.  
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SUBJECT: WDNR Comments on RFI Tasks 3A, 3B & 3C  
Cook Composites and Polymers  
Saukville, Wisconsin  
EPA ID#: WID980615439

Dear Bob:

The following WDNR comments are based on a review of "Revised Project Plans - Task 3A, 3B & 3C" submitted by RMT, Inc. of Madison, Wisconsin on behalf of Cook Composites and Polymers Co., formerly Freeman Chemical, of Saukville, Wisconsin. The submittal was received by the Department on November 22, 1991.

I think the general objectives of the sampling plan are good. They seem to be much more well-defined than those outlined previously by Hatcher-Sayre. In my opinion, there is not a great deal that needs to be done to revise this document. My comments are as follows:

1. Section 2.3.1, pages 18 and 23, and Table 2, replacement page 11: The Ranney collectors are probably adequate sampling locations for characterizing contamination of the glacial aquifer with Appendix IX samples. They would supply a composite sample from the most highly contaminated area of the plume, but I do not see a need for samples from discreet locations. However, we should request one sample from the shallow dolomite aquifer, possibly at either 21A, 29 or 38.

The total number of samples in the last column of Table 2 in the row corresponding to "Contamination Characterization" should be 7 instead of 5.

2. Table 5 and Table 6, replacement pages 20 and 21: Table 6 states that glacial overburden well 45 is not a perimeter location. However, from the information that I have, it may be a more appropriate location to monitor the fringe of the plume in the glacial aquifer than wells 8 or 3A. Perhaps well 45 should be added to the list of wells to monitor the perimeter of the plume in the glacial aquifer.

3. Section 2.3.1, pages 12 to 23 and Table 2, replacement page 11: RMT has proposed less frequent sampling for certain wells. This is generally okay, due to the slow movement of contaminants at the site. They have suggested annual sampling for wells at the fringe of the plume. A problem may arise due to variability in sample results; it would take four times as long to statistically discern any trends taking place at the fringe of the plume as it would if quarterly sampling of these wells were done. At a minimum, semi-annual sampling of the perimeter wells should be required.

4. Section 2.9 and 2.10, pages 48 to 53: The Logeman and churchyard property soils will be addressed in separate sampling plans that will be submitted after the QAPP is approved. That approach is acceptable to WDNR.

I have a concern about the soils at the Cook facility proper. Item 11 on page 11 under "Releases to the Environment" in the Consent Order listed soils as a concern at Cook. Certain areas were noted as having the highest levels of contamination based on the presence of odor in soil samples taken during well installation. These areas included the tank farm, southwestern property line, area of the abandoned dry well, and north of the truck scales. However, on-site soil contamination (with the exception of the Logeman and churchyard areas) seems to have been left out of the remainder of the RFI process at Cook. I did not see these areas mentioned in the Task 1 - Description of Current Conditions. Were these areas ever investigated, and was the extent of soil contamination in those areas defined? This is something that should be brought up at the March QAPP meeting.

5. Section 2.11, pages 53 to 56: I have not seen the results of the seismic survey performed by Hatcher-Sayre at Cook. I believe it determined the buried depression to be a karst feature and not a buried channel, and it defined the extent of that feature. We should make certain that wells 7 and 8 or their replacements (or at least some wells) are located to the east of this feature, and that they are included in the routine monitoring plan.
6. Section 2.12.3, page 62: Paragraph 2 states that the eight driven well points that are proposed to be used to monitor the capture zone of the Ranney Collectors during the pump test are shown on Figure 5. It is not evident which wells these are; they should be listed in the text in addition to being shown on the figure.
7. If the laboratory section of the QAPP is not approved at this time, WDNR recommends that the sampling and data management plans as outlined in RMT's November 1991 version of the Revised Project Plans - Tasks 3A, 3B & 3C be implemented with the next sampling round.

If you have any questions or comments on the above, please call me at (608)266-5741.

Sincerely,

*Jill Fermanich*

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Noted by: *Mark S. Gordon*  
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3-5-92  
Date