



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

caust
Zimmer

JUL 24 1992

REPLY TO THE ATTENTION OF:

HRE-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Craig Bostwick
Cook Composites and Polymers
P.O. Box 247
222 East Main Street
Port Washington, Wisconsin 53074

RECEIVED
JUL 24 1992
BUREAU OF SOLID
HAZARDOUS WASTE MANAGEMENT

RE: Corrective Action Order
on Consent V-W-88-R-002
Workplan Comments
Additional Work

Dear Mr. Bostwick:

On October 19, 1987, pursuant to Section 3008(h) of the Resource Conservation and Recovery Act of 1976, as amended, the United States Environmental Protection Agency (U.S. EPA), and the Wisconsin Department of Natural Resources (WDNR) entered into a Corrective Action Order on Consent (CAO), V-W-88-R-002, with Cook Composites and Polymer's (CCP) predecessor, Freeman Chemical Company. Pursuant to Paragraph 3, Section II, Parties Bound, the Respondent (Freeman) would give notice to any successor (CCP) of the CAO and any sale or transfer of the facility would not relieve the Respondent of its obligations under the CAO.

The objective of the CAO is to protect the public health and the environment through the prevention or reduction of the release or migration of hazardous waste or hazardous constituents to the groundwater, surface water, air and soil in and around the Respondent's facility. The objective is obtained through an investigation of the facility, a study of the alternative technologies available to remediate the environmental problems, and the implementation of appropriate corrective measures. Groundwater and soil have been addressed to some extent in a previously approved workplan, but other areas of the facility have not been adequately addressed. Due to additional information obtained from investigatory work, it is apparent that the corrective measures presently in place do not meet the objective of the CAO.

Pursuant to Section IX, Additional Work, the U.S. EPA has determined that additional investigatory work and corrective measures are necessary at the facility to protect human health and the environment. The scope of the additional work is outlined in the attached Scope of Work. The scope of this work will necessitate additional workplan submittals and approvals.

This determination is based, in part, on the 1991 annual report (Task 5 of the CAO) and historical data. The 1991 annual report evaluated the present groundwater remediation as "effective". U.S. EPA disagrees with this conclusion because the groundwater remediation and monitoring system was designed and installed under significantly different hydrogeologic conditions. Specifically, the groundwater table is, at a minimum, 5 feet lower today than when the program was implemented. The lower water table at the site can be attributed to the drought-like conditions present from the time remediation began in 1987 and the dewatering of the glacial aquifer due to a hydraulic connection to the lower "dolomite aquifer" which is supplying noncontact cooling water for the facility. As a result, the present groundwater monitoring and remediation system has become deficient because it no longer accurately characterizes the actual site conditions nor completely remediates the contamination. The current remedial system is considered to be an "interim measure" at best; not a final, comprehensive corrective measure for the facility.

In addition, the approved workplan does not address all areas of known or suspected contamination at the facility. The attached scope of work outlines the additional work needed to protect human health and the environment.

Any sampling that is required pursuant to this letter must be performed pursuant to an approved Quality Assurance Project Plan (QAPjP). It is recognized that other sampling that was to be conducted in the approved workplan has not been carried out due to difficulties in obtaining an approved QAPjP. It is required that all work at the facility done pursuant to the CAO and this letter be done pursuant to an approved QAPjP. The Region V model QAPjP and appropriate guidance is attached to this letter. If this model is followed, all deficiencies in the previously submitted QAPjPs can be resolved.

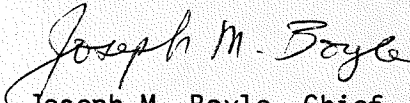
The CAO (V-W-88-R-002) is somewhat of a hybrid RCRA Facility Investigation (RFI) and Corrective Measures Study (CMS). In essence, the CAO formalized work conducted at the facility pursuant to a series of previous administrative orders entered into between the State of Wisconsin and the Respondent. The RFI included the groundwater monitoring in place at the signing of the CAO in addition to some soil sampling and the CMS consisted of an evaluation of the effectiveness of the pump and treat system. The narrow focus of the "CMS" portion of the order (TASK 5) has been proven to provide an incomplete characterization of contamination at the facility, as well as no assessment of alternative remedies. Therefore, the Respondent is now required to conduct a comprehensive Corrective Measures Study pursuant to the attached CMS Scope of Work in addition to filling in data gaps for a complete RFI.

Cook Composites and Polymers must submit a workplan which addresses: 1) the comments to the changes in the Tasks 3A, 3B, and 3C workplan proposed by RMT, 2) the additional work; 3) a Corrective Measures Study for the facility, and 4) a QAPjP based on the Region V Model QAPjP that addresses the sampling required in the previously approved Task 3A, 3B, and 3C workplan (Hatcher-Sayre) and the additional work. The workplan addressing the above requirements shall be submitted within 45 days from receipt of this letter.

Because of the complexity of some of the above issues, the U.S. EPA is willing to meet with CCP and the WDNR to discuss and/or clarify the comments, scopes of work and/or guidance that has been provided to you in this letter. If such a meeting is desired, please contact Robert Smith to arrange an appropriate time and place. Depending on when the meeting will take place, there may be a need to modify the above timeframe for submittal of documents. U.S. EPA will consider such a modification upon your request, within 10 days of receipt of this letter.

Thank you in advance for your cooperation. The U.S. EPA looks forward to coordinating our efforts to resolve all outstanding issues on this matter. If you have any concerns or questions, please contact Robert Smith of my staff at (312) 886-7568.

Sincerely yours,



Joseph M. Boyle, Chief
RCRA Enforcement Branch

Enclosures

cc: Barbara Zellmer, WDNR
Jill Fermanich, WDNR
Stacy McAnulty, RMT