



COPY

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July 12, 1993

Ms. Colleen Hellenbrand
Administrative Assistant
Hazardous Waste Management Section
Bureau of Solid & Hazardous Waste Management
Wisconsin Department of Natural Resources
101 South Webster Street
Box 7921
Madison, WI 53707

recd 7-19-93

RE: Financial Responsibility - Closure Costs
Cook Composites and Polymers Co.
WID 980615439

Dear Ms. Hellenbrand:

This letter is written as a follow-up to our phone conversation of July 12, 1993, in which we discussed Cook Composites and Polymers Co.'s (CCP) closure cost estimate for its hazardous waste incinerator and hazardous waste storage facility located at 340 Railroad St., Saukville, WI.

As discussed, there was a misunderstanding as to the submittal of the revised cost estimate. As stated, no changes to the closure plan or no changes in operation apply to CCP's facility, so therefore, CCP's cost estimate has been adjusted for inflation. CCP has used the inflation factor of 1.041 which the Department provided in previous correspondence.

CCP will again provide a letter of credit to demonstrate financial responsibility for closure, and the letter of credit will be increased to the revised amount of \$130,425.77 by the anniversary date of August 2, 1993. As indicated during our conversation, your verbal acceptance constituted Department approval of the updated cost estimate.

A copy of this correspondence has been provided to Pat Brady - WDNR Southeast District Office. If you have any questions regarding this matter, please feel free to contact me at (816) 391-6025.

Sincerely,
Cook Composites and Polymers Co.

Craig R. Bostwick
Craig R. Bostwick
Corporate Manager Environmental & Safety

Enclosure

COOK COMPOSITES AND POLYMERS CO.
CLOSURE COST ESTIMATE BY YEAR

YEAR	COST	INFLATION FACTOR OR NET CHANGE FROM PREVIOUS YEAR
1987	\$101,540.00	-----
1988	\$108,662.00	1.065
1989	\$111,812.00	1.028
1990	\$115,614.21	1.033
1991	\$120,354.39	1.039
1992	\$125,288.92	1.039
1993	\$130,425.77	1.041

ESTIMATED CLOSURE COSTS
ORIGINAL 1987 ESTIMATE

ITEM	COST
EQUIPMENT DECONTAMINATION	\$13,970.00
DISPOSAL OF MAXIMUM INVENTORY	\$68,900.00
DISPOSAL OF PROCESS RESIDUES	\$ 6,290.00
PROFESSIONAL CERTIFICATION	\$ 750.00
ADMINISTRATIVE COSTS	\$ 2,400.00
TOTAL	\$92,310.00
CONTINGENCIES (10%) OF ABOVE	\$ 9,230.00
SUBTOTAL	\$101,540.00
CHANGES DUE TO INFLATION FACTOR, UPDATED COST, AND NEW REGULATIONS (OVER LAST 6 YRS)	\$ 28,885.77
TOTAL CURRENT CLOSURE COST	\$130,425.77

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recd 6-15-93



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June 14, 1993

Mr. Pat Brady
Hazardous Waste Section
WDNR - Southeast District
2300 N. Dr. Martin Luther King Dr.
P.O. Box 12436
Milwaukee, WI 53212

RE: Cook Composites and Polymers Co.
Structural Integrity Testing
Saukville, WI Hazwaste Facility WID980615439

Dear Pat:

Enclosed please find copies of the Structural Integrity Testing Report for the Hazardous Waste Accumulation Storage Tanks at Cook Composites and Polymers Co.'s (CCP) Saukville, WI facility WID980615439. As you may recall, such testing is required once every five years as described in the February 8, 1988, Feasibility Determination and Plan of Operation Report as well as the facility's RCRA Part B Permit Application.

Structural integrity testing was performed by Wisconsin Industrial Testing and certified by Spectrum Engineering Incorporated. The testing and inspection of two tanks (WT-3 and WT-4) occurred on April 29, 1993, and that of two additional tanks (WT-5 and WT-6) occurred on May 17, 1993. The final two tanks (WT-1 and WT-2) are scheduled to be tested, inspected, and recertified the week of June 21, 1993. A subsequent report involving those two tanks will then be forwarded to you.

As noted in the enclosed reports, Spectrum Engineering Incorporated has reviewed the tank design and the ultrasonic testing reports, has conducted field inspections, and has certified that the subject tanks have sufficient structural integrity and are acceptable for continued accumulation of the permitted hazardous waste liquids.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,
Cook Composites and Polymers Co.

Craig R. Bostwick
Corporate Manager Environmental & Safety