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Secretary

TSM

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August 4, 1993

File Ref: 246004430

Ozaukee
HW/LIC

Mr. Craig Bostwick
Cook Composites and Polymers
Box 419389
Kansas City, MO 64141-6389

SUBJECT: Former Hazardous Waste Incinerator Closure;
Results of Pilot Soil-Vapor Extraction Test;
Saukville, WI 53080
U.S. EPA I.D. No.: WID980615439

Dear Mr. Bostwick:

This letter provides a basis for proceeding with the closure of the former hazardous waste incinerator area. Please note that Cook Composites and Polymers is obliged to prepare a report that addresses condition #4 of the September 14, 1992 closure plan modification conditional approval. The Department believes we need to keep this situation moving ahead, so that it isn't delayed until next summer. RMT has informed me that the SVE pilot adequately demonstrated the feasibility of the remedial technology (which means that CCP should proceed with condition #5 of the 9/14/92 approval which requires the design and implementation of an SVE system), but adequate information was not obtained to proceed with the final design, due to a high water table resulting from above average precipitation.

Consistent with condition #4 of the approval and its information requirements, CCP must submit a report. Since it has been more than six weeks since the pilot test was performed, I'm expecting that most of this information has been drawn together and a report should be able to be readily prepared. This report should reflect current conditions. The report should describe:

- ▶ pilot plant design, installation and operation, including soil boring logs and any appropriate well construction forms;
- ▶ current conditions, including ground-water elevation and the Ranney collector effects on ground-water elevation in the former incinerator vicinity and pilot SVE wells (and other wells if helpful);



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Mr. Bostwick: Pilot SVE Results - August 4, 1993

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- ▶ conditions at the time of the pilot plant test;
- ▶ information obtained from the pilot plant and its need;
- ▶ information that was unable to be obtained;
- ▶ why this missing information is necessary for further action;
- ▶ status of final design (condition #5 response); and,
- ▶ a plan for further action.

The plan for further action should contain dates for specific actions (ground-water monitoring well measurements, additional pilot plant tests) and a date certain for decision making and actions. I believe this report should be submitted consistent with the requirements of condition #4. Although no specific date or time period after pilot plant completion was placed into condition #4 for the report submittal, this report should be submitted at the earliest possible date, preferably by early September.

As you stated yesterday, CCP wants a decision with a common basis for understanding. However, you have not provided the DNR with adequate information to make a decision. This report will help get us to that point.

If you have any questions, please contact me at 608/266-0061. I expect that we'll be talking soon.

Sincerely,



Timothy S. Mulholland, PhD
Waste Management Engineer
Hazardous Waste Management Section
Bureau of Solid & Hazardous Waste Management

cc: E. Lynch - SW/3
J. Fermanich - SW/3
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