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Ozaukee County
HW/CA

Mr. Robert Dean Smith, HRE-8J
U.S. EPA Region 5
77 W. Jackson Blvd.
Chicago, IL 60604-3590

SUBJECT: WDNR comments on the "Draft Site Investigation and Continuing Interim Corrective Measures Workplan,"
Cook Composites and Polymers
Saukville, WI
EPA ID#: WID980615439

Dear Bob:

The following WDNR comments are based on a review of the "Draft Site Investigation and Continuing Interim Corrective Measures Workplan" submitted by RMT, Inc. of Madison, Wisconsin on behalf of Cook Composites and Polymers Co., of Saukville, Wisconsin. The submittal was received by the Department on February 19, 1993.

The following are general comments on the workplan:

1. The number of borings and proposed locations listed in Table 5-1 for areas 2 and 3 is somewhat sparse. If the old dry well in area 2 can be accurately located and a boring placed immediately adjacent to it such that the boring does not penetrate fill material backfilled into the old well when it was abandoned, then one boring may be adequate. Otherwise, two borings should be installed. In area 3 (tank farm), three borings should be installed instead of the proposed two. If possible, the third should be located midway between the two proposed borings. It should be remembered that this soil sampling effort is a survey to determine if contamination is present at these locations. If the sample results do show contamination, then the agencies will require more sampling to determine the extent of contamination.
2. Table 5-1 and section 5.2 report that one at-depth sample for Appendix IX SVOCs will be collected from all areas. From what depth will the SVOC samples be collected? On what basis will that depth be chosen?
3. All investigative wastes, including drill cuttings, excavated soil, decontamination water, surge and wash waters, etc. from all borehole and groundwater monitoring well construction and development, sampling activities and remedial actions, etc. shall be collected, containerized

and properly managed as either a solid waste or hazardous waste. CCP is responsible for making a hazardous waste determination on the above material in accordance with ss. NR 610.05 or NR 615.06, Wis. Adm. Code.

4. Well W-8A (replacement for W-8) and any future monitoring wells that may be installed at the facility shall be installed in accordance with ch. NR 141, Wis. Adm. Code. In addition, the following forms are required to be used where appropriate and submitted to the Department:

Monitoring well construction form 4400-113A
Monitoring well development form 4400-113B
Well/drilling/borehole abandonment form 3300-5b
Soil boring log form 4400-122

5. On page 5, objectives are listed for the site investigation and workplan. The first objective of the site investigation is listed as "to collect data necessary to determine whether or not additional corrective measures are necessary to remediate remaining on-site sources that may be contributing to groundwater contamination." Also, Table 5-1 states that the data use for samples collected in areas 1 through 5 is to evaluate the need for remediation. It is true that the purpose of the site investigation is to collect data to determine if contamination is present and if remediation is necessary. However, it should be emphasized that the target cleanup level for any soil remediation that may take place is not simply to reduce contaminant migration to groundwater, but to reduce contaminant levels in the soil to no detect (for organics) or background (for any naturally occurring contaminants). During the CMS or CMI stages of work, if CCP can demonstrate that it is not feasible to achieve background or no detect, then CCP may propose alternative cleanup levels along with supporting documentation to justify that the alternative levels will be protective of human health and the environment.

Since these target cleanup levels pertain to all site soils, conducting the risk assessment for the churchyard and Logeman property may be premature at this point. Cook must first demonstrate that it is not feasible to clean up to background or no detect in these areas before a risk assessment may be proposed.

As far as groundwater cleanup at CCP is concerned, it must be emphasized that, although plume containment and receptor protection are both vital, the ultimate goal is groundwater cleanup. Chapter 160, Wis. Stats. and chapter NR 140, Wis. Adm. Code establish numerical standards for groundwater consisting of preventive action levels (PALs) and enforcement standards (ESs) that are to be protective of public health and welfare. If a PAL is attained or exceeded, the WDNR may require a facility to implement corrective measures to:

- a. Minimize the concentration of the substance in groundwater at the applicable point of standards application where technically and economically feasible;

- b. Regain and maintain compliance with the PAL. If the WDNR determines that compliance with the PAL is not technically or economically feasible, then CCP must achieve compliance with the lowest possible concentration that is technically and economically feasible.
 - c. Ensure that the ES is not attained or exceeded at the point of standards application.
6. Only one round of Appendix IX groundwater sampling has been proposed. This is acceptable provided that any Appendix IX detects be added to the monitoring plan for that group of wells in which they were detected.
7. A hydrogeologist or other qualified person, as defined in s.NR 600.03(98), Wis. Adm. Code, shall observe and direct the drilling and construction of all monitoring wells and soil borings and shall supervise the operation of the aquifer tests. In addition, all reports shall be certified by a registered professional engineer and a hydrogeologist.

Please call me at (608)266-5741 with any comments you may have on the above.

Sincerely,



Jill Fermanich, Hydrogeologist
Hazardous Waste Management Section
Bureau of Solid & Hazardous Waste Management

- cc: Mark Gordon - SW/3
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Noted by: 
Mark Gordon, P.E., Unit Leader

9/15/93
Date