

Pat Brady - SEID/Rochards St

CORRESPONDENCE/MEMORANDUM

State of Wisconsin

Department of Natural Resources
Bureau of Solid & Hazardous Waste Management

DATE: October 1, 1993 FILE REF: 246004430
TO: Ed Lynch - SW/3 Eric Syftestad - SW/3 Ozaukee HW/LIC
FROM: Tim Mulholland *TM* SW/3
SUBJECT: Cook Composites and Polymers - Incinerator Modifications

On October 1, 1993, I spoke with Craig Bostwick of Cook Composites and Polymers (CCP) regarding possible modifications for their Saukville incinerator. Craig explained that CCP, through its various mergers and closures, now has several facilities that generate wastes that are likely compatible with the Saukville incinerator. At the same, a few of the sibling CCP facilities that were sending wastes to the Saukville incinerator have closed. Craig's main purpose was to explore what might be necessary for CCP to take wastes from these "new" sibling facilities so that they make better use of the Saukville incinerator as well as reduce their corporate waste disposal costs.

After briefly discussing the situation with Ed, I spoke again with Craig and relayed the following information. First, CCP should prepare a proposal and submit it to the Department for a modification determination under s. NR 680.07, Wis. Adm. Code. This proposal should be prepared according to the requirements of s. NR 680.05, Wis. Adm. Code. The proposal should discuss what CCP is proposing and explain why it is important to the company. Second, the proposal should include waste analyses for the generated wastes at the "new" facilities. Last, the proposal should include information from the trial burn, showing the concentration and degree of incineration difficulty of the primary organic hazardous constituents (POHCs) for the surrogate compounds used in the trial burn. The proposal should compare the "new" wastes against the POHCs used in the trial burn. Based on this information, the Department could then make a determination as to the type of modification that this proposal describes (either major modification or expansion). It is also possible that the Department might require additional information prior to making this determination. Once the determination was made, the Department would proceed, at CCP's request, to make a completeness determination on the proposal.

Craig also mentioned that some of the "new" facilities were generating F005 wastes, a waste code that the Saukville incinerator is not permitted to incinerate. He stated that the F005 wastes are primarily toluene, which is not greatly dissimilar from the F003 (xylene) wastes that the incinerator is now taking. I told Craig that there was a possibility that this might be an expansion, but might also be considered similar waste under s. NR 680.07(1)(c), Wis. Adm. Code. This review of this would be a part of the modification type determination.

Finally, Craig said that the likely participants in this effort would be himself, Jim Rickun (RMT), possibly another RMT-Madison person, and Don



Corwin, who is an incinerator specialist from a company recently acquired by RMT. Craig said that he would be discussing this with RMT in the near future, and that a conference call with the Department would be likely to help CCP and RMT prepare the proposal.

I told Craig that the proposal should be made to Barb Zellmer, who would then likely delegate to Ed Lynch. From there, it would be up to Ed to delegate, probably to Eric, our incinerator specialist, but possibly to myself. I also stated that the SED's hazardous waste engineer, Pat Brady, might take the lead on this review.

If you have any questions, I can be reached at 266-0061.

cc: P. Brady - SED

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