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Headquarters
P.O. Box 419389
Kansas City, MO 64141-6389
(816) 391-6000
FAX (816) 391-6215

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Jill Fermanich
Wisconsin Department of Natural Resources
101 South Webster Street
P.O. Box 7921
Madison, WI 53707

**BUREAU OF SOLID
HAZARDOUS WASTE MANAGEMENT**

RE: Interim and Long-Term Remedial Objectives for the Cook Composites & Polymers Facility in Saukville, Wisconsin

Dear Jill:

This letter has been prepared in response to a telephone conversation between you and Gene McLinn of RMT during March, 1994. I have prepared this brief letter discussing the relationship of the interim remedial objectives for the RCRA Facility Investigation (RFI) at the Cook Composites & Polymers Co. (CCP) Saukville facility to the long-term remedial objectives at the site. The purpose of this letter is to tie the objectives of the RFI workplan to the long-term remedial objectives at the site.

The RFI workplan was designed to address three broad issues:

- Confirming that the contaminants of concern detected in soil and groundwater at the site are representative and complete
- Assessing the nature and extent of soil contamination associated with the site, and quantifying the potential risks to human health posed by off-site soil contamination
- Evaluating the effect of groundwater pumping from the on-site remedial system and the municipal wells on groundwater flow

The first issue concerns the completeness of site characterization and will be addressed by collecting soil samples from the five areas of concern identified in the RFI workplan, collecting one round of groundwater samples from the on-site groundwater monitoring well network, and analyzing those samples for Appendix IX constituents. The objective of this broad-spectrum soil and groundwater monitoring is to confirm that the constituents being remediated at the site are, in fact, the constituents of concern at the site.

The second issue concerns the extent and significance of affected shallow soil that is suspected of containing residual contamination from surface spills at the Saukville site, and will be dealt with by performing a shallow soil investigation. The objectives of the shallow soil investigation are threefold:

- To assess the degree to which potential source areas are contributing to groundwater contamination at the CCP site, including three on-site locations: the former urethane laboratory (Area 1), the former dry well (Area 2), and the former tank farm area (Area 3) and two off-site locations: the Logemann property (Area 4) and the Churchyard (Area 5).
- To assess the risks to human health and the environment posed by the affected, shallow, off-site soil, based on the data collected on the nature and extent of contamination at the off-site locations.
- To establish appropriate remedial objectives for the affected on-site and off-site shallow soil.

The third issue concerns the optimization of the on-site groundwater recovery system. The response of the groundwater flow system to pumping will be evaluated with an aquifer test. The objective of the aquifer test is to assess aquifer parameters and hydraulic boundaries for the dolomite aquifer. After the aquifer parameters are evaluated, a refined conceptual model of groundwater flow for the CCP site will be developed. The refined conceptual model will be incorporated into a numerical groundwater flow model that will be used to optimize operation of the groundwater recovery system.

Currently, the long-term remedial objective for soil at the site is to deter further migration of residual contamination in soil to the groundwater flow system, and to reduce the potential for human exposure to off-site contaminated soil. The Appendix IX soil chemical analyses performed on the samples collected during the shallow soil investigation and the risk assessment for off-site soil will enable us to move toward the long-term remedial objective for soil.

At the present time, the long-term remedial objective for groundwater at the site is to restore groundwater quality at the site to the extent that is technically and economically feasible, in accordance with NR 140, Wisconsin Administrative Code. The Appendix IX groundwater sampling and the aquifer test will improve our understanding of the contaminant hydrogeology of the site, and will enable us to optimize the performance of the groundwater recovery system. However, the Saukville site poses a high potential for non-aqueous-phase liquids being present, based on the high concentrations of VOCs detected in groundwater at the site. In addition, the hydrogeologic setting is complex, with a fractured dolomite aquifer and strong downward gradients. Consequently, aquifer restoration may be technically impracticable.

As the data from the RFI are collected and evaluated, and as a revised conceptual model of groundwater flow and contaminant transport is developed for the site, the initial remedial objectives will be revisited and re-evaluated. Final remediation goals will be developed after completion of the RFI and RCRA Corrective Measures Study.

If you have any questions about this letter, please contact me, Jim Rickun (RMT), or Gene McLinn (RMT).

Sincerely,



Craig R. Bostwick
Corporate Manager, Environmental and Safety

cc: Daniel Grasset - CCP
Eric Naimark - CCP
Jim Rickun - RMT