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June 20, 1994

Mr. Timothy S. Mullholland, Ph.D.
Waste Management Engineer
Hazardous Waste Management Section
Bureau of Solid & Hazardous Waste Management
Wisconsin Department of Natural Resources
P.O. Box 7921
Madison, WI 53707

RECEIVED

JUN 27 1994

BUREAU OF SOLID
HAZARDOUS WASTE MANAGEMENT

Dear Tim:

This letter is a follow-up to your recent telephone inquiry regarding the status of the soil vapor extraction (SVE) pilot-scale project at the Cook Composites & Polymers Co. (CCP) Saukville former incinerator location.

As you may recall, last September CCP provided the Wisconsin Department of Natural Resources (WDNR) with the results of the soil vapor extraction pilot-scale test performed on June 15, 1993. Briefly, this report concluded the following:

- SVE is an effective technique for removing volatile organic contaminants from the unsaturated soil at the former hazardous waste incinerator area.
- Benzene, toluene, ethylbenzene and xylenes (BTEX) were present in the off-gas at concentrations in the 10^{-4} to 10^{-3} lb/ft³ range.
- The water table was encountered in the SVE wells at a depth of 5 to 6 feet below grade which is 2 to 5 feet higher than expected.

Based on depth to water, RMT Inc., CCP's consultant, recommended monitoring the groundwater levels on a monthly basis until levels decreased to historical levels. After reviewing this information, you contacted CCP on November 15, 1993, inquiring about clarification of the phrase "recede to historical levels."

On November 29, 1993, CCP responded with a letter indicating that, because of the greater-than-normal precipitation during the summer of 1993, CCP believed that the groundwater levels were temporarily elevated and that, historically, water levels were between 8 and 10 feet below grade. Per your directive, CCP was asked to monitor the water levels in the area of the former hazardous waste incinerator. The trend in water levels is depicted on the enclosed graph. On the basis of this new information, the water table fluctuates between 5 and 6 feet below grade. CCP and RMT now believe this 5- to 6-foot depth to the water table represents the equilibrium water table elevation and that it may have been incorrect to initially estimate the water equilibrium to be at 8 to 10 feet below grade, because of the abnormally low amount of precipitation in the preceding summers (1991 and 1992).

On the basis of this nominal 5-foot equilibrium water table level, CCP would like to proceed to design a full-scale system for SVE remediation and closure for soils in the former hazardous waste incinerator area, rather than conduct further pilot testing. CCP is proceeding with the design and anticipates its review submittal to you at the end of July.

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In the meantime, if you have any questions, please contact me directly at 816-391-6025.

Sincerely,
Cook Composites and Polymers Co.

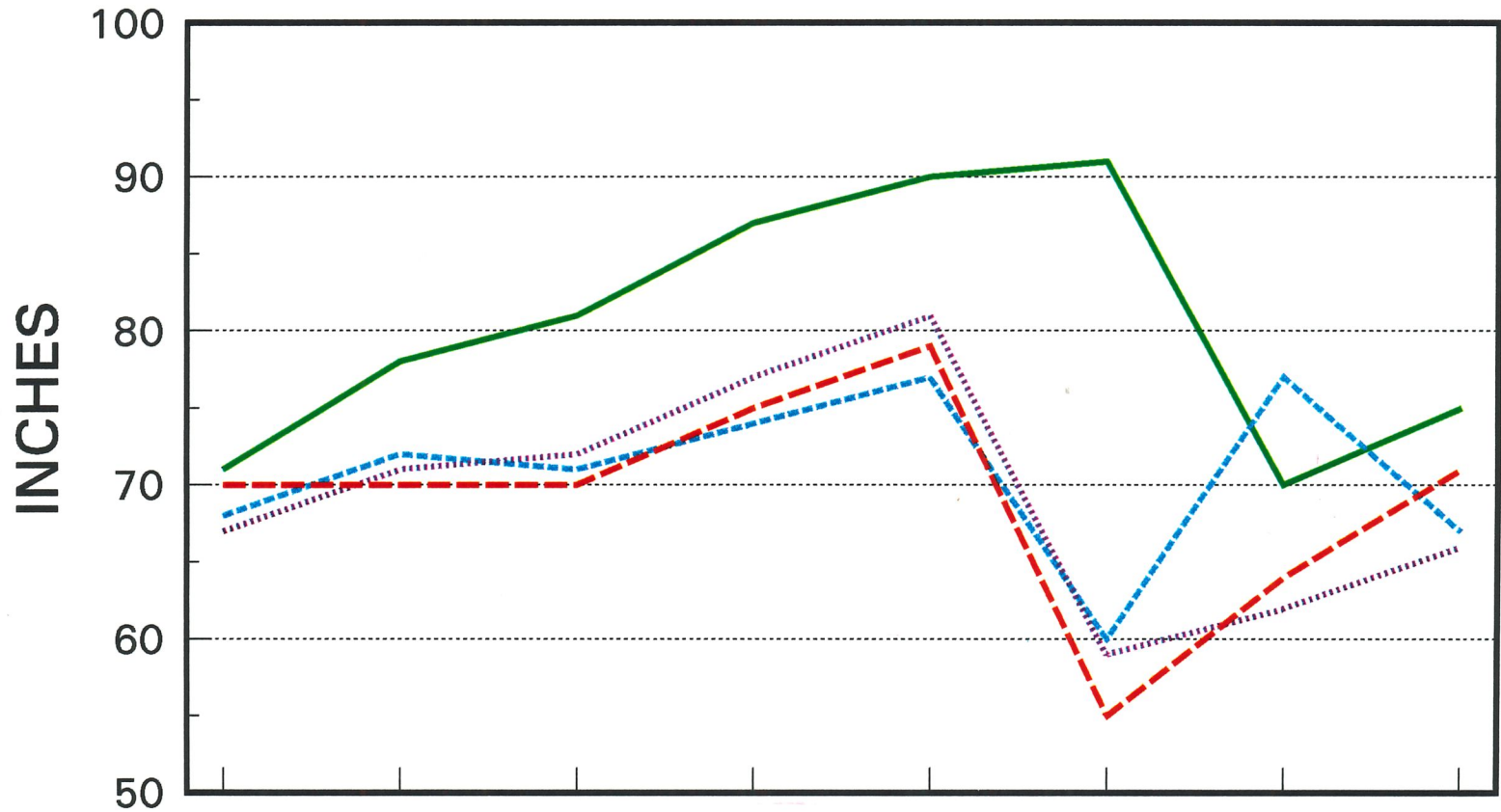


Craig R. Bostwick
Corporate Manager Environmental & Safety

Enclosure

cc: E. Lynch - SW/3
J. Fermanich - SW/3
W. Ebersohl/P. Brady - SED
J. Rickun/G. McLinn - RMT
D. Grasset - CCP
E. Naimark/D. Bolz - CCP-Saukville

SAUKVILLE SVE WELLS



DATE	8/4/93	8/24/93	9/1/93	10/8/93	11/9/93	3/24/94	5/5/94	6/1/94
VE1	71	78	81	87	90	91	70	75
VE2	68	72	71	74	77	60	77	67
VM1	67	71	72	77	81	59	62	66
VM2	70	70	70	75	79	55	64	71