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August 1, 1994

Ms. Colleen D. Hellenbrand
Administrative Assistant
Hazardous Waste Management Section
Bureau of Solid & Hazardous Waste Management
101 South Webster Street
Box 7921
Madison, WI 53707

RECEIVED

AUG 04 1994

RE: Financial Responsibility - Closure Costs **BUREAU OF SOLID HAZARDOUS WASTE MANAGEMENT**
Cook Composites and Polymers Co.
WID 980615439

Dear Ms. Hellenbrand:

Pursuant to your letter of July 19, 1994, Cook Composites and Polymers Co. (CCP) is providing the revised closure cost estimates for its former incinerator located at 340 Railroad St., Saukville, WI. As previously agreed to by the Department, the cost estimates for this facility cover operation and maintenance costs for the soil-vapor extraction system.

The cost estimates have been adjusted for inflation and have taken into account any changes in operation of the facility. The revised closure cost estimate is \$113,910, which has been adjusted using the current inflation factor of 1.025. CCP will submit proof that it has increased its letter of credit to the amount adequate to cover the new cost estimates.

Enclosed is a detailed breakdown documenting how the closure cost estimates were calculated. A copy was also sent to Pat Brady at WDNR - Southeast District.

Please feel free to contact me at (816) 391-6025 if you have any questions regarding this matter. CCP awaits the Department's approval of the revised cost estimates.

Sincerely,
Cook Composites and Polymers Co.


Craig R. Bostwick
Corporate Manager Environmental & Safety

Enclosure

cc: Pat Brady - WDNR
Eric Naimark - CCP
Don Berkstresser - CCP

Cook Composites and Polymers Company

CLOSURE COST ESTIMATE
COOK COMPOSITES AND POLYMERS CO.
SAUKVILLE, WI
WID 980615439

MONTHLY SYSTEM INSPECTION, MONITORING, OPERATION, AND QUARTERLY LETTER REPORT (ASSUMES 3 YEARS OF OPERATION AND MAINTENANCE AT \$36,000) PER YEAR; INCLUDES TWELVE QUARTERLY REPORTS PREPARED FOR THE WDNR).	\$108,000
1993 INFLATION FACTOR OF 1.029	\$ 3,132
1994 INFLATION FACTOR OF 1.025	\$ 2,778
REVISED CLOSURE COST ESTIMATE	\$113,910

Section 5
COST OF CLOSURE

The preliminary cost for the alternative closure method is presented in Table 5-1. Approximately \$291,000 is estimated for installation, 3 years of operation and maintenance, and documentation of closure. The estimate assumes that gas treatment will not be required.

Financial Assurance

As discussed in the WDNR letter dated March 20, 1992, CCP must provide financial assurance to cover the cost of the closure method's operation and maintenance. The required financial assurance amount is \$108,000. Financial assurance will be secured by CCP before full-scale operation of the SVE system begins.

TABLE 5-1

**PRELIMINARY COST FOR CLOSURE
BY SOIL VAPOR EXTRACTION**

1.	Well Installation & Analytical ¹	\$ 38,000
2.	Pilot-Scale Study & Report ²	8,000
3.	Full-Scale Design ³	7,000
4.	Equipment & Control Housing ⁴	50,000
5.	Paving ⁵	10,000
6.	System Start-up (First Month Sampling) ⁶	13,000
7.	Monthly System Inspection, Monitoring, Operation, and Quarterly Letter Report ⁷	108,000
8.	Documentation of Closure ⁸	<u>31,000</u>
	SUBTOTAL	\$265,000
	10% Contingency	<u>26,000</u>
	TOTAL	\$291,000

ASSUMPTIONS:

- ¹ Includes installation of 2 SVE wells and 2 vacuum monitoring wells. Ten soil samples characterized for BTEX at \$235 per sample. Twenty soil samples characterized for HSL semivolatiles at \$640 per sample.
- ² Includes two pilot-scale tests, each 4 hours long.
- ³ Assumes no additional SVE wells nor off-gas treatment is required. Assumes the incinerator area does not require remediation for semivolatiles, or other constituents.
- ⁴ Includes 1 blower and air/water separator at \$10,000 L.S., piping and mechanical installation at \$15,000 L.S., instrumentation at \$15,000 L.S., and control housing at \$10,000 L.S.
- ⁵ Paving 666 s.y. at \$15 per s.y.
- ⁶ Start-up activities include monitoring for the first 3 days of operation and weekly inspections and monitoring for the next 3 weeks of operation.
- ⁷ Assumes 3 years of operation and maintenance at \$36,000 per year; includes twelve quarterly reports prepared for the WDNR.
- ⁸ Assumes closure is achieved by SVE for total BTEX compounds. Includes analysis of 20 soil samples at \$235 per sample and preparation of documentation report.