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BUREAU OF SOLID
HAZARDOUS WASTE MANAGEMENT

October 3, 1994

Ms. Jill Fermanich
Wisconsin Department of Natural Resources
Hazardous Waste Management Section
Bureau of Solid & Hazardous Waste Management
P.O. Box 7921
101 South Webster Street
Madison, WI 53707

RE: Plan Modification Approval to Impose State Equivalent
Corrective Action
Cook Composites and Polymers Co. (CCP), Saukville, WI
WID 980615439

Dear Ms. Fermanich:

Cook Composites and Polymers Co. (CCP) has reviewed the modification to the plan of operation approval for the existing incinerator at CCP's Saukville, WI plant, and acknowledges the conditions to the modification received in correspondence dated August 22, 1994:

1. CCP shall implement further environmental investigation to define degree and extent of contamination in accordance with Departmental review and approval of the RFI workplan. It is anticipated that some additional field work will be initiated this year and the CMS report submitted in middle 1996.
2. CCP shall develop a community relations plan, as required in Task 1, in consultation with the Village of Saukville. The plan shall be submitted to the Department within 60 days from the date of this letter. Enclosed is the Community Relations Plan which was reviewed by the Village of Saukville and which incorporated all of its concerns.
3. CCP shall submit copies of pertinent reports, engineering plans, correspondence and other submittals pertaining to corrective action to the Village of Saukville Administrator at the same time the documents are submitted to the Department. A copy of this letter and enclosures has been simultaneously forwarded to the Village.
4. Within 60 days after the date the Department approves the RFI workplan, CCP shall provide detailed cost estimates for completing the remaining work associated with the RFI and the entire CMS phase of the project. The costs shall be in current year dollars and broken out on a per unit basis, based on a third-party performing the work.

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Enclosed are the cost estimates. Although the total cost reflected is \$412200, the amount actually provided in the proof mechanism to be submitted to the Department by April 1, 1995, will be \$255000. This lesser amount represents the deduction of costs associated with completion of three corrective action tasks: well 7/8 installation, Appendix IX groundwater sampling and analysis, and soils investigation. These tasks will be completed in late 1994.

In addition, CCP shall establish proof of financial responsibility for compliance with the corrective action requirements, as well as updating the cost estimates, pursuant to the wording detailed in Condition 4 of the plan modification approval.

CCP also has reviewed the Findings of Fact and suggests some additional clarifications:

General Information, Location, Page 1. Suggest revising the site description to include the Saukville facility and the two off-site locations (Churchyard and Logeman properties) to which the RCRA corrective action requirements apply.

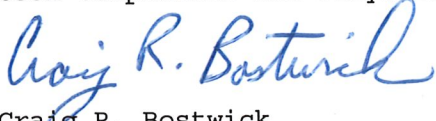
Item 6, Page 3. Please define the level of groundwater contamination reported at municipal well #2 in 1979 (i.e. were the contaminant concentrations exceeding PALs or ESS, or near detection limits, etc.).

Item 20, Page 5. Please clarify that the borings were located at the northeast corner of the CCP facility, and that these rock cores indicated fractured bedrock at this specific location.

If you have any questions, please contact me at (816) 391-6025.

Sincerely,

Cook Composites and Polymers Co.



Craig R. Bostwick

Corporate Manager Environmental & Safety

cc: Walt Ebersohl/Pat Brady - SED
Laura Lodisio/Robert Smith - USEPA Region V, HRE/8J
Jim Rickun/Stacy McAnulty - RMT Inc.
Chris Lear/Jeff Knight - Village of Saukville
Eric Naimark - CCP

COOK COMPOSITES AND POLYMERS CO.

COST ESTIMATES FOR CORRECTIVE ACTION REQUIREMENTS

TASK TO BE PERFORMED FOR RFI AND CMS PHASES	\$\$ AMOUNT
1. WELL 7/8 REPLACEMENT & INSTALLATION	\$ 9200.00
2. APPENDIX IX GROUNDWATER SAMPLING & ANALYSIS	\$ 22000.00
3. SOILS INVESTIGATION	\$ 126000.00
4. AQUIFER PUMP TESTING & ANALYSIS	\$ 45000.00
5. DATA ANALYSIS - EVALUATION OF APPENDIX IX RESULTS AND SOIL RESULTS	\$ 49000.00
6. GROUNDWATER MODELING	\$ 40000.00
7. RCRA FACILITY INVESTIGATION REPORT	\$ 41000.00
8. CORRECTIVE MEASURES STUDY REPORT	\$ 80000.00
TOTAL	\$ 412200.00

Pursuant to Condition No. 4 of the Plan Modification Approval to Impose State Equivalent Corrective Action at Cook Composites and Polymers Co.'s (CCP's) Saukville WI facility (WID 980615439), CCP is providing the above detailed cost estimates for completing the remaining work associated with the RFI and CMS phases of the project. The costs are in current year dollars and are broken out on a per unit basis. The costs are based on a third-party performing the work.

According to said Condition No. 4, CCP shall also establish proof of financial responsibility ensuring the availability of funds for compliance with these corrective action requirements in accordance with s. 144.443(2)(c), Stats. The proof of financial responsibility shall be submitted to the Department by April 1, 1995. At that time, proof will be submitted in the amount of \$255000 because Tasks 1, 2, and 3 will have been accomplished and costs associated with these completed tasks will have been deducted from the total cost estimate of \$412200.

In addition, CCP shall annually update the corrective action cost estimate to adjust for inflation and to reflect any changes in the approved investigation or remediation at the facility, beginning in 1996. These updated corrective action cost estimates shall be submitted to the Department no later than 60 days before the anniversary of the date the initial proof of financial responsibility for corrective action was established. Whenever the cost estimate increases to an amount greater than the amount of the then-current financial responsibility mechanism, CCP shall submit proof that the financial responsibility mechanism has been increased to an amount adequate to cover the new cost estimate. This proof shall be submitted to the Department within 60 days after the new cost estimate is approved by the Department.

4.0 COMMUNITY RELATIONS PLAN

4.1 HISTORICAL COMMUNITY RELATIONS

Cook Composites and Polymers Co. (CCP) has historically operated under a formal community relations plan for the RCRA Corrective Action program and has disseminated appropriate environmental information to the public. This approach has included specific information pertaining to requirements of the Administrative Order of Consent. Activities performed and completed by CCP and/or its predecessor (Freeman Chemical Corporation) included:

4.1.1 OPEN HOUSES

Four Open Houses were conducted at the Saukville facility.

4.1.1(A) The initial Open House (1986) was directed to educating the general public as to business operations conducted at the facility.

4.1.1(B) The second Open House (1986) was conducted for the Saukville Village Board, including a plant tour and discussion of the groundwater remediation program.

4.1.1(C) The third Open House (1987) provided the Saukville Village Board with a groundwater remediation program update.

4.1.1(D) The fourth Open House (1991) was sponsored to acquaint citizens, officials, and interested parties with facility environmental improvements and with the hazardous waste incinerator/storage complex.

4.1.2 MEDIA

The Company disseminated information to local and regional press regarding the reason for and status of its RCRA Corrective Action effort. Appropriate articles have appeared in the Ozaukee Press, News Graphic, and Milwaukee Journal/Sentinel.

4.1.3 VILLAGE OF SAUKVILLE

The Company traditionally communicated information to Village officials, including the Administrator, President, and Trustees, on an as-needed basis. These discussions included generalized RCRA Corrective Action updates as well as specific analytical data.

4.1.4 COMMUNITY GROUPS/CITIZENS

Company representatives met formally and informally with community groups regarding provisions of the Consent Order. Such groups included: Immaculate Conception School & Board, Linden Street Neighborhood Association, Saukville Chamber of Commerce, Ozaukee County Board. Company representatives also met with Saukville citizens during an initial informational meeting in 1986 and subsequently encouraged individual citizens to call with comments and/or concerns.

4.2 CONTINUATION OF COMMUNITY RELATIONS PLAN

As noted previously, the Company has historically operated under a formal community relations plan for the RCRA Corrective Action program. Cook Composites and Polymers Co. is committed to maintaining and improving its community relations efforts. To that end, the Company will continue to respond to inquiries and concerns brought to its attention by the Village, its citizens, or other interested parties. Foremost, the Company will ensure improved communications with Village officials by implementing the following action plan:

4.2.2 OPEN HOUSES

The Company will sponsor a formal Open House for Village citizens and officials in the Spring of 1995. A specific date will be coordinated through operational feasibility and Village administration. Thereafter, the Company will provide biannual Open Houses, as established with CCP Management, to update the RCRA Corrective Action effort. The Open Houses will be variable in terms of formality due to production and economic considerations, although all will be designed to provide timely and pertinent information. The Company will continue to arrange informal plant tours for special interest groups and individual citizens under the discretion and authority of Plant Management.

4.2.2 VILLAGE MEETINGS

The Company will participate in quarterly meetings with the Saukville Village Board regarding the status of environmental issues at the facility. One of the annual quarterly meetings will be a general meeting with Company executive, corporate, and plant management. This will be a direct interface. The format for the other three meetings will be in-person or conference call, as mutually determined

by the Company and the Village Board, to explain and update environmental issues. The preferred format will be in-person unless extenuating circumstances dictate otherwise. Meeting dates will have to be arranged in advance to accommodate traveling parties. These meetings will include corporate environmental, plant management, and possible consultant personnel.

4.2.3 INFORMATIONAL CONTACT

The Company will designate the Plant Manager as the primary facility informational contact. The Plant Manager is most familiar with day-to-day operations, ongoing environmental projects, and other facility activities. Corporate personnel will be available to support the Plant Manager concerning historical activities, data interpretation, or specific inquiries, as necessary. The Plant Manager will work closely with the Village President and Village Administrator in establishing meeting dates, responding to concerns, and prioritizing communication. Village officials may contact a designated alternate in the event of a concern.

The Company will provide the Village with a 24-hour phone number to contact. The Village will make the number available to the public.

4.2.4 WRITTEN REPORTS

The Company will continue to provide the Village with quarterly results from municipal wells and POTW sampling and testing. The Company will also provide a one-time historical background summary explaining the Company's past submittals to the regulatory agencies. The Company will provide written summary reports and/or copies of finalized documents to the Village as applicable. In addition, the Company will investigate ways of providing information in a simple, concise, and regular manner to the Village and its citizens to enhance understanding of company environmental issues.