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February 12, 1996

Mr. Timothy S. Mulholland, PhD.
Waste Management Engineer
Hazardous Waste Management Section
Bureau of Solid & Hazardous Waste Management
Wisconsin Department of Natural Resources
Box 7921
101 S. Webster Street
Madison, Wisconsin 53707-7921

RECEIVED

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**BUREAU OF SOLID
HAZARDOUS WASTE MANAGEMENT**

RE: Financial Responsibility for Corrective Action Activities
Cook Composites and Polymers Co., Saukville, WI
U.S. EPA I.D. No.: WID 980615439

Dear Mr. Mulholland:

Enclosed please find Cook Composites and Polymers Co.'s (CCP's) response to your letter dated February 1, 1996, in which you requested CCP to provide updated financial responsibility for corrective action at its Saukville facility. In an earlier letter of January 8, 1996, to Ms. Colleen Hellenbrand of WDNR, CCP had provided cost estimates; however, you requested CCP to provide an addendum to the January 8, 1996 letter to include itemized cost estimates for engineering services and groundwater monitoring to be performed in 1996.

You indicated that the Department needed further documentation to explain how the \$50,000 amount was derived. Enclosed is a copy of the original scope of services by RMT Inc. to perform the Corrective Measures Study (CMS) for an estimated cost of \$80,000. The work on this task is approximately 60% completed, leaving about \$32,000 to be spent. In addition, based on current billing rates, funds were also set aside to account for engineering services which might have to be performed pending WDNR review and conditional approval of the previously submitted RCRA Facility Investigation (RFI) Report. It was estimated that \$8,000 might be necessary for additional comments and \$10,000 for possible technological experimentation.

You also raised a second issue and requested cost estimates for the 1996 groundwater monitoring program, based on the Department's acceptance of the February 1993 "Draft Site Investigation and Continuing Interim Corrective Measures Workplan" and subsequent Plan Modification Approval Letter of August 22, 1994. Condition #4 of that approval required CCP to establish a financial assurance mechanism for the corrective action program, including groundwater monitoring.

Enclosed is a copy of the scope of services to perform the 1996 Groundwater Monitoring for an estimated cost of \$99,000.

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Consequently, CCP is providing you with the revised corrective action cost estimates of \$149,000 prior to the anniversary date of April 1, 1996. CCP intends to use the net worth method of establishing proof of financial responsibility in the aforementioned amount (\$50,000 for CMS completion, RFI comments, and technological experimentation as necessary + \$99,000 for annual groundwater monitoring); this proof will be submitted to the Department within 60 days after the cost estimates are approved by the Department. A breakdown of the revised cost estimates is as follows:

COMPLETION OF CORRECTIVE MEASURES STUDY	\$32,000
ADDITIONAL COMMENTS TO RCRA FACILITY INVESTIGATION	\$ 8,000
TECHNOLOGICAL EXPERIMENTATION, IF NECESSARY	\$10,000
ANNUAL GROUNDWATER MONITORING	\$99,000
REVISED CORRECTIVE ACTION COST ESTIMATE	\$149,000

As you further requested, the revised corrective action program cost estimate and documentation is being submitted prior to February 20, 1996, so that CCP and the Department can resolve this issue in sufficient time to meet the anniversary date of April 1, 1996.

If you have any further questions regarding this submittal, please feel free to contact me at (816) 391-6025.

Sincerely,
Cook Composites and Polymers Co.



Craig R. Bostwick
Director Environmental Regulatory Safety

Enclosure

cc: M. Gordon - SW/3
C. Hellenbrand - SW/3
P. Brady - SED
D. Berkstresser - CCP
E. Naimark - CCP
D. Grasset - CCP

SCOPE OF SERVICES

PROJECT ELEMENT: CORRECTIVE MEASURES STUDY REPORT

Objective:

- To develop and evaluate remedial alternatives and prepare the Corrective Measures Study Report.

Scope of Work:

RMT will perform the following tasks:

- Meet with the WDNR to review the approach for developing the CMS report and to establish the corrective action objectives (i.e., soil cleanup goals). On CCP's behalf, RMT would negotiate that a performance-based standard be used as the soil cleanup standard for the site. The RMT Project Manager and one project team member will attend the meeting.
- Conduct technology screening and corrective measure alternatives development in a manner consistent with the RCRA remedy evaluation and selection process described in the Department's "Hazardous Waste Facility Investigation Results and Corrective Measures Study Task II" guidance and consideration of the s. NR 722, Wisconsin Administrative Code, remedy evaluation and selection process. This process includes the following steps:
 1. Development of corrective action objectives
 2. Identification of material volumes potentially requiring a response action
 3. Identification and screening of specific technology process options based on implementability, effectiveness, and relative cost
 4. Development of the retained technologies/process options into corrective measure alternatives
- Meet with the WDNR in Madison to discuss the preliminary identification and screening of technologies and the retained corrective measure alternatives. The RMT Project Manager and one project team member will attend the meeting.
- Develop conceptual designs and cost estimates (i.e., +50%, -30%) for each corrective measure alternative. A total of three alternatives would be developed.
- Evaluate the corrective measure alternatives according to the criteria listed in the Department's "Hazardous Waste Facility Investigation Results and Corrective Measures Study Task II" guidance. These evaluation criteria consist of the following:

- a. Overall protection of public health, safety, and welfare and of the environment
- b. Attainment of media cleanup standards
- c. Control the release of ongoing source(s)
- d. Compliance with any applicable standards for management of waste
- e. Other factors, including:
 - Long-term reliability and effectiveness
 - Reduction of toxicity, mobility, or volume of waste
 - Short-term effectiveness
 - Implementability
 - Cost

In addition, s. NR 722 requires that the evaluation and selection of alternatives consider the following:

- f. Compliance with state and federal environmental laws and standards
- g. Evaluation of the alternative's technical and economic feasibility to determine which alternative constitutes the best available technology to restore the environment to the extent practicable.

Compare and contrast each alternative with respect to all the criteria (a through g) listed above.

- Meet with the WDNR in Madison to discuss the comparative analysis results for the corrective measure alternatives and the CCP's preferred alternative. The RMT Project Manager and one additional project team member will attend the meeting.
- Prepare a draft CMS Report for CCP's review and comment.
- Prepare a final draft CMS Report for submittal to the WDNR.
- Meet with the WDNR in Madison to discuss the Agency's comments on the final draft CMS Report. The RMT Project Manager and one project team member will attend the meeting.
- Revise the final draft CMS Study Report to incorporate the WDNR's comments, and submit final copies.

Outputs:

- Two copies of the draft CMS Report for CCP review and comment.
- Five copies of the final draft CMS reports for WDNR submittal.
- Five copies of the final CMS Report for WDNR submittal.

Cost Estimate: \$80,000

Basis for Cost Estimate:

- The WDNR's interpretation of the RCRA and s. NR 720 remedy evaluation and selection processes is consistent with this task description.
- Remedial technologies and process options will be identified through a literature review, discussions with commercial vendors on specific process options, and prior RMT experience.
- Up to three corrective measure alternatives will be developed and evaluated. One of these alternatives will consist of a limited action alternative (e.g., institutional controls).
- Corrective measure alternatives will be developed to address contaminated soil. Addressing other media of concern is not included in this project task.
- The WDNR's comments on the draft final CMS Report will be provided to CCP within 4 weeks.
- Revisions of the draft final CMS Report to incorporate the WDNR's comments will not exceed 60 hours.
- No public meetings or negotiations with other agencies or groups are included in this project task.