

COOK COMPOSITES AND POLYMERS

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Ozaukee

HW/CA

March 20, 1996

Mr. Tim Mulholland
Hazardous Waste Management
Bureau of Solid & Hazardous Waste Management
Wisconsin Department of Natural Resources
Box 7921
101 South Webster Street
Madison, WI 53707-7921

RECEIVED

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**BUREAU OF SOLID
HAZARDOUS WASTE MANAGEMENT**

RE: Draft Conditional Minor Plan Modification Approval
RCRA Facility Investigation
Cook Composites and Polymers Co.
Saukville, WI; U.S. EPA I.D. No. 980615439

Dear Mr. Mulholland:

Enclosed please find Cook Composites and Polymers Co.'s (CCP's) comments to the DRAFT Conditional Minor Plan Modification Approval for the RFI which CCP had previously provided to the Department. These comments are being provided in response to Barbara Zellmer's letter dated March 8, 1996:

- 1) No. 3, Page 2. In the description about Area 5 - Churchyard (off-site), the word "are" should be "area."
- 2) No. 4, Page 3. CCP receives non-contact cooling water from its private well 30. If needed, additional supplemental water is received from village-supplied municipal wells, most likely MW 4 or MW 1. The village does not pump MW 2, and therefore CCP cannot use City Well 2 as a source of non-contact cooling water.
- 3) No. 13, Page 4: The last sentence of this finding of fact should be changed to read: *This report serves as the technical basis for CCP's pursuit of corrective measures for the areas of concern at the facility.* This will ensure that no misunderstanding ensues because the Corrective Measures Study (CMS) will address only on-site areas of concern. The former owner, Georgia Gulf Corporation, is currently working with the Department to address off-site areas.
- 4) No. 14, Page 4: It is not clear if the Department granted approval to the requested modification of analytical methods used during the quarterly groundwater monitoring.



March 20, 1995

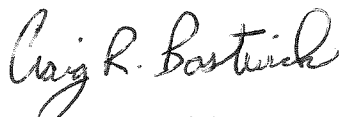
Page 2

- 5) No. 15, Page 4: It is not clear if the Department granted approval of the updated financial responsibility estimate that included continuing groundwater monitoring and corrective measure study activities.
- 6) No. 5, Page 4 (Conclusions of Law): The word "Stresau" should read "Wis. Adm. Code."
- 7) Page 5 Condition: CCP believes the condition should read: "*CCP's RCRA Facility Investigation is approved as submitted. CCP shall submit to the Department a RCRA Corrective Measures Study within 120 days of the date of this letter which meets Conditions #1 and #2 of the September 24, 1994, conditional plan of operation modification for Area 1 (Former Urethane Laboratory/Hazardous Waste Incinerator), Area 2 (Former Dry Well), and Area 3 (Former Tank Storage Area).*" Again, this will reduce any possibility for confusion about the CMS which will address on-site areas of concern, not off-site areas.

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

Sincerely,

Cook Composites and Polymers Co.



Craig R. Bostwick

Director Environmental Regulatory Safety

cc: E. Naimark - CCP
D. Grasset - CCP
J. Rickun - RMT
C. Lear - Village of Saukville