

CORRESPONDENCE/MEMORANDUM**State of Wisconsin**Department of Natural Resources
Bureau of Waste Management

DATE: September 25, 1996 FILE REF: 246004330
TO: Cook Composites and Polymers (CCP) Corrective Action File Ozaukee
FROM: Tim Mulholland - WA/372 HW/CA
SUBJECT: Correction Oversight Inspection

On July 30, 1996, a facility visit was made to the Cook Composites and Polymers facility in Saukville, WI. Off-site remediation activities were being performed by the former owner of the CCP facility, Georgia Gulf Corporation (GGC), in the adjacent churchyard property.

CCP is subject to corrective action under a September 24, 1994 plan of operation modification that incorporated State-lead corrective action authorities into CCP's plan of operation. CCP was previously subject to corrective action through an administrative order on consent with Region V of the U.S. Environmental Protection Agency. For the past ten years or so, CCP and its predecessors have pursued remedial actions for on- and off-site soil and ground-water contamination. The Department was informed in the Fall of 1995 that one of the terms of the sales agreement between CCP and GGC is that CCP would be responsible for addressing on-site contamination, while GGC would continue to be responsible for off-site contamination. GGC has actively pursued the off-site AOCs (the churchyard and the Logemann Brothers property) over the past year or so.

GGC's consultant on this project is RMT, Inc. of Madison, WI. I accompanied Mr. Gene McLinn of RMT to the site for this inspection. The churchyard remediation was proposed by GGC in the late spring/early summer of 1996. The remediation consists of removal of all soils above the water table contaminated at concentrations greater than NR 720 direct contact standards. GGC initiated the remediation in late July. We have recently been informed that the remediation is essentially complete, and documentation will be supplied to the Department in the near future.

At the time of the inspection, RMT and its subcontractors were removing contaminated soil, down to a depth of about 5'. The lateral extent of soil removal was bounded on the south and west by the CCP facility, while the northern and eastern boundaries were determined by field measurements of contamination. Once the soil was removed, a sand layer and impermeable membrane were placed at the excavation base. Next, clean soil was placed on top of the liner, and the clean soil was overlain by sod.

During the excavation, in-place remedial measures were encountered. These consist of an arm of the french drain system that is under the churchyard, as well as a monitoring well. During excavation, the well was disturbed, removed, and replaced by GGC so as to not

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interrupt CCP's on-going remedial activities. Twenty photographic slides of the inspection are attached to the original of this memo.

Also during the site inspection for the churchyard, Mr. McLinn and I visited the Logemann Brothers property to discuss issues regarding the remediation of this site. While there, we visited the former incinerator area, walked over the area of alleged drum disposal, and walked the incinerator ash pile. We also attempted to determine if wetlands existed near the ash pile, which I had been lead to believe had been impacted by the ash pile. (The wetland is better addressed in a 9/13/96 memo from me to the file).

Based on this inspection, it appears that CCP is addressing its obligations to the State for corrective action at its facility. GGC has taken responsibility for the off-site contamination areas and is pursuing their remediations. CCP continues to execute its on-site corrective action duties, as the Department approved it's RFI this past spring. Also, CCP recently submitted a CMS (9/20/96) that we will review in the near future.

cc: M. Gordon - RR/3
W. Ebersohl - SER/Richards St. Annex
H. Croke - USEPA/Region V - HRP-8J (copy of 9/13/96 memo attached)
C. Bostwick - CCP
C. Geiger - GGC
J. Knight - Village of Saukville
CCP HW/CME file

HAZARDOUS WASTE COMPLIANCE MONITORING
AND ENFORCEMENT (CME) FORM
Form 4430-5 Rev. 1-90

State of Wisconsin
Department of Natural Resources

C 2645

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A. GENERAL INFORMATION:

Date Sent to HW- SW/3	Date Received by HW-SW/3	HW-SW/3 Review Date	Initials	CMEL Data Entry Date	Initials	Entrack Data Entry Date	Initials
Facility Name (As shown in a current EPA Notification Printout) <u>Cook Composites & Polymers</u>				EPA ID Number <u>WI D980615439</u>		FID Number <u>246004330</u>	
Street/Location <u>340 Railroad St</u>				Notification Status (As shown in a current EPA Notification Printout) (Circle all that apply) <u>LOG</u> SQG VSQG TRANS <u>TSD</u>			
1/4 of Section		Town		Range		Other	
City, Zip Code <u>Saukville, WI 53080</u>		District/County <u>Grant</u>		Type of Contact <input checked="" type="checkbox"/> Field Inspection <input type="checkbox"/> Other <input type="checkbox"/> Conference		Contact Date <u>9/25/96</u>	
Contact Name/Phone <u>Glenn Prester 414/284-5541</u>							

B. FACILITY INSPECTED AS (Check one box only):

- Note: The box checked here, the Notification Status circled in Section A and the type of Inspection Form completed must all be status consistent.
- | | | |
|---|--|--|
| <input type="checkbox"/> Commercial Treatment/Storage | <input type="checkbox"/> Generator - Large Quantity | <input type="checkbox"/> Under Review for Activity (Recommended Status Is _____) |
| <input type="checkbox"/> Non-Commercial Treatment/Storage | <input type="checkbox"/> Generator - Small Quantity | <input type="checkbox"/> Non-Hazardous Waste Entity |
| <input type="checkbox"/> Land Disposal Facility | <input type="checkbox"/> Generator - Very Small Quantity | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Incinerator | <input type="checkbox"/> Transporter | |

C. NOTIFICATION CHANGE:

- Status Change (Attach Status Change Form 4430-12): Field Verified Status Is _____
- Name Change: Change Name To _____

D. EVALUATION TYPE (Check all that apply):

- | | | |
|--|--|---|
| <input type="checkbox"/> Compliance Evaluation Insp (1) | <input type="checkbox"/> Complaint (6) | <input type="checkbox"/> Comp GW Monitoring Eval (4) |
| <input type="checkbox"/> Land Disposal Restriction Insp (13) | <input type="checkbox"/> Sampling Insp (2) | <input type="checkbox"/> O & M Inspection (12) |
| <input type="checkbox"/> Follow-up Insp (Date _____) (5) | <input type="checkbox"/> Case Development (11) | <input type="checkbox"/> Closure/Long Term Care (9) |
| <input type="checkbox"/> Routine Surveillance (10) | <input type="checkbox"/> Immediate Threat (14) | <input type="checkbox"/> Licensing Evaluation (7) |
| <input type="checkbox"/> Activity Verification (8) | <input type="checkbox"/> Record Review (3) [FRR ___] | <input checked="" type="checkbox"/> Other <u>Corr. Action Oversight Inspection</u> (15) |

E. ENFORCEMENT ACTIONS (List violation and/or enf. type separately):

Viol Type Class	Enf Type	Violation Discovery Date MM DD YY	Date Issued MM DD YY	Response Due MM DD YY	Actual Comp MM DD YY	Enf Stat	NR 181 or NR 600 Citation	Additional Information
1	2	- - -	- - -	- - -	- - -			
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		- - -	- - -	- - -	- - -			
		- - -	- - -	- - -	- - -			

F. SPECIALTIES (CHECK ONLY IF VIOLATION(S) HAVE BEEN CONFIRMED WITH OFFICE OF ENVIRONMENTAL ENFORCEMENT):

This facility is: High Priority Violator (H) Violating CA Schedule (C) Violating Insurance/Liability Regs (I)

District/Area Comments: _____

HW-SW/3 Comments:

Original correction action oversight inspection means of slides photos in on file; copies to slides sent to EPA, Region, et al.

District/Area Signature(s)

Date

Bryan S Mueller

9/25/96

Documentation

- Inspection Form; Attachment # _____ Letter/NON/NOV to Facility
 Status Change Form Other _____

District Review

Date

Distribution: Copy 1 - District Copy 2 - HW-SW/3; Rtn to Dist after CMEL entry Copy 3 - HW-SW/3 Copy 4 - Area