

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor George E. Meyer, Secretary Gloria L. McCutcheon, Regional Director Southeast Region Annex 4041 N. Richards Street, Box 12436 Milwaukee, Wisconsin 53212-0436 TELEPHONE 414-229-0800 FAX 414-229-0810

October 16, 2001

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Craig R. Bostwick Cook Composites and Polymers P.O. Box 419389 Kansas City, MO 64141-6000

SUBJECT:

Corrective Measures Study, on-site areas of concern, Cook Composites and

Polymers Co., Saukville, file reference FID #246004330

Dear Mr. Bostwick:

I am sorry for the extended length of time it has taken the department to review this document. I have reviewed it based on the report submitted by your consultant, Woodward-Clyde, *Corrective Measures Study*. I am not approving your plan of action at this time due to the following concerns:

- The extent of remaining soil contamination has not been delineated in the area to the east and south of the former urethane laboratory and liquids incinerator or in the hazardous waste incinerator area. It is not reported if soil chemistry data was collected for the former tank farm area. If additional data was collected and documented outside of this report, please submit that information or specify what reports the department may have that would contain it. Submit a map delineating the remaining soil contamination. Additional investigation may be necessary.
- Please submit separate tables and isoconcentration maps for groundwater chemistry data for the glacial, upper dolomite and lower dolomite aquifers. Also submit separate groundwater flow maps.
- Submit a remedial performance evaluation report that contains, at a minimum, graphs of cumulative contaminant removal for each recovery well, graphs of time verses groundwater contaminant concentrations for each recovery well and the most contaminated monitoring well, and a list of dates that the groundwater extraction system has been inoperative.
- The corrective measures report did not declare long term plans for the groundwater recovery system. How long do you plan to run it? Direct your consultant to determine if shutting down the system and letting natural attenuation remediate the groundwater contaminant plume is a feasible option now or in the future.
- Submit a report on the condition of the impermeable cap and the groundwater collection system.
- Soil vapor extraction (SVE) wells are shown on Figure 3 of the report, although SVE was not a recommended option. Was an SVE system put in?



If you have any questions about this letter, call me at 414-229-0850.

Sincerely,

John Feeney Hydrogeologist

cc: