



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott McCallum, Governor
Darrell Bazzell, Secretary

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March 24, 2001

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Ozaukee County
HW Lic. File

Mr. Michael Gromacki
Cook Composites and Polymers Co.
P.O. Box 419389
Kansas City, MO 64141-6389

Subject: Financial Responsibility - Closure and Liability Coverage
Cook Composites and Polymers Co.
WID980615439

Dear Mr. Gromacki:

According to s. NR 685.07(3)(b), Wis. Adm. Code, Cook Composites and Polymers Co. (CCP) is required to prepare and submit new closure cost estimates to the Department each year for its hazardous waste incinerator and storage facility and its former hazardous waste incinerator located at 340 Railroad Street in Saukville, Wisconsin. The cost estimates must be adjusted for each year for inflation and take into account any changes to the closure plan resulting from new or revised hazardous waste regulations which apply to the facility, or changes in the operation of the facility.

According to our records, CCP last updated its cost estimate and letter of credit for the incinerator and storage facility in July 2000 and for the former incinerator in October 1999. The revised cost estimates are to be submitted to the Department at least 60 days before the facility's financial responsibility anniversary date. CCP's anniversary date for the storage facility and incinerator is August 2nd, and the anniversary date for the former incinerator is October 30th. Therefore, the revised cost estimates must be submitted to the Department by June 3rd and August 31st of each year, respectively. The current inflation factor available to the Department is 1.021. You may use this factor when updating your cost estimates for inflation. The cost estimates should include a detailed breakdown which documents how the total closure cost estimates were calculated. When submitting the revised cost estimates to the Department, please submit one copy to me and one copy to:

Mike Ellenbecker – SER – Sturtevant Office
Wisconsin Department of Natural Resources
9531 Rayne Road, Suite 4
Sturtevant, WI 53177

Currently, CCP is using letters of credit to demonstrate financial responsibility for closure for these facilities. For the hazardous waste incinerator and storage facility, the letter of credit is in the amount of \$108,696, and for the former incinerator, the letter of credit is in the amount of \$86,446. Whenever your cost estimates increase to an amount greater than your current letters of credit, you must submit proof that you have increased the letters of credit to an amount adequate to cover the new cost estimates. This proof must be submitted to me within 60 days after the new cost estimates are approved by the Department.

In accordance with s. NR 685.08, Wis. Adm. Code, you are also required to demonstrate that you have continuing liability coverage for these facilities. Our records show that the current Hazardous Waste Facility Certificate of Liability Insurance on file with us has an effective date of January 15, 2000. Since most liability insurance policies are in effect for one year, you need to submit an updated certificate of insurance showing the current liability policy number and effective date. Please submit the updated certificate to me within two weeks of the date of this letter.

If you have any questions regarding these matters, please feel free to contact me at 608-267-7515.

Sincerely,



Colleen D. Hellenbrand, Chief
Program Services Section
Bureau of Waste Management

cc: Mike Ellenbecker