

May 5, 2022

Mr. Keith Linton  
Retia USA, Legacy Site Services LLC  
Total Energies Petrochemicals & Refining USA, Inc.  
1201 Louisiana St.  
Houston, TX 77002

Subject: Review of Site Investigation Work Plan and Addendum  
Arkema Coating Resins/Cook Composite/Former Freeman Chemical  
340 Railroad Street, Saukville, WI  
BRRTS #: 02-46-000767, FID #: 246004330

Dear Mr. Linton:

The Department of Natural Resources (DNR) received the reports titled, *Site Investigation Work Plan*, dated March 12, 2021, and the *Site Investigation Workplan Addendum*, dated December 3, 2021, for the site identified above. Both reports were submitted by your environmental consultant, Endpoint Solutions Corp (Endpoint). This letter serves as the DNR's response to the site investigation work plan and addendum (referred to in this letter as the SIWP and the Addendum). The DNR does not require a fee to be submitted for this review under the DNR's and the Environmental Protection Agency's One Cleanup Program Memorandum of Agreement.

#### Recent Regulatory Background

In 2020, the cleanup progress of Arkema Coating Resins/Cook Composite/Former Freeman Chemical (the Site) was evaluated by comparing the Site activities with RCRA baseline milestones. This review was documented in a letter to you from the DNR dated August 18, 2020. The review letter concluded that the site investigation was incomplete, listed requirements under Wis. Stat. § 292, and under Wis. Admin. Code chs. NR 700-799, and identified that since the Site is no longer in production and the structures on the Site were planned for demolition, an opportunity existed to conduct investigations and active remediations that may get the Site moving through the federal and state cleanup processes more efficiently and ultimately toward case closure. Endpoint submitted the SIWP in response to these requirements. The Addendum was submitted by Endpoint in response to the DNR's initial review comments sent to you in an email dated August 17, 2021. The Addendum stated that the proposed investigation activities would focus on the extent of contamination in the unsaturated soils and future work would include additional investigation activities within the building footprints, primarily within former active production areas.

#### Review of the SIWP and Addendum

The DNR has reviewed all the recently submitted technical information with the historic case file information for regulatory compliance with Wis. Admin. Code ch. NR 716 and has the following comments with respect to regulatory requirements:

## A. Degree and Extent of Contamination

Wis. Admin. § NR 716.11(3)(a) requires the field investigation to determine the nature, degree and extent, both areal and vertical, of the hazardous substances or environmental pollution in all affected media. Additionally, Wis. Admin. Code § NR 716.11 (3) (d) identifies a purpose of the field investigation as providing an estimate, along with all necessary supporting information, of the mass of contamination in the source area(s).

### 1. Soil Investigation - Sample Locations

Based on the DNR's review, additional soil investigation is requested in the following areas, including former building interiors, to meet the code requirements cited above. The numbers in parentheses below refer to building and room locations indicated on the attached *Site Map, Drawing 2*, Woodward-Clyde Consultants, August 2, 1996-Addendum, that was included in the March 12, 2021 Addendum:

- a. Central to the Dry Well (AOC 2) and into saturated soil to characterize the source area west of 20: Kettle, Therminol Boiler, Boiler, and Surge Rooms.
- b. Re-sample central to the Urethane Lab/Old Incinerator/SVE area (AOC 1) to determine current contaminant concentrations in this source area south of 7: Former Urethane Laboratory.
- c. Runoff Catch Basin, additional borings west of the two proposed borings near the existing catch basin east of the product warehouse Buildings 44 and 45.
- d. Kettle Rooms identified as 3, 5, and 20.
- e. Thinning Room identified as 18.
- f. Raw Materials Warehouse identified as 13.
- g. Tank Wagon Loading Shed (Dock) identified as 11.
- h. Drum Filling Facility identified as 48.
- i. Loading Dock by Raw Materials Storage identified as 37.

### 2. Soil Investigation - Sample Depths

Sample at sufficient depths to fully characterize contamination even if in saturated conditions. The DNR suggests soil/saturated soil sampling at intervals to the depth of bedrock with multiple soil borings in the AOC 1 and AOC 2 areas for field screening and laboratory analysis.

### 3. Vapor

As site investigation data is collected and interpreted with historic data, conduct a vapor screening evaluation to address any potential vapor intrusion concerns at the Site, which may include off-site properties affected by the contamination. Refer to DNR guidance document, *Addressing Vapor Intrusion at Remediation and Redevelopment Sites in Wisconsin (RR-800)* for the vapor screening evaluation criteria.

## B. Migration Pathways

Wis. Admin. Code § NR 716.11 (5) (a) states that potential pathways for migration of the contamination including drainage improvements, utility corridors, bedrock, and permeable material or soil along which vapors, free product or contamination water may flow must be evaluated.

## 1. Utilities

Evaluate how utilities and sub-surface piping may be affecting the extent of contamination and possibly acting as a migration pathway(s).

### Other DNR Comments

- A. Due to the complexity of the Site, the DNR is requesting the development and use of a conceptual site model at this stage of the site investigation, per Wis. Admin. Code § NR 716.17(1). As a best management practice (BMP) in the environmental industry, the CSM is an iterative, evolving representation of a contamination site that summarizes and helps all involved parties visualize and understand available information. The CSM is a project planning and management tool, assisting property owners and consultants with decisions throughout all stages of investigation and cleanup. The CSM is also a tool that can help communicate and demonstrate compliance with regulatory requirements.

The CSM uses a combination of written and graphical work products to portray and interpret both known and potential site information. The CSM should include all historic sampling data, known and potential sources of contamination, migration pathways, and receptors. Integrating this information at this Site will justify soil sampling locations and may identify additional gaps in the soil investigation.

- B. Since all Site buildings have been demolished, no structural impediments are present to prevent the completion of the site investigation and remedial action.
- C. It is the DNR's understanding that a *Groundwater Site Investigation Work Plan* will be forthcoming following this round of soil investigation. The Groundwater SIWP is proposed to include updated figures and cross sections with sampling results, including groundwater and recent soil data, to justify well locations and address historic data gaps. In particular, the DNR will request a well be installed at the former dry well location. The DNR recognizes that it may be more efficient, in terms of time and financial resources, to convert some of the proposed soil borings into monitoring wells to avoid duplicative efforts.

Capture zones for the Ranney Collectors have not been established. The Groundwater SIWP should consider areas of the Site influenced by the Ranney Collectors to establish representative groundwater conditions and accurate delineation of the groundwater plume and flow direction.

### Next Steps

The DNR understands that a *Site Investigation Report (SIR) for Soil* will be submitted following the collection of the data described in the SIWP and Addendum. This report must incorporate the above comments and be submitted within 60 days after completing the additional SI activities. As a reminder, all sampling results are required to be submitted within 10 days of receiving laboratory data, according to Wis. Admin. Code § NR 716.14.

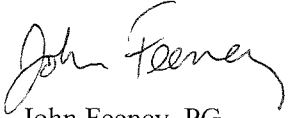
As the site investigation is an iterative process and you have chosen to investigate the environmental media separately, the DNR will request the submittal of a *Comprehensive Site Investigation Report* once additional investigative work has been completed and the degree and extent of contamination has been delineated for all environmental media, in compliance with Wis. Admin. Code § NR 716.15.

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The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this decision or anything outlined in this letter, or would like to arrange a meeting, please contact me, the DNR Project Manager, at 262-416-8643, or at [johnm.feeney@wisconsin.gov](mailto:johnm.feeney@wisconsin.gov).

Sincerely,



John Feeney, PG  
Southeast Region Department of Natural Resources  
Remediation & Redevelopment Program

Cc: Mr. Bob Cigale, Endpoint Solutions  
Ms. Angela Carey, DNR

Attachment: Site Map, Drawing 2, Woodward-Clyde Consultants, August 2, 1996

DATE TO PRINT: \_\_\_\_\_  
 DATE: 7-13-98  
 SCALE: 1" = 100'  
 SHEET NO.: 2 OF 9  
 PROJECT NO.: 8ED9062  
 DRAWN BY: MAS  
 CHECKED BY: MAG  
 DESIGNED BY: MAS  
 DATE: 7-13-98

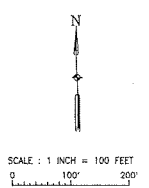
REV	DESCRIPTION OF REVISION	BY	DATE



- LEGEND**
- BUILDING AND NUMBER (SEE TABLE BELOW)
  - ROAD
  - FENCE/FACILITY BOUNDARY
  - RAILROAD
  - DEEP DOLOMITE WELL

- NOTES**
1. BASE MAP PROVIDED BY RMT, INC.
  2. BUILDING LOCATIONS AND KEY PROVIDED BY TR-D ENGINEERING, INC.

- KEY**
- |                              |                                  |
|------------------------------|----------------------------------|
| 1 BOILER ROOM                | 40 HOT ROOM                      |
| 2 STORAGE ROOM               | 41 EAST LOADING DOCK             |
| 3 KETTLE ROOM                | 42 SHED WAREHOUSE                |
| 4 THINNING ROOM              | 43 THINNING ROOM                 |
| 5 KETTLE ROOM                | 44 WAREHOUSE                     |
| 6 THINNING ROOM              | 45 WAREHOUSE                     |
| 7 FORMER URETHANE LABORATORY | 46 R.F.P. APPLICATION LABORATORY |
| 8 TANK FARM                  | 47 POLYESTER STORAGE ROOM        |
| 9 CONTROL LABORATORY         | 48 DRUM FILLING FACILITY         |
| 10 STORAGE TANK ROOM         | 49 FIRE EQUIPMENT SHED           |
| 11 TANK WAGON LOADING SHED   | 50 MAINTENANCE STORAGE SHED      |
| 13 WAREHOUSE RAW - MATERIALS | 51 MAINTENANCE STORAGE SHED      |
| 16 TANK STORAGE ROOM         | 52 MAINTENANCE PIPE SLAB         |
| 17 TANK STORAGE ROOM         | 53 FOREMAN OFFICE                |
| 18 THINNING ROOM             | 54 ELECTRICAL CONTROL ROOM       |
| 18 ELECTRICAL CONTROL ROOM   | 55 FOAM RAW MATERIAL             |
| 19 SPECIAL PROCESS ROOM      | 56 TANK MFG.                     |
| 20 KETTLE ROOM               | 56 ELECTRICAL CONTROL ROOM       |
| 20 THERMOL BOILER ROOM       | 57 OFFICES                       |
| 20 BOILER ROOM               | 58 GARAGE                        |
| 20 SURGE ROOM                | 20 SURGE ROOM                    |
| 20 ELECTRICAL CONTROL ROOM   | 60 CONTROL ROOM                  |
| 31 GARAGE                    | 61 BACKFLOW PREVENT HSE.         |
| 31 OFFICES AND LOCKER ROOM   | 62 OFFICES AND LOCKER ROOM       |
| 32 WAREHOUSE                 | 64 GROUNDWATER PUMP HSE.         |
| 33 MAINTENANCE               | 65 TANK FARM PUMP HSE.           |
| 34 WAREHOUSE                 | 66 TANK FARM RISER ROOM          |
| 35 NITROGEN STORAGE          | 67 TANK FARM UNLOADING BAY       |
| 36 INCINERATORS              | 68 LIQUID INCINERATOR            |
| 37 LOADING DOCK              | 69 INCINERATOR TANK STORAGE      |
| 38 WATER TANK                | 70 INCINERATOR COMP. ROOM        |
| 39 ENGINEERING OFFICE        | 71 RUNOFF CATCH BASIN            |
| 39 FIRE PUMP ROOM            | 72 TRUCK PARKING                 |
|                              | 73 RAILROAD BASIN                |



**Woodward-Clyde Consultants**  
 Engineering & sciences applied to the earth & its environment  
 8383 Greenway Boulevard  
 Middleton, Wisconsin 53562

**WARNING**  
 IF THIS BAR DOES NOT MEASURE 1" THEN DRAWING IS NOT TO SCALE

DESIGNED: MAS  
 DRAWN: MAS  
 CHECKED: MAG  
 PEER REVIEWED: KHK  
 PROJECT MANAGER: RLH  
 DATE: 8-2-98

**SITE MAP**

**COOK COMPOSITES AND POLYMERS  
 CORRECTIVE MEASURES STUDY  
 SAUKVILLE, WISCONSIN**

REVISION	PROJECT	DRAWING	SHEET
	8ED9062	2	2 OF 9