

CORRESPONDENCE/MEMORANDUM

STATE OF WISCONSIN

Date: August 30, 1978

File Ref: 4410

*S. Kleinert -
Outpost*

To: Diecast Division - Tecumseh Products File

From: Renato Millan
Nile Ostenso *NO*

SEP 1 1 1978

Subject: Site Inspection and Meeting on August 10, 1978

This memo is to confirm a site inspection and meeting on the hydro-geologic investigation to determine in-field conditions at the Diecast Division-Tecumseh Products plant in Sheboygan Falls. Attending the meeting were: Kenneth Miller of Tecumseh Products, Pat Ries of Donohue and Associates, and Tim Krueger, Renato Millan and Nile Ostenso of the DNR.

The site was inspected and photographs were taken. A more detailed description of the site will be documented when the photographs are available. Briefly, the general location of the dike, river, fenced area, building and contaminated areas were inspected.

The meeting consisted of reviewing past and current developments and a handout of the proposed investigation (see enclosed two-page outline presented by Mr. Ries entitled "Hydrogeologic Investigation to Determine In-Field Conditions, Diecast Division-Tecumseh Products, DPN 4909). The highlights of the meeting are as follows:

1. Stabilization of the dike may not be as difficult as originally thought. The original stream bank is riprapped with stone, there is an old tree line between the stream bank and the dike, and the dike has an established growth of weeds, grasses and various bushes and small trees. Very little of the dike appears to have been eroded by last year's spring flooding. It appears that stabilization of the dike may be limited to the areas that have been recently excavated or may be found to be exposed to erosion on closer inspection of the site. Donohue must document the present dike conditions and stability in more detail in order to substantiate and verify our current understanding.
2. In the area behind the plant (fenced area), the waste material from the plant operation was deposited and included spent refractory bricks, small metal cast waste and general plant sweepings including "speedy-dry", oil absorbent compound containing high concentrations of PCB. It appears that some of this waste material was incorporated into the dike at the time of its construction. It appears that the dike was constructed

with fill material hauled in by the City of Sheboygan Falls. Due to the nature of the dike construction, it is believed that the PCB contaminated materials in the dike would occur in pockets or isolated cells having dimensions similar to a dozer bucket or multiples thereof. No one recalls the exact events at the time of the dike construction or the exact dates of the dike construction.

3. It appears that the PCB contaminated areas in the fenced area are the result of dumping small volumes of "speedy-dry" material on the ground surface. Currently there appears to be no exact pattern for this type of disposal.
4. The results of the latest soil investigation, as verbally reported, indicate that the PCB's have not migrated into deeper soils. The DNR indicated that more testing is necessary to establish this fact.
5. The DNR stressed, that since there appears to be a relationship between PCB, "speedy-dry" and other plant wastes, that investigation efforts should first identify where these wastes are in the dike and that laboratory testing for PCB's should be limited to these types of materials and adjacent soils that may have been contaminated. This would mean soil borings at closer intervals and soil sampling more frequently with depth than proposed in the enclosed outline.
6. Mr. Reis asked if all the soil samples needed to be saved. The DNR responded by saying that it is not necessary to save all samples, although the ones that are not saved should be documented by a written narrative and photographed. It was suggested that color photographs would be a good means to supplement the documentation of the borings. The question of throwing away samples is essentially an economical one. Donohue indicated that they would have no problem resampling if necessary.
7. The sampling procedure for the fenced area (see 1A of enclosure) seemed adequate as a start but would have to be more intensive to be complete. It was generally agreed that more PCB contamination material may be located closer to the back door area of the plant. If this proves to be the case, efforts must be concentrated in this area or any other contaminated area with closer testing intervals. Soil sampling and testing should indicate conclusively the areas that are contaminated.
8. The DNR stressed that the investigation should be phased in such a way as to be able to incorporate conditions at the site as they become better understood. The most important objective of this investigation is to identify the contaminated areas and the extent of contamination.

9. Installation of wells is second in importance and identifying and removal of contaminated soils is first. Wells, therefore, should not be located in contaminated areas in such a way as to inhibit removal of contaminated soil. For this reason the well should be placed after the soil study and in areas where they would not inhibit removal of contaminated soils or placed in such a way that contaminated soils can be removed from the vicinity of the well.
10. Mr. Ries indicated that the Sheboygan landfill was a serious consideration for temporary storage of the contaminated soil. We stressed that the licensing process for establishing such a disposal operation may be lengthy and the landfill may not be a feasible location. It was generally agreed that the state of the art disposal of PCB is changing so rapidly that a better alternative may be available by next summer.
11. The DNR indicated that a formal, written proposal in greater detail than the outline enclosed, would be necessary before the Department can respond officially to the proposed investigation. Mr. Ries acknowledged this fact and that this meeting was primarily for informational purposes, and indicated that such a written proposal would be forthcoming.

NO:dk

Attach.

cc: Chuck Hammer - 13
Stan Kleinert - Outpost
Tom Sheffy - Outpost
Skip Glor - Milwaukee
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Bob Glebs - 9
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