



State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny
Secretary

BOX 7921
MADISON, WISCONSIN 53707

12/26/84
Kulibert - NCD
SNE FILE

December 26, 1984

IN REPLY REFER TO: 4430

Chem-Waste Control
1055 E. Wayzata Blvd.
Suite 211
Wayzata, MN 55391

RECEIVED
Wis. Dept. of Natural Resources

JAN 04 1985

N. C. Dist. Hdqtrs.
RHINELANDER, WI

Gentlemen:

The purpose of this letter is to respond to your request regarding sites in Wisconsin where pentachlorophenol (PCP) contaminated waste is located.

We have consulted with our district offices concerning this matter and have located one current (PCP) incident.

The release of PCP occurred at SNE Corporation which is located in Wausau, Wisconsin at 910 Cleveland Avenue. According to information available, the release is a result of a leaking underground storage tank.

If further information is required, please feel free to contact us.

Sincerely,
Bureau of Solid Waste Management

James J. Bakken

James Bakken, Environmental Specialist
Hazardous Waste Management Section

JB:db
4903Q

cc: Gary Kulibert

12/13/84

SNE CORPORATION
WAUSAU, WISCONSIN

DEC 13 1984

ENGINEERING REPORT
PRESENTING
A SITE INVESTIGATION PLAN
FOR
PENTACHLOROPHENOL

OFFICE COPY

PROJECT #509-1
DECEMBER 1984

EDER ASSOCIATES
CONSULTING ENGINEERS, P.C.
85 Forest Avenue
Locust Valley, New York 11560



eder associates
consulting engineers, p.c.

December 4, 1984
File #509-1

James G. Derouin, Esq.
DeWitt, Sundby, Huggett,
Schumacher & Morgan, S.C.
121 South Pinckney Street
Madison, Wisconsin 53703

Re: Engineering Report Presenting
a Site Investigation Plan For
Pentachlorophenol at SNE Corporation
in Wausau, Wisconsin

Dear Mr. Derouin:

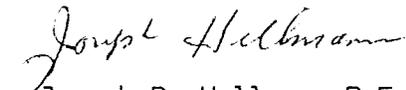
Pursuant to your request, we are pleased to transmit herewith our engineering report presenting a preliminary site investigation plan for the potential effects of fugitive pentachlorophenol from SNE's Wausau Manufacturing Plant.

The study concentrates on determining the effect, if any, on the groundwater in and around the SNE facility. Should these results prove positive, further investigations may be necessary.

We are prepared to discuss the site investigation plan with yourself and representatives from the DNR at your convenience.

Very truly yours,

EDER ASSOCIATES CONSULTING ENGINEER, P.C.


Joseph B. Hellman, P.E.
JBH/mw

85 FOREST AVENUE • LOCUST VALLEY, NEW YORK 11560 • (516) 671-8440

LEONARD J. EDER, P. E. • FREDERICK H. INYARD, P. E. • STEPHEN J. OSMUNDSEN, P. E. • GARY A. ROZMUS, P. E.
JOHN McGUIRE, P. E. • JORGE MOLINA, ING. • WILLIAM J. CUNNINGHAM, P. E. • VINCENT J. FRISINA, P. E.

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I. INTRODUCTION

SNE Corporation is a manufacturer of wood windows and patio doors. Its headquarters and principal manufacturing plant is located at 910 Cleveland Avenue in Wausau, Wisconsin. SNE acquired these facilities in 1982, when it merged with the previous owner, Harris-Crestline Corporation.

As is common in the wood window industry, SNE treats some of the wood that is used in its products with a Pentachlorophenol based preservative commonly referred to as "Penta". The Penta used in the Wausau operations is stored in three underground tanks. Two of the tanks, having capacities of 3,000 and 4,000 gallons, are about 40 years old. The other tank is about 15 years old and holds about 8,000 gallons. There is, in addition, a partially buried 3,400 gallon open top tank used in one of the Penta application processes.

Because of the general problem of leaks in old chemical tanks, SNE became concerned about the condition of the Penta storage tanks. It is impossible to tell from records of Penta purchases whether any of the chemical is being lost to the ground. In researching the subject, SNE became aware of soil core samples that were taken on the property in August of 1978. These samples were taken to determine soil foundation properties for an addition to Harris-Crestline facilities. The samples were tested in October, 1984 and suggested the presence of Penta. SNE immediately notified the Wisconsin Department of Natural Resources (DNR) of these findings on October 22, 1984, and SNE's attorney, James Derouin of DeWitt, Sundby, Huggett, Schumacher & Morgan, S.C., retained Eder Associates Consulting Engineers, P.C. to assist the Company in its studies.

Leak testing of the storage and dip tanks was performed in November, 1984 under Eder Associates direction. The tests indicated that the 3,000 and 8,000 gallon storage tanks and the dip tank are not leaking. The test made on the 4,000 gallon tank was inconclusive.

However, the test strongly suggests that this tank was also not leaking and if it was, the leak was so small as to be hardly measurable. A review of plant processes suggested the possibility of spillage having occurred around the dip tank.

As a result of these findings, SNE immediately undertook a program of modifying manufacturing operations to eliminate potential sources of spillage. SNE has emptied the 4,000 gallon tank and taken the dip line out of service. The 3,000 and 3,400 gallon tanks will be emptied into the 8,000 gallon tank as production permits. In addition, SNE wishes to undertake an investigation of the site to determine whether any spills which may have occurred in the past have had any significant effect on the groundwater in and around the plant site.

This report presents the proposed investigation plan.

II. EXISTING CONDITIONS

Location

Figure 1 presents a location map of the Wausau area. The SNE plant is located on two parcels of land in the southern part of the City, west of the Wisconsin River. Land use to the north and south is industrial. Land use to the east and west is residential.

Most of the City is served by a municipal water system supplied by six wells. Three wells are located in the northern part of the City, on the west side of the River, approximately two miles from the SNE site. Three wells are located on the east side of the River. Because of the distances involved and the influence of the Wisconsin River, it is highly unlikely that any past fugitive Penta could have effected the City's water supply. The area south of Chellis Street was recently incorporated within the City. This area is presently served by individual shallow wells. The municipal water supply system is being extended into the area. All consumers should be connected within a year. Should the proposed monitoring program demonstrate significant Penta contamination of the groundwater on the SNE site and indicate a direction of groundwater flow toward this area, selected individual wells south of Chellis Street would also be tested.

Topography in the vicinity of the SNE site slopes toward the River from elevation 1200 (above mean sea level), east of the property to 1170 along the River bank. Property elevation is between 1180 and 1190. River elevation is 1161. Groundwater flow through the site is probably in an easterly direction toward the River. It is also possible that a southerly flow can occur under certain River conditions.

The SNE manufacturing operations are performed on the larger south parcel of property shown on Figure 1. Figure 2 presents a site plan

SNE CORPORATION
WAUSAU, WISCONSIN

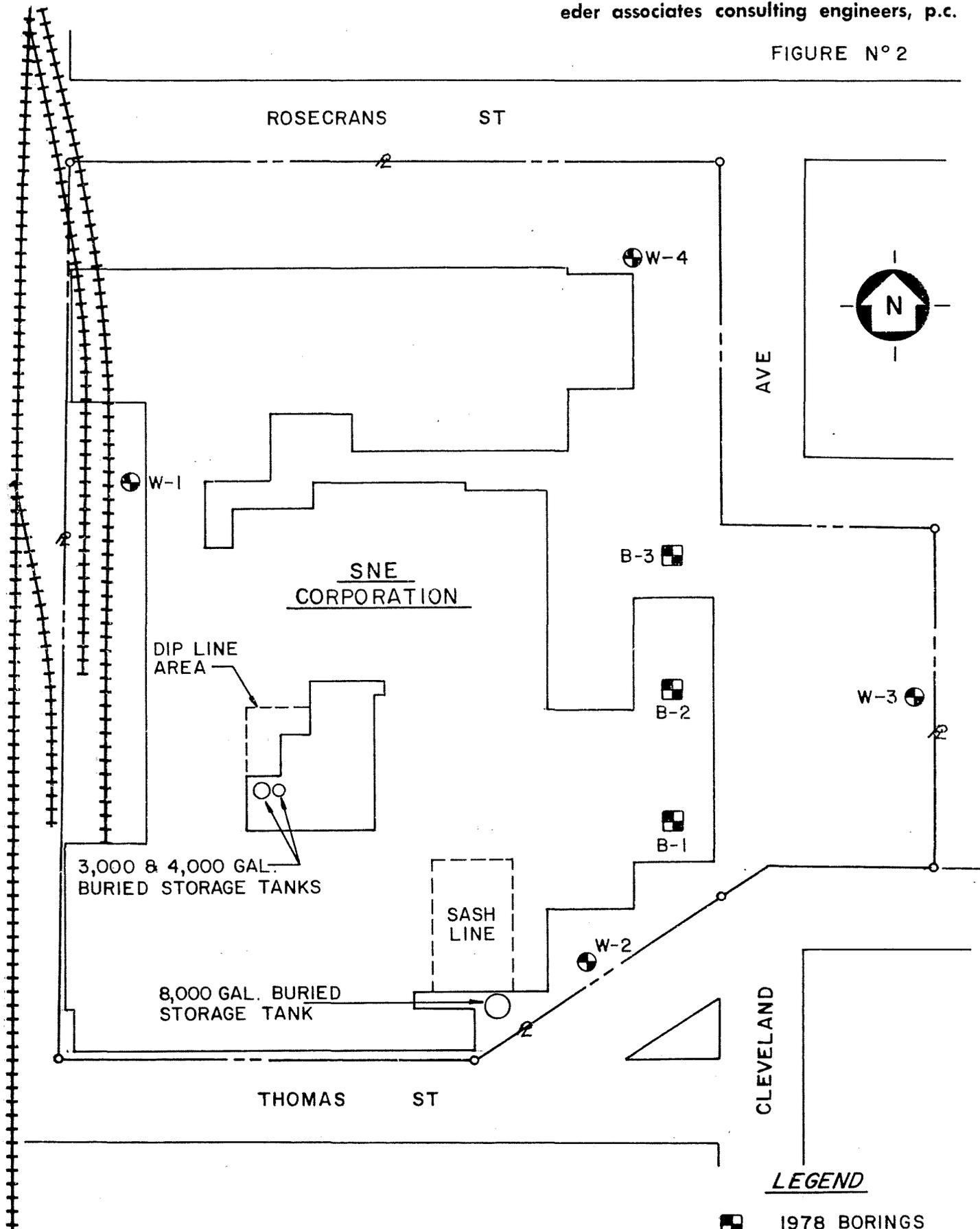


Scale 1:24000

Distance to nearest private wells ~ 2000 ft, > 1/4 mi

LOCATION MAP

FIGURE N° 2



LEGEND

-  1978 BORINGS
-  APPROX. LOCATION OF PROPOSED MONITORING WELLS

SITE PLAN

SCALE: 1" = 100'

of this parcel. Plant buildings are located on that part of the parcel west of Cleveland Street. The area to the east is a parking lot.

Manufacturing Operations

SNE acquired the Wausau plant in 1982 from the Harris-Crestline Corporation. In 1944, Crestline began the use of a liquid wood preservative, commonly called Penta, in a dip line. This operation is located in an old one story building with wood slat floors over a crawl space with an earth floor located near the center of the plant. Penta is stored in two buried steel tanks of 3,000 and 4,000 gallon capacity. From these storage tanks, the Penta is pumped into an open top 3,400 gallon dip tank inside the building. Wood pieces to be treated are soaked in the dip tank, removed by an elevator and allowed to drain over the floor. Part of the floor is underlain by steel pans to collect and return the drainage to the dip tank. It is possible that, over the years, some drainage was not collected and was accidentally dripped into the crawl space. Some Penta may also have occasionally spilled into the crawl space due to accidental overfilling of the 3,000 and 4,000 gallon storage tanks. Because of the potential for spillage, SNE has discontinued the use of this line.

A second Penta treatment line was installed in 1972. This line, referred to as the sash line, uses a bubble application method and is located on the second floor of a building near the south property line. Penta for this line is stored in the buried 8,000 gallon steel tank. The Penta is pumped out of this tank for use on the line. Excess Penta is returned to the tank by gravity in a continuous cycle. The line is totally enclosed and is not the source of any spillage. It is now the only line in use. A second sash line may have to be installed to replace the dip tank if product demand requires it.

In the past, the Penta was delivered by rail and truck. As an extra safety precaution, the rail deliveries and the use of associated

pipelines have also been discontinued.

Penta is now delivered only by truck and discharged into the 8,000 gallon tank. A drip pan will be constructed around the fill port to catch any potential hose drippage during filling.

Wood Preservative

The wood preservative, Penta, is trade named Woodtox Pre-prime, manufactured by Koppers Chemical and Coatings. This is a 5% solution of Pentachlorophenol dissolved in 85% mineral spirits with 10% inerts. It has a flash point of 104°F (PMCC) and is classified as a Class II combustible liquid under National Fire Protection Association standards. The product is registered as a pesticide under the Federal Insecticide, Fungicide and Rodenticide Act and the Wisconsin Pesticide Use and Control Regulations (Ch. Ag 29 Wisconsin Administrative Code).

Pentachlorophenol is normally a solid at room temperature and insoluble in water. It is identified as hazardous waste under Federal Environmental Protection Agency (EPA) regulations (40 CFR 261, Appendix VIII). It has also been listed as a hazardous substance under the Federal Water Pollution Control Act (40 CFR 116, Table 116.4-A).

The mineral spirits is Stoddard solvent, also known as petroleum naphtha. It has a specific gravity of .79, a vapor pressure of 2 mm Hg at standard conditions, and is immiscible in water.

If Penta were spilled, the mineral spirits would eventually volatilize leaving a solid residue of Pentachlorophenol. Having a specific gravity less than 1, Penta will float on water.

? 5 CI →
should be
heavier than
H₂O after
mineral spirits
are gone.

Past Investigations

A subsurface exploration was performed in 1978 by Soil Testing Service of Wisconsin Inc. for the east building expansion. This

consisted of three soil borings indicated on Figure 2. The borings were advanced to depths of from 21.5 feet to 26.5 feet, using continuous flight solid-stem augers. Borings 1 and 3 were advanced with roller bit and Revert drilling mud below depths of six and four feet respectively. Soil samples were taken at two foot intervals to a depth of 15 feet and at five foot intervals thereafter.

The boring report indicates that a fill material of silty fine sand was encountered to a depth of from four to six feet. Underlying the fill were sand and gravel. Depth to groundwater was estimated as 25 feet. A strong odor was noted in Borehole 3 at the 25 foot depth.

Recently, SNE became concerned about the possibility of the leakage of Penta from storage tanks. Two investigations were immediately performed. First, the soil samples which had stored since 1978 were analyzed for the presence of Penta; and second, the storage tanks on the plant site were leak tested.

Soil samples were analyzed using high performance liquid chromatography. The results are presented in Table 1. The highest concentration of Penta was found in Borehole 1. The lowest concentration was found in Borehole 3. It should be noted that the drilling and sampling was for the purpose of obtaining foundation data and not for investigating soil contamination. The protocols for performing soil contamination investigations were therefore not performed. Foreign contamination of samples may have occurred. Also, the analysis method used by the lab is not EPA approved.

The soils analysis suggested the possibility of site contamination by Pentachlorophenol. In November, the tanks containing Penta were tested to determine whether leakage was occurring. The tests consisted in measuring liquid levels during periods of plant shutdown when Penta was not being consumed. The results are presented in Table 2.

SNE CORPORATION
WAUSAU, WISCONSIN

TABLE 1

1978 SOIL SAMPLE ANALYSIS
(performed October 1984)

<u>Core</u>	<u>Depth (ft)</u>	<u>Pentachlorophenol Content (mg/kg)</u>
B-1	4-5	175
	10-11.5	102
	15-16	125
	20-21	132
B-2	4-5.5	97
	8-9	94
	15-16.5	73
	20-21	89
B-3	4-5.5	35
	8-9	30
	15-16.5	29
	20-21	53
	25-26.5	97

NOTE: Boring locations are shown in Figure 2.

SNE CORPORATION
WAUSAU, WISCONSIN

TABLE 2

TANK LEAK TESTING
November 1984

<u>Tank</u>	<u>Test Number</u>	<u>Elapsed Time (hours)</u>	<u>Drop in Liquid Surface (inches)</u>
8000 gal.	1	34	0
	2	122	< 1/16
4000 gal.	1	47	3-1/8
	2	30	(+3/16)
	3	122	1/4
3000 gal.	1	62	0
Dip Tank	1	64	1/32*

*Control - 3/16

Liquid levels in the 3,000 and 8,000 gallon storage tanks remained constant or dropped insignificantly. It is concluded that these tanks do not leak. Leak testing of the 4,000 gallon storage tank showed variable results. For the first test, this tank was filled into the vent line. The large liquid level drop occurred within the vent which was leaking. Penta was removed from the tank to drop the liquid level below the tank vent and a second test was performed. The liquid level rise during this test was probably due to the method of measurement. A third test was performed using careful measurement techniques. The liquid level dropped slightly during this test. Although the variations in the readings make the test somewhat inclusive, the greatest drop in level recorded was less than the evaporation rate measured in a control. One can conclude that the tank was probably not leaking and if it was, the leak was so small as to be immeasurable. Since evaporation from the open top surface of the dip tank would lower liquid level naturally, an open bucket of Penta was read at the same time as a control. The drop in liquid level of the dip tank was less than the control. It is concluded that this tank also does not leak.

III. PLAN OF INVESTIGATION

The direction of groundwater flow through the site could be variable. Most probably, the local groundwater flows horizontally through the porous soils under the site. Deeper regional groundwater at the site may have an upward component toward the River bed. Penta spillage reaching the groundwater would float on the surface of the local groundwater flow.

if still in matrix of mineral spirits.

The proposed investigation plan involves the installation of four groundwater monitoring wells, one along each of the directional property boundary lines. The proposed locations are shown in Figure 2. This will ensure that background groundwater and groundwater leaving the site from any direction will be intercepted. The lateral extent of a potential plume of contamination can be estimated from the lateral wells. Since groundwater contamination should occur at the water table surface, the wells will be installed to intercept this layer.

At least 1 well should be installed near dip track 1/2 or 4000 gal build back.

Soil samples will be obtained during drilling to evaluate the depth of potential contamination. A first set of groundwater samples will be obtained on the day after well installation. Since drilling may disturb subsurface strata and influence groundwater quality, a second set of groundwater samples will be obtained three months after well installation to allow for a period of well stabilization.

Why not allow for some stabilization first? Take first sample 1 wk after well installation.

Well Installation

Wells will be installed in accordance with DNR proposed Guidelines for Monitoring Well Installation. Boreholes will be advanced using hollow stem augers to approximately 12 feet below the water table, or about 35 feet below grade. In the event difficulties are encountered, boreholes will be advanced using wash boring in combination with casing. Drilling water will be sampled in accordance with the

protocol for groundwater samples. Soil samples will be taken every five feet using split spoon samplers and placed in glass containers. All samples will be stored in an insulated shipping box filled with ice and will be transported to the laboratory at the same time as groundwater samples. Chain of Custody documentation will be maintained in accordance with the requirements for groundwater sampling.

Well casing will consist of 2 inch Schedule 40 PVC with threaded connections. Well screen will consist of 15 feet of .010 inch slots, ^{Probably ok.} installed approximately 12 feet below the water table. A filter pack consisting of well sorted medium sand will be placed around and about three feet above the screen. The annular space between the borehole and well casing above the filter pack will be sealed with three feet of bentonite pellets and bentonite slurry. A protective steel casing set in a concrete cap will be placed over each well.

After installation and prior to sampling, the wells will be developed by baling a minimum of 20 casing volumes of groundwater.

All equipment will be steam cleaned, washed with a non-phosphate detergent and rinsed with tap water prior to drilling each well. Drilling will proceed from potentially least to most contaminated sites to prevent cross contamination of samples. The order of well installation will be W-1, W-4, W-2 and W-3. Soil samplers will be detergent washed and rinsed with tap water prior to each use.

Groundwater Sampling Protocol

Before sampling, a new plastic sheet will be placed around the well. All equipment will be detergent washed, rinsed with tap water and distilled water, and placed on the sheet. Water table depth will be measured using a weighted tape. The well will be baled a minimum of five casing volumes prior to withdrawing the sample. A nylon rope will be used to raise and lower the b_{al}er. The rope will be discarded after use at each well.

Duplicate samples of one well will be taken for the purpose of evaluating analysis reproducibility. Replicate samples of one well will also be taken. The replicate sample will be spiked with a known amount of phenol to evaluate the recovery rate of the analysis procedure. A sample of the distilled water will be taken as a blank.

Sample containers and preservation methods are listed in Table 3. The containers will be placed in an insulated shipping box filled with ice and delivered to the laboratory on the same day. At the laboratory, samples will be stored at 40°C. Analysis will be performed within seven days.

Chain of Custody documentation will be maintained to ensure the proper processing of samples. Each sample container will be labeled with a sample number, name of collector, date and time of collection and sampling location. A Chain of Custody record will be maintained which identifies each sample with the signature of persons involved in its handling with inclusive dates of possession. A sample analysis request sheet will be delivered to the laboratory with the samples.

Sample Analysis

Analysis parameters and methodology are presented in Table 4. Groundwater samples will be analyzed in the field for pH and conductivity and in the laboratory for the parameters listed. Groundwater sample preparation for phenol analysis will be performed in accordance with Methods 3510 or 3520 of EPA SW-846.

Soil samples will be analyzed for phenols only. Sample preparation will be in accordance with Methods 3540 or 3550 of EPA SW-846.

SNE CORPORATION
WAUSAU, WISCONSIN

TABLE 3

WATER SAMPLE CONTAINERS

<u>Type</u>	<u>Container</u>	<u>Volume (ml)</u>	<u>Preservation</u>
1	Plastic	500	None
2	Plastic	250	HNO ₃ to pH < 2
3	Plastic	250	H ₂ SO ₄ to pH < 2
4	Glass	250	None

SNE CORPORATION
WAUSAU, WISCONSIN

TABLE 4

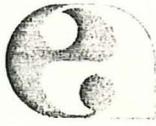
ANALYSIS PARAMETERS

	<u>Parameters</u>	<u>EPA Method*</u>	<u>Sample Container Type</u>	
1. Field	pH	150.1		
	Conductivity	120.1		
2. Laboratory	pH	150.1	1	
	conductivity	120.1	1	
	why? {	alkalinity	130.1 or 2	1
		hardness	130.1 or 2	2
	chlorides	325.1, 2 or 3	1	
	why? {	dissolved solids	160.1	1
	one of these ok {	chemical oxygen demand	410.2	3
		total organic carbon	415.1	3
		phenols	8040	4
		? aptha VOC scan (at least 1)		

*Reference: (1) Methods for chemical analysis of water and wastewaters
EPA-600/4-79-020

(2) Test methods for evaluating solid waste EPA SW-846

12/12/84



eder associates
consulting engineers, p.c.

December 12, 1984
File #509-1

Mr. Gary Kulibert
State of Wisconsin
Department of Natural Resources
North Central District Headquarters
P.O. Box 818
Rhinelander, Wisconsin 54501

Dear Mr. Kulibert:

Enclosed is a copy of the Site Investigation Plan for SNE Corporation. We look forward to meeting you at the site on Monday afternoon, December 17, 1984.

Yours truly,

EDER ASSOCIATES CONSULTING ENGINEERS, P.C.

Joseph Hellmann
Joseph B. Hellmann, P.E.

JBH/mw
Enc.

cc: R. Schuff

*copy to
adviser*



State of Wisconsin / DEPARTMENT OF NATURAL RESOURCES

North Central District Headquarters
Box 818
Rhineland, Wisconsin 54501
(715)362-7616

11-2-84
Carroll D. Besadny
Secretary

November 2, 1984

Mr. Seymour Kroll, President
SNE Corporation
910 Cleveland Avenue
P. O. Box 1007
Wausau, Wisconsin 54401

Dear Mr. Kroll:

Thank you for your letter of October 22, 1984, advising me of your discovery of a potential pentachlorophenol problem at your Wausau facility. It is not very often that we are informed of problems in such a straightforward manner, and I would like to commend you for it.

From the information supplied in your letter, you have taken or will take all the necessary steps to stop the source of "penta" contamination from your facility. We will be pleased to work with you and your consultant to determine the extent, degree and the possible cleanup of the contamination. I have assigned Chuck Fitzgerald of my staff here in Rhineland to be your contact with the Department. I would suggest you contact Chuck to discuss with him the results of the meeting you had with your consultant. Chuck can be reached at (715)362-7616.

If I can be of any assistance or if you have any questions, please feel free to contact me.

Sincerely,

John G. Brasch
District Director

cc: G. Kulibert/C. Fitzgerald, Rhineland
J. Baltus, Antigo
B. Baker, WRM/2
L. Lueschow, TS/2
R. Krill, WS/2
P. Didier, SW/3
D. Urso, Rhineland

RECEIVED
Wis. Dept. of Natural Resources

OCT 25 1984

SNE Corporation

N. C. Dist. Hdqtrs.
RHINELANDER, WI

910 Cleveland Avenue
P.O. Box 1007
Wausau, WI 54401

715 845-1161

October 22, 1984

Wisconsin Department of Natural Resources
North Central District
P. O. Box 818
Rhineland, Wisconsin 54501

Attn: Mr. John G. Brasch
District Director

Gentlemen:

SNE Corporation is a manufacturer of wood windows and patio doors. Its headquarter and principal manufacturing plant is located at 910 Cleveland Avenue in Wausau. SNE acquired its Wausau facilities in 1982, when it merged with the previous owner, Harris-Crestline Corporation.

We are writing to advise you of circumstances we have recently discovered at SNE's Wausau plant and to advise you of the actions we are taking as a result.

As is common in the wood window industry, SNE treats much of the wood that is used in its products with the preservative pentachlorophenol (commonly referred to as "penta"). The penta used in SNE's Wausau operations is stored in three underground tanks. Two of these tanks, having capacities of 3,000 and 4,000 gallons, are about 40 years old. The other tank is about 15 years old and holds about 8,000 gallons.

We are informed that, beginning in early 1985, the EPA will prohibit the sale of penta to persons other than licensed applicators. While preparing to meet the new EPA rule, we learned about the general problem of leaks in old chemical storage tanks. As a result, we became concerned about the age of our penta tanks.

It is impossible to tell from records of volumes of use of penta whether any of the chemical stored in Wausau is being lost to the ground. However, in researching the subject, we became aware of soil core samples that were taken at the SNE Wausau property in August of 1978,

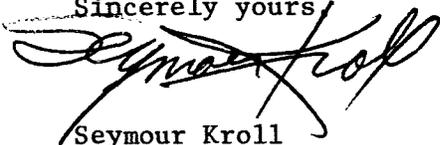
Wisconsin Department of Natural Resources
October 22, 1984
Page 2

prior to our ownership. These samples were taken to determine soil properties before the construction of the foundation for an addition to SNE's (then Harris-Crestline Corp.'s) facilities. We have now tested these 1978 core samples and have found penta present in samples which we understand were collected at various depths. An inspection of SNE's penta application facilities indicates that there is no significant spilling or other discharge of the chemical during the wood treatment process.

As a result of the above, we are proceeding to take appropriate protective actions. We are emptying the 40 year old tanks and are in the process of procuring above-ground storage tanks to replace all underground tanks. We anticipate installing these new tanks as soon as they can be obtained, at which time the underground tanks will be removed or filled with an inert material. We are also meeting next week with a consulting engineering firm to determine what additional analysis may be necessary to more clearly establish the facts in this matter.

SNE is committed to avoiding environmental pollution at its facilities and will welcome any questions or suggestions the Department of Natural Resources might have.

Sincerely yours



Seymour Kroll
President

SKjw

RECEIVED
Wis. Dept. of Natural Resources

OCT 25 1984

N. C. Dist. Hdqtrs.
RHINELANDER, WI

10/25/84
SNE Corporation

910 Cleveland Avenue
P.O. Box 1007
Wausau, WI 54401
715 845-1161

October 22, 1984

Wisconsin Department of Natural Resources
North Central District
P. O. Box 818
Rhinelander, Wisconsin 54501

Attn: Mr. John G. Brasch
District Director

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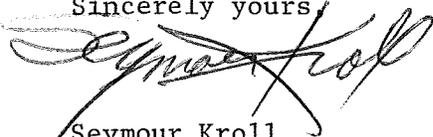
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SNE is committed to avoiding environmental pollution at its facilities and will welcome any questions or suggestions the Department of Natural Resources might have.

Sincerely yours,



Seymour Kröll
President

SKjw

10/22/84

RECEIVED
Wis. Dept. of Natural Resources

OCT 25 1984

SNE Corporation

N. C. Dist. Hdqtrs.
RHINELANDER, WI

910 Cleveland Avenue
P.O. Box 1007
Wausau, WI 54401
715 845-1161

October 22, 1984

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North Central District
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Attn: Mr. John G. Brasch
District Director

Gentlemen:

SNE Corporation is a manufacturer of wood windows and patio doors. Its headquarter and principal manufacturing plant is located at 910 Cleveland Avenue in Wausau. SNE acquired its Wausau facilities in 1982, when it merged with the previous owner, Harris-Crestline Corporation.

We are writing to advise you of circumstances we have recently discovered at SNE's Wausau plant and to advise you of the actions we are taking as a result.

As is common in the wood window industry, SNE treats much of the wood that is used in its products with the preservative pentachlorophenol (commonly referred to as "penta"). The penta used in SNE's Wausau operations is stored in three underground tanks. Two of these tanks, having capacities of 3,000 and 4,000 gallons, are about 40 years old. The other tank is about 15 years old and holds about 8,000 gallons.

We are informed that, beginning in early 1985, the EPA will prohibit the sale of penta to persons other than licensed applicators. While preparing to meet the new EPA rule, we learned about the general problem of leaks in old chemical storage tanks. As a result, we became concerned about the age of our penta tanks.

It is impossible to tell from records of volumes of use of penta whether any of the chemical stored in Wausau is being lost to the ground. However, in researching the subject, we became aware of soil core samples that were taken at the SNE Wausau property in August of 1978,

JG

Wisconsin Department of Natural Resources

October 22, 1984

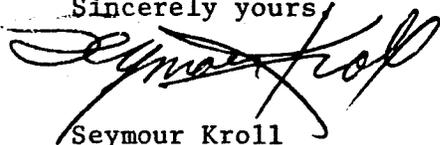
Page 2

prior to our ownership. These samples were taken to determine soil properties before the construction of the foundation for an addition to SNE's (then Harris-Crestline Corp.'s) facilities. We have now tested these 1978 core samples and have found penta present in samples which we understand were collected at various depths. An inspection of SNE's penta application facilities indicates that there is no significant spilling or other discharge of the chemical during the wood treatment process.

As a result of the above, we are proceeding to take appropriate protective actions. We are emptying the 40 year old tanks and are in the process of procuring above-ground storage tanks to replace all underground tanks. We anticipate installing these new tanks as soon as they can be obtained, at which time the underground tanks will be removed or filled with an inert material. We are also meeting next week with a consulting engineering firm to determine what additional analysis may be necessary to more clearly establish the facts in this matter.

SNE is committed to avoiding environmental pollution at its facilities and will welcome any questions or suggestions the Department of Natural Resources might have.

Sincerely yours



Seymour Kröll
President

SKjw



2/25/84

SNE Corporation

A Sentry Enterprise

910 Cleveland Avenue
P.O. Box 1007
Wausau, WI 54401
715 845-1161

February 25, 1984

Department of Natural Resources
Box 310
Antigo, WI 54409

Attention: Jim Anklam

Dear Jim:

Enclosed you will find the completed Hazardous Waste Activity Report. As you will see, we were over our 100 kg. weight limit at the end of 1984. There were several reasons for this.

Our Plant Engineer, who was responsible for waste disposal, left our Company in the latter half of 1984. The responsibility to dispose of accumulated waste was given to me in late November. At that time, I began working with Wausau Chemical to dispose of this waste. Because of some problems with the Eau Claire disposal site, I was not able to ship waste until after the first of January, 1985.

As of February 5, 1985, I have disposed of 4,400 pounds, bringing us within the 100 kg. limit.

If you have any questions or need additional information, call me at 715-845-1161.

Sincerely,

Patrick Wierzba
Plant Engineer

PJW/11
Enclosure

Wis. Dept. of Natural Resources
FEB 27 1985
ANTIGO AREA HEADQUARTERS
ANTIGO, WISCONSIN

HAZARDOUS WASTE FACILITIES REPORT FORM
 Required under Chapter 144, Wis. Stats.
 Form 4430-3 1-85

LEAVE BLANK - DNR USE ONLY

WI0006125835 7 37 01 L 10
 SNE
 910 CLEVELAND AVE
 WAUSAU WI 54401

GENERATOR ANNUAL REPORT
 This report is for the year ending Dec. 31 1984

Please read the attached instructions, and provide all applicable information on both sides of this form. This form must be completed, signed, and returned to the appropriate district office within 30 days. All answers on this page MUST BE IN POUNDS.	A. Ignitables (pounds)	B. Halogenated Solvents and Toxic Solvents (pounds)	C. Heavy Metals (pounds)	D. Toxic Wastes Other Than Those Listed in B & C (pounds)	E. Corrosives (pounds)	F. Reactives (pounds)	G. Acute H.W., Toxic Products and Intermediates (pounds)	Totals
1. Amount of hazardous waste on-site at beginning of the reporting period.	2120							2120
2. Amount of hazardous waste generated on-site during the reporting period.	5360	1120						6480
3. Amount of hazardous waste received from other facilities during the reporting period. (List facilities on Page 2.)								
4. Total. Add lines 1, 2 and 3 for each column.	7480	1120						8600
5. Amount of hazardous waste shipped off-site during the reporting period. (List transporters used on Page 2.)	3080							3080
6. Amount of hazardous waste recycled on-site during the reporting period.								
7. Total amount of hazardous waste that was treated on-site during the reporting period.								
a. Amount of hazardous waste treated by treatment code T _ _ _								
b. Amount of hazardous waste treated by treatment code T _ _ _								
c. Amount of hazardous waste treated by treatment code T _ _ _								
8. Total amount of hazardous waste disposed on-site during the reporting period.	3080							3080
a. Amount of hazardous waste disposed by disposal code D 85	3080							3080
b. Amount of hazardous waste disposed by disposal code D _ _ _								
9. Amount of hazardous waste still on-site at end of the reporting period.	4400	1120						5520

3. Hazardous waste received from others. (List facilities.) Attach additional sheet if needed.

Facility Name	EPA I.D. Number	City	State
(1) NONE			
(2)			
(3)			
(4)			
(5)			
(6)			
(7)			
(8)			
(9)			
(10)			

5. Transporters used to ship hazardous waste. (List transporters.) Attach additional sheet if needed.

Transporter Name	EPA I.D. Number	City	State
(1) WAUSAU CHEMICAL	WI0006136220	WAUSAU	WI
(2)			
(3)			
(4)			
(5)			
(6)			
(7)			
(8)			
(9)			
(10)			

I certify under penalty of law, that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Name (Print or type) **PATRICK WIERZBA**
 Signature and Title *Patrick Wierzba* **PL ENL. MGR.** Date Signed **2-25-85**
 Page 2

