E&K HAZARDOUS WASTE SERVICES, INC.

"YOUR WASTE HANDLING ALTERNATIVE"

P.O. BOX 1249 • 2905 PAINE AVENUE
SHEBOYGAN, WISCONSIN 53082-1249 • (414) 458-6030

November 11, 1987

Mr. John Emmerling
Kohler Company - Generator Division
C.T.H. LS
Sheboygan, WI 53081

Subject: Removal of 1000 gallon UST at Generator Plant 11/10/87

Dear John:

This letter will serve as E & K Hazardous Waste Services' report of our activities for the removal of the underground diesel tank at your plant on November 10, 1987. The following steps were taken:

- The remaining fuel in the tank was pumped out using a vacuum tank. Approximately 200 gallons were recovered, based on the information of a Kohler employee who had measured the product in the tank the week before. This fuel was then transferred to your "active" 10,000 gallon diesel tank.

- The piping to the pump was disconnected. This allowed approximately 5 to 10 gallons of fuel to drain into the well sump, which already contained 10 to 15 gallons of water, with some fuel on the surface. This material was drummed, labeled, and Kohler Environmental Engineering personnel were notified. The drum was stored in the Generator hazardous waste storage area.

- The fuel and vent piping and electrical conduit serving the tank were removed from the west wall of the building. The only section of pipe left in place was an approximately 10 foot section that ran through some ductwork on the test stand ventilation system. The ends of this section of pipe were capped.

- The soil from around the tank was removed and placed to the west of the tank. An HNU meter was used to monitor the soil as it was removed. There was a 2 or 3 part per million reading above background on a few back hoe bucket scoops of the soil but none above 5 ppm. The tank, which was lying along a north-south axis was exposed along the west side and both ends. The back hoe was then used to lift the tank from the excavation.

- The soil at the bottom of the excavation was checked with the HNU. Readings over most of the floor did not move above a background reading of 1 ppm. Readings at the north end of the tank approached 5 ppm, as they had with some of the surface soil, but did not exceed that concentration. The only explanation I can offer for that is that the pump was located at the north end of the tank and may have been the source of a small amount of product. When the 5 ppm reading was encountered, the soil was dug deeper in that area to determine if it was the start of a plume of higher concentration, but it proved to be a small area with no area of higher concentration. The walls of the excavation were also checked, but no readings above background were detected. Two composite samples were collected; one of the bottom of the excavation and one of the sides.

- The information regarding the meter readings was given to Mr. Lloyd Wunch, Town of Mosel Fire Chief, who was on site. He inspected the tank, which showed no sign of leaks, but did exhibit some scaling of the outer coat. Based on the HNU readings and visual inspection of the excavation and tank, he gave permission to fill in the excavation. I asked if he wanted analysis run on the soil samples to back up the HNU readings, but he said that the meter readings and inspection were adequate to close the excavation.

- The pump from the tank was salvaged by the Kohler Generator maintenance department. The tank was taken to the E & K yard where it will be degassed and cut up for scrap. The tank will not be reused.

- The excavation was refilled using the soil removed from the excavation, the concrete top, and approximately 8 cubic yards of sand. The soil was mounded up over the excavation to allow for settling over the winter. As you indicated, the entire area will be reseeded next spring as part of the roofing project.

- I've attached an Underground Petroleum Product Inventory form. If you already have this form filled out for the tank that was removed, it should be updated to show that the tank was removed. This can be done by making a photocopy of your original form and marking it "amended" at the top, checking #4 at the top of the form "Location for which tank has been removed" and indicating in section A.7. that the tank has been removed on 11/10/87. If this form has not yet been submitted for this tank, it should be completed and sent at this time to the address at the upper right corner. You should retain a copy, and a copy should be sent to Kohler Environmental Engineering.

Copies of this letter will be sent to the individuals listed below. As we discussed, a copy should also be sent to Kohler Environmental Engineering for their records. If further information regarding this project is required, please call me.

I enjoyed working with you on this project John, and I hope that you will contact E & K in the future if we can be of assistance.

Cordially,

Peter Madden

Peter Madden
E & K Hazardous Waste Services

Enclosure

cc: Mr. Mike Schwartz WDNR
Mr. Lloyd Wunsch - Town of Mosel Fire Dept.

PM/jh

Tank 26

Department of Natural Resources

LEAKING UNDERGROUND STORAGE TANK (Case Tracking)
Form 4400-146 ~~1491~~ 5119 3-91

Site Name: Kohler Co - Generator Div/Tank 26
CTH LS at Garton Rd
PMN: Mosel FID: 460 038700
Proj Mgr: M Schwartz
Support Person:

District: SED County: Sheboygan
Address: City Tnk LS
Legal Municipality: Sheboygan 53081
Legal Desc: ____ 1/4 ____ 1/4 Sec ____ T ____ R ____ E/W

Date of Initial Contact: 11 / 11 / 87 Date of Letter: ___/___/___ Date Site Closure Approved: 11 / 11 / 87

Status
____ 1 = State Lead
✓ 2 = RP Lead

Priority Screening
____ 1 = High
____ 2 = Medium
✓ 3 = Low
____ 4 = Unknown

Score: ____ . ____

Funding Source
✓ 1 = RP
____ 2 = LTF
____ 3 = EF
____ 4 = SF
____ 5 = None
____ 6 = Other (Describe In Comments)
____ 7 = EPA (Emergency Resp)

PECFA Review Requested
(√) ____ Yes ____ No

Date PECFA Request Received
(mm/dd/yy) ___/___/___

Lust Trust Eligible
✓ 1 = Federal
____ 2 = Non-Federal

CASE STATUS

(√) As Appropriate	Date Initiated (mm/dd/yy)	Date Completed (mm/dd/yy)	Comments
____ No Action Taken (N)			
____ Emergency (E)	___/___/___	___/___/___	
____ Emergency Response (R)	___/___/___	___/___/___	
✓ Field Investigation (I)	11 / 10 / 87	11 / 10 / 87	pulled 1 test, overexcavated
____ Remedial Action (C)	___/___/___	___/___/___	
____ Long Term Monitoring (L)	___/___/___	___/___/___	

(√) All Appropriate	Known Impacts (√)	Potential Impacts (√)
____ Fire/Explosion Threat (1)		
____ Contaminated Private Well (2)		
____ Contaminated Public Well (3)		
____ Groundwater Contamination (4)		
____ Soil Contamination (5)	✓	
____ Other: (6) ____		

Substances (√)
____ Leaded Gas(1)
____ Unleaded Gas (2)
✓ Diesel (3)
____ Fuel Oil (4)
____ Unknown Hydrocarbons (5)
____ Other (8) ____
____ VOCS (6)
____ Pesticide (7)

1000 gal diesel

Quantity Discharged ____

Responsible party
Name: ~~same~~ The Kohler Co ~~John Emmerling~~
Address: 444 Highland Dr
Kohler, WI 53044
Telephone: 414 / 457-4441
(list additional on separate list and attach.)

attn Gene Wong

Consultant: Erik Hay Waste Services Inc
Contact: Peter Madden
Address: PO Box 1249 2505 Paine Av
Sheboygan 53082-1249
Telephone: 414 / 458-6030
Amount Committed: $____ . ____
Amount Spent: $____ . ____
(list additional on separate list and attach.)

ENFORCEMENT ACTION TAKEN

01 = Inf. Contact, Resp Initiated
02 = RP Letter, Resp Initiated
03 = NTC of Non Compliance
04 = Inf. Enf. Conf, Resp Initiated
05 = Follow-up Enf. Conf, Resp Initated
06 = Inspection Letter
07 = Response Received
08 = Adequate Response
09 = Progress Being Made
10 = Defer Enforcement
11 = Close Out
12 = Recommend NFA
13 = FWD to Secondary Enf
14 = Notice of Violation
15 = Formal Enf Conf
16 = Enf Conf. Letter
17 = Admin. Order Proposed
18 = Admin. Order Final
19 = Admin. Order Modified
20 = Admin. Order Cancelled
21 = Contest Case Hearing
22 = Draft Referral
23 = Referral to DOJ
24 = Referral to DA
25 = Referral to EPA
26 = Continuing Violation
27 = See Next Violation
28 = Site Inspection
99 = Other Action: ____

ACTION (code from above)	DATE (mm/dd/yy)	COMMENT
01	10 / 11 / 87	Consultant notified by letter
11	11 / 11 / 87	NFAR

(list additional on separate list and attach.)