file - Hopkins Ag Chem

ecology and environment, inc.

111 WEST JACKSON BLVD., CHICAGO, ILLINOIS 60604, TEL. 312-663-9415

International Specialists in the Environment

M E M O R A N D U M

DRAFT

DATE: July 14, 1986

TO: File

FROM: Tom Clyne Tom Clyne

SUBJECT: HRS Scoring
Wisconsin/TDD: R05-8404-09,
WST#: WI0082
Randolph/Hopkins AG Chem Co.
USEPA ID#: WID006075352

Part A Status - Existing
Interim Status Candidate
Generator
Transporter
(TSD) Treatment, Storage and/or
Disposal Facility

Source USEPA Computer Printout
Dated: 1/14/86

The site, Hopkins Agricultural Chemical Company is covered by RCRA because "Part A" status is an existing therefore, HRS scoring need not proceed.

16K:6M

recycled paper

(AD-75)

CORRESPONDENCE/MEMORANDUM

STATE OF WISCONSIN

Date: May 23, 1986 *File Ref:* 4430

To: File

From: Nichol Mamolou-Horicon

Subject: Hopkins Ag Chemical, Randolph facility

Thursday, May 23, 1986, Lee Schwalenberg called to respond to my inquiry about toxaphene production at the Randolph facility. He said that several government officials were expressing concern about this chemical.

He told me that toxaphene was kept on-site in an above-ground tank from 1978-1985. This tank is not in the vicinity of the storage pad, which we are currently investigating for closure.

Hopkins used the toxaphene to manufacture a pesticide, Duo-Tox E.C. Lee said that this product was made only once. The rest of the unused bulk toxaphene was shipped out to some other chemical company.

By January, 1985, the toxaphene storage tank had been cleaned and emptied. Waste toxaphene sludge and washwater (4, 55 gal. drums) from the tank are currently on the storage pad, along with 1 55 gal. drum of Duo-Tox which was returned. Lee said that records are maintained on these drums, and that there has never been a leak or spill of toxaphene at Randolph. Just as a precaution, however, he is placing each drum into larger drums for double protection.

When I visit the site for the storage pad cleaning project, I should review the inspection log for toxaphene.

ANM:lr

cc: Joe Brusca, SD
~~SW/3~~

(AD-75)

CORRESPONDENCE/MEMORANDUM

File

STATE OF WISCONSIN

Date: April 30, 1986 *File Ref:* 4430

To: File

From: Wendell Wojner

WJW

Subject: Hopkins Agricultural Products, EPA I.D. #WID 006075352, Dodge County

On April 17, 1986, Kevin Lehner of RMT, a consulting firm hired by Hopkins contacted me to discuss the current status of the facility with respect to their storage area. Hopkins is undergoing a modification of their interim license in order to better protect the environment near the site.

The open unprotected storage pad was not acceptable for meeting the standards of NR 181.43(6)(d). Therefore, Hopkins has constructed a building in order to store hazardous wastes. The process was performed under a modification proposal and approval as shown in a January 29, 1986, letter. One of the conditions of that approval would be to implement the closure plan for the currently used storage area. When the first two conditions of the approval were met (building construction report and contingency plan changes) it was thought that waste materials would be moved into the building and the closure plan for the old storage area would be implemented.

On February 28, a meeting was held to clarify the closure plan and operations for the existing hazardous waste storage unit at the facility. The meeting's purpose was to have Hopkins submit a closure plan that would be in the format that the Department wanted so that a determination could be made as to it's adequacy. It is hoped that this memo clarifies the Department's stance with respect to the modification of interim licensing and the conditions of that modification.

WW:ps

cc: Mr. Lee Schwalenberg, Hopkins Ag., Products Division, P.O. Box 7532, 537 Atlas Avenue, Madison, WI 53707
Mr. John Kirth, Hopkins Ag., Co., 110 Hopkins Drive, Randolph, WI 53956
Nichol Mamolou - Horicon Area
Pat Kirsop - SW/3 - GEF II
Mr. Kevin Lehner, Suite 122, Washington Square, 1406 East Washington Avenue, Madison, WI 53703

→ File

State of Wisconsin \ **DEPARTMENT OF NATURAL RESOURCES**

Carroll D. Besadny
Secretary

Horicon Area Headquarters
1210 N. Palmatory Street
Horicon, WI 53032

File Ref: 4430

April 8, 1986

Hopkins Agricultural Products Division
P. O. Box 7532
537 Atlas Avenue
Madison, WI 53707
Attn: Lee Schwalenberg

Dear Lee:

Re: Waste Analysis Plan, Hopkins Agricultural Chemical Company
EPA ID# WID 006075352, Dodge County

I have reviewed the waste analysis plan for the Hopkins Manufacturing Facility at Randolph, Wisconsin, and found it to meet the requirements of 40 CFR 264.13 and NR 181.42(1)(e). Thank you for your cooperation in this matter. If you have any questions or comments, please contact me at (414) 485-4434.

Sincerely,

ANM

A. Nichol Mamolou
Hazardous Waste Specialist

ANM:je

cc: Joe Brusca, SD
SW/3
Ken Schultz, Hopkins Agricultural Chem. Co.