WISCONSIN
DEPT. OF NATURAL RESOURCES
George E. Meyer
Secretary

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

101 South Webster Street
Box 7921
Madison, Wisconsin 53707
TELEPHONE 608-266-2621
DNR TELEFAX 608-267-3579
DNR TDD 608-267-6897
SOLID & HAZARDOUS WASTE MGMT 608-266-2111
SOLID & HAZARDOUS WASTE TELEFAX 608-267-2768

March 21, 1995

File Ref: FID#114010820
Dodge County
HW CA File

Mr. Richard D. Yabroff, P.E.
Environmental Manager
HACCO, Inc. - Administrative Office
P.O. Box 7190
537 Atlas Avenue
Madison, WI 53707

SUBJECT: HACCO, Inc. (HACCO)
Randolph, Wisconsin (WID#006075352)
Notice of Intent to Issue a Conditional Approval of the Hazardous Waste Facility Investigation (HWFI) Workplan - Volume 1: Groundwater Investigation; the Sections Pertaining to Groundwater Investigations in the HWFI Workplan - Volume II: Quality Assurance Program; the September 1993 Annual Groundwater Monitoring Report and the December 1994 Annual Groundwater Monitoring Report.

Dear Mr. Yabroff:

The Department has reviewed the documents titled: "Hazardous Waste Facility Investigation (HWFI) Workplan - HACCO, Inc., Randolph, WI - November 1994 - Volume 1: Groundwater Investigation" and the "Hazardous Waste Facility Investigation (HWFI) Workplan - HACCO, Inc., Randolph, WI - November 1994 - Volume II: Quality Assurance Program", prepared by HACCO, Inc. The Department has also reviewed HACCO's September 1993 Annual Groundwater Monitoring Report (prepared by RMT, Inc. on behalf of HACCO) and December 1994 Annual Groundwater Monitoring Report (prepared by HACCO). Attached are the Department's draft cover letter and draft conditional approval of those workplans and reports.

Please carefully review the attached draft cover letter and draft conditional approval. If you have any questions or comments, or disagree with any of the information, notify us in writing no later than Thursday, March 30, 1995. If we do not receive a response from you, we will then issue the conditional plan approval in final form.

Printed on Recycled Paper

If you have any questions regarding this letter please contact Cynde English at (608) 266-7017.

Sincerely,

Barbara J. Zellmer, Chief
Hazardous Waste Management Section
Bureau of Solid and Hazardous Waste Management

BZ:ce

Enclosure: Draft Cover Letter
Draft Conditional Plan Approval

cc: Mark Gordon - SW/3
Joe Brusca - Southern District
Dave Edwards - Horicon Area
Laura Lodisio/Allen Wojtas - U.S. EPA Region V (HRE-8J)
Gordon Garcia - U.S. EPA Region V (HRM-7J)
Lee Schwalenberg - HACCO, Inc. Manufacturing Plant

CE:hacmar95.dft

WISCONSIN
DEPT. OF NATURAL RESOURCES

George E. Meyer
Secretary

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

101 South Webster Street
Box 7921
Madison, Wisconsin 53707
TELEPHONE 608-266-2621
DNR TELEFAX 608-267-3579
DNR TDD 608-267-6897
SOLID & HAZARDOUS WASTE MGMT 608-266-2111
SOLID & HAZARDOUS WASTE TELEFAX 608-267-2768

DRAFT

File Ref: FID#114010820
Dodge County
HW CA File

Mr. Richard D. Yabroff, P.E.
Environmental Manager
HACCO, Inc. - Administrative Office
P.O. Box 7190
537 Atlas Avenue
Madison, WI 53707

SUBJECT: HACCO, Inc. (HACCO)
Randolph, Wisconsin (WID#006075352)
Conditional Approval of the Hazardous Waste Facility Investigation (HWFI) Workplan - Volume 1: Groundwater Investigation; the Sections Pertaining to Groundwater Investigations in the HWFI Workplan - Volume II: Quality Assurance Program; the September 1993 Annual Groundwater Monitoring Report and the December 1994 Annual Groundwater Monitoring Report.

Dear Mr. Yabroff:

The Department has reviewed the documents titled "Hazardous Waste Facility Investigation (HWFI) Workplan - HACCO, Inc., Randolph, WI - November 1994 - Volume 1: Groundwater Investigation" and the "Hazardous Waste Facility Investigation (HWFI) Workplan - HACCO, Inc., Randolph, WI - November 1994 - Volume II: Quality Assurance Program", prepared by HACCO, Inc. On March 1, 1995, the Department gave HACCO verbal, conditional approval for the design, installation, development, construction documentation and sampling/analysis of additional monitoring wells at the HACCO facility in Randolph, Wisconsin.

Enclosed is the Department's conditional approval of the information in those workplans that pertain to monitoring well design, installation, development, construction documentation and groundwater sampling/analysis, excluding the Health and Safety Plan contained in Appendix A. The Health and Safety Plan is required to be submitted, but it is Department policy not to approve them. Conditions #1 through #8, which pertain to the well installations and follow-up sampling and analysis, are standard Department requirements. Condition #11 references general submittal and copy distribution requirements. These conditions were provided to HACCO on March 3, 1995 prior to HACCO initiating the well installations on March 6, 1995.

Chs. NR 140 and NR 635, Wis. Adm. Code give the Department authority to require that HACCO establish a groundwater monitoring program to determine whether their facility is in compliance with established groundwater protection standards. Chs. NR 140 and NR 635, Wis. Adm. Code give the

Printed on Recycled Paper

Department further authority to require groundwater monitoring and corrective measures necessary to achieve compliance with established groundwater protection standards. It is the Department's understanding that the Hazardous Waste Facility Investigation Workplan - Volume II: Quality Assurance Program being approved for the initial groundwater sampling of the new sandstone piezometers also applies to the routine groundwater monitoring program currently being implemented at the facility in Randolph.

The Department has reviewed HACCO's September 1993 Annual Groundwater Monitoring Report (prepared by RMT, Inc. on behalf of HACCO) and December 1994 Annual Groundwater Monitoring Report (prepared by HACCO), and determined they are generally satisfactory. Under condition #9 of the attached plan approval, the Department is now requiring that HACCO submit a workplan for a revised groundwater monitoring program, within 60 days of the date of this letter.

Finally, under condition #10 of the attached plan approval the Department is requiring that HACCO submit an evaluation of the need for any additional monitoring wells no later than November 1, 1995 (unless approved otherwise by the Department), after HACCO has had a chance to review additional groundwater monitoring data and evaluate the effectiveness of the pump and treat system tentatively proposed to be on-line in June of 1995. The Department is also requiring that HACCO provide recommendations to address the low pH conditions detected in groundwater collected from MW-12A as part of that submittal.

If you have any questions regarding this letter please contact Cynde English at (608) 266-7017.

Sincerely,

***DRAFT***

Barbara J. Zellmer, Chief
Hazardous Waste Management Section
Bureau of Solid and Hazardous Waste Management

BZ:ce

Enclosure: Conditional Plan Approval

cc: Mark Gordon - SW/3
Joe Brusca - Southern District
Dave Edwards - Horicon Area
Laura Lodisio/Allen Wojtas - U.S. EPA Region V (HRE-8J)
Gordon Garcia - U.S. EPA Region V (HRM-7J)
Lee Schwalenberg - HACCO, Inc. Manufacturing Plant

CE:hacmar95.wll

BEFORE THE
STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
CONDITIONAL PLAN APPROVAL
HACCO, INC. (HACCO)

FINDINGS OF FACT

GENERAL INFORMATION

| | |
|---|---|
| AUTHORIZED CONTACT | Mr. Richard D. Yabroff, P.E.<br>Environmental Manager<br>HACCO, Inc. - Administrative Office<br>P.O. Box 7190<br>537 Atlas Avenue<br>Madison, WI 53707<br>(608) 221-6200 |
| CONSULTANT | Applied Environmental Engineering, Inc.<br>2122 Luann Lane<br>Madison, WI 53713<br>Noel Anderson, Hydrogeologist<br>(608) 277-9933 |
| OWNER/OPERATOR | HACCO, Inc.<br>P.O. Box 7190<br>537 Atlas Avenue<br>Madison, WI 53707<br>(608) 221-6200 |
| FACILITY LOCATION | HACCO, Inc. - Manufacturing Plant<br>110 Hopkins Drive<br>Randolph, WI 53956<br>(414) 326-5141<br><br>The HACCO, Inc. - Manufacturing Plant is located at the southeastern edge of the Village of Randolph, Dodge County, Wisconsin in the N 1/2 of the SE 1/4 and the NE 1/4 of the SW 1/4 of Section 6, T12N, R13E. |

The Department finds that:

1. HACCO, Inc. (HACCO) was granted an interim license under ch. NR 181, Wis. Adm. Code, for a hazardous waste storage facility. On August 21, 1986, HACCO notified the Department that it intended to close its hazardous waste storage facility. A closure inspection was performed on January 23, 1991 and the storage facility was found to have been closed in conformance with the applicable portions of the approved closure plan for the storage facility. Accordingly, HACCO's interim license was revoked on May 17, 1991.

2. Hazardous wastes are defined in s. 144.61(5), Wis. Stats., and ch. NR

605, Wis. Adm. Code, and hazardous substances are defined in s. 144.01(4m), Wis. Stats., and s. NR 158.03(4), Wis. Adm. Code.

3. Hazardous wastes and hazardous substances have been discharged at the HACCO facility.

4. On September 8, 1993 the Department received a document titled "Annual Groundwater Monitoring Report - Hopkins Agricultural Chemical Company - Randolph, Wisconsin - September 1993", prepared by RMT, Inc. on behalf of HACCO, Inc.

5. On July 11, 1994 HACCO, Inc. entered into a Corrective Action Special Consent Order with the Wisconsin Department of Natural Resources under the authorities of ss. 144.73 and 144.735, Wis. Stats.

6. On November 4, 1994, the Department received a document titled "Hazardous Waste Facility Investigation (HWFI) Workplan - HACCO, Inc., Randolph, WI - November 1994 - Volume 1: Groundwater Investigation", prepared by HACCO, Inc.

7. On November 4, 1994, the Department received a document titled "Hazardous Waste Facility Investigation (HWFI) Workplan - HACCO, Inc., Randolph, WI - November 1994 - Volume II: Quality Assurance Program", prepared by HACCO, Inc.

8. On December 9, 1994 the Department received a document titled "Annual Groundwater Monitoring Report - HACCO, Inc., Randolph, Wisconsin - December 1994", prepared by HACCO, Inc.

9. Additional documents and letters considered in review of the documents listed in conditions #4, #6, #7 and #8, above, include the following:

   a. Document titled "Phase III Remedial Investigation Report - Hopkins Agricultural Chemical Company - Randolph, Wisconsin - July 1992", prepared by RMT, Inc. on behalf of HACCO.

10. In accordance with s. NR 103.08, Wis. Adm. Code, the Department has determined that the activities approved under this conditional plan approval will not adversely affect any wetland areas. Therefore, these activities are in conformance with the provisions of ch. NR 103, Wis. Adm. Code.

11. Chapter NR 140, Wis. Adm. Code preventive action limits (PALs) and enforcement standards (ESs) for substances of health and welfare concern have been attained or exceeded at the point of standards application at the HACCO facility in Randolph, WI.

12. This conditional plan approval is necessary to protect human health and the environment and comply with ch. NR 140, Wis. Adm. Code and s. 144.735, Wis. Stats.

## CONCLUSIONS OF LAW

1. The Department has the authority to impose monitoring requirements at the HACCO facility pursuant to ss. NR 600.07 and 615.05(4)(a)8, Wis. Adm. Code.

2. The Department has the authority to require a response under s. 160.23, Stats., and s. NR 140.24, Wis. Adm. Code if a preventive action limit for a substance of health or welfare concern has been attained or exceeded at a point of standards application.

3. The Department has the authority to require a response under s. 160.25, Stats., and s. NR 140.26, Wis. Adm. Code if an enforcement standard for a substance of health or welfare concern has been attained or exceeded at a point of standards application.

4. The Department has the authority under s. 144.735, Wis. Stats., to require corrective action to address releases from solid waste management units (SWMUs), including corrective action beyond the facility boundary.

## CONDITIONAL PLAN APPROVAL
## HACCO, Inc.

Based on the Findings of Fact and Conclusions of Law, the Department has the authority pursuant to s. 144.735, Wis. Stats. to issue this conditional approval of the "Hazardous Waste Facility Investigation (HWFI) Workplan - Volume 1: Groundwater Investigation"; the sections pertaining to groundwater investigations in the "Hazardous Waste Facility Investigation (HWFI) Workplan - Volume II: Quality Assurance Program" (excluding the Health and Safety Plan); the September 1993 Annual Groundwater Monitoring Report and the December 1994 Annual Groundwater Monitoring Report, subject to compliance with chs. NR 600 through 685 and NR 140, Wis. Adm. Code, and the following conditions:

1. All wells shall be designed, installed, developed and documented in accordance with the requirements of ch. NR 141, Wis. Adm. Code.

2. In accordance with ch. NR 141, Wis. Adm. Code, drilling fluids and water may be used to drill monitoring wells only when there are no reasonable alternatives. If drilling fluids are used, the driller shall document the type of fluids, any additives used and the chemical constituents of the mixture. If water is used, the source of the water shall be

identified (see s. NR 141.15, Wis. Adm. Code).

3. Where conditions permit, samples shall be collected using undisturbed soil sampling techniques. Samples may not be composited for testing purposes. In fine-grained soil environments, continuous samples shall be collected. In uniform, coarse-grained soil environments samples shall be collected from each major soil unit encountered and at maximum 5-foot intervals. At least one soil sample shall be collected at the depth of any subsequently placed monitoring well screen. If borings are extended into bedrock, selected core samples of the bedrock shall be taken and the rock properties including fracture frequency, rock quality designation and percent recovery shall be determined.

4. A boring log shall be submitted for each boring in accordance with ch. NR 141, Wis. Adm. Code and soil boring log information Form 4400-122 (or comparable form). Each boring log shall also include descriptions of the samples collected from each major soil unit, bedrock formation and the soil sample(s) collected at the depth of any subsequently placed monitoring well screen to include:

   a. The results of headspace screening performed on the samples.

   b. Grain size distribution by mechanical and hydrometer test and Atterberg limits, as appropriate for the particular soil type.

   c. Texture, structure, mottling, moisture content, layering, jointing, lenses, fractures, organic matter, voids, geologic origin, visual classification according to the USCS (Unified Soil Classification System) and Muncell color chart, and any other relevant information.

5. In addition to a soil boring log, the following forms shall be submitted to the Department within 60 days after well installation:

   a. 4400-113A "Monitoring Well Construction"

   b. 4400-113B "Monitoring Well Development"

   c. Up-dated 4400-89 "Groundwater Monitoring Well Information Form"

6. Color and turbidity shall be noted for the groundwater samples collected from the monitoring wells.

7. HACCO shall select analytical laboratory methods that meet the criteria outlined in s. NR 140.16, Wis. Adm. Code, including limits of detection and limits of quantitation below the preventive action limit. If no analytical method exists that can achieve limits of detection and limits

of quantitation below the PAL, then the method that produces the lowest available limits of detection and limits of quantitation shall be proposed.

8. All laboratory chemical analysis of soils, groundwater, surface water, sediment, air and subsurface gas shall be performed in accordance with standard methods, at a laboratory certified or registered by the Department under ch. NR 149, Wis. Adm. Code.

9. HACCO shall submit a workplan for a revised groundwater monitoring program at the facility in Randolph within 60 days of the date of this letter. At a minimum this workplan shall include:

   a. A proposal to revise and expand the existing configuration of source and perimeter monitoring wells to better define the horizontal/vertical degree and extent of groundwater contamination, and evaluate the effectiveness of the pump and treat system tentatively proposed to be on-line in June of 1995.

   b. A proposal to revise and expand the current groundwater parameter list to include additional constituents previously detected in soil and groundwater, unless HACCO demonstrates that the detects are exclusively a result of background contamination (e.g., naturally occurring constituents, contamination due to agricultural practices or other off-site contamination that has migrated onto the property), and/or exclusively attributable to laboratory contamination.

   c. A proposal to include a discussion of any problems encountered and/or any deviations from the Hazardous Waste Facility Investigation Workplan - Volume II: Quality Assurance Program, with submittal of the quarterly groundwater monitoring data and annual groundwater monitoring reports.

   d. A proposal to include the results of analyses of trip blanks, field blanks, duplicates and matrix spike/matrix spike duplicates with submittal of the quarterly groundwater monitoring data.

10. HACCO shall submit an evaluation of the need for additional groundwater monitoring wells at the facility in Randolph no later than November 1, 1995, unless approved otherwise by the Department. This submittal shall also include recommendations to address the low pH conditions detected in groundwater collected from MW-12A. If HACCO determines that additional monitoring wells are needed, then the submittal shall include a proposal for monitoring well design, installation, development and construction documentation in accordance with ch. NR 141, Wis. Adm. Code. HACCO shall include a proposal to add the additional wells to the

routine groundwater monitoring program.

11. Copies of all correspondence, plans, plan sheets, reports, or other related documents shall be prepared in accordance with the "General Submittal Requirements" outlined in Section A of the State Task I (Hazardous Waste Facility Investigations), and distributed in accordance with the notification requirements outlined in Section XIX of the July 11, 1994 Corrective Action Consent Order.

The Department retains the right to modify this determination and to require additional information at any time. Nothing in this conditional plan approval shall relieve HACCO of the legal obligation to comply with applicable federal, state and local requirements.

NOTIFICATION OF APPEAL RIGHTS

If you believe that you have a right to challenge this decision, you should know that Wisconsin statutes and administrative rules establish time periods within which requests to review Department decisions must be filed. For judicial review of a decision pursuant to sections 227.52 and 227.53, Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition with the appropriate circuit court and serve the petition on the Department. Such a petition for judicial review shall name the Department of Natural Resources as the respondent.

This notice is provided pursuant to s. 227.48(2), Stats.

***DRAFT***

Dated:_____

DEPARTMENT OF NATURAL RESOURCES
For the Secretary

***DRAFT***

_____
Barbara J. Zellmer, Chief
Hazardous Waste Management Section
Bureau of Solid & Hazardous Waste Management

***DRAFT***

_____
Cynthia K. English, Hydrogeologist
Hazardous Waste Management Section
Bureau of Solid & Hazardous Waste Management

CE:hgwmar95.apr