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September 30, 2004

Ms. Denise Nettesheim
Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg, WI 53711

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SOUTH CENTRAL REGION

**Subject: HACCO, Inc., Randolph, Wisconsin**
**September 2004 Quarterly Progress Report**
**FID# 114010820**

Dear Ms. Nettesheim:

Attached is the September 2004 quarterly progress report for the HACCO, Inc. (HACCO), facility in Randolph, Wisconsin.

If you have any questions regarding this report, please contact me at your convenience, at 608-662-5242.

Sincerely,

RMT, Inc.

Steven L. Martin, P.G.
Project Manager

cc: Lon Bohannon, Neogen Corp.
Lee Schwalenberg, HACCO
Mark Gordon, WDNR

# HACCO, Inc.
# Randolph, Wisconsin
# September 2004 Quarterly Progress Report
# FID No. 114010820

**Activities:** Interim Measures, Hazardous Waste Facility Investigation, Groundwater Monitoring

**Prepared by:** Steven L. Martin, P.G.

**Date:** September 30, 2004

**Copies:** Lon Bohannon, Neogen Corp.
Lee Schwalenberg, HACCO
Mark Gordon, WDNR
Denise Nettesheim, WDNR

## 1. Progress Made This Reporting Period

*Groundwater Pump-and-Treat System*

Approximately 46,116 gallons of contaminated groundwater were pumped and treated from RW-1, and approximately 33,572 gallons were pumped and treated from RW-2 during the period from June 2004 through August 2004. Sampling of the system continued on a frequency of approximately 100,000 gallons, or once per month, and the effluent continued to meet discharge permit levels.

*Soil Vapor Extraction Operation and Monitoring System*

The soil vapor extraction system has not been operated in 2004. The rationale for discontinuing the operation of this system was explained in the Annual Groundwater Monitoring Reports for the years 2002 and 2003.

*Groundwater Monitoring*

No groundwater monitoring was conducted (nor required) during this period.

*2004 Annual Groundwater Monitoring Report*

The 2004 annual groundwater monitoring report was submitted on July 1, 2004.

## 2. Summary of Findings/Status Discussion

*Groundwater Pump-and-Treat System*

The groundwater pump-and-treat system continues to operate as planned.

Data compiled for the past several years indicate that breakthrough on the carbon treatment units occurs after about 140,000 gallons of throughput. Up to this time, sampling of the treatment system to detect breakthrough has been performed on a frequency of approximately 100,000 gallons, or once per month, whichever comes first. This monitoring frequency was established when the system was first started up (about 10 years ago) and before we had data indicating when breakthrough would occur. However, the breakthrough data that have been compiled indicate that monitoring breakthrough on a monthly basis is usually excessive. It is also apparent that a monitoring program based on throughput rather than elapsed time is appropriate. Based on the review of breakthrough data, it is apparent that a much less frequent testing program would be appropriate, and we recommend a program as follows:

- After a new carbon unit is installed, conduct the first sampling round after 100,000 gallons of throughput.
- Conduct sampling at 10,000-gallon intervals thereafter.

Even with this reduced sampling program there is almost no risk of unacceptable discharges because of the redundant treatment units (series configuration) in place. Also, there have never been any detects of contaminants after the second treatment unit. This proposed modification will not lessen the performance or adequacy of this system and will allow HACCO to direct the savings toward other environmental matters at the facility.

*Soil Vapor Extraction (SVE) Operation and Monitoring System*

The SVE system was last operated in the summer of 2003, and air effluent samples were collected to determine if appreciable contaminant mass could be recovered with the system. The results of the testing indicated minimal contaminant mass recovery and we previously recommended (in the 2002 Annual Groundwater Monitoring Report) that the system not be operated if contaminant mass recoveries were low. Therefore, the SVE system has not been operated, and it is not expected to be operated in the future. A more comprehensive discussion of the results of this system's operation was included in our Annual Groundwater Monitoring Report for 2003.

*Groundwater Monitoring*

The semiannual exceedence reports and letters to private well owners for the April 2004 monitoring round were prepared and submitted in July 2004.

## 3. Schedule Status

Work continues on conducting monitoring and sampling, and on operating the remediation systems in accordance with the approved workplans.

## 4. Scope Changes

No scope changes occurred during this period.

5. **Summary of Contacts With the Public or Non-WDNR Government Agencies**

No contacts have been made during this period.

6. **Summary of Contacts with the WDNR**

Ms. Denise Nettesheim of the WDNR contacted RMT to inquire on the status of the project.

7. **Problems and Recommended Solutions**

None.

8. **Changes in Key Personnel**

None.

9. **Anticipated Progress Next Reporting Period**

We expect to conduct the October semiannual groundwater monitoring round in accordance with the approved plan.

10. **Overall Progress**

The extent of soil and groundwater contamination has been defined. Those areas on-site site where impacted soils are present are capped or covered to prevent direct contact and to minimize infiltration. Hydraulic containment of mobile contaminants in the shallow aquifer continues.