Beggs, Tauren R - DNR

From: Danelski, Denise D - DNR
Sent: Tuesday, September 05, 2017 2:12 PM
To: Beggs, Tauren R - DNR
Subject: FW: Notification of PCB Contamination_Safety-Kleen Systems Kaukauna, WI
Attachments: Umanifested Waste Report_US EPA Skana.pdf; Skana Aluminum Timeline Summary.pdf

Tauren,
Unsure what the deal is here. Don't really think this has anything currently, to do with the RR program. Waste was notified.

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Denise D. Danelski
Phone: (920) 662-5494
denise.danelski@wisconsin.gov

From: Edelstein, Gary A - DNR
Sent: Tuesday, August 29, 2017 1:27 PM
To: Danelski, Denise D - DNR
Subject: FW: Notification of PCB Contamination_Safety-Kleen Systems Kaukauna, WI

For your Skana Aluminum Manitowoc file. I note WMM staff, Amy Walden, was already cc'd.

http://dnr.wi.gov/botw/GetActivityDetail.do?adn=0736555269&siteId=22545900&crumb=1&search=b

Thanks, Gary E

From: Ramanauskas, Peter [mailto:ramanauskas.peter@epa.gov]
Sent: Tuesday, August 29, 2017 11:42 AM
To: Edelstein, Gary A - DNR
Subject: FW: Notification of PCB Contamination_Safety-Kleen Systems Kaukauna, WI

Hi Gary,

Passing this along FYI – source identified as Skana Aluminum. The name sounded familiar and Annette Weissbach was involved in a soil cleanup, but I believe she's no longer with WDNR, correct?

Let me know if you have questions.

Thanks,
Peter

From: Taylor, Kelly [mailto:Kelly.Taylor@safety-kleen.com]
Sent: Tuesday, August 29, 2017 9:43 AM
To: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
Cc: amy.walden@wisconsin.gov; Prince, Mark A. <Prince.MarkA@cleanharbors.com>
Subject: Notification of PCB Contamination_Safety-Kleen Systems Kaukauna, WI

Good Day Peter,

Attached is an Initial/Final Report of PCB contamination detected at our Kaukauna WI facility and the unmanifested waste report.

The PCB-contaminated used oil has been removed from the route truck and the truck has been decontaminated. A timeline/final report is included with this submittal. The source, Skana Aluminum is aware of this situation and has cooperated with Safety-Kleen, and there have been procedures established to ensure any potentially-contaminated used oil will be segregated and managed as TSCA waste.

Please let me know if you have questions or require additional information.

Kelly Dale Taylor, CHMM Environmental, Health & Safety Manager | Safety-Kleen | A Clean Harbors Company | Madison, WI | kelly.d.taylor@safety-kleen.com
608.298.6420 (o) | 608.209.0280 (c) | 608.221.9685 (f) | safety-kleen.com

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August 29, 2017

Mr. Peter Ramanauskas
US EPA-Region 5 PCB Coordinator
77 West Jackson Blvd, LU 9J
Chicago, IL 60604

RE: Unmanifested Waste Report

Dear Mr. Ramanauskas:

This letter serves as documentation of an unmanifested waste report in accordance with 40 CFR 761.2111.

Name, Address, and EPA ID Number of the commercial storage facility
Safety-Kleen Systems, Inc.
2100 Badger Road
Kaukauna, WI 54130
WID 981 520 049

Date of Receipt of unmanifested waste
June 30, 2017

Transporter Name and EPA ID Number
Safety-Kleen Systems, Inc.
TXR 000 081 205

Name and Address of Generator
Skana Aluminum Company
2009 Mirro Drive
Manitowoc, WI 54220

Type and Quantity of unmanifested waste
1,600 Gallons of used oil contaminated with Polychlorinated Biphenyls (PCBs)

Explanation of why the waste was unmanifested

The used oil was characterized as non-PCB used oil by the generator. At the time of pickup, neither Safety-Kleen nor the generator was aware of the PCB contamination in the used oil containers that were pumped.

Management of PCB contaminated material

The material was not returned to the generator because it was commingled with used oil received from other sources on the Safety-Kleen collection truck before the PCB contamination was known. All material commingled or in contact with the PCB contaminated material is being managed as TSCA-regulated PCB material.

If you have questions or require additional information, please contact me at 608.298.640 or via email at Kelly.d.taylor@safety-kleen.com.

Sincerely,

Kelly Dale Taylor

Kelly Dale Taylor, CHMM
Environmental, Health & Safety Manager

Kaukauna - Kimberly, WI – Skana Aluminum PCB Event Timeline Summary

CERP Number: 17-060-KAU-28

Date of Detection: July 5, 2017

Date	Actions
June 30, 2017	• On June 30, 2017 the Safety-Kleen Service Representative from Safety-Kleen's Kaukauna, WI branch collected 1,600 gallons of used oil from nine totes at Skana Aluminum Company, 2009 Mirro Drive, Manitowoc, WI 54220. The oil was comingled on the truck with 800 gallons of used oil from a second customer. The truck returned to the Safety-Kleen Kimberly Oil Terminal.
July 5, 2017	• On July 5, 2017, a pre-acceptance sample was taken from the truck and screened for polychlorinated biphenyls (PCBs) at the Safety-Kleen Madison Oil Terminal at 3715 Lexington Avenue, Madison, WI 53714 (Madison). Polychlorinated biphenyls were detected in the truck sample. The truck was removed from service to prevent further contamination and the truck sample and the customer retain samples from both customers were sent to the laboratory at Safety-Kleen Systems, Inc. 601 Riley Road, East Chicago, IN 46312 (East Chicago) for additional analysis.
July 6, 2017	• The East Chicago laboratory reported the truck sample contained 5.37 ppm of PCB aroclor 1248 in the truck sample. • Arrangements were made to dispose of the PCB contaminated oil. • Branch personnel resampled the customers who were serviced on June 30. These samples were sent to the East Chicago lab.
July 7, 2017	• The resample results identified 2of the 9 totes from Skana Aluminum as the sole source of the PCB contamination. The resample results identified 2.2 ppm and 6.7 ppm of aroclor 1248.
July 12-14, 2017	• Safety-Kleen had numerous discussions with Skana as to TSCA applicability. Skana Aluminum Company responded on July 14, 2017 the PCB concentration was from a source greater than fifty ppm, with the result the contaminated oil became a TSCSA regulated PCB waste. • Safety-Kleen made arrangements to dispose of the contaminated oil and to decontaminate the collection truck.
July 18, 2017	• The 2,400 gallons of PCB contaminated oil was transferred from the collection truck into eight totes. The collection truck was decontaminated using diesel fuel following the self-implementing guidelines in 40 CFR 761.79. The decontamination of the truck created one fifty five gallon drum of tank heel, three fifty five gallon drums of PCB contaminated wash water and two totes of diesel used as a rinsate. The containers of liquid wastes, the contaminated oil,

	the water wash and the diesel rinsate were shipped for incineration at Clean Harbors Deer Park, LLC, 2027 Independence Parkway South, La Porte, TX 77571. These containers were shipped on manifests 005994001SKS, 00594002SKS, 005994005SKS, and 005995298SKS. The containers of solid waste were shipped for TSCA landfill at Clean Harbors Grassy Mountain, LLC, 3 Miles East 7 Miles North of Knolls, Knolls, UT 84083. These wastes were shipped on manifests 005241977SKS and 005994004SKS.
July 19, 2017	The Safety-Kleen collection truck was returned to service.

Beggs, Tauren R - DNR

From: Walden, Amy S - DNR
Sent: Monday, July 17, 2017 9:34 AM
To: Beggs, Tauren R - DNR
Subject: RE: PCB values on Mirro Drive

Thanks, Tauren!

From: Beggs, Tauren R - DNR
Sent: Friday, July 14, 2017 2:55 PM
To: Walden, Amy S - DNR
Subject: RE: PCB values on Mirro Drive

Hi Amy,

I looked through the two closed cases with residual PCB contamination at the site. Residual soil and groundwater PCB contamination appears to only be on the northern end of the site and not associated with the area where the pit is located that the used oil came from. Ed Lynch and I had a quick call at 2:30pm today with Peter Lemke from Safety Kleen and told him that Skana should try to investigate more into the source of where the PCBs are coming from to determine if the source would be regulated under TSCA. Skana is unsure of the source at this point, so to be conservative, it sounds like Safety Kleen will dispose of the used oil as TSCA waste and continue to do so until Skana can make a more accurate determination on the source.

Have a nice weekend,

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Tauren R. Beggs
Phone: (920) 662-5178
Tauren.Beggs@wisconsin.gov

From: Walden, Amy S - DNR
Sent: Friday, July 14, 2017 1:11 PM
To: Beggs, Tauren R - DNR
Subject: PCB values on Mirro Drive

Hi Tauren,

Thanks for looking in the file for the PCB values found at the former location of one of the many Mirro Company locations (current Skana Aluminum facility) on Mirro Drive. I let Pete Lemke know that I would be leaving the office today at 1:30. I told him if he did not hear from me, to call you. Monday would be ok too.

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Have you signed up for our free e-subscription to WDNRs Hazardous Waste Decoded? Sign up here

Amy Walden
Waste Management Specialist- Waste and Materials Management

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