UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 27 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:
DE-9J

Colin Beveridge
Environmental Engineer
Trent Tube
2015 Energy Drive
East Troy, Wisconsin 53120

Re: Trent Tube Division Plant No. 1
WID006097281

Dear Mr. Beveridge:

On October 28, 2005, representatives of the United States Environmental Protection Agency (U.S. EPA) and Wisconsin Department of Resources (WDNR) inspected Trent Tube Division Plant No.1 (Trent Tube) located in East Troy, Wisconsin. In response to violations identified during the inspection, U.S. EPA issued a Notice of Violation to Trent Tube on February 15, 2006. Subsequent to U.S. EPA's Notice of Violation, Maverick Tube submitted additional information regarding the identified violations in a correspondence dated March 13, 2006.

This letter is to inform Trent Tube that U.S. EPA has reviewed the referenced response, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. U.S. EPA and WDNR will continue to evaluate the Trent Tube facility in the future.

If you have any questions or concerns regarding this matter, please contact Michael Beedle at (312) 353-7922.

Sincerely,

Paul Little

Paul Little, Chief
Enforcement and Compliance Assurance Branch
Compliance Section 2

cc:
Sandy Miller, WDNR

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Trent Tube

2015 Energy Drive PO Box 77
East Troy, WI 53120-0077
262-642-7321 1-800-558-2260

ENGINEERING DEPARTMENT

Fax #: 262-642-8476

ATTN: Donia Zilles

COMPANY:

FAX #:

PHONE #:

FROM: Colin Beveridge

PAGE 1 OF 3

Phone #: 262-642-8369

DATE: 2-22-06

For your file, here's copies of the correspondence I have with the agencies related to the inspection.

Trent Tube
A Division of Crucible Materials Corp

Fax Numbers
Sales • 262-642-9571
Accounting • 262-642-8479
Engineering • 262-642-8476
Purchasing • 262-642-8478

November 14, 2005

Mr. Michael Beedle
Environmental Scientist
U. S. Environmental Protection Agency
77 West Jackson Boulevard, DRE-9J
Chicago, IL 60604-3590

Re: Trent Tube Plant 1 Remediation Site
USEPA ID # WID0006097281

Dear Mr. Beedle,

Enclosed please find the following documents you requested during our recent telephone conversation:

1. Hazardous Waste Manifests and Land Disposal Restrictions (past 3 years)
2. Waste Analysis and Disposal Profiles
3. Training Records (past 3 years)
4. Hazardous Waste Contingency Plan
5. Hazardous Waste Inspection Records (past 3 years)

Note that Triad Engineering has been contracted by Trent Tube to perform remediation activities at the site and also conducts all the hazardous waste management activities associated with the remediation.

Please do not hesitate to contact me if you have any questions about the enclosed documents or require any additional information concerning the Plant 1 site.

Sincerely,

Colin R. Beveridge
Environmental Engineer

ISO Certified 2015 Energy Drive • P.O. Box 77 • East Troy, WI 53120-0077 1-800-558-2260 • 262-642-7321
Website: www.trent-tube.com

Trent Tube
A Division of Crucible Materials Corp

Fax Numbers
Sales • 262-642-9571
Accounting • 262-642-8479
Engineering • 262-642-8476
Purchasing • 262-642-8478

November 2, 2005

Wisc. Dept. Natural Resources
Bureau of Waste Management
P.O. Box 8094
Madison, WI 53708

Re: Trent Tube Div. Plt. No. 1
EPA ID: WI006097281

Dear Sir or Madam,

During a recent inspection by USEPA and the WDNR it was brought to Trent Tube's attention that there was no record in the WDNR files of the secondary copy of the Hazardous Waste Manifest for several of the shipments we have made over the past three years. I have enclosed a copy of the report provided to us which indicates the copies that are not available.

In order to ensure that our Hazardous Waste Manifest file is complete and accurate I have also enclosed copies of the manifests that the report indicates are not in the WDNR's files. All the copies contain the signature of the receiving facility.

Please note that one of the Manifests listed on the report, IL10215532, is for a shipment that was not from the Plant 1 site, USEPA ID# WID006097281. The shipment was made from Trent Tube's Young Street facility. The USEPA ID number for this facility at the time of the shipment was WID980570055. The current USEPA ID number for this facility is WIR000121202.

Please do not hesitate to contact me if you have any questions about these records.

Sincerely,

Colin R. Beveridge
Environmental Engineer

Trent Tube
2015 Energy Drive PO Box 77
East Troy, WI 53120-0077
262-642-7321 1-800-558-2260

ENGINEERING DEPARTMENT

Fax #: 262-642-8476

ATTN: Donia Zilles

COMPANY:

FAX #:

PHONE #:

FROM: Colin Beveridge

PAGE 1 OF 8

Phone #: 262-642-8369

DATE: 2-21-06

There are attachments to the letter and report that I will mail.

Colin

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 15 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF
DE-9J

Colin Beveridge
Environmental Engineer
Trent Tube
2015 Energy Drive
East Troy, WI 53120

Re: Notice of Violation
Compliance Evaluation Inspection
Trent Tube Division Plant No. 1
WID 006 097 281

Dear Mr. Beveridge:

On October 28, 2005, representatives of the United States Environmental Protection Agency and Wisconsin Department of Natural Resources (WDNR) inspected the Trent Tube facility located at 2188 Church Street in East Troy, Wisconsin. The purpose of the inspection was to evaluate Trent Tube's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on information provided by Trent Tube personnel, a review of records, and personal observations by the inspector while inspecting the facility, U.S. EPA finds that Trent Tube is engaged in the management of hazardous waste without a hazardous waste storage license, and is in violation of certain requirements of the Wisconsin Administrative Code (WAC). To be eligible for the exemption from the requirement to obtain a hazardous waste storage license, Trent Tube must be in compliance with the conditions of Wisconsin Administrative Code (WAC) ss. NR 615.05(4) and (6). Specifically, we find that Trent Tube is in noncompliance with the following conditions for a storage license exemption, and in violation of the following requirements:

Violation 1. Dating Containers. NR 615.05(4)(a)5. [40 CFR 262.34(a)(3)]

NR 615.05(4). ACCUMULATION OF WASTES BY GENERATORS FOR 90 DAYS OR LESS. (a) On–site accumulations. A generator who accumulates hazardous waste on–site, in containers or tanks, without a storage license, for 90 days or less shall comply with the requirements of this subsection:
5. The date upon which each period of accumulation begins shall be clearly marked and visible for inspection on each container or tank.

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At beginning of the inspection, two 55-gallon drums of hazardous waste were not marked for the date of accumulation. The drums were dated during the inspection after it was determined the drums were not satellite drums. This requirement is a condition for a storage license exemption.

Violation 2. Sending a Copy of Manifests to WDNR. NR 615.08(10).

NR 615.08 (10) A generator who uses a manifest from a consignment state that is not Wisconsin shall send a photocopy of the copy received from the operator of the facility to which the hazardous waste is shipped, to the department within 5 business days of receiving the copy from that facility.

Trent Tube was not sending copies of manifests to WDNR after receipt from the disposal facility.

Violation 3. RCRA Records Not Onsite. Waste Analysis Records NR 615.06(5), Manifest Records NR 615.08(7), and Personnel Training Records NR 630.16(4). [40 CFR 262.40 and 40 CFR 265.16(e)]

Waste analysis records, manifest records and personnel records are required to be kept onsite per the above specific citations. The personnel training records requirement is a condition for a storage license exemption.

These records were not onsite during the inspection. The records were provided to the U.S EPA inspector after the inspection.

Violation 4. Contingency Plan Contents. NR 630.22(1)(e)(1) and (6). [40 CFR 265.52(d)&(e)]

NR 630.22(e) The contingency plan shall, as a minimum, contain the following:
1. The name, position, address and phone number, office and home, of all persons qualified to act as facility emergency coordinator and this list shall be kept up to date.

6. A current list of all emergency equipment at the facility, such as fire extinguishing equipment, spill equipment, internal and external alarms, and decontamination equipment where this equipment is required. The list shall include the location, physical description and the capabilities of each item.

The home address and phone number of the primary emergency coordinator was not listed in the contingency plan. A list of the emergency equipment at the facility was not in the contingency plan. The Contingency Plan requirements are conditions for a storage license exemption.

At this time, U.S. EPA is not requiring Trent Tube to apply for a storage license/permit so long as Trent Tube immediately establishes compliance with the conditions for an exemption outlined above. Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928, U.S. EPA may issue an order assessing a civil penalty for any past or current

violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Michael Beedle United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Mr. Beedle of my staff at (312) 353-7922.

Sincerely yours,

Paul Little

Paul Little, Chief
Compliance Section # 2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

cc: Sandy Miller, WDNR

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, WPTD, ECAB, DE-9J
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: **Trent Tube Division Plant No. 1**

EPA ID No.: **WID006097281**

ADDRESS: **2188 Church Street**
East Troy, WI 53120

DATE OF INSPECTION: **10/28/2005**

EPA INSPECTOR: Michael Beedle

PREPARED BY: **Michael Beedle** MB — **December 6, 2005**
Date Completed

RECEIVED BY: Paul Little, Chief
Compliance Section #2 — 12-7-05
Date Received

Purpose of Inspection
This inspection was an evaluation of Trent Tube's compliance with hazardous waste regulations found at the Wisconsin Administrative Code (WAC) and the Code of Federal Regulations (CFR). I performed the inspection with Sandy Miller of Wisconsin Department Natural Resources (WDNR). The inspection was a Federal lead RCRA Compliance Evaluation Inspection (CEI).

Participants
Michael Beedle, Environmental Scientist, U.S. EPA
Sandy Miller, WDNR Milwaukee

Representatives of Trent Tube:
Bob Schroeder, Human Resources, Safety Manager, Trent Tube
Bill Meyers, Trent Tube, Maintenance Superintendent, Trent Tube
Richard Binder, Vice President, Triad Engineering Inc.
Matt Baake, Environmental Technician, Triad Engineering

Introduction
Prior to the inspection, I reviewed available information about Trent Tube and the site. Specifically, I reviewed the following sources of information: Trent Tube's web page; EPA Databases RCRAInfo and OTIS; and WDNR Hazardous Waste Annual Report and Hazardous Waste Manifest Records. See Attachment A. EPA Database site information identifies Trent Tube as a Large Quantity Generator (LQG). The site was determined to be undergoing remediation. The wastes reported being generated are free product chlorinated solvents, contaminated personal protective equipment (PPE), system sludge, and spent granular activated sludge. It was determined that Trent Tube manufacturing operations were occurring at another location in East Troy on Energy Drive.

The inspectors arrived at the site at approximately 9:00 AM. The site is no longer operating. The manufacturing buildings have been torn down with only the concrete slabs were still in place. The facility is fenced. There are two newer buildings that were later determined to be used for remediation operations. We decided to go to the operating facility to gain access at this site. Upon arrival at the Trent Tube site located on Energy Drive, we requested to meet with the environmental representative. The environmental manager was on vacation. Messrs. Schroeder and Meyers met us as representatives for Trent Tube.

The inspectors introduced ourselves, presented our inspector credentials, and described the purpose of the inspection and the process by which we intended to conduct the inspection. Messrs. Schroeder and Binder provided us with a brief verbal description of the site. We all then went to the Church Street site to gain access.

Site Description and Tour
Messrs. Schroeder and Meyers confirmed the site was undergoing remediation. The contractor performing the remediation was identified as Triad. I took panoramic photographs of the site.

See Attachment B for the photographs. We went to the remediation buildings. The doors were locked. We requested access to the buildings. Triad Engineering was contacted and they sent two representatives to the site. Triad offices are in Milwaukee.

In the meantime, we continued to walk around the site. We observed an approximate 500-gallon tank/container that was labeled with a faded torn hazardous waste label. The top of the tank/container was open. There was liquid in it that appeared to be water. See Photographs 6-8. We observed groundwater monitoring wells throughout the site.

Messrs. Baake and Binder arrived at the site approximately one hour after being contacted. (Milwaukee is approximately an hour away from the site.) Mr. Binder described historic operations and current remedial actions. The facility use to manufacture tubes. The groundwater is contaminated by chlorinated solvents from previous facility operations.

Currently waste is derived from three main remedial operations. In one area of the site DNAPL is manually removed from wells in the creek adjacent to the property. Mr. Baake uses a peristaltic pump and tubing to pump out DNAPL from pipes stuck in the creek bottom. Additionally wells are pumped to a groundwater treatment system in the two remediation buildings. The groundwater is pumped through a groundwater treatment system that includes an oil water separator and a carbon filter, before being discharged to the creek. The facility also generates contaminated personal protective equipment (PPE).

We went inside of the groundwater remediation buildings. In the building that contained the carbon filter system, there were three 55-gallon drums. The drums were labeled and closed. One drum contained contaminated PPE. It was not full and not dated. See Picture 7 in Appendix B.

The two other drums contained oil water system sludge. Neither drum was completely full. One system sludge drum was approximately three quarters full and the other was approximately half full. Combined both drums were more than 55-gallons of waste. Mr. Baake indicated that three drums of the waste were generated at the same time. Water was removed from the top of the drums and put into the water treatment system. The reaming sludge was consolidated into two drums. After discussing the matter with Trent representatives and Ms. Miller, it was determined that the drums were not satellite accumulation drums. Since more than 55 gallons of waste was generated at one time, the drums needed to be dated at the time of generation. Mr. Baake dated the drums at time of the inspection. He dated the drums October 21, 2005, the day the waste was generated. See Pictures 8 and 9 in Appendix B.

In the building that housed the oil water separator, there was a satellite accumulation 55-gallon drum containing free product chlorinated solvents. The drum was closed and labeled. The waste codes on label were F001, F002, U226, and U228. See Photographs 21-23 in Appendix B.

Record Review

The RCRA records were not available on-site. Mr. Colin Beveridge of Trent Tube provided the records to the U.S.EPA via UPS with a letter dated November 14, 2005. I reviewed waste

profiles and analysis records, manifests, land band restriction notifications (LDR), weekly container inspection logs, and the contingency plan. I completed a Large Quantity Generator (LQG) checklist during the record review. The home phone number and address of the Primary Emergency Coordinator (Mr. Beveridge) was not in the Contingency Plan. No other issue was identified during the record review. See the Checklist in Attachment C.

Closing Conference

We summarized the following issues identified at the time of the inspection: labeling drums immediately when generating more than 55 gallons of waste; maintenance of RCRA records onsite; and sending a copy of a manifest to the WDNR after Trent receives the original copy from the Treatment Storage Disposal Facility. The inspection concluded at approximately 12 PM.

Inspection Follow-up

I did not talk to ? mike about this issue CB

On or about November 4, 2005, I called and spoke with Mr. Beveridge. He confirmed the material in the 500 gallon tank/container was rain water. He reported that Trent Tube processed the rain water through their groundwater treatment system. He mentioned that the tank/container was used previously on a special project to temporary store contaminated water prior to transferring the water to the groundwater treatment system. Therefore Trent Tube had labeled the tank/container for the project. He stated the tank/container should have had the label removed when it was emptied, and it should have been closed at that time.

Attachments

A. EPA Database and Site Information
B. Photographs
C. Checklist

[illegible]

Mr. Michael Beedle
Environmental Scientist
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard, DE-9J
Chicago, IL 60604

March 13, 2006

Dear Mr. Beedle:

RE: Response to February 15, 2006 Comment Letter Regarding Compliance Evaluation Inspection and Notice of Violation
Trent Tube Plant No. 1
2188 Church Street
East Troy, WI
WID 006097281
Symbiont Project No. W063671

On behalf of Crucible Materials Corporation (Crucible Materials) and Trent Tube, a subsidiary of Crucible Materials provided herein are responses to United States Environmental Protection Agency (USEPA) concerns stated in a February 15, 2006 letter to Mr. Colin Beveridge of Trent Tube. The February 15, 2006 USEPA letter was in regards to the hazardous waste management compliance evaluation inspection conducted on October 28, 2005 at Trent Tube Plant No. 1 (Plant No. 1) and a notice of violation of certain conditions required for a hazardous waste storage license exemption. Each identified compliance condition is stated below and followed by Symbiont's (formally Triad Engineering Incorporated) response.

VIOLATION 1 – DATING CONTAINERS. NR 615.05(4)(A)5. [40 CFR 262.34(A)(3)]:

NR 615.05(4). ACCUMULATION OF WASTES BY GENERATORS FOR 90 DAYS OR LESS.

(a) On-site accumulations. A generator who accumulates hazardous waste on-site, in containers or tanks, without a storage license, for 90 days or less shall comply with the requirements of this subsection.

5. The date upon which each period of accumulation begins shall be clearly marked and visible for inspection on each container or tank.

At the beginning of the inspection, two 55-gallon drums of hazardous waste were not marked for the date of accumulation. The drums were dated during the inspection after it was determined the drums were not satellite drums. This requirement is a condition for a storage license exemption.

Response: The two partially filled 55-gallon drums of hazardous waste observed in the dense nonaqueous phase liquid (DNAPL) room of Remediation Building No. 2 were generated on October

21, 2005 during a quarterly maintenance activity associated with the treatment of groundwater collected from the onsite pump and treatment system. The maintenance activity involved removing sludge (solid/liquid slurry) from the DNAPL tank using a pump and transfer hose, transferring the sludge into properly labeled 55-gallon drums, allowing the sludge slurry to settle for several days, decanting the water (which is recirculated through the onsite water treatment system using a pump and hose), followed by repetition of the last two steps as needed. When the majority of water is removed from the sludge slurry, the remaining solids are consolidated into a single or several drums and labeled with an accumulation date. As such, the decanting process was not complete at the time of the inspection. It is Symbiont's interpretation that under the Clean Water Act the two partially filled 55-gallon drums which were involved in this maintenance activity was considered part of the treatment system process at the time of the inspection and thus an accumulation date was not required for them.

However, from this date forward, it will be Symbiont's policy to date the drums used to perform the maintenance activities associated with the treatment system at the time the activity is performed.

VIOLATION 2 – SENDING A COPY OF MANIFESTS TO WDNR. NR615.08(10)

NR 615.08(10) A generator who uses a manifest from a consignment state that is not Wisconsin shall send a photocopy of the copy received from the operator of the facility to which the hazardous waste is shipped, to the department within 5 business days of receiving the copy from the facility.

Trent Tube was not sending copies of manifests to the Wisconsin Department of Natural Resources (WDNR) after receipt from the disposal facility.

Response: On November 2, 2005 Mr. Colin Beveridge, of Trent Tube, forwarded secondary copies of the Plant No. 1 hazardous waste manifest forms from the past 3 years that the WNDR indicated were missing from the Trent Tube hazardous waste manifest file. Each of the manifests was signed by the receiving facility. In the future, care will be taken by Mr. Beveridge or other Trent Tube representatives to insure that manifests are forwarded and received by the WDNR within 5 days of receipt from the disposal facility.

VIOLATION 3 – RCRA RECORDS NOT ONSITE. WASTE ANALYSIS RECORDS NR 615.06(5), MANIFEST RECORDS NR 615.08(7), AND PERSONNEL TRAINING RECORDS NR 630.16(4). [40 CFR 262.40 AND 40 CFR 265.16(E):

Waste analysis records, manifests records and personnel records are required to be kept onsite per the above specific citations. The personnel training records requirement is a condition for a storage license exemption.

These records were not onsite during the inspection, the records were provided to the USEPA inspector after the inspection.

Response: At the time of the inspection copies of all waste profiles, analysis records, hazardous waste manifests, land band restriction notifications, and weekly container inspection logs associated with Plant No. 1 from the past 3 years were stored at the Trent Tube corporate office

located at 2015 Energy Drive, East Troy, Wisconsin, 53120, which is located 1.3 miles from the site. Subsequent to the USEPA site visit, copies of these records were forwarded on November 14, 2005 to Mr. Beedle, of the USEPA, for review. In addition, a copy of the Contingency Plan (Triad, 2005) which was onsite at the time of the inspection was also forwarded to Mr. Beedle.

Copies of waste related records are now stored onsite. In addition to waste records, personnel training records (OSHA certifications and hazardous waste training records) for all Symbiont employees who enter the site are also stored onsite. The records are stored inside a water tight box on the lower level of the work bench in the northeast corner of Remediation Building No. 2 at Plant No. 1 and the lower level of the work bench at Trent Tube Plant No. 3.

VIOLATION 4 – CONTINGENCY PLAN CONTENTS. NR 630(1)(e)(1) AND (6). [40 CFR 265.52(d)&(e)]

NR 630.22(e) The contingency plan shall, as a minimum, contain the following: 1. The name, position, address and phone number, office and home, of all persons qualified to act as facility emergency coordinator and this list shall be kept up to date.

6. A current list of all emergency equipment at the facility, such as fire extinguishing equipment, spill equipment, internal and external alarms and decontamination equipment where this equipment is required. The list shall include the location, physical description and the capabilities of each item.

The home address and phone number of the primary emergency coordinator was not listed in the contingency plan. A list of the emergency equipment at the facility was not in the contingency plan. The Contingency Plan requirements are conditions for storage license exemption.

Response: Page 2 of the Contingency Plan provided a work address and phone number for Mr. Colin Beveridge, the primary emergency coordinator at the site. The work and home phone number of the first alternate emergency coordinator, Tina Reese, is stated. Page 2 of the Contingency Plan has been updated to include the home address (N7466 Burr Oak Road, Whitewater, WI 531909) and phone number (262-473-9956) of Mr. Beveridge.

Page 4 of the Contingency Plan includes a brief list of emergency equipment and references figures that mark the location of the equipment. The Contingency Plan has been updated to include a detailed list of emergency equipment, spill equipment, internal and external alarms, and decontamination equipment at both Trent Tube Plant 1 and Trent Tube Plant 3 groundwater remediation facilities (Table 1). The list includes the location, physical description and the capabilities of each item.

Replacement pages associated with the Contingency Plan additions is included as an attachment and has been forwarded to the proper recipients.

I trust this information meets your needs. If you have any questions or comments, please do not hesitate to contact me at 414-719-1105 or tina.reese@symbiontonline.com.

Sincerely,

SYMBIONT

Tina A. Reese

Tina A Reese
Project Manager

c: Colin Beveridge/Trent Tube
Chris Odachowski/Trent Tube
Donia Zilles/Crucible Material
File/Symbiont

Mr. Scott J. Ferguson
SER Spills Coordinator
Wisconsin Department of Natural Resources
2300 North Dr. Martin Luther King Jr. Drive
P.O. Box 12436
Milwaukee, WI 53212

March 13, 2006

Dear Scott:

RE: Updated Contingency and Emergency Plan for Site Remedial Activities
Replacement Pages
Trent Tube Plant Nos. 1 and 3, East Troy, Wisconsin
FID No. 265097030, HW/GENCL, BRRTS No. 02-65-245827
(Plant No. 1)
FID No. 265006170, BRRTS No. 02-65-354633 (Plant No. 3)
Symbiont Projects No. W063671 and W063673

Provided herein are replacement pages for the Updated Contingency and Emergency Plan related to ongoing remedial activities at Trent Tube Plant Nos. 1 and 3 located in East Troy, Wisconsin. This document replaces pages 1 through 7 of the previous Updated Contingency and Emergency Plan for Site Remedial Activities dated November 2, 2005 and includes updated contact information and a detailed list of the emergency equipment at each of the facilities. The list includes the location, physical description and the capabilities of each item.

Symbiont (formerly Triad Engineering Incorporated) performs ongoing operation and maintenance of the groundwater extraction and treatment systems at Plant Nos. 1 and 3. Symbiont also performs manual free-product recovery operations at the Plant No. 1 site, as well as additional investigation and remediation activities.

In the event that the remedial activities generate hazardous waste in an amount that would make Trent Tube a Large Quantity Generator at these locations, a Contingency and Emergency Plan is required. The attached Health and Safety Plan (HASP), in conjunction with this letter, is intended to meet the applicable contingency and emergency planning requirements of NR 615.05 (4)(a)(6), NR 630.22 (1)(e) and NR 630.21 Wisconsin Administrative Code (WAC).

The following lists the requirements of a Contingency and Emergency Plan per NR 630.22 (1)(e) WAC and references where the requirement is addressed in the attached HASP. In some instances the requirement is addressed with this letter, and in other instances the requirement is not applicable to site conditions because, for example, there are no manufacturing operations conducted at the sites.

1. List of Emergency Coordinators

The Primary Emergency Coordinator for the site is Colin Beveridge, Environmental Engineer for Trent Tube. The alternate emergency coordinators are the Symbiont personnel familiar with site operations. Contact the individuals in the following order:

PRIMARY EMERGENCY C00RDINAT0R

Colin Beveridge
Environmental Engineer
Trent Tube

Work:
2015 Energy Drive
East Troy, WI 53120
(262) 642-8369
Home:
N7466 Burr Oak Road
Whitewater, WI 53190
(262) 473-9956

FIRST ALTERNATE EMERGENCY COORDINATOR

Christine A. Reese
Project Manager – Senior Hydrogeologist
Symbiont
6737 West Washington Street
Suite 3440
West Allis, Wisconsin 53214
(414) 291-8840 (work)
(414) 719-1477 (mobile)
(262) 574-4712 (home)

SECOND ALTERNATE EMERGENCY COORDINATOR

Stephanie M. Golden
Project Hydrogeologist
Symbiont
6737 West Washington Street
Suite 3440
West Allis, Wisconsin 53214
(414) 291-8840 (work)
(414) 719-2186 (mobile)
(414) 403-5010 (home)

THIRD ALTERNATE EMERGENCY COORDINATOR

Jay Fieker
Environmental Technician
Symbiont
6737 West Washington Street
Suite 3440
West Allis, Wisconsin 53214
(414) 291-8840 (work)
(414) 719-1474 (mobile)
(414) 464-2935 (home)

2. Facility Layout, Wastes, Hazards, etc.

Layout drawings for Plant Nos. 1 and 3 are provided with this letter. Detailed floor plan drawings for the remediation buildings are also included. The former Plant No. 1 manufacturing building has been demolished. The Plant No. 3 remediation building is not part of the Plant No. 3 manufacturing operations, but located across the street at 2084 Energy Drive. Relative to typical manufacturing operations, the remediation buildings are small, as such there are no "roads inside the building."

Hazards are identified in the HASP at Section 3.0 and in Appendix A (Site Chemical Information/Treatment Chemical Material Safety Data Sheets). Types of wastes that may be generated are also noted in the HASP in Section 3.0 and include the following:

- Soil, sediment or groundwater contaminated with metals (cadmium, chromium, and lead). Potentially applicable waste codes include D006, D007, and D008.

- Soil, sediment or groundwater contaminated with volatile organic compounds such as trichloroethylene and vinyl chloride. Potentially applicable waste codes include F001, F002, U226, U228, D040, and D043.

- Remediation system waste, such as groundwater treatment sludge, carbon media and filters that contains detectable levels of volatile organic compounds such as trichloroethylene and vinyl chloride. Potentially applicable waste codes include F001, F002, U226, U228, D040, and D043.

- At the former Plant No. 1 remediation site, free product in the form of dense non-aqueous phase liquid (DNAPL) and light non-aqueous phase liquid (LNAPL) is present. DNAPL is recovered manually on a weekly basis from site monitoring wells and stored in 55-gallon drums. LNAPL is recovered at various monitoring locations across the site using absorbent socks (passive free product removal). The DNAPL free product is primarily trichloroethylene that may contain other volatile organic compounds such as 1,1,1-trichioroethane and vinyl chloride. The LNAPL free product is primarily naphthalene. Applicable waste codes include F001, F002, U226, U228, D040, and D043.

3. Evacuation Plan

Evacuation routes are not warranted for the site conditions—the buildings are typically uninhabited, are small, and exits are obvious and noted on the attached drawings. Personnel working at the sites will be wearing appropriate personal protective equipment (PPE) to address potential releases. Emergency procedures are indicated in the HASP.

4. Emergency Shut Down Procedures

Remediation system buildings have emergency "STOP" or shutdown buttons located by all doors to immediately shutdown all equipment should there be a failure. Likewise, individual equipment such as pumps, blowers, etc., have local disconnects to shutdown individual equipment. Both remediation buildings are designed to provide secondary containment. Both buildings also have collection sumps that are designed to alarm and shutdown the treatment system if a leak occurs. If all other measures fail, including no access to the building, the system controls may be remotely shutdown. During outdoor field activities site personnel will shut off excavation or drilling equipment if necessary to contain a release.

5. Procedures to Notify Local Authorities

Procedures to notify local authorities are noted in the HASP.

6. List of Emergency Equipment

Personnel working at the site will be wearing appropriate PPE per the HASP. Symbiont personnel will have first aid kits in their vehicles or with them. Site personnel will be equipped with cellular telephones. The remediation buildings have fire extinguishers located in the building as indicated on the attached drawings. In addition, first aid kits, telephones, and portable emergency eyewash stations are located in both remediation buildings. A supply of spill and decontamination equipment is also kept at both remediation buildings. A detailed list of all emergency equipment, spill equipment, internal and external alarms, and decontamination equipment at the sites is provided in Table 1. The list includes the location, physical description and capabilities of each item.

7. Arrangements with Authorities and Contractors

Trained personnel working at the site will be wearing PPE and are generally capable of managing any release without assistance from local authorities or other contractors. A copy of this letter and the HASP has been provided to the following entities in accordance with the requirements of NR 630.21 (6) WAC.

- POLICE DEPARTMENT: Village of East Troy Police Department
  2106 Church Street
  P.O. Box 667
  East Troy, Wisconsin 53120

- FIRE DEPARTMENT: Village of East Troy Fire Department
  Hwy ES
  P.O. Box 644
  East Troy, Wisconsin 53120

- LOCAL HOSPITAL: Lakeland Medical Center
  W3985 County Road NN
  Elkhorn, Wisconsin 53121

- WISCONSIN DEPARTMENT OF NATURAL RESOURCES:
  To Scott J. Ferguson, via this letter

In addition, a copy has also been provided to:

- Village of East Troy
  2106 Church Street
  P.O. Box 166
  East Troy, WI 53120 (262) 642-6255

- Walworth County Department
  of Health & Human Services
  W4051 County Road NN
  P.O. Box 1005
  Elkhorn, WI 53121-1005 (262) 741-3200

8. PROCEDURES IN THE EVENT OF A SANITARY FORCE MAIN BREACH BETWEEN THE CURRENT AND FORMER LIFT STATIONS

The Village operates a sanitary force main which is located beneath the Plant No. 1 property approximately 5 feet below the interface of a dense grey silt formation. A deactivated force main is also present. The approximate locations are provided on the attached figure. In the event the active force main is breached during investigative drilling or probing or other remedial activities, the contractor shall attempt to minimize the immediate release by leaving the sampling equipment in the borehole as an obstruction. Regardless of the cause, in the event of force main failure the following procedures will be followed.

1. Village of East Troy Wastewater Treatment Plant Notification

   Primary Contact:
   Tom Rossmiller
   (262) 642-6253

   Secondary Contact:
   Steve Nelson
   (262) 642-6254
   (262) 903-3867 cell

Direct Village personnel to turn off the force main (5-10 minutes from time of call) and bring chlorine tablets. Village personnel shall assist Pats Sanitary at the lift station on Brule Drive and monitor the sewer manhole south of Honey Creek at Church Street. In the event of imminent sewage release to Honey Creek, Village personnel shall add chlorine tablets sufficient to render to sewage harmless.

2. Pats Sanitary (800) 642-7287 Notification

Pats Sanitary will provide tankers and trucks sufficient to substitute for the lift station indefinitely (1-2 hours from time of call). They must be able to handle 300 gallons per minute (gpm) and pump from a depth of 40 feet. Pats Sanitary personnel will transport the sewage to a manhole indicated by Village employees for disposal.

ROUTE TO LIFT STATION

Take I-43 to the Highway 120 (Church Street) exit in East Troy, head north (toward town) go 1/3 mile, turn right on Bruell Drive go 500 feet, the lift station is the first structure on the left (north) side of the road.

3. Dakota Intertek Corporation (Excavator – Pipe Repair) Notification

Primary Contact:
Wenbin Yuan
(262) 784-8844

Mann Brothers (Back-up to or support of Dakota Intertek Corporation)

Primary Contact:
Dan Townsend
(262) 723-5500

Excavation contractors must bring a trench box, dewatering pumps, 8-inch dresser couplings and repair sleeves for schedule 40 PVC pipe. The estimated depth to the force main on the Plant No. 1 property is up to 30 feet below ground surface. (1-2 hours from time of call.)

Symbiont personnel will move three polyethylene tanks (total capacity of 6,000 gallons) to within 250 feet of the force main breach to accept the discharge from the excavation dewatering pumps. Symbiont will provide a 2-inch 200-gpm trash pump to assist the dewatering of the trench.

We trust that the attached HASP, in conjunction with this letter, meets the contingency and emergency planning requirements applicable to these remediation sites. Please contact me if you have any questions or comments.

Sincerely,

SYMBIONT

Tina A. Reese

Tina A. Reese
Senior Hydrogeologist

Attachments

c: Donia Zilles/Crucible Materials
Chris Odachowski/Trent Tube
Colin Beveridge/Trent Tube
Doug Clark/Foley & Lardner
Tina Reese/Symbiont
Village of East Troy
Village of East Troy Police Department
Village of East Troy Fire Department
Lakeland Medical Center
Walworth County Department of Health & Human Services

Table 1
Personal Protection, Spill Response, Emergency, and System Alarm Equipment
Trent Tube Plant Numbers 1 and 3
East Troy, WI

Building	Location	Item	Qty	Type
Trent Tube Plant No. 1				
Building# 1	Next to main door on wall	Fire extinguisher	1	Emergency equipment
Building# 1	Next to main door on wall	First aid kit	1	Personal protection equipment
Building# 1	Next to main door in cabinet	Box of nitrile gloves	1	Personal protection equipment
Building# 1	Next to main door in cabinet	Full face shield	1	Personal protection equipment
Building# 1	Next to main door in cabinet	Box of particulate masks	1	Personal protection equipment
Building# 1	Located on control panel	Emergency shut off switch	1	Internal system alarm
Building# 1	Located next to overhead door on wall	Emergency shut off switch	1	Internal system alarm
Building# 1	Located next to main door on wall	System alarm beacon	1	Internal system alarm
Building# 1	Located on control panel	System alarm siren	1	Internal system alarm
Building# 1	Located above overhead door	System alarm beacon		External system alarm
Building# 2	Directly in front of bag filters	Pressurized portable emergency eyewash station	1	Emergency equipment
Building# 2	Next to main door on wall	Fire extinguisher	1	Emergency equipment
Building# 2	Work bench	Box of shop rags	1	Decontamination equipment
Building# 2	Work bench	Half face respirator	1	Personal protection equipment
Building# 2	Work bench	Box of nitrile gloves	1	Personal protection equipment
Building# 2	Work bench	Forearm length chemical gloves	2	Personal protection equipment
Building# 2	Work bench	Half face respirator	1	Personal protection equipment
Building# 2	Work bench	Tyvec suits	2	Personal protection equipment
Building# 2	Work bench	Safety glasses	1	Personal protection equipment
Building# 2	Work bench	First aid kit	1	Emergency equipment
Building# 2	Next to main overhead door	Sorbent products hazwik spill kit	1	Spill response equipment (5 gallons)
Building# 2	Located next to overhead door on wall	Emergency shut off switch	1	Internal system alarm
Building# 2	Located next to main door on wall	Emergency shut off switch	1	Internal system alarm
Building# 2	Located next to overhead door on wall	System alarm beacon	1	Internal system alarm
Building# 2 DNAPL room	Next to main door on wall	Emergency shut off switch	1	Internal system alarm
Building# 2 DNAPL room	Next to main door on wall	System alarm beacon	1	Internal system alarm
Skimmer building	Shelving	Acid smock	2	Personal protection equipment
Skimmer building	Shelving	Pair of rubber boots	2	Personal protection equipment
Skimmer building	Shelving	Hard hat	2	Personal protection equipment
Skimmer building	Shelving	Micro 90	1	Decontamination equipment
Skimmer building	Shelving	5 gallon bucket	2	Decontamination equipment
Skimmer building	Shelving	Portable eyewash	2	Emergency equipment
Skimmer building	Shelving	Full face shield	2	Personal protection equipment
Skimmer building	Floor	Box of rectangular spill pads	100	Spill response equipment (50 gallons)
Skimmer building	Floor	Sorbent booms	8	Spill response equipment (400 gallons)
Trent Tube Plant No. 3				
Main room	Next to main door on wall	Fire extinguisher	1	Emergency equipment
Main room	Next to main door on wall	First aid kit	1	Emergency equipment
Main room	Across from main door on shelf	Box of shop rags	1	Decontamination equipment
Main room	Across from main door on shelf	Safety glasses	1	Personal protection equipment
Main room	Across from main door on shelf	Full face shield	1	Personal protection equipment
Main room	Across from main door on shelf	Micro 90	1	Decontamination equipment
Main room	Across from main door on shelf	Ear protection	6	Personal protection equipment
Main room	Across from main door on shelf	Hard hat	1	Personal protection equipment
Main room	Across from main door next to shelf	Pressurized portable emergency eyewash station	1	Emergency equipment
Main room	Across from main door next to shelf	Eyewash solution	1	Emergency equipment
Main room	Across from main door on shelf	Sorbent products hazwik spill kit	1	Spill response equipment (5 gallons)
Main room	Located on control panel	Emergency shut off switch	1	Internal system alarm
Main room	Located on control panel	System alarm siren	1	Internal system alarm
Main room	Located above overhead door	System alarm beacon		External system alarm
DNAPL room	Next to main door on wall	Fire extinguisher	1	Emergency equipment
DNAPL room	Next to main door on floor	Acid smock	1	Personal protection equipment
DNAPL room	Next to main door on floor	Fire ladder	1	Emergency equipment
DNAPL room	Next to main door on wall	Emergency shut off switch	1	Internal system alarm

Notes:
DNAPL- Dense Non Aqueous Phase Liquid