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May 30, 2000

VIA FACSIMILE AND MAIL

Mr. Scott J. Ferguson
Hydrogeologist
Wisconsin Department of Natural Resources
Hazardous Waste Management Section
4041 North Richards Street
P.O. Box 12436
Milwaukee, WI 53212

Dear Scott:

RE: Quarterly Report (March 2000 through May 2000)
Site Closure/Investigation
Trent Tube, former Plant No. 1
East Troy, Wisconsin
FID No. 265097030, HW/GENCL
Triad Engineering Incorporated Project No. W003671.008

This Quarterly Report is provided to the Wisconsin Department of Natural Resources (WDNR) pursuant to Section 10.7.3 of the May 1995 Site Closure/Investigation Plan prepared for Trent Tube, Plant 1 (the Closure Plan or the Plan). The Plan was conditionally approved by the WDNR on August 23, 1995.

I. CLOSURE ACTIVITIES

A. DESCRIPTION OF ACTIVITIES

Triad Engineering Incorporated (Triad), on behalf of Trent Tube, continued to recover free product from beneath Honey Creek sediment (WP-9) as an interim measure. Free product was also recovered from RW-8, which is located near the center of the former Plant No. 1 building. Product recovery has been conducted on a semi-weekly basis, as weather permits. As of May 15, 2000, approximately 311 gallons of free product has been recovered from WP-9 and approximately 88 gallons has been recovered from RW-8.

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Currently, the WDNR has not determined if Wis. Stat. Chapter 30 permitting is required for installation of additional well points in Honey Creek. Additional well points are necessary to determine the nature and extent of free product occurrence beneath the soft sediment and to recover additional free product. Pending the WDNR's determination and any required permitting, additional well points will not be installed.

At the request of Jeff Shure (WDNR-Water Quality Specialist), Triad prepared a sampling plan to identify impacts to surface water from product recovery at the existing WP-9. Fieldwork was conducted pursuant to this plan on April 25, 2000. Triad is currently preparing a summary of the findings from this surface water-sampling event.

A report documenting the sediment characteristics and subsurface conditions in and near Honey Creek will be submitted to the WDNR after sampling results from the proposed additional well points can be evaluated and incorporated into a draft report that has been prepared for previous investigative efforts.

During this quarter, the groundwater extraction and treatment system was operated and effluent was sampled in accordance with the Wisconsin Pollutant Discharge Elimination System (WPDES) permit and correspondence with Mark Drews (WDNR). On May 4, 2000, fouling in the air stripper caused the system to be shutdown. The pumps and equipment were cleaned and the system was restarted on May 25, 2000. The April effluent sample showed an exceedance of the PAH limit (phenanthrene at 0.29 µg/L as compared to the total PAH limit of 0.1 µg/L); however, system data indicated that this likely was a laboratory artifact. The WDNR was notified immediately of the possible exceedance; and subsequently, the laboratory was contacted. Triad requested that the laboratory review their data. Upon their review of their data, the laboratory determined that sample results should be revised to reflect no detect of phenanthrene.

During this quarter, Triad continued to develop the design for Phase II expansion (installing additional groundwater extraction wells). The initial seven wells appear to provide localized downgradient hydraulic control.

Subsequent to an April 3, 2000 telephone conversation with you (see "Summary of Contacts" below), the Village of East Troy force main was located by Triad staff and initial well points were installed within backfill in the vicinity of the force main and sanitary sewer adjacent

to Highway 120. The well points were installed to evaluate the potential for DNAPL to be in contact with utility piping materials. No DNAPL was observed at the well point locations. Triad is currently developing a comprehensive utility corridor investigation work plan that will be consistent with the WDNR guidance document (PUBL-RR-649, March 2000, Guidance for Documenting the Investigation of Utility Corridors as it Pertains to NR 708 and NR 716 Requirements). The plan will be submitted in June 2000.

During the first week of May, nine observation probes were installed to facilitate performance evaluation for Phase II of the remedial system. The field activities for the second quarter-2000, groundwater monitoring were conducted during the second week of May 2000.

As indicated in a letter to you dated February 15, 2000, groundwater monitoring data from the fourth quarter of 1999 through the second quarter of 2000 will be included in the annual remedial system performance report which will be submitted on September 1, 2000.

B. CHANGES IN OR DEVIATIONS FROM ORIGINAL PLANS

There were no changes in or deviations from the original plan related to the site.

C. SUMMARY OF CONTACTS

During this quarter, Discharge Monitoring Reports for the groundwater treatment system were submitted to WDNR on a monthly basis. In addition, the following contacts were made with representatives of public interest groups and local or state government

March 22, 2000:	Triad (Steven Franks) submitted a letter to WDNR (Mark Drews) requesting consent from the WDNR to treat and discharge a cleaning solution for the system. A procedure for sampling the pH of effluent was proposed.
March 24, 2000:	WDNR (Mark Drews) submitted a letter to Trent Tube (Chris Odachowski) and Triad (Steven Franks) approving Triad's request of March 22, 2000.

April 3, 2000:	WDNR (Scott Ferguson) called Triad (Rick Binder) regarding recent inquiries from the public regarding the status of remedial system construction and whether ion exchange was anticipated. Triad informed WDNR that the potential for ion exchange still needs to be evaluated. Also, Triad informed the WDNR that a utility corridor assessment work plan would be submitted, particularly related to assessment of the area of the Village force main and near the Honey Creek bank. WDNR indicated that work could commence immediately and that a brief work plan should be submitted to WDNR.
April 17, 2000:	WDNR (Jeff Shure) contacted Triad (Brandon Koltz) requesting that a brief work plan be prepared to assess impacts to surface water quality in Honey Creek during product recovery from the existing well point (WP-9).
April 21, 2000:	Triad (Brandon Koltz) submitted a memorandum via facsimile to WDNR (Jeff Shure) regarding a sampling plan to identify impacts to surface water from product recovery at the existing WP-9.
April 24, 2000:	Triad (Sonya Simon) left message with WDNR (Jeff Shure) indicating the schedule for fieldwork related to the surface water quality sampling plan.
May 11, 2000:	Triad (Sonya Simon) contacted the WDNR (Scott Ferguson) via telephone regarding the schedule for submittal of the design report for the Phase II wells.
May 11, 2000:	In a telephone conversation with WDNR (Mark Drews), Triad (Sonya Simon) notified the WDNR of a possible exceedance of WPDES permit limits. The April effluent sample had a detection of

	0.29 µg/L of phenanthrene. The duplicate sample submitted to the laboratory had no detection of phenanthrene. WDNR waived the permit's written notice requirement. (Subsequently, the laboratory determined that their reported detection of phenanthrene was erroneous.)
May 19, 2000:	WDNR (Scott Ferguson) called Triad (Brandon Koltz) to discuss a citizen inquiry regarding blowing dust and construction material from the site. Triad discussed the status of the system construction activities and the site closure plan.

D. PROBLEMS ENCOUNTERED AND ACTIONS TAKEN

Fouling of pumps and valves continues to create a need for increased maintenance and occasionally has shut the system down. Measures to deal with this problem have been tested and evaluated. Currently, a 10 percent hydrochloric acid solution is utilized to clean system pumps, valves and piping of hardness and iron fouling. Approximately 4 to 6 gallons of wastewater from this procedure will be generated every 3 months. This wastewater will be neutralized and effluent will be sampled per correspondence with Mark Drews, WDNR.

E. PERSONNEL CHANGES

There were no personnel changes during the reporting period.

II. SCHEDULE

Triad has commenced work on the Phase II system expansion design as planned. Data related to water table drawdown, groundwater recovery and treatment system operation, and groundwater concentrations collected over the past 6 to 7 months of operation is being utilized. The proposed schedule is to have the design complete by mid-June, 2000, a contractor procured by July 15, 2000, and the system expansion complete by October 1, 2000.

As indicated in a letter to you dated February 15, 2000, groundwater monitoring data from the fourth quarter of 1999 through the second quarter of 2000 will be

included in the annual remedial system performance report which will be submitted on September 1, 2000.

After additional well points have been installed in Honey Creek and Triad has had an opportunity to evaluate results, a report will be submitted to WDNR summarizing the results of the Honey Creek sediment investigations and interim remedial action to date.

Please do not hesitate to call should you have any questions.

Sincerely,

TRIAD ENGINEERING INCORPORATED

Brandon J. Koltz
Project Manager

Enclosures
c: Scott Ferguson/WDNR-Milwaukee (original and 1 copy)
Doug Clark/Foley & Lardner
Bob Taggart/Crucible Materials
Chris Odachowski/Trent Tube
Sonya Simon/Triad Engineering
Rick Binder/Triad Engineering
Steven Franks/Triad Engineering