TRIAD
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April 4, 2003

Mr. Scott Ferguson
Wisconsin Department of Natural Resources
Hazardous Waste Management Section
P.O. Box 12436
2300 North Dr. Martin Luther King Jr. Drive
Milwaukee, WI 53212

Dear Scott:

RE: Annual Status Report (March 2002 through February 2003)
Site Closure/Investigation Plan
Trent Tube, Former Plant No. 1
East Troy, Wisconsin
BRRTS No. 02-65-245827
FID No. 265097030, HW/GENCL
Triad Engineering Incorporated Project No. W033001

On behalf of Crucible Materials Corporation (Crucible Materials), this Annual 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, former Plant No. 1 (the Closure Plan or the Plan) and an October 12, 2001, letter confirming your verbal authorization that status report submittal frequency may be reduced from quarterly to annually.

I. CLOSURE ACTIVITIES

A. DESCRIPTION OF ACTIVITIES

- **Interim Action – Free Product Recovery**

  As an interim measure, Triad Engineering Incorporated (Triad) continued to recover free product (dense non-aqueous phase liquid [DNAPL]) from beneath soft sediments within Honey Creek from well point (WP-9). As of February 27, 2003 approximately 647 gallons of free product has been recovered from WP-9.

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Prior to October 2001, DNAPL was also recovered intermittently from RW-8, which is located near the center of the former Trent Tube Plant No. 1 building. However free product has not been measured in RW-8 since October 19, 2001. Approximately 99 gallons of DNAPL has been recovered from RW-8, to date. A summary of DNAPL level measurements and volume recoveries at RW-8 and WP-9 is presented in Table 1.

Light non-aqueous phase liquid (LNAPL) was noted at observation probes OP-1 and OP-3. OP-3 has measurable LNAPL, whereas only a sheen was noted at OP-1. LNAPL was also observed at recovery well RW-8. SoakEase™ socks were installed at all three locations (OP-1, OP-3 and RW-8) in June 2002. The socks are monitored on a weekly basis. Table 2a through 2C summarizes the SoakEase™ sock monitoring and LNAPL recovery activity. The volume of LNAPL recovered to date is estimated to be approximately 1.0 gallon.

A monitoring and maintenance program was also initiated in mid-August 2001 for a series of absorbent booms that were installed in Honey Creek adjacent to the bank upstream and downstream of well point WP-9. During all observed monitoring events the boom has contained any visible LNAPL sheens released from bank soils. Based on the visual observation of product content, maintenance/replacement of the boom occurs, as needed. Boom monitoring activities are summarized on Table 3. The volume of LNAPL recovered to date from the booms is estimated to be approximately 15 gallons.

- **Remediation System Building Expansion**

On July 17, 2002, the construction of the remediation system expansion was initiated. The remediation system was deactivated on October 10, 2002 in order to complete the construction of the subgrade and above grade conveyance piping, install the new process equipment, and install and program all needed electrical equipment. The remediation system was reactivated on November 19, 2002 and has run consistently since.

There are currently 26 recovery wells operating at Plant No. 1. Effluent sampling was performed to comply with the frequency indicated in the Wisconsin Pollutant Discharge Elimination System (WPDES) permit and correspondence with Mr. Mark Drews and/or Mr. Corey Heckel of the WDNR. Based on analytical results obtained from monthly effluent sampling, the remediation system has been in compliance with permit limits.

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

March 5, 2002: Triad received a fax from the Village of East Troy Planning Commission conditionally approving the Plant No. 1 remediation system building expansion.

March 6, 2002: Ms. Heather Schoff of Triad had a telephone conversation with Mr. Tom Rossmiller, Village of East Troy Superintendent of Public Works regarding storm sewer tie-in connection drawing submittal/review, the availability of the 20-foot offset written documents, future work to be completed at Plant No. 1, as well as the Village of East Troy's requirements for working near active water and wastewater lines.

March 7, 2002: Triad submitted revised drawings of the remediation system building expansion to Mr. Ray Ellingen, City Administrator, Village of East Troy.

March 8, 2002: The September 2001 through February 2002 Trent Tube Plant No. 1 Annual Status Report was submitted to the WDNR. The report documented closure activities (description of activities, changes in or deviations from original plans, summary of contacts, problems encountered and actions taken and personnel changes) that

occurred at the site during the above referenced time period, as well as work scheduled for the upcoming year.

March 12, 2002: Mr. Mark Gordon of the WDNR returned a voice mail message left by Ms. Tina Reese of Triad requesting information/guidance on implementing a soil management plan for Plant No. 1 utilizing the "Area of Contamination" approach. Mr. Gordon indicated that if Mr. Scott Ferguson, WDNR project manager, was comfortable with the approach from a technical standpoint, Mr. Gordon would see no problem approving the plan.

March 27, 2002: Mr. Ray Ellingen, Village of East Troy City Administrator, contacted Ms. Heather Schoff of Triad to enquire about obtaining documentation of the extent of groundwater contamination at Plant No. 1 for use in the Village's wellhead protection plan.

April 1, 2002: Mr. Dean Stefanczyk of Triad had a telephone conversation with Mr. Don Reed of the Southeastern Wisconsin Regional Planning Commission to inquire about the procedure for obtaining information on endangered species in the vicinity of the Plant No. 1 retaining wall.

April 15, 2002: Triad submitted a request for information (Endangered Resources Impact Review) from the WDNR, Bureau of Endangered Resources.

April 22, 2002: Triad submitted a letter to Mr. Mike Solomon of the WDNR documenting corrections to the WDNR Fact System Facility Profile (database). These corrections were made in order to reflect consistency between the columns titled "Transfer HW Manifest" and "Waste HW Ann Rep".

April 26, 2002: Triad submitted a figure depicting the "Extent of Enforcement Standard Exceedances in Site Groundwater, Trent Tube Plant No. 1" to Mr. Ray Ellingen for use in the Village of East Troy's well head protection plan.

May 8, 2002: Triad submitted a letter to Mr. Corey Heckel of the WDNR to notify them of planned modifications to the treatment process for the groundwater remediation system at Trent Tube Plant No. 1. The modifications were needed to increase the efficiency of

system operation, reduce operating costs, and provide for required supplemental treatment.

May 17, 2002: Triad submitted a Contingency and Emergency Plan for Groundwater Extraction and Treatment Systems for Trent Tube Plant Nos. 1 and 3 to Mr. Scott Ferguson of the WDNR. In the event that the remedial activities generate hazardous waste in the amount that would make Trent Tube a Large Quantity Generator at these locations a Contingency and Emergency Plan is required. This Contingency and Emergency Plan was prepared to comply with the requirements of NR 615.05 (4)(a)(6), NR 630.22 (1)(e) and NR 630.21 Wisconsin Administrative Code (WAC).

May 30, 2002: A letter was submitted to Ms. Pam Schense of the WDNR to request consent to install a temporary silt curtain adjacent to the north bank of Honey Creek located in East Troy, Wisconsin in the area of planned retaining wall repair at Trent Tube Plant No. 1.

July 9, 2002: Triad received a letter from the WDNR, Bureau of Endangered Resources, indicating that their Natural Heritage Inventory data files contained information on endangered resources occurring within or near the project site (Plant No. 1 retaining wall) and included the following: Blandings turtle, queen snake, lake chubsucker, banded killifish.

Ms. Tina Reese had a telephone conversation with a representative (Jamie) from the Endangered Species Division of the WNDR. Jamie indicated that there were no concerns regarding any of the endangered species referenced above in the vicinity of the existing retaining wall at Plant No. 1.

August 2, 2002: Triad received a letter from Ms. Pam Schense of the WDNR indicating that she had received and reviewed the May 30, 2002 letter submitted by Triad. Ms. Schense indicated that the Department found that the temporary silt curtain could be installed in Honey Creek and that this activity would not require a separate permit from the Department. However, the silt curtain could not be installed until after the permit for the retaining wall repairs was submitted to the WDNR to avoid having the curtain in place for an undetermined amount of time. Triad would also need to monitor the installation of the curtain so that fish would not be trapped within the curtain and finally if maintenance needs to be conducted on the curtain, it must

be performed in such a way that trapped sediments would not be released downstream into Honey Creek.

September 4, 2002: The *2001-2002 Annual Remedial System Performance Monitoring Report, Trent Tube Plant No. 1*, was submitted to the WDNR. The report was prepared to comply with Condition 7 of the WDNR correspondence dated October 9, 1998 entitled *Conditional Approval for a Groundwater Extraction and Treatment System, Trent Tube Plant No. 1* (WDNR, 1998) and the reporting requirements of Wisconsin Administrative Code (WAC) NR 724.

September 20, 2002: Ms. Tina Reese had a telephone conversation with Mr. Scott Ferguson of the WDNR regarding obtaining approval to use a geotextile fabric as an engineered barrier to soils that exceeded direct contact residual contaminant levels (RCLs) for select constituents of concern at the Trent Tube Plant No. 1 site. Mr. Ferguson indicated that Triad needed to write an e-mail/letter that would be distributed to a WDNR Tech Distribution List for comment. The e-mail/letter should outline reasons why Triad is requesting the use of the fabric and where it would be used, as well as a history of the site.

October 31, 2002: Triad submitted a letter to Mr. Scott Ferguson of the WDNR, to obtain approval for use of a synthetic geotextile fabric as an engineered barrier in the area of a slope layback design alternative to replace a retaining wall that is located adjacent to Honey Creek on the Plant No. 1 property. The geotextile would be installed on the subgrade of the slope to enhance slope stability and prevent fine-grained soils from migrating upward through additional overlying slope stabilization materials and 6 inches of soil.

November 4, 2002: Triad received a letter from Mr. Corey Heckel of the WDNR approving the use of two additives to be used in the Plant No. 1 groundwater remediation system. The WDNR approved the proposed chemical, AquaMag™, a liquid phosphate blend, that would be used to control hardness in the system and ChemTreat P-817, a high molecular weight anionic flocculent that would be used as a settling aid for the backwash cone bottomed settling tank.

November 5, 2002: Mr. Ryan Eckdale-Dudley held a telephone conversation with Mr. Corey Heckel regarding a sentence in the

November 4, 2002 letter that indicated that the ChemTreat P-817E flocculent would be used for metals precipitation. Mr. Eckdale-Dudley clarified that the flocculent was not for metals precipitation, but would be used to settle fine-grained particulate mater from the water column. Mr. Heckel indicated that the letter as written was fine and that he understood the use of the flocculent.

November 7, 2002: Triad received an email from Mr. Scott Ferguson with comments he had received from the WDNR internal Tech Distribution List on the October 31, 2002 letter/e-mail that had been submitted to the WDNR requesting approval of a synthetic geotextile fabric as an engineered barrier to soils that exceeded direct contact RCLs for select constituents of concern. Mr. Ferguson requested that Triad prepare a response to the Tech Distribution List's comments and concerns.

January 9, 2003: Triad submitted a letter to the WDNR addressing the comments and concerns of the WDNR personnel on the Tech Distribution List who commented on a request for approval to utilize a synthetic geotextile fabric as an engineered barrier in the area of the slope layback design alternative.

February 4, 2003: Ms. Tina Reese met with Ms. Judy Weter, Village of East Troy City Administrator, and Mr. Tom Rossmiller, Village of East Troy Superintendent of Public Works, to discuss the potential for Crucible Materials to request the Village of East Troy become a co-applicant for a Chapter 30 permit application. Preliminary site grading plans were also discussed.

February 12, 2003: Ms. Judy Weter indicated via e-mail that due to the large amount of grading occurring at the site, the City Planning Commission would need to approve the site grading plans. Dates when the Planning Commission was meeting in the near future was also discussed.

February 28, 2002: A request to reduce the frequency of groundwater monitoring from semi-annual to annual, as well as to eliminate a number of locations (MW-9, MW-10, MW-10A and MW-14) from the monitoring network for Plant No. 1 was submitted to Mr. Scott Ferguson. The reduction in groundwater monitoring frequency will begin with the May 2003 sampling event. Requested changes and rationale for elimination of monitoring locations were

included in the letter. At this time, Triad has not received approval on the requested changes.

D. PROBLEMS ENCOUNTERED AND ACTIONS TAKEN

There were no problems encountered during the reporting period.

E. PERSONNEL CHANGES

There were no personnel changes during this reporting period.

II. SCHEDULE

Upon approval from the WDNR, groundwater monitoring frequency will be reduced from semi-annual to annual at Plant No. 1 starting with the May 2003 sampling event. In addition, a number of locations (MW-9, MW-10, MW-10A and MW-14) will be eliminated from the monitoring network. All the wells eliminated are considered background wells and are no longer needed for water quality monitoring. Monitoring location MW-11 will be utilized as the background well for the site.

Triad is currently developing and designing an alternative to replace the existing retaining wall. The alternative under consideration consists of removing the soil behind the retaining wall and sloping or "laying back" the soil at an angle such that a retaining structure is not required for slope stability. Work is anticipated to be completed in late 2003 or early 2004 pending submittal and approval of a Chapter 30 permit.

Triad is currently preparing a bid specification package to excavate approximately 10,000 cubic yards of impacted soil that lies adjacent to Honey Creek south of the former Trent Tube Plant No. 1 building and east of the existing retaining wall. The impacted soil will be managed on site in an "Area of Contamination" pending final approval of a Soil Management Plan by the WDNR and submittal and approval of a Chapter 30 permit.

A design to install source area extraction wells and conveyance piping has been completed. However, the installation of these wells and piping will be delayed until the above referenced retaining wall and Honey Creek bank excavation projects have been completed. Triad anticipates that this work will be completed in early 2004.

Triad will remove two underground storage tanks, if present, that were identified on historical figures. Work is anticipated to be performed in the spring or early summer of 2003.

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

Sincerely,

TRIAD ENGINEERING INCORPORATED

Tina A. Reese

Tina A. Reese
Project Manager

Enclosures
c: Bob Taggart/Crucible Materials
Donia Zilles/Crucible Materials
Chris Odachowski/Trent Tube
Colin Beveridge/Trent Tube
File/Triad Engineering Incorporated

TABLE 3
SUMMARY OF PRODUCT LEVEL MEASUREMENTS
2002 ANNUAL STATUS REPORT
TRENT TUBE PLANT No. 1
2188 CHURCH STREET
EAST TROY, WISCONSIN

Date	RW-8								RW-9				WP-9							
	LNAPL DTP	DTW	DNAPL DTP	DTB	LNAPL Thicknes	DNAPL Thickness in the well	DNAPL Thickness above silt	Product Recovered	LNAPL DTP	DTW	DTB	LNAPL Thickness	LNAPL DTP	DTW	DNAPL DTP	DTB	LNAPL hicknes	DNAPL Thickness in the well	DNAPL Thickness above silt	Product Recovered
03/06/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.54	6.32	8.26	NM	1.94	0.51	0.75
03/13/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.63	6.41	8.26	NM	1.85	0.42	0.75
03/15/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.62	6.39	8.26	NM	1.87	0.44	1.00
03/20/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.45	6.42	8.26	NM	1.84	0.41	0.75
03/27/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.68	6.37	8.26	NM	1.89	0.46	0.75
03/29/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.64	6.36	8.26	NM	1.90	0.47	0.75
04/04/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.63	6.37	8.26	NM	1.89	0.46	0.75
04/10/02	—	9.02	—	13.28	NM	0	0.00	0.125	NM	NM	NM	NM	—	1.68	6.36	8.26	NM	1.90	0.47	0.75
04/12/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.67	6.38	8.26	NM	1.88	0.45	0.75
04/16/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.65	6.41	8.26	NM	1.85	0.42	0.75
04/19/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.62	6.39	8.26	NM	1.87	0.44	0.75
04/23/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.63	6.4	8.26	NM	1.86	0.43	0.75
04/26/02	8.38	8.39	—	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.65	6.43	8.26	NM	1.83	0.40	0.75
04/29/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	0.75
05/03/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	0.75
05/06/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.70	6.40	8.26	NM	1.86	0.43	0.75
05/08/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.71	6.32	8.26	NM	1.94	0.51	0.75
05/15/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.69	6.3	8.26	NM	1.96	0.53	1.00
05/17/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.72	6.29	8.26	NM	1.97	0.54	0.75
05/21/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.70	6.23	8.26	NM	2.03	0.60	1.00
05/26/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.72	6.28	8.26	NM	1.98	0.55	0.75
06/03/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	1.78	1.79	6.20	8.26	NM	2.06	0.63	1.00
06/06/02	—	7.44	—	13.31	—	—	—	0.0	NM	NM	NM	NM	—	1.22	6.25	8.26	NM	2.01	0.58	1.00
06/11/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	1.78	1.79	6.20	8.26	NM	2.06	0.63	1.00
06/14/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.48	6.30	8.26	NM	1.96	0.53	1.00
06/17/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.55	6.28	8.26	NM	1.98	0.55	1.00
07/02/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.87	6.21	8.26	NM	2.05	0.62	1.25
07/05/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	1.91	1.93	6.22	8.26	NM	2.04	0.61	1.00
07/08/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	1.98	2.04	6.21	8.26	NM	2.05	0.62	1.25
07/12/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	1.77	1.79	6.26	8.26	NM	2.00	0.57	1.00
07/15/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	1.96	1.98	6.28	8.26	NM	1.98	0.55	1.00
07/19/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	2.01	2.04	6.31	8.26	NM	1.95	0.52	1.00
07/23/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	2.07	2.08	6.33	8.26	NM	1.93	0.50	0.75
07/25/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	2.17	2.18	6.32	8.26	NM	1.94	0.51	0.75
7/29/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	1.14	1.17	6.28	8.26	NM	1.98	0.55	0.75
8/5/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	2.18	6.73	8.26	NM	1.53	0.10	0.75
8/8/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	2.19	6.72	8.26	NM	1.54	0.11	0.75
8/13/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	1.98	1.98	6.02	8.26	NM	2.24	0.81	1.00
8/15/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	2.00	2.02	NM	8.26	NM	NM	NM	1.00
8/19/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	1.98	2.04	NM	8.26	NM	NM	NM	1.00
8/22/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	1.72	1.74	6.32	8.26	NM	1.94	0.51	1.00
8/25/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.95	6.30	8.26	NM	1.96	0.53	0.75
8/30/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.98	6.31	8.26	NM	1.95	0.52	1.00
9/3/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.98	6.31	8.26	NM	1.95	0.52	0.75
9/5/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	2.02	6.32	8.26	NM	1.94	0.51	0.75
9/9/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	2.04	6.32	8.26	NM	1.94	0.51	0.75
9/12/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	2.00	2.02	6.32	8.26	NM	1.94	0.51	1.00
9/17/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	2.04	2.05	6.33	8.26	NM	1.93	0.50	1.00
9/20/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	2.08	6.34	8.26	NM	1.92	0.49	0.75
9/24/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	2.06	6.33	8.26	NM	1.93	0.50	0.75
9/27/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	2.04	6.38	8.26	NM	1.88	0.45	0.75
9/30/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	2.01	6.41	8.26	NM	1.85	0.42	0.75
10/4/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.98	6.38	8.26	NM	1.88	0.45	0.75
10/8/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.71	6.38	8.26	NM	1.88	0.45	0.75
10/10/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.76	6.24	8.26	NM	2.02	0.59	0.85
10/14/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.63	6.31	8.26	NM	1.95	0.52	0.75
10/17/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	1.58	1.59	6.33	8.26	NM	1.93	0.50	0.75
10/22/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.58	6.31	8.26	NM	1.95	0.52	1.00
10/24/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.60	6.33	8.26	NM	1.93	0.50	0.75
10/28/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	1.57	1.58	6.28	8.26	NM	1.98	0.55	0.75
11/1/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.51	6.30	8.26	NM	1.96	0.53	0.50
11/12/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.44	6.25	8.26	NM	2.01	0.58	0.75
11/15/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	1.39	1.40	6.28	8.26	NM	1.98	0.55	0.75
11/18/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.48	6.31	8.26	NM	1.95	0.52	1.00
11/21/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	1.50	1.51	6.31	8.26	NM	1.95	0.52	0.75
11/25/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	1.48	1.49	6.25	8.26	NM	2.01	0.58	0.50
11/28/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.38	6.29	8.26	NM	1.97	0.54	0.75
12/3/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.33	6.28	8.26	NM	1.98	0.55	0.50
12/5/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.34	6.31	8.26	NM	1.95	0.52	0.25
12/9/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.32	6.32	8.26	NM	1.94	0.51	0.15
12/23/02	—	9.35	—	13.32	—	—	—	NM	NM	NM	NM	NM	—	1.70	6.27	8.26	NM	1.99	0.56	0.60
12/27/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.72	6.28	8.26	NM	1.98	0.55	1.00
12/30/02	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.70	6.26	8.26	NM	2.00	0.57	0.75
1/3/03	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.72	6.31	8.26	NM	1.95	0.52	0.50
1/6/03	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.72	6.33	8.26	NM	1.93	0.50	0.75
1/10/03	—	9.6	—	—	NM	NM	NM	—	NM	NM	NM	NM	—	1.73	6.38	8.26	NM	1.88	0.45	0.75
1/13/03	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.78	6.28	8.26	NM	1.98	0.55	0.75
1/17/03	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.85	6.32	8.26	NM	1.94	0.51	0.75
1/21/03	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.86	6.36	8.26	NM	1.90	0.47	0.25
1/24/03	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.87	6.37	8.26	NM	1.89	0.46	0.25
1/27/03	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.93	6.33	8.26	NM	1.93	0.50	0.75
1/30/03	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.97	6.28	8.26	NM	1.98	0.55	0.75
2/4/03	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	1.98	6.29	8.26	NM	1.97	0.54	0.75
2/7/03	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	2.08	6.35	8.26	NM	1.91	0.48	0.50
2/10/03	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	2.15	6.38	8.26	NM	1.88	0.45	0.25
2/14/03	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	2.12	6.48	8.26	NM	1.78	0.35	0.50
2/17/03	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	2.12	6.45	8.26	NM	1.81	0.38	0.75
2/20/03	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	2.08	6.42	8.26	NM	1.84	0.41	1.00
2/24/03	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	2.09	6.43	8.26	NM	1.83	0.40	0.50
2/27/03	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	—	2.18	6.45	8.26	NM	1.81	0.38	0.75

Total Product Recovered at RW-8: 98.83
Total Product Recovered at RW-8 for Reporting Period: 0.13

Total Product Recovered at WP-9: 646.43
Product Recovered at WP-9 for the Reporting Period: 69.85

Notes:

RW-8 was installed in March 1999. It is installed approximately 0.5 feet into the dense gray silt.
RW-9 and WP-9 were installed in June 1999.
RW-9 is installed approximately 1.3 feet into the dense gray silt. WP-9 is intalled approximately 1.4 feet into the dense gray silt.

DTW - Depth to water
DTP - Depth to product
DTB - Depth to bottom of well
DNAPL - Dense non-aqueous phase liquid
LNAPL - Light non-aqueous phase liquid
RW - Recovery well
WP - Well point
NI - Not installed
NM - Not measured
— - Not Present
12/21/99, 1/7/00 - Product Recovery suspended due to severe weather.
1) All measurements collected from top of casing (TOC) recorded in feet.

TABLE 2A
RW-8 SOAKEASE MONITORING
2002 ANNUAL STATUS REPORT
TRENT TUBE PLANT 1
2188 CHURCH STREET
EAST TROY, WISCONSIN

Well ID	Sock ID	Date Inspected	Amount of Product Recovered in Sock (ft)	Percentage of Sock Absorbed[1]	Weight (Lbs)	Cumulative Gallons of Product Recovered/ Per Sock	Color	Odor
RW-8	RW-8_6-23-02	6/17/02	0.00	0%	0.00	0.00	Brown	Strong
	RW-8_6-23-02	6/23/02	0.10	3%	0.10	0.01	Brown	Strong
	RW-8_6-23-02	7/2/02	0.10	3%	0.10	0.01	Brown	Strong
	RW-8_6-23-02	7/9/02	0.10	3%	0.10	0.01	Brown	Strong
	RW-8_6-23-02	7/18/02	0.20	7%	0.20	0.02	Brown	Strong
	RW-8_6-23-02	7/25/02	0.30	10%	0.31	0.03	Brown	Strong
	RW-8_6-23-02	8/2/02	0.30	10%	0.31	0.03	Brown	Strong
	RW-8_6-23-02	8/2/02	0.40	13%	0.41	0.03	Brown	Strong
	RW-8_6-23-02	8/8/02	0.40	13%	0.41	0.03	Brown	Strong
	RW-8_6-23-02	8/15/02	0.50	17%	0.51	0.04	Brown	Strong
	RW-8_6-23-02	8/22/02	0.50	17%	0.51	0.04	Brown	Strong
	RW-8_6-23-02	8/30/02	0.60	20%	0.61	0.05	Brown	Strong
	RW-8_6-23-02	9/5/02	0.60	20%	0.61	0.05	Brown	Strong
	RW-8_6-23-02	9/12/02	0.70	23%	0.71	0.06	Brown	Strong
	RW-8_6-23-02	9/20/02	0.70	23%	0.71	0.06	Brown	Strong
	RW-8_6-23-02	9/27/02	0.80	27%	0.81	0.07	Brown	Strong
	RW-8_6-23-02	10/4/02	0.90	30%	0.92	0.08	Brown	Strong
	RW-8_6-23-02	10/10/02	1.00	33%	1.02	0.08	Brown	Strong
	RW-8_6-23-02	10/17/02	1.10	37%	1.12	0.09	Brown	Strong
	RW-8_6-23-02	10/22/02	1.10	37%	1.12	0.09	Brown	Strong
	RW-8_6-23-02	10/28/02	1.20	40%	1.22	0.10	Brown	Strong
	RW-8_6-23-02	11/12/02	1.30	43%	1.32	0.11	Brown	Strong
	RW-8_6-23-02	11/21/02	1.40	47%	1.42	0.12	Brown	Strong
	RW-8_6-23-02	11/28/02	1.50	50%	1.53	0.13	Brown	Strong
	RW-8_6-23-02	12/5/02	1.50	50%	1.53	0.13	Brown	Strong
	RW-8_6-23-02	12/13/02	1.60	53%	1.63	0.13	Brown	Strong
	RW-8_6-23-02	12/20/02	1.70	57%	1.73	0.14	Brown	Strong
	RW-8_6-23-02	12/23/02	1.70	57%	1.73	0.14	Brown	Strong
	RW-8_6-23-02	12/30/02	1.80	60%	1.83	0.15	Brown	Strong
	RW-8_6-23-02	1/10/03	1.80	60%	1.83	0.15	Brown	Strong
	RW-8_6-23-02	1/13/03	1.90	63%	1.93	0.16	Brown	Strong
	RW-8_6-23-02	1/21/03	1.90	63%	1.93	0.16	Brown	Strong
	RW-8_6-23-02	1/30/03	1.90	63%	1.93	0.16	Brown	Strong
	RW-8_6-23-02	2/7/03	2.00	67%	2.03	0.17	Brown	Strong
	RW-8_6-23-02	2/14/03	2.00	67%	2.03	0.17	Brown	Strong
	RW-8_6-23-02	2/20/03	2.10	70%	2.14	0.18	Brown	Strong
	RW-8_6-23-02	2/27/03	2.10	70%	2.14	0.18	Brown	Strong

Note: Total Gallons of Product Removed as of 2/27/03 = 0.18

Sock Length = 3ft
Sock ID = Well Name_+ Date Inserted (00/00/00)
one absorbed 2.0 inch sock equals 0.25 gallons of product.
[1] Percentage of Sock Absorbed is estimated from a visual observation of length in feet of unaffected sock.

100% of sock absorbed is assumed to be 3.05 lbs of product

Product assumed to be TCE which is 12.2 lbs per gallon

TABLE 2B
OP-3 SOAKEASE MONITORING
2002 ANNUAL STATUS REPORT
TRENT TUBE PLANT 1
2188 CHURCH STREET
EAST TROY, WISCONSIN

Well ID	Sock ID	Date Inspected	Amount of Product Recovered in Sock (ft)	Percentage of Sock Absorbed[1]	Weight (Lbs)	Cumulative Gallons of Product Recovered/ Per Sock	Color	Odor
OP-3	OP-3_06-17-02	6/17/02	2.86	95%	2.91	0.24	Brown	Very Strong
	OP-3_06-17-02	6/23/02	2.92	97%	2.97	0.24	Brown	Very Strong
	OP-3_06-23-02	7/9/02	1.42	47%	1.44	0.12	Brown	Very Strong
	OP-3_06-23-02	7/18/02	1.56	52%	1.59	0.13	Brown	Very Strong
	OP-3_06-23-02	7/25/02	1.64	55%	1.67	0.14	Brown	Very Strong
	OP-3_06-23-02	8/2/02	1.72	57%	1.75	0.14	Brown	Very Strong
	OP-3_06-23-02	8/2/02	1.80	60%	1.83	0.15	Brown	Very Strong
	OP-3_06-23-02	8/8/02	1.90	63%	1.93	0.16	Brown	Very Strong
	OP-3_06-23-02	8/15/02	2.30	77%	2.34	0.19	Brown	Very Strong
	OP-3_06-23-02	8/22/02	2.40	80%	2.44	0.20	Brown	Very Strong
	OP-3_06-23-02	8/30/02	2.50	83%	2.54	0.21	Brown	Very Strong
	OP-3_06-23-02	9/5/02	2.60	87%	2.64	0.22	Brown	Very Strong
	OP-3_06-23-02	9/12/02	2.80	93%	2.85	0.23	Brown	Very Strong
	OP-3_06-23-02	9/20/02	3.00	100%	3.05	0.25	Brown	Very Strong
	OP-3_09-27-02	9/27/02	0.10	3%	0.10	0.01	Brown	Very Strong
	OP-3_09-27-02	10/4/02	0.40	13%	0.41	0.03	Brown	Very Strong
	OP-3_09-27-02	10/10/02	0.60	20%	0.61	0.05	Brown	Very Strong
	OP-3_09-27-02	10/17/02	0.70	23%	0.71	0.06	Brown	Very Strong
	OP-3_09-27-02	10/22/02	0.90	30%	0.92	0.08	Brown	Very Strong
	OP-3_09-27-02	10/28/02	1.00	33%	1.02	0.08	Brown	Very Strong
	OP-3_09-27-02	11/12/02	1.00	33%	1.02	0.08	Brown	Very Strong
	OP-3_09-27-02	11/21/02	1.20	40%	1.22	0.10	Brown	Very Strong
	OP-3_09-27-02	11/28/02	1.40	47%	1.42	0.12	Brown	Very Strong
	OP-3_09-27-02	12/5/02	1.50	50%	1.53	0.13	Brown	Very Strong
	OP-3_09-27-02	12/13/02	1.50	50%	1.53	0.13	Brown	Very Strong
	OP-3_09-27-02	12/20/02	1.60	53%	1.63	0.13	Brown	Very Strong
	OP-3_09-27-02	12/23/02	1.80	60%	1.83	0.15	Brown	Very Strong
	OP-3_09-27-02	12/30/02	2.00	67%	2.03	0.17	Brown	Very Strong
	OP-3_09-27-02	1/10/03	2.40	80%	2.44	0.20	Brown	Very Strong
	OP-3_09-27-02	1/13/03	2.60	87%	2.64	0.22	Brown	Very Strong
	OP-3_09-27-02	1/21/03	2.90	97%	2.95	0.24	Brown	Very Strong
	OP-3_09-27-02	1/30/03	3.00	100%	3.05	0.25	Brown	Very Strong
	OP-3_01-30-03	2/7/03	0.20	7%	0.20	0.02	Brown	Very Strong
	OP-3_01-30-03	2/14/03	0.40	13%	0.41	0.03	Brown	Very Strong
	OP-3_01-30-03	2/20/03	0.60	20%	0.61	0.05	Brown	Very Strong
	OP-3_01-30-03	2/27/03	0.60	20%	0.61	0.05	Brown	Very Strong

Note: Total Gallons of Product Removed as of 2/27/03 = 0.79

Sock Length = 3ft
Sock ID = Well Name_+ Date Inserted (00/00/00)
one absorbed 2.0 inch sock equals 0.25 gallons of product.
[1] Percentage of Sock Absorbed is estimated from a visual observation of length in feet of unaffected sock.

100% of sock absorbed is assumed to be 3.05 lbs of product
Product assumed to be TCE which is 12.2 lbs per gallon

TABLE 2C
OP-1 SOAKEASE MONITORING
2002 ANNUAL STATUS REPORT
TRENT TUBE PLANT 1
2188 CHURCH STREET
EAST TROY, WISCONSIN

Well ID	Sock ID	Date Inspected	Amount of Product Recovered in Sock (ft)	Percentage of Sock Absorbed[1]	Weight (Lbs)	Cumulative Gallons of Product Recovered/ Per Sock	Color	Odor
OP-1	OP-1_6-17-02	6/17/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	6/23/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	7/2/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	7/9/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	7/18/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	7/25/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	8/2/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	12/23/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	8/2/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	8/8/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	8/15/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	8/22/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	8/30/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	9/5/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	9/12/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	9/20/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	9/27/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	10/4/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	10/10/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	10/17/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	10/22/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	10/28/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	11/12/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	11/21/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	11/28/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	12/5/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	12/13/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	12/20/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	12/23/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	12/30/02	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	1/10/03	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	1/13/03	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	1/21/03	0.00	0%	0.00	0.00	none	none
	OP-1_6-17-02	1/30/03	0.10	3%	0.10	0.01	Brown	none
	OP-1_6-17-02	2/7/03	0.10	3%	0.10	0.01	Brown	none
	OP-1_6-17-02	2/14/03	0.10	3%	0.10	0.01	Brown	none
	OP-1_6-17-02	2/20/03	0.10	3%	0.10	0.01	Brown	none
	OP-1_6-17-02	2/27/03	0.10	3%	0.10	0.01	Brown	none

Note: Total Gallons of Product Removed as of 2/27/03 = 0.01

Sock Length = 3ft
Sock ID = Well Name_+ Date Inserted (00/00/00)
one absorbed 2.0 inch sock equals 0.25 gallons of product.
[1] Percentage of Sock Absorbed is estimated from a visual observation of length in feet of unaffected sock.

100% of sock absorbed is assumed to be 3.05 lbs of product
Product assumed to be TCE which is 12.2 lbs per gallon

TABLE 3
BOOM MONITORING
2002 ANNUAL STATUS REPORT
TRENT TUBE PLANT NO. 1
2188 CHURCH STREET
EAST TROY, WISCONSIN

Date Boom Installed	Number of Booms Installed	Date Boom Removed	Number of Booms Removed	Field Measured Weight of Booms at Time of Removal (lbs)	Calculated Weight of Product (lbs)[1]	Estimated Gallons of Product Recovered[2]	Estimated Cumulative Gallons of Product Recovered
5/10/01	2	12/13/01	2	32.5	28.5	3.42	3.42
12/13/01	3	7/25/02	3	48	42	5.03	8.45
7/25/02	3	3/19/03	3	27	21	2.52	10.97
10/22/02	2	3/19/03	2	16	12	1.44	12.41
12/9/03	3	3/19/03	3	30	24	2.88	15.28
3/24/03	9						

Note:

- Weight of new boom = 2.0 lbs

[1] Calculated Weight of Product = (Number of Booms)(Weight of New Boom)-Field Measured Weight of Booms

[2] Estimated Gallons of Product Recovered = (Gallons per Cubic Feet of Water)(Weight of Product/Density of Water)