WISCONSIN
DEPT. OF NATURAL RESOURCES

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Gloria L. McCutcheon, Regional Director

Southeast Region Headquarters
2300 N. Dr. Martin Luther King, Jr. Drive
PO Box 12436
Milwaukee, Wisconsin 53212-0436
Telephone 414-263-8500
FAX 414-263-8606
TTY 711

Rationale for No Action Required

Date stamped: 2/23/2004 and 2/27/2004 Date reviewed: 3/2/2004

Name and description of site: Alloy Products Corp.
(incl. County, size...) 1045 Perkins Ave.
Waukesha, WI

Who is submitting and for whom? (Consultant and client) Rick Fulk, P.E. (River's Bend Engineering)
Steve Jensen (Alloy Products)

What has been submitted? Cover letter describing spill and sampling rationale, lab results, notification form

Description of contamination: 10 to 40 gallons nitric acid release to soil beneath concrete retainer

Any references to other documents available, but not submitted? no

What is being requested? What further action is required by DNR

Conclusions: No Action Required, based on lab results for metals and pH of soil, visual confirmation of very low impacts, no groundwater encountered

BRRTS # 09-68-522741

Please copy to Walt

Signed: Michelle Williams

RBE RIVER'S BEND ENGINEERING, INC.

• DESIGN/BUILD • ENGINEERING • ENVIRONMENTAL • INFORMATION TECHNOLOGY

RECEIVED
FEB 27 2004
By

MEMORANDUM

Date: 2-27-03

To: Victoria Stovall, Wisconsin Department of Natural Resources

From: Rick Fulk, P.E.

Subject: Nitric Acid Release at Alloy Products

Copies: Steve Jensen, Alloy Products

River's Bend Engineering, Inc. (RBE) notified the Wisconsin Department of Natural Resources (DNR) on February 20, 20004 of a potential release of nitric acid from the Alloy Products Corporation facility located at 1045 Perkins Avenue, Waukesha, Wisconsin. This release resulted from a sudden failure of a 1,600-gallon nitric acid pickle tank used to pickle stainless steel parts. The sudden failure was the result of a stainless steel part falling off a hoist and striking the bottom of the tank. The tank then discharged its contents (between 1,100-gallons and 1,500-gallons of 33% nitric acid) into a secondary containment pit. From there the nitric acid containment pit the acid was pumped to wastewater treatment where it was neutralized, the heavy metals precipitated and the treated supernatant released under permit to the sanitary sewer. RBE recommended Alloy empty the second pickle tank in the containment area and remove the tanks to allow inspection of the containment pit. After this was done, a 4" by 6" hole was discovered beneath the second pickle tank. The second pickle tank did not leak nor did it release any acid to the containment area.

After reviewing Alloy's response actions and wastewater treatment records, RBE estimates that Alloy treated approximately 1,669-gallons of acid from the first pickle tank. This would account for all of the acid in the tank. Based on this information, RBE is estimating that between 10-gallons and 40-gallons of acid may have been released to the soil beneath the containment pit.

On Monday, February 23, Alloy had removed approximately a 3-foot by 3-foot section of the acid containment pit floor in the area where the hole was. The rebar in the concrete was in tact and showed no signs of aid deterioration. Near surface soil samples were tested for pH by mixing 10g of soil with 100ml of distilled water. The pH of the soil in contact with the under side of the containment pit concrete was 10.1 S.U. RBE then advanced a hand auger 16" into the soil beneath the location of the hole and took a composite sample. The results of metals analysis are attached and listed as sample SB-1. The pH of the soil sample was 6.8 S.U. RBE then advanced a hand auger 20" into the soil approximately three feet north east of SB-1 and took a composite sample. The results of metals analysis are attached and listed as sample SB-2. The pH of the soil sample was 6.8 S.U. Sample SB-3 was a composite of the top two inches of soil in contact with the concrete of the containment pit.

1139 S Sunnyslope Drive, Ste 203
Racine, WI 53406
Tele. 262-886-3882
Fax. 262-886-4458

www.riversbend-engineering.com

5524 North County Line Road, Ste. 2
Auburn, IN 46706-9325
Tele. 260-627-7117
Fax. 260-627-8615

RBE

No groundwater was encountered during the sampling event. Facility personnel recall groundwater in the area as eight to twelve feet below the finished floor of the facility. The containment pit is 29" deep. RBE is currently investigating depth to groundwater.

The soil samples were tested for hexavalent chromium, total chromium and nickel. Hexavalent chromium is not usually found in stainless pickling operations. The primary metals in stainless steel pickling are iron, nickel and chromium. Other NR 720 criteria metals such as arsenic, cadmium and lead are not found in pickling acids. Tested metals are below the NR 720 RCL levels listed in Table 2 for soils.

RBE is requesting guidance on further investigative actions the Department may require.

Rivers Bend Engineering	Project: general	
1139 Sunny Slope Drive Suite 203	Project Number: [none]	**Reported:**
Racine, WI 53406	Project Manager: Rick Fulk	02/27/04 08:38

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
SB-1	W402186-01	Soil	02/23/04 00:00	02/23/04 13:12
SB-2	W402186-02	Soil	02/23/04 00:00	02/23/04 13:12
SB-3	W402186-03	Soil	02/23/04 00:00	02/23/04 13:12

Great Lakes Analytical–Oak Creek

Andrea Stathas, Project Manager

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Rivers Bend Engineering	Project: general	
1139 Sunny Slope Drive Suite 203	Project Number: [none]	**Reported:**
Racine, WI 53406	Project Manager: Rick Fulk	02/27/04 08:38

Total Metals by EPA 6000/7000 Series Methods

Great Lakes Analytical--Buffalo Grove

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
SB-1 (W402186-01) Soil	**Sampled: 02/23/04 00:00**	**Received: 02/23/04 13:12**							
Chromium	**619**	0.571	mg/kg dry	1	4020509	02/25/04	02/25/04	EPA 6010B	A-01, QC
Hexavalent Chromium	**0.924**	0.457	"	"	4020508	02/25/04	02/26/04	EPA 7196A	
Copper	**126**	2.86	"	"	4020509	02/25/04	02/25/04	EPA 6010B	A-01
Nickel	**307**	2.86	"	"	"	"	"	"	A-01, QC
SB-2 (W402186-02) Soil	**Sampled: 02/23/04 00:00**	**Received: 02/23/04 13:12**							
Chromium	**191**	0.553	mg/kg dry	1	4020509	02/25/04	02/25/04	EPA 6010B	A-01, QC
Hexavalent Chromium	ND	0.442	"	"	4020508	02/25/04	02/26/04	EPA 7196A	
Copper	**200**	2.76	"	"	4020509	02/25/04	02/25/04	EPA 6010B	A-01
Nickel	**121**	2.76	"	"	"	"	"	"	A-01, QC
SB-3 (W402186-03) Soil	**Sampled: 02/23/04 00:00**	**Received: 02/23/04 13:12**							
Chromium	**170**	0.656	mg/kg dry	1	4020509	02/25/04	02/25/04	EPA 6010B	A-01, QC
Hexavalent Chromium	**1.92**	0.524	"	"	4020508	02/25/04	02/26/04	EPA 7196A	
Copper	**105**	3.28	"	"	4020509	02/25/04	02/25/04	EPA 6010B	A-01
Nickel	**91.0**	3.28	"	"	"	"	"	"	A-01, QC

Great Lakes Analytical--Oak Creek

Andrea Stathas

Andrea Stathas, Project Manager

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

GREAT LAKES ANALYTICAL

CHAIN OF CUSTODY REPORT

1380 Busch Parkway
Buffalo Grove, IL 60089-4505
(847) 808-7766
FAX (847) 808-7772

140 E. Ryan Road
Oak Creek, WI 53154
(414) 570-9460
FAX (414) 570-9461

02/27/2004 11:46 2628864458 RBE PAGE 05

Client: Alloy Products
Address: 1045 Perkins Av PO 529
Waukesha WI

Bill To: Rivers Bend Engs.
Address: 1139 Sunnyslope Rd
Racine WI 53406

TAT: STD. 4 DAY 3 DAY 2 DAY (1 DAY) < 24 HRS.
[X] YES - TAT is critical
[ ] NO - TAT is not critical
DATE RESULTS NEEDED:
Received: [ ] ice [X] ambient [ ] refrigerator
Temp. Upon Receipt: 20°C

Report to:
E-mail: Steve Jenson
Phone #: ( )
Fax #: ( )

State & Program:

Phone #: (262) 886-3382
Fax #: (262) 886-4458

Deliverable Package: [ ] STD [ ] Other
Delivery Method: GLA [ ] Client [X] Shipped [ ] Courier [ ]

Project Name:
Project #/PO#:
Sampler: Richard J Falk

	FIELD ID, LOCATION	DATE COLLECTED	TIME COLLECTED	SAMPLE MATRIX	# of Bottles Preservative Used: MeOH	NaHSO4	HCl	HNO3	H2SO4	NaOH	NONE	TOTAL # OF BOTTLES	DO NOT DRY-WEIGHT CORRECT RESULTS	SAMPLES FIELD FILTERED [ ] YES [ ] NO	Nickel	Chromium	Copper	Hex Cr					CRACKED/BROKEN	IMPROPERLY SEALED	SAMPLE CONTROL	LABORATORY ID NUMBER
1	SB-1	2-23-04		Soil							✓				✓	✓	✓	✓								W402186-01
	PID:																									
2	SB-2	"		"							✓				✓	✓	✓	✓								-02
	PID:																									
3	SB-3	"		"							✓				✓	✓	✓	✓								-03
	PID:																									
4	~~SB-4~~	X		↓							X															~~-04~~ AB
	PID:																									
5																										
	PID:																									
6																										
	PID:																									
7																										
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8																										
	PID:																									
9																										
	PID:																									
10																										
	PID:	2-23-04																								

RELINQUISHED	DATE	RECEIVED	DATE	RELINQUISHED	DATE	RECEIVED	DATE
Richard J. Falk	2-23-04	Angela Baran	2/23/04				
	TIME 1312		TIME 1312		TIME		TIME
RELINQUISHED	DATE	RECEIVED	DATE	RELINQUISHED	DATE	RECEIVED	DATE
	TIME		TIME		TIME		TIME

COMMENTS:

PAGE | OF

01-68-522741

FID#'s 1.268016760

RECEIVED FEB 23 2004

State of Wisconsin
Department of Natural Resources

Hazardous Substance Release Fax Notification (Non-Emergency Only)

Form 4400-225 (11/02) Page 1 of 2

Emergency Releases / Spills must be reported via the 24-hour Hotline: 1-800-943-0003

Notice: Hazardous substance discharges must be reported immediately according to the "Spills Law", s. 292.11 Wis. Stats., Section NR 706.05(1)(b), Wis. Adm. Code, requires that hazardous substance discharges are to be reported by one of three methods: telephoning the Department (toll free Spill Hotline number above), telefaxing a report to the Department or visiting a Department office in person. If you choose to notify the Department by telefax, you should use this form to be sure that all necessary information is included. However use of this form is not mandatory. Under s. 292.99, Wis. Stats., the penalty for violating ch. 292 Wis. Stats., shall be no less than $10 nor more than $5000 for each violation. Each day of continued violation is a separate offense. It is not the Department's intention to use any personally identifiable information from this form for any purpose other than program administration. However, information submitted on this form may also be made available to requesters under Wisconsin's Open Records Law (ss. 19.31 – 19.39, Wis. Stats.).
Confirmatory laboratory data should be included with this form, to assist the DNR in processing this Hazardous Substance Release Notification.

Complete this form. TYPE or PRINT LEGIBLY. FAX it to the appropriate WDNR region (see next page) IMMEDIATELY upon discovery of a potential release from (check one):

- ☐ Underground Petroleum Storage Tank System
- ☐ Aboveground Petroleum Storage Tank System
- ☐ Dry Cleaner Facility (DERP eligibility based on: ☐ Facility owner/operator ☐ Property owner of licensed facility)
- ☒ Other - Describe: Stainless steel acid pickle (40% nitric acid, 12% hydrofluoric acid)

TO WDNR, ATTN: **R & R Program Assistant** | (Area Code) FAX Number: 414-263-8483

1. Discharge reported by:

Name	Firm	Date FAXed to WDNR
Richard J. Falk, P.E.	River's Bend Engineering	2-20-04

Mailing Address	(Area Code) Phone Number
1139 Sunnyslope Drive, Ste 203 Racine WI 53406	262-886-3882

2. Site Information

Name of site at which discharge occurred. Include local name of site/business, not responsible party name, unless a residence / vacant property: Alloy Products Corp

Location: Include street address, not PO Box. If no street address, describe as precisely as possible, e.g., 1/4 mile NW of CTHs 60 & 123 on E side of CTH 60
1045 Perkins Av.

Municipality (City, Village, Township) Specify municipality in which the site is located, not mailing address/city
Waukesha

County:	Legal Description:
Waukesha	_____1/4, _____1/4, Section _____, Tn_____, Range _____E / W (circle one)

3. Responsible Party (RP) and/or RP Representative

Responsible Party Name: Business or owner name that is responsible for cleanup. If more than one, list all. Attach additional pages as necessary: Alloy Products Corp
Craig Bear - President 262-832-8441

☐ Reported in compliance with s. 292.11(2), Wis. Stats., by a local government exempt from liability under s.292.11(9)(e), Wis. Stats. For more information see http://www.dnr.state.wi.us/org/aw/rr/liability/muni_1.html

Contact Person Name (if different)	Phone Number
Steve Jensen	262-832-8464

Mailing Address	City	State	ZIP Code
1045 Perkins Av. PO Box 529	Waukesha WI	WI	53187

(continued

State of Wisconsin
Department of Natural Resources

Hazardous Substance Release Fax Notification
(Non-Emergency Only)

4. Hazardous Substance Impact Information

Identify hazardous substance discharged (check all that apply):

- ☐ Ammonia
- ☐ Arsenic
- ☐ Chlorinated Solvents
- ☐ Chromium
- ☐ Cyanide
- ☐ Diesel
- ☐ Fertilizer
- ☐ Fuel Oil
- ☐ Gasoline-Lead Unknown
- ☐ Gasoline-Leaded
- ☐ Gasoline-Unleaded
- ☐ Herbicide
- ☐ Hydraulic Oil
- ☐ Hydrocarbon-Unknown Type
- ☐ Kerosene
- ☐ Leachate
- ☐ Lead
- ☐ MTBE-Methyl Tertiary Butyl Ether
- ☐ Mercury
- ☒ Metals (specify): Cr, Ni
- ☐ Milk
- ☐ Oil & Grease
- ☐ Other (specify): Acid
- ☐ PAH's
- ☐ Paint (oil based)
- ☐ Paint (latex)
- ☐ PCB's
- ☐ Petroleum-Unknown Type
- ☐ PERC
- ☐ Pesticides
- ☐ RCRA Hazardous Waste
- ☐ SVOC (Semi-volatile Organic Compound)
- ☐ Stoddard Solvents
- ☐ Transformer Fluid
- ☐ Unknown
- ☐ VOC's
- ☐ Waste Oil

Impacts to the environment (enter "K" for known/confirmed or "P" for potential for all that apply)

- ___ Air Contamination
- ___ Co-contamination
- K Concrete/Asphalt
- ___ Contained/Recovered
- ___ Contamination Within 1 Meter of Bedrock
- ___ Contaminated Private Well
- ___ Contaminated Public Well
- ___ Contamination in Fractured Bedrock
- ___ Contamination In Row of Way
- ___ Direct Contact
- ___ Expanding Plume
- ___ Fire Explosion Threat
- ___ Free Product
- ___ Groundwater Contamination
- ___ Off-Site Contamination
- ___ Other
- ___ Sanitary Sewer Contamination
- K Soil Contamination
- ___ Storm Sewer Contamination
- ___ Surface Water Contamination
- ___ Within 100 ft of Private Well
- ___ Within 1000 ft of Public Well

Contamination was discovered as a result of:

☐ Tank closure assessment	☒ Site assessment	Other – Describe:
Date	Date 2-20-04	Date

Lab results:

- ☒ Lab results will be faxed upon receipt
- ☐ Lab results are attached

Additional Comments: Include a brief description of immediate actions taken to halt the release and contain or cleanup hazardous substances that have been discharged.

Pickle tanks were drained and removed from secondary containment
The acid source has been removed and cleanup are repairs underway

FAX numbers to report non-emergency releases in DNR's five regions are as follows:

Northeast Region (920-492-5859); Attention - RR Program Assistant:
Brown, Calumet, Door, Fond du Lac ***(except City of Waupun - see South Central Region)***, Green Lake, Kewaunee, Manitowoc, Marinette, Marquette, Menominee, Oconto, Outagamie, Shawano, Waupaca, Waushara, Winnebago Counties

Northern Region (715-365-8932); Attention - RR Program Assistant:
Ashland, Barron, Bayfield, Burnett, Douglas, Forest, Florence, Iron, Langlade, Lincoln, Oneida, Polk, Price, Rusk, Sawyer, Taylor, Vilas, Washburn Counties

South Central Region (608-275-3338); Attention - RR Program Assistant:
Columbia, Dane, Dodge, Fond du Lac ***(City of Waupun only)***, Grant, Green, Iowa, Jefferson, Lafayette, Richland, Rock, Sauk Counties

Southeast Region (414-263-8483); Attention - RR Program Assistant:
Kenosha, Milwaukee, Ozaukee, Racine, Sheboygan, Walworth, Washington, Waukesha Counties

West Central Region (715-839-6076); Attention – RR Program Assistant:
Adams, Buffalo, Chippewa, Clark, Crawford, Dunn, Eau Claire, Jackson, Juneau, LaCrosse, Marathon, Monroe, Pepin, Pierce, Portage, St. Croix, Trempealeau, Vernon, Wood Counties