

Date: June 24, 1981

File Ref: 4400

To: The File

From: Pat Kandziora
Jim Anklam

Subject: Connor Forest Products - June 17, 1981

Jim Anklam, Bruce Nimz, and I arrived at about 8:15 a.m. at the east gate adjacent to Cleveland Street which borders the Connor Forest property in Wausau. We parked the car opposite the gate, facing north on Cleveland. From there, we watched the activities of the Connor Forest yard beyond the gate.

After no more than ten minutes of surveillance, we observed a forklift transporting two barrels south in the yard. Jim and I got out of the car and, through the gate, entered the property under the premise of State Statute 144.76(8).

A closer look at these barrels revealed these were reagents, not wastes. Rather than arouse suspicion in the employees, by going back to the car which was easily visible to them, we resorted to concealing ourselves on the property to watch from there.

Information obtained from our anonymous informant helped us to find the area in question. On our way there, we noticed an area in the grass which was devoid of vegetation. At first, we thought this was the site in question then realized it was not because the grass around it was around two feet high, and there were no tire tracks leading back there. We agreed this area possibly was a former dump site and should be investigated later on. See (1) of the enclosed map for the location of this spot.

We situated ourselves behind the current dump site in the woods (Map 3). Jim cut east through the woods to the fence on Cleveland Street. He climbed out and told Nimz the wait could be a long one, at least an hour. The anonymous informant had said, during one phone conversation, they could dump the material anywhere between 8:00 and 12:00 p.m., more likely around 9:30 a.m.

About 11:00 a.m., we noticed one person from the company meandering about our area in the woods. Minutes later, two others from the company saw us and called us out asking what we were doing in there. Simultaneously, we noticed the forklift, carrying two barrels, drive by in the yard heading north.

We identified ourselves and told them we have reason to believe industrial wastes are being illegally disposed here. One of them asked us to come with him. He took us to Mr. Yach, who was in a meeting with a Mr. Palaza and another officer of the company. He told them we were from the DNR then he left. We repeated, to those in the meeting, our reasons for being there.

Mr. Yach was the first to ask us questions which focused on his impression that we had taken liberties to trespass and insinuated unethical action on the part of the Department by not using the "front door" and confronting them.

Jim responded to this by giving him our reasons for the approach we took. Essentially, that we wanted to prove or disprove this disposal practice before taking further action with the company. In addition, I mentioned State Statute 144.76(8) which gives us premise, based on our professional opinion regarding the urgency of the situation, to enter private property unannounced. Specifically, I said we felt once chemicals are dumped and leached into the groundwater, they are virtually irretrievable and could pose a health hazard to wells in the area.

The third Connor Forest officer in the meeting, whose name we did not catch, said he knew nothing of this (illegal disposal) - it isn't his area.

Mr. Yach asked for Jim's ID, Gary's name and telephone number and said he remembered me from the EPA inspection in February.

Mr. Palaza said all of Connor Forest's solvents get shipped out. The last shipment, he said, just went recently. We clarified that we did not insinuate these are solvents being dumped. Yach said all he can think of is water, in specific, water from the cleanup operation. When we asked what else is in the water, he said, "A little glue". He and Mr. Palaza repeatedly stressed Connor Forest has nothing to hide and, if they are doing something wrong, they would like to know about it.

They added the glue is waterbased. When asked why, if the waste is innocuous to the environment, it does not get sewered and treated, Yach said there are no drains in the area where the waste is generated. It would be necessary to transport the waste to another spot in the building to dump it down a drain.

I added I would like to see their contingency plan, manifests, operating record, inspection record - all of which were not available when we were there with EPA in February. They agreed this would be possible.

Getting back to the subject of the waste, I said we had heard 100 gallons per day of this waste gets dumped out there. Yach said the waste goes out there at a rate of one barrel every two to three weeks. Palaza agreed, saying no way does a hundred barrels of solvent go out every day. Again, we clarified 100 gallons per day and these are not necessarily solvents. Yach said, perhaps, the anonymous informant sees two barrels go out on the forklift each day but certainly two barrels are not dumped.

Before leaving, we asked where the waste is generated in the plant. Another officer of Connor Forest showed up and said Gary Nest has all the forms regarding EPA's requirements. He included he would be glad to show us the generating points. I asked for Palaza's name for the record and we left.

This fourth Connor Forest officer walked us through the manufacturing building to the yard and Jim left to get Bruce. The officer left to get Nest. Gary Nest arrived and asked similar questions, as did Yach, regarding illegal entry. I explained, under the circumstances, we felt it was necessary. We have legal premise and, in view of complaints, we have been receiving since February 23 - Nest interrupted and asked, "Complaints about what?" I said about waste disposal. He asked "Specifically, what types?" I said, "These complaints regarded improper disposal of process wastes." At that point, he dropped the subject.

Jim and Bruce pulled up in the car. Jim got out, Bruce parked it on the west side of the main building and walked back. Nest asked if we had been back at the site, and we said we had. He walked us back to the disposal area. When asked how long they had been doing this, he said three to four years. He estimated about two to three barrels per week are dumped, adding it's a water-based, rinsed down solution generated from cleanup of glue machines.

On the way to the dump site, he asked again what the other disposal complaints were regarding. Just then, we passed an area where half of a rusted drum was protruding from the ground which looked like it was recently (within the last few months) filled and leveled. I pointed that out as a possible example, and he said it was just some junk strewn about. There was no further discussion on that issue. See Map 2 for that site.

At the current site, there were two inverted barrels with caked solids inside which had slipped to the ground and compacted there. The area was littered with rusted barrels and some trash. There is a marked void of vegetation in this area. Yellow and white coagulated matter was on the ground. The ground sloped slightly to the east here and a small pocket of white, opaque liquid was ponded. Jim took a mason jar and metals bottle. With the metals bottle, he scooped up the solution to fill the Mason jar. There wasn't enough material to fill the metals jar too. Jim said this practice has to be stopped and related the violations to Nest, NR 180.13 and, possibly, state and federal hazardous waste laws. Nest added these solids from this waste had been used to fill the area over the years.

We asked to see the processes which generate this waste. Nest said, "A variety of chemicals go into each of the three processes, and the wastes are sometimes combined and sometimes not, when they are to be dumped".

Responding to the question of why Connor Forest notified EPA as a generator of K086, Nest said it was an error. Connor Forest has renotified with the correct HW number. They have denotified as storers and received no response from EPA regarding either.

As we walked away from the spill area, one of the many employees watching us from the warehouse yelled, "Where Connor goes, nothing grows"!

We asked why the material had not been sewerred rather than spilled. Nest said the material has potential to clog the sewer. He also said, "It is easier than funnelling it down a sewer, plus, there are no drains near the points of generation". It was pointed out this dump site is not exactly near the point sources either. He replied he had talked to a municipality official regarding sewerred of this waste. The official asked him not to do it as the sewage treatment plant was having enough problems balancing its "bugs" and chemicals, at that time.

Jim locked the sample in the trunk, and the four of us walked through two of the areas (a third area was not yet known to us) where the glue wastes are fructified.

Both operations are water-based gluing. When asked, Nest said no gluing goes on on the second floor.

He escorted us to the waiting room and left us there for about 30 minutes. While waiting, we all looked at Connor Forest's contingency plan and manifests which all appeared to be orderly. He returned with all the spec sheets on the raw materials used and all three of the gluing processes, then added there was another gluer he forgot to show us. He had calculated out just how much waste is accumulated each week. It totalled to eight, 55-gallon barrels which corresponds with the information we had received earlier. Nest was surprised to find this much waste generated each week. We did not take him up on going to look at the third operation since we had all the necessary data.

The spec sheets told us little more than manufacturer code numbers and how to use the material. He said he would call National Casein and we certainly could too. We said the generic names are most important to us for the determination of hazard. Palaza came in and told us the names of three chemicals he knew to be used in the process. These were the three we knew about before - polyvinyl acetate, urea formaldehyde and an acid salt catalyst.

We told Nest we would like photographs of the site before leaving. Bruce, Jim and I drove out to it, Nest walked.

Once at the site, Jim said, again, to stop the practice and containerize the material until we have it analyzed. I said we would let him know our findings from the lab. He approved and said if it is hazardous, they would get a consultant in to recommend cleanup or whatever it takes.

Jim closed by informing Nest that this is a 180.13 violation and the area should be cleaned up.

We took photographs of the area and then took a spin around the property, on Nest's recommendation, to assure ourselves nothing else was awry.

We left, dropped Bruce off, and went to the Marathon County Landfill. There I calibrated the pH meter and took a pH of the sample. It was 5.9. I sealed the jar for chain-of-custody and locked it in the trunk. That night, the anonymous informant told me that a dump had occurred while we were being confronted by the Connor Forest employees back in the woods. According to the informant, the sample we had taken was a fresh sample of the waste mixture without dilution from the previous nights rain, as we originally thought.

Overnight, the sample was locked in a cabinet at the DNR.

June 18, 1981, I filled out the chain-of-custody papers, packed and mailed the sample (in accordance with Chapter 50) to the State Lab of Hygiene at Madison.

The manifests were as follows:

1. 17 barrels 1,100 gallons D001 (solid)(liquid) mix NA1142. Sent 4/22/81 to Hydrite.
2. 58 barrels 3190 gallons F017 1142. Sent 4/24/81 to WRR. Compound lacquer - thinning.

Empty barrels are recycled.

PK:dim

Added note There were 6 barrels
of haz. w. on site & none were dated.
They were told, then, that w/o stor. i.e.
they must manifest > "smll quant" off-site
in ≤ 90 days & the barrels must be dated clearly
at the w/ the date waste
accumulation begins in that container.

Pet

June 29, 1981

4400

The File

Jim Anklam

Clandestine Operations Designed to Incriminate Connor Forest Industries of Illegal Hazardous Waste Disposal

On Wednesday, June 17, 1981, Patricia Kandziora, District Hazardous Waste Specialist, Bruce Nimz, an area warden and I, conducted a clandestine surveillance operation at the Connor's plant in the City of Wausau. The purpose of the surveillance was to find out if, in fact, Connors was illegally dumping hazardous waste on their property as a complainant had alleged.

At approximately 8:15 a.m., we parked outside the Connor's workyard gate, Pat and I noted a tow motor driving past the gate with two 55-gallon drums. From the information Pat's informant had given us, this seemed to be the waste on its way to being dumped. We decided to follow the tow motor taking with us sample bottles and a camera. It turned out the barrels the driver had were empty barrels. We subsequently came across some new information supplied by the informant and decided to hide in the woods on Connor's property within the work yard. We took up our hiding post at approximately 8:35 a.m. I went out to the road at this time to inform Bruce Nimz who was waiting in the car outside the gate of our plan.

Pat and I spent the next 2 hours observing the alleged dump site, with no action. Then at approximately 10:45 a worker came back in the woods where we were hiding and appeared to be looking for us. He was unable to find us in our well concealed observation area. Approximately five minutes later, we noted the tow motor driver heading away from us with two barrels. At the same time two other employees who were looking for us spotted us. They questioned our presence on the property and asked us to come with them to the plant manager's office. We complied with their request.

Once in the plant manager's office (who was visibly upset with our unannounced presence on company property) we explained our purpose for being there and our suspicions. He seemed to be ignorant of any wrong doing and insisted his plant was open to the DNR. We asked if we could conduct a plant inspection, our wishes were complied with.

We completed the inspection by first summoning Bruce Nimz and a plant inspection was conducted. The illegal disposal area was located and all points in the plant where this waste was generated were observed. We informed Connors that at a minimum this was a solid waste violation and is potentially a hazardous waste violation. They agreed not to dispose of waste in this manner any more and the Department agreed to get back to them about the nature of their waste and future disposal.

JAA:bjs

Hazardous Waste Case Status Sheet

Date Received: 6/5/81 Time: 4:15 PM Case Number 209-81
Initials: PK

Information Received From:

Name: Anonymous Complaint Telephone Number _____
Address: _____ Location: _____

Entity Involved:

Name: Connor Forest Products Telephone Number: _____
Address 131 Thomas St. Location: WZUSZU

Contact Person: Mr. Nest is normally contact

Available Information:

See the attached sheet for info.

Initials PK
Date 6/5

Required Information:

Method To Obtain Required Information:

Date Required Information Obtained:

(Use reverse side to record telephone contacts)

6/5
4:15 p.m.

Rec'd a ^{inform} l from Wausau ofc. A j. ~~complaint~~ was in their ofc - wanted to know some info. A co. (to be un-named till later when + if hazards turn up) was having an employee dump ≈ 100 gal ≈ 4 X/wk onto the ground. Wants to know what the material is + if a sample could be brought in to us. Is concerned mainly, about the wells in the neighborhood.

I told A.I. ^(Anony Informant) not to take a sample but to get me the names of the raw material. The processes these wastes come from are the veneer / particleboard core laminating process. (A.I. feels this process \rightarrow the worst waste.) It's machine washdown waste so probably isn't s'd much composition-wise.

6/8
5:30 p.m.

Called A.I. to ~~give~~ get names of chems.:

- ① CL-8800 R10401-58 Resin emulsion
- ② Catalyst K-1 (corrosive placard)
- ③ Urea resin glue (lig.) *550

all are supplied by (except a yeast/water soln which is also dumped)

Nat'l Casein
601 W. 80th St.

Chi. IL 60620 (312)-846-7300 TWX 910-221-2582

I would check out these #'s + get generic chem. names to check against HW lists + for characteristic. Don't take a sample!

6/9
8:30 a.m.

Called Dave Degenhardt, he said to be able to get full info it'd be best to tell the supplier our suspicions.

8:35 a.m. Called Nat'l Caseins - Bob Burns. In essence I said, 'we know of a co. dumping these things, to be sure they're not hay we need the names.' He said the processes that the following are used in are not listed processes accdy to EPA.

- ① polyvinyl acetate copolymer emulsion
- ② $AlCl_3$ (50%) pH is nearly unreadable it's so low, <1, !!
- ③ Urea formaldehyde resin (= polynoxylin)

①+② are mixed for the process: the p^H increases here. None of the materials are 'listed' although they surely are hazardous in the "common sense" sense.

Merck Info.

Vinyl Acetate: polymerizes in light to colourless transparent mass.

LD₅₀ orally = 2.92 g/kg
note!

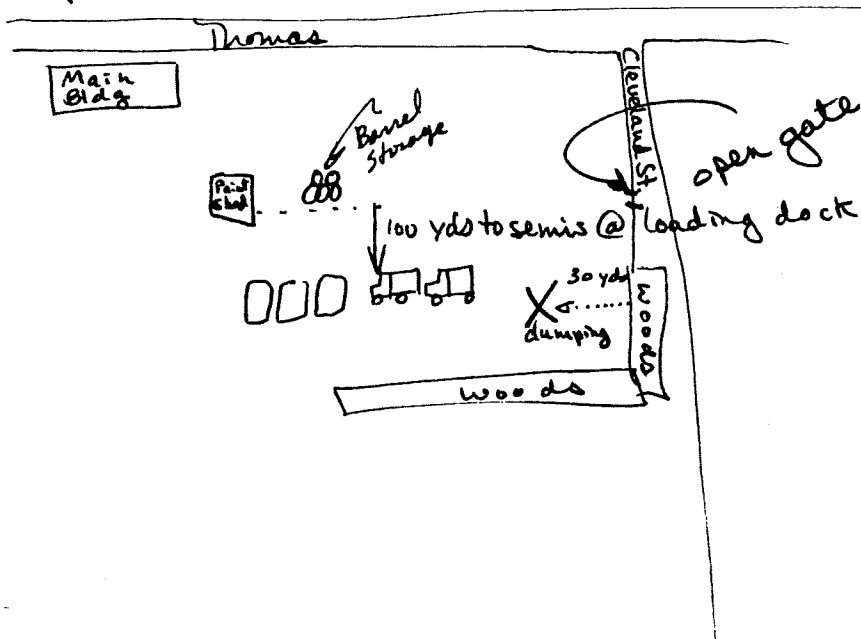
AlCl₃: combines w/ H₂O w/ explosive violence (the anhydrous does)

- * hexahydrate is a wood preservative-deodorant + anhydrotic
- * anhydrous is an acid catalyst.

Polynoxyl: haz. are not listed in our Merck.

Time + frequency of spilling varies, Usually they don't mix the solus together.

A map of area as described on phone by A.I.



6/9

3:00 p.m.

Dale Mrs Gary K & I disc. what fo we have + what's needed.
If we want to force clean-up + monitoring of samples
we should go the route of - seeing the act done, pulling
samples, seeing what → the waste.

Dale + I checked topo maps to see g.w. flow. It appears
to flow through a housing area from C-F property.

Checked part A applic.

6/9

5:30 p.m.

Called A.I., we adjusted my perception of where dumping occurs
by use of part A map C-F sent us. See it for details + see
map I drew.

A.I.: frequency is about each A.M.

avg time is before 9:30 or thereabouts (9:30, that is)

@ night a lift driver may dump too - not sure will ✓
if yes, A.I. assumes it's same ~~about~~ amt. as during day.

Agrees catching the dumper is good route to go. Says
most people @ C-F who know about this, dislike idea of dumping it.

→ Will try to find out when does what get dumped.

Can't tell waste is on ground by end of day - it soaks in.

Some went today - Some will go tomorrow!!

We Need to know: * Are wells in the area?

* Is the diluted wash ↓ so diluted that
PH is raised enough so non-haz?

* What did C-F file ~~PART-A~~ for?

F017 & K086 are no longer listed!

* WAIT for A.I.'s next info.

* ✓ solubilities of empds

* how long's process been on line?

* Scenario of our actions

how
long process
been

