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1313 Merchants Bank Building
11 South Meridian Street
Indianapolis, Indiana 46204
(317) 638-1313

MAR 7 9 32 AM '94

TWX 810-341-3427 B&T LAW IND
Telecopier (317) 231-7433

March 4, 1994

U.S. EPA - Region V
RCRA Enforcement Branch, HRE-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

Attention: Indiana Steel & Wire Project Coordinator

Re: Indiana Steel & Wire, Muncie, Indiana
USA v. GK Technologies, and Indiana Steel & Wire Company
Civil Action No. IP90 2122C

Dear Project Coordinator:

This is to reconfirm our prior notification to you that Leo M. Brausch, P.E. has been designated as the Project Coordinator for the above-referenced project (see paragraph 52(c) of the Consent Decree). Please advise us of the name of the Project Coordinator designated by EPA for this project, as required by paragraph 44 of the Decree.

Paragraph 43 of the Decree requires Defendants to notify EPA of (1) the name, title, and qualifications of the engineer or geologist supervising the project, and (2) any contractors or subcontractors and their personnel to be used in carrying out the terms of the Decree. Please be advised that all work performed pursuant to the Decree shall be under the direction and supervision of Mr. Brausch, who is a professional engineer with expertise in hazardous waste site investigations and remediation. Enclosed please find Mr. Brausch's resume, which outlines his qualifications for this position. All future communications between the Defendants and EPA should be directed through Mr. Brausch at the following address:

Mr. Leo M. Brausch, P.E.
131 Wedgewood Drive
Gibsonia, Pennsylvania 15044
Phone: 412/444-0377
Fax: 412/444-0351

Paragraph 43 of the Consent Decree also requires Defendants to notify EPA of the contractors and subcontractors and their personnel to be used in carrying out the

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Mr. Brausch

terms of this Consent Decree. The following contractors or subcontractors have been engaged to date:

Mr. Ronald B. St. John, CPG
Vice President
Midwest Operations
Mittelhauser Corporation
1240 Iroquois Drive
Suite 510
Naperville, Illinois 60566

(geology; hydrogeology)

Ronald M. Morosky, P.G.
Vice President
GMG Corporation
930 Third Street
Oakmont, Pennsylvania 15139

(wastewater treatment consultant)

Vic Paynter
Thompson Construction
3840 Prospect Street
Indianapolis, Indiana 46203

(sewer remediation)

John Furiak
Heritage Remediation
7901 West Morris Street
Post Office Box 51020
Indianapolis, Indiana 46251

(waste removal and disposal)

Mr. Dave Whittlesey
J.F. New and Associates, Inc.
708 Roosevelt Road
Post Office Box 243
Walkerton, Indiana 46574

(wetlands delineation)

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Charles McGee
Earth Exploration
5958 West 71st Street
Indianapolis, Indiana 46278

(well driller)

Stanley West
Sherry Laboratories
2203 South Madison
Post Office Box 2847
Muncie, Indiana 47307-0847

(laboratory)

Gregory Gargis
Metropolitan Environmental
Post Office Box 378
Celina, Ohio 45822

(disposal of residual waste from acid
sewer rehabilitation)

Jane Overman
Chemical Waste Management
2000 South Batavia Avenue
Genevia, Illinois 60134-3329

(disposal site)

Please call if you have any questions or need additional information.

Sincerely,

Original Signed by
Marcie R. Horowitz

Marcie R. Horowitz

MRH:naw

MRH01257

Via Federal Express

cc: Mr. Tom Linson, IDEM
Stuart Hersh, Esquire

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LEO M. BRAUSCH, P.E.
CONSULTING ENVIRONMENTAL ENGINEER

EXPERIENCE

Independent Environmental Engineering Consultant
1991 - Present

Mr. Brausch is an independent environmental engineering consultant providing management and technical services to industrial clients for hazardous waste projects. Management functions have included the following:

- Project management for site investigations, engineering designs, and site remediation.
- Client liaison and representation before regulatory agencies.
- Representation on committees of potentially responsible parties (PRPs) for sites being remediated under State or Federal Superfund programs.

Mr. Brausch's key technical contributions focus on the identification and design of remedial measures. Technical consultation is also provided in evaluating contaminant fate and transport data, analyzing remedial action alternatives, and remedial action planning.

Examples of hazardous waste projects in which Mr. Brausch is currently participating follow:

- Remedial investigations and feasibility studies (RIs/FSs) at National Priorities List (NPL) sites in Florida, Virginia and New York under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) program. Sites include manufacturing facilities where process wastes were reported disposed of onsite and formerly used municipal and industrial landfills.
- Remedial design and remedial action (RD/RA) at NPL sites in New York and Vermont. Remedial measures currently under design or construction include landfill capping, leachate management through deep (up to 35 feet) interceptor trenches, and recovery and treatment of leachate and affected groundwater. At one location, the recovery wells and treatment systems are being

designed to handle as much as 5.0 million gallons per day (mgd) of groundwater affected by chlorinated solvents.

- Closure of hazardous waste management units and affiliated solid waste management units (SWMUs) under Resource Conservation and Recovery Act (RCRA) regulations at site in Connecticut and Indiana. Units include container storage areas, landfills, and surface impoundments containing approximately 50,000 cubic yards (yd³) of waste alleged to be listed hazardous waste. Closure involves waste removal and treatment, stabilization and capping.

Remcor, Inc.

Chief Operating Officer

Vice President of Engineering and Project Development

1985 - 1991

Mr. Brausch was Chief Operating Officer, and earlier, Vice President of Engineering and Project Development of Remcor, Inc. (Remcor) in Pittsburgh, Pennsylvania. In this capacity, Mr. Brausch provided senior management of Remcor's technical and project management staff. In keeping with a "hands-on" management approach, Mr. Brausch also served as the senior technical director and project director of integrated investigation, engineering and remediation projects:

- RCRA closure and corrective action at SWMUs subject to continuing releases provisions.
- CERCLA removal actions and final remediation.
- Environmental liability assessments associated with the transfer of contaminated industrial real estate.
- Industrial facility decontamination, including polychlorinated biphenyl (PCB) decontamination under the Toxic Substances Control Act PCB Spills Cleanup Policy.

This work was performed for private-sector clients in steel, chemical and manufacturing industries. Technologies applied to site cleanups generally focused on in-situ or on-site treatment of wastes and soil and groundwater contamination, including bioremediation, soil vapor extraction, in situ chemical fixation and waste stabilization.

Mr. Brausch was also the project director and/or manager responsible for technical quality, budget and schedule for major turnkey hazardous waste projects undertaken by Remcor. Descriptions of representative projects follow:

- Investigation and subsequent cleanup of a 90-acre industrial complex in western Pennsylvania. This project involved the assessment of contamination and design and implementation of remedial measures associated with: PCB decontamination of plant buildings, equipment and process sewers; closure of a former PCB waste disposal area; decontamination and closure of electroplating facilities; and plant-wide removal of asbestos-containing materials.
- RCRA closure plan development and implementation for five surface impoundments containing 14,000 yd³ of electroplating sludge, in-situ containment of contaminated soils and groundwater recovery/treatment. In addition, potential continuing releases from on-site SWMUs were investigated, and corrective measures were designed and implemented.
- Under the requirements of a CERCLA Section 106 Order, sampling and analysis of PCB concentrations in plant facilities, surface waters and sediment associated with leakage from a heat exchanger that led to contamination of off-site drainageways, in eastern Pennsylvania. The investigation results were used to develop both on-site decontamination and off-site cleanup plans that were subsequently implemented under CERCLA Orders. The on-site decontamination included cleaning, scarifying concrete surfaces and encapsulation; the off-site removal involved excavation and off-site disposal of PCB-contaminated stream sediments with strict erosion and sedimentation controls.
- Performance of the RI/FS and concurrent design/construction of a groundwater treatment system at a site in eastern Pennsylvania. Groundwater treatment employs two large air strippers in series to remove trichloroethylene and other chlorinated aliphatics for a pumpage rate of approximately 300 gallons per minute. The treatment system effluent is either discharged to the municipal water supply system or to a small stream when water demand is low. The pumping and treatment of groundwater addressed the need for adequate local water supply and effectively controls and recovers the plume of contamination.

Much of Mr Brausch's work involved representation of clients in regulatory agency negotiations and in intercompany negotiations involving real estate transactions.

International Technology Corporation
Manager of Project Development
1980 - 1985

Mr. Brausch served as the Manager of Project Development for International Technology Corporation in Pittsburgh, Pennsylvania (formerly D'Appolonia Waste Management Services, Inc.). His primary role was in the planning and development of remedial response programs for formerly utilized waste disposal sites. Representative experiences included the following:

- Project manager for the investigation of the degree and extent of PCB contamination at seven manufacturing facilities in five states.
- Project manager for CERCLA removal actions at two NPL sites in New Jersey.
- Project director for preparation of a RCRA closure plan for two lagoons (containing nearly 100,000 yd³ of mixed organic and inorganic sludge) at a plant site in Ohio.

In addition to such assignments, Mr. Brausch served as in-house consultant on health and safety programs; air quality monitoring during waste site cleanup; and waste analysis, manifesting, transportation and disposal.

Waste Isolation Pilot Plant (WIPP)
Lead Engineer, Environmental Issues
1978 -1980

Mr. Brausch served as the Lead Engineer, Environmental Issues, for the environmental and safety analysis of the Waste Isolation Pilot Plant (WIPP) located east of Carlsbad, New Mexico. This position involved coordinating and leading investigations attendant to environmental permits, approvals, and compliances required for this radioactive waste storage/disposal facility.

D'Appolonia Consulting Engineers, Inc.
Project Leader and Technical Contributor
1976 - 1978

With D'Appolonia Consulting Engineers, Inc., Mr. Brausch served as a project leader and technical contributor on environmental investigations and engineering designs. His principal involvement was in environmental permitting and the design of pollution control facilities. Representative technical tasks included air quality and meteorological monitoring, preparation of emission inventories and evaluations of control technologies for new-source air quality permitting. Mr. Brausch also prepared the process, hydraulic and structural design of industrial wastewater treatment facilities. Key issues in the treatment schemes included the design and economic analysis of alternative treatment schemes (e.g., precipitation/clarification, ion exchange, biological); conveyance and disposal of metal hydroxide and organic sludge; and plant start-up, operation and maintenance.

Engineering Technician
Part time
1972- 1976

Prior to receiving his degrees, Mr. Brausch worked part time as an engineering technician in wastewater treatment design, highway planning and surveying.

EDUCATION

M.S., 1976, Civil and Environmental Engineering, University of Cincinnati

B.S.C.E., 1975, Civil and Environmental Engineering, University of Cincinnati

PROFESSIONAL REGISTRATION

Professional Engineer: Mississippi, Ohio, Pennsylvania, South Carolina