

January 5, 2023

Ms. Karen Locher
Goldfinger Properties, LLC
1021 12th Avenue, Grafton, WI
53024-1964

Subject: Plymouth Foundry Technical Assistance Request
1019 – 1025 11th Avenue, Grafton, WI
BRRTS #: 02-46-189396, 02-46-189401, 03-46-189407, FID #: 246148100

Dear Ms. Locher:

On September 13, 2022, the Wisconsin Department of Natural Resources (DNR) received the Emerging Contaminants Evaluation (Report) which included select portions of a Phase I Environmental Site Assessment (ESA), dated June 28, 2022, submitted on your behalf by your consultant, The Sigma Group, Inc. (Sigma). Specifically, the Report requests the DNR provide concurrence regarding the emerging contaminants statement and recommendations contained in the ESA for operations at 1019 – 1025 11th Avenue in Grafton (the Site). The DNR received the applicable technical assistance fee for providing review and response to the Report, in accordance with Wis. Admin. Code § NR 749.04(1).

Site History

The buildings on the Site have been vacant in recent years. However, when a Phase I and II ESA was conducted in 1993 by Key Environmental Services Inc. (Key), the Site was being used by Westby Production Components and by Holton Brothers pavement company. According to Key, the original building was built in 1911 by Jungers Stove and Range Company for the manufacture of coal and wood stoves, as well as oil and gas furnaces from gray iron castings. By 1964, Plymouth Foundry, owned by the Goldberg family, operated on the Site. Key also found occupancy permits for Draco Labs in 1984, Senn Tool in 1986, and Custom Display in 1987.

According to Sigma's 2022 Phase I ESA, the facility buildings formerly housed a foundry for stove manufacture then a machine shop from 1929 to 1979. In the 1960s and 1970s, additional uses included unspecified manufacturing operations, metal plating of an unknown type, machining, and a type of mineral reclamation. From 1979 to 1990, Matrix Packaging and Machine, and Westby Manufacture operated on the Site. Gurthee's Custom Upholstery and C. Trupke & Son Contractors were on-site from 2000 to 2010, followed by Goldberg LLC, the current property owner.

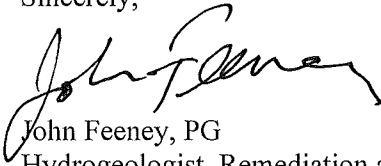
DNR Review

The DNR has reviewed the Report submitted by Sigma. The DNR does not agree that the use of PFAS or PFOA at the Site can be ruled out based on the use history, most notably due to past upholstery shop operations at the Site. Upholstery operations commonly included applying stain-resistant and/or water-resistant products that contained PFAS/PFOA compounds. Other unspecified operations at the Site may have also used PFAS/PFOA compounds. The DNR is not requiring sampling at this time; however, if a hazardous substance discharge(s) are discovered at the Site in the future, it may be appropriate to sample for PFAS/PFOA compounds in soil and/or groundwater.

The DNR reviewed the sub-slab vapor sampling data collected by GZA. Sub-slab vapors were measured at concentrations above vapor risk screening levels (VRSLs) for PCE in May of 2021 in the 1019 11th Avenue Plymouth Foundry building. If the plans are to occupy the building, under the authority of Wis. Admin. Code §§ 708.11(1)(b), NR 726.05(8)(b), an evaluation of the necessity of a vapor mitigation system must be completed to ensure protective conditions exist for building occupants.

If you have any questions about this letter, please contact me, the DNR Project Manager, at 262-416-8643 or johnm.feeney@wisconsin.gov.

Sincerely,



John Feeney, PG
Hydrogeologist, Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

cc: Mr. Steve Meer, The Sigma Group, Inc.
Mr. Stephen Castner for Goldberg LLC