

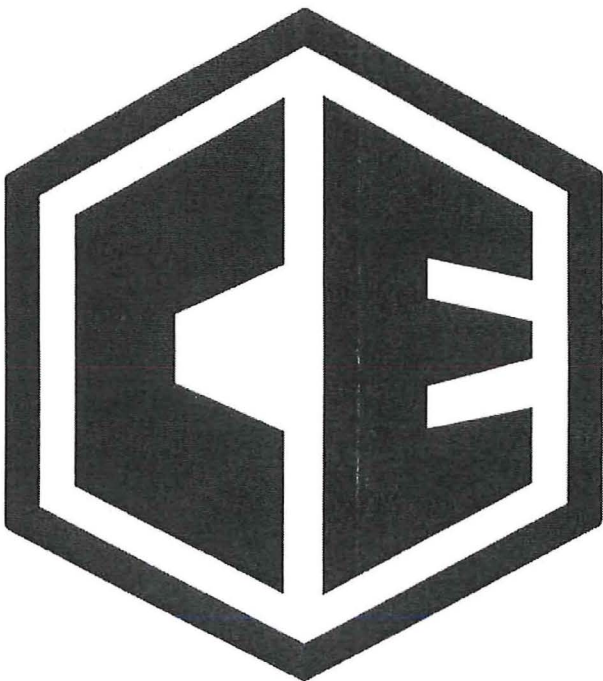
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PHASE I ENVIRONMENTAL SITE ASSESSMENT

FOR

**FORMER THOMAS SERVICE STATION
55 WISCONSIN AVENUE
MONTREAL, IRON COUNTY, WISCONSIN**

JULY 2010



**Coleman
Engineering**

Civil Engineering • Environmental Engineering
Geotechnical Engineering • Land Surveying • Test Drilling
Construction Quality Control • Materials Laboratory Testing

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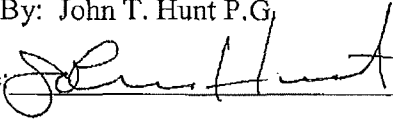
JULY 2010

Prepared By:

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CEC Project #EE-10201

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Signature:  Date: 7-8-10

Reviewed By: David W. Schmutzler, Environmental Engineering Manager

"I declare that, to the best of my professional knowledge and belief, I meet the definition of environmental professional as defined in §312.10 of 40 CFR 312 and 12.13.2. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312."

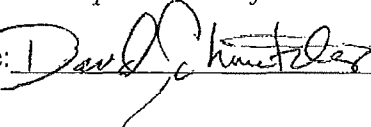
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EXECUTIVE SUMMARY

Coleman Engineering Company (CEC) has performed a Phase I Environmental Site Assessment (ESA) in conformance with the Scope and Limitations of American Society for Testing and Materials (ASTM) E 1527-05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process at the Former Thomas Service Station (subject property). Any exceptions or deletions from the ASTM E 1527-05 practice are revealed in Section 1.0 of this report.

This assessment has revealed no evidence of recognized environmental conditions (RECs) in connection with the subject property with the exception of the following:

- The subject property is listed by the Wisconsin Department of Natural Resources (WDNR) as a leaking underground storage tank (LUST) site (BRRTS # 02-26-000788). This indicates the subject property is a source of a release of a hazardous substance(s) to the environment and is, therefore, considered a REC.
- Underground storage tanks (USTs) were reported and observed on the subject property. The presence of a petroleum retailer indicates large quantities of hazardous materials had been stored on the subject property in USTs and aboveground storage tanks (ASTs). The presence of these USTs containing fluid presents evidence for the potential of a release of a possible petroleum product and a material threat of a release of a petroleum product to the environment at the subject property and is, therefore, considered a REC.
- The subject property was an operating service station from the 1940s (or before) to the mid-1980s. The disposal of automotive fluids at service stations of the 1940s through the 1960s was often via on-site land application. The presence of this historic former service station site presents evidence for the potential of a release of possible petroleum products to the environment at the subject property and is, therefore, considered a REC.
- The wastewater discharge from the service station was reportedly directly into the West Branch of the Montreal River until the station closed in the 1980s. This indicates the subject property was a source of a release of potentially hazardous substance(s) to the environment and is, therefore, considered a REC.

In addition, a non-REC item was observed approximately 100 yards east of the subject property. A mine poor rock dump area had been developed between 1938 and 1954. This is discussed in Sections 2.7 and 4.2; a photo is included in Appendix D.

Although ASTM E 1527-05 Standard does not require a demonstration of appropriate inquiry beyond scope considerations, there may be standards or protocols for assessment of potential hazards and conditions associated with beyond scope conditions developed by government entities, professional organizations, or other private entities.

No efforts have been expended to investigate the potential for off-site, third-party impacts. Further investigation of REC's may require site sampling and analysis. These activities are all beyond the defined scope of this investigation. The Client may, however, wish to undertake these activities. Only the Client is capable of determining the relevancy of information presented and the need to pursue items of concern further. Qualifications of Environmental Professionals conducting this assessment are provided as Appendix G. Additional Limitations are provided as Appendix H.

1.0 INTRODUCTION

1.1 Background

CEC has been retained by Iron County, Wisconsin to perform a Phase I ESA of the former Thomas Service Station property, 55 Wisconsin Avenue, in the City of Montreal, Iron County, Wisconsin (subject property). The subject property is approximately 0.4 acres in size and is now owned by Iron County, Wisconsin.

1.2 Purpose

The purpose of the Phase I ESA process, as set forth in ASTM E 1527-05, "...is to define good commercial and customary practice in the United States of America for conducting an environmental site assessment of a parcel of commercial real estate with respect to the range of contaminants within the scope of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) and petroleum products." As such, this practice is intended to permit a buyer of a property to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner or bona fide prospective purchaser defenses, to CERCLA liability: That is, the practices that constitute "all appropriate inquiry into previous ownership and uses of the property consistent with good commercial or customary practices," as defined in 42USC 9601.

"In defining a standard of good commercial and customary practice for conducting an environmental site assessment of a parcel of property, the goal of the processes established by this practice is to identify recognized environmental conditions."

The term REC means the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The terms 'hazardous substances' or 'petroleum products' include those even under conditions in compliance with laws. According to ASTM: "The term," (REC), "is not intended to include de minimis conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies."

1.3 Scope

Information needed for completion of a Phase I ESA may be provided by a number of parties including third-party vendors, present owners and operators of the property, regulatory agencies, neighbors, past and present employees, etc. Prior assessments may also contain usable information. A Phase I ESA does not include any testing or sampling of materials.

Limitations of a Phase I ESA are predicated by the scope of services. The Scope of Services for the Phase I ESA focused on the following:

- Regulatory agency file search. The purpose of this review is to help determine the potential for hazardous substances or petroleum products on the subject property and within a reasonable "Search Distance" of the subject property as a result of either past or present activities; and if such substances are present, to assess if conditions suggest that such materials have the potential to affect the subject property.
- Federal, State, local and Tribal regulatory agency files are reviewed through the use of a specialized environmental database search firm. The information includes, but is not limited to, CERCLA, National Priorities List (NPL), Resource Conservation and Recovery Act (RCRA), the State List of Environmental Contamination Sites, the State List of Leaking Underground Storage Tank (LUST) Sites, and the State List of Underground Storage Tank (UST) Sites.
- Local records and/or additional state or tribal records shall be checked when in the judgment of the environmental professional; such additional records are sufficiently useful.
- Limited interviews with persons having specific knowledge of the subject property. The goal of the interviews is to assess if conditions suggest that hazardous substances or petroleum products are present on or have the potential to affect the subject property.
- A site reconnaissance of the subject property. The goal of the site reconnaissance is to assess if conditions suggest that hazardous substances or petroleum products are present on or have the potential to affect the subject property.
- Investigation of adjoining properties, limited to a review of the possible existence of regulated substances through information supplied by regulatory agency databases. General observations as to the potential existence of visually evident REC's on adjoining properties are also performed during the site reconnaissance by walking the property lines of the subject property.
- The completion of a report describing the investigation methods, findings and conclusions.

1.4 Limitations and Exceptions

The scope of the ASTM Phase I investigation is specifically limited from consideration of asbestos containing materials (ACMs), radon, lead-based paints, lead in drinking water, potable water well tests, septic tank/drainfield tests, herbicides/pesticides, and wetlands. The scope of the proposed investigation did not include preparation of a title abstract, nor was one provided by the Client.

There are other limitations inherent to ESAs. When dealing with natural conditions, and especially natural conditions that are hidden from view, even the most accomplished investigator can only deal in probabilities. Environmental conditions are also affected by time due to the mobility of contaminants, change in state and other characteristics of materials.

No ESA can wholly eliminate uncertainty regarding the environmental condition of the site. A Phase I ESA is intended to reduce, but not eliminate, uncertainty regarding the environmental condition of the subject property. A Phase I ESA also does not constitute an exhaustive assessment of a clean property. There is a point at which the cost of information gathered and/or the time required to gather it outweighs the usefulness of the information and, in fact, may be a material detriment to the orderly completion of transactions. The Client must be comfortable that a balance between the competing goals of reasonable and practical ESAs and the reduction in unknown conditions resulting from additional information has been attempted. Additional Limitations are included in Appendix H of this report.

1.5 Special Terms and Conditions

This report is intended solely for use of the Client. Any reuse without update and/or written verification of applicability from CEC is at the user's sole risk.

CEC expressly disassociates itself from any use of this document or the information included herein, except as authorized. All information related to or provided by private sources is confidential. The identification of private sources shall not be interpreted as authorization or permission by CEC for contact with such sources.

2.0 SITE DESCRIPTION

2.1 Location

The subject property is located in the City of Montreal, Iron County, Wisconsin. The site is a small lot, as shown on the figures in Appendix A.

Figure 1 in Appendix A shows the regional project location, while Figure 2 indicates the site location on the United States Geologic Survey (USGS) 7.5-minute Quadrangle. Figure 3 is an aerial photo of the property.

2.2 Legal Description

The property description for the subject property is as follows:

SE ¼ of the SW ¼ of Section 27, Town 46 North, Range 02 East, City of Montreal, Iron County, Wisconsin. The street address is 55 Wisconsin Avenue, Montreal Wisconsin 54550.

2.3 Site and Vicinity Characteristics

The subject property lies on the Gogebic Iron Range, a series of west-southwest/east-southeast series of ridges. The Gogebic Iron Range is a historic iron mining district. There are closed underground iron mines ½ mile northeast and ¼ mile southwest of the subject property.

Precambrian banded iron formation rock underlies the subject property. Depth to bedrock is unknown, however, bedrock is assumed to be shallow as there are numerous outcrops in the area. Glacially derived unconsolidated deposits overlie the bedrock at the subject property. The unconsolidated deposits consist of a sequence of inter-bedded gravel, sand, silt and boulders with variations over short distances.

The subject property lies at an elevation of approximately 1,475 feet above mean sea level (MSL). The Gile Flowage, approximately ½ mile south of the subject property, lies at an elevation of 1,495 feet MSL. The West Branch of the Montreal outlets from a dam and flows north from the Gile Flowage to immediately west of the subject property. Approximately 1 mile southeast of the subject property the ground surface rises to 1,775 feet MSL. North of the subject property the ground surface of the Gogebic Iron Range slopes downward to Lake Superior (10 miles north) elevation of 600 feet MSL.

2.4 Current Use of Subject Property

The subject property is currently vacant with no structures.

2.5 Past Uses of Subject Property

The past use of the subject property had been as a gasoline retailer and automotive service station since at least the 1940's.

2.6 Description of Site Structures and Improvements

There are no structures on the subject property. There are concrete and asphalt surface coverings on parts of the subject property. Two (2) USTs are reported to be on the subject property.

2.7 Current Uses of Adjoining Properties

The adjoining properties, defined as any real property or properties, the border of which is contiguous or partially contiguous with that of the subject property, or that would be contiguous

or partially contiguous with that of the subject property but for a street, road, or other public thoroughfare separating them, were observed during the site reconnaissance. Figure 3, the aerial photo, shows the properties surrounding the subject property.

The adjoining properties are summarized by general direction from the subject property:

North: North of the subject property is Wisconsin State Highway 77 (Wisconsin Avenue) beyond is vacant property.

South: South of the subject property is vacant property to the West Branch of the Montreal River, approximately 200 feet. There is a high voltage power line right-of-way in this area.

West: To the west of the subject property is vacant property to the West Branch of the Montreal River, approximately 200 feet. There is a high voltage power line right-of-way in this area.

East: To the east of the subject property is a possible mine poor rock dump approximately 100 yards from the subject property, beyond is residential and commercial property.

3.0 CLIENT PROVIDED INFORMATION

A Phase II ESA, Phase II½ ESA and Phase IV ESA provided by the WDNR are included in Appendix F.

4.0 RECORDS REVIEW

Based on the reviews listed below and the interviews, review of further databases or lists was judged to be unnecessary to determine the history of the property.

4.1 Government Database Review

A record review following ASTM standards for Environmental Site Assessments (E 1527) was completed using the services of First Search Technology Corp. (FirstSearch), Indianapolis, Indiana. The list of State and Federal databases searched, along with the applicable ASTM search distances in parentheses, and is listed below. The results, including the Radius Map, are presented in Appendix B.

1. U.S. Environmental Protection Agency (USEPA) National Priority List (NPL) (1.0 mile)
2. USEPA Comprehensive Environmental Response, Compensation and Liability Act (CERCLIS) (0.5 mile)

3. USEPA Resource Conservation and Recovery Information System Treatment, Storage, and Disposal Facilities (RCRIS-TS) (0.5 mile)
4. USEPA Resource Conservation and Recovery Information System Large Quantity Generator (RCRIS-LG) (0.25 miles), and Small Quantity Generator (RCRIS-SG) (0.25 miles)
5. USEPA Emergency Response Notification System (ERNS) (0.05 miles)
6. WDNR Registered USTs (0.25 miles)
7. WDNR LUST Sites (0.5 miles)
8. WDNR Solid Waste Facilities/Landfills (LF) (0.5 miles)
9. WDNR Contaminated Sites (SHWS) (1.0 mile)

Three (3) other lists not required by the ASTM standard appear in this FirstSearch Report: the Facility Index System (FINDS) list, (Coal Gas) Former Manufactured Gas Sites, and AST. The FINDS list is an index of sites appearing on several other USEPA databases. Real Property Scan, Inc. provides the existence and location of Coal Gas sites to FirstSearch.

Those sites found in the search are shown on a radius map located in the FirstSearch Radius Map Report in Appendix B. The FirstSearch Report tallies the total number of sites in each category discovered. There is also a list of sites for which no address is available, known as the Orphans Summary, presented in the FirstSearch Report. Using local knowledge, the Orphan sites within the ASTM radius were determined and included below:

Finding of Interest

The addresses listed in the databases are normally the administrative or reporting address of the institution or business involved. As a result, the FirstSearch Report may exclude sites for which the official address is outside the search radius.

1. The NPL, better known as the list of Superfund sites, are those sites identified by USEPA under CERCLIS as requiring immediate action. The sites are ranked according to the potential for harm to the environment and the risk to the population.

There were no NPL sites reported within a 1.0-mile radius.

No orphan facilities were identified.

2. The CERCLIS database is a list of all sites identified by the USEPA as having uncontrolled or abandoned hazardous waste or those sites which have a reportable release of a hazardous substance, regardless of the amount, severity, or risk to the environment or the population at

large. Once included on this list, a site is never removed, but is added to the *No Further Remedial Action* Planned database. The sites, which receive a sufficiently high Hazardous Ranking Score, are placed on the NPL.

There are no specific CERCLIS sites reported within the 0.5-mile radius.

No orphan facilities were identified.

3. RCRIS-TSD is the Federal Act, which tracks generators of hazardous waste. The treating, storing, and/or disposing (TSD) database includes all the facilities listed as TSD of hazardous waste.

There were no RCRIS-TSD facilities identified within the 0.5-mile search radius.

No orphan facilities were identified.

4. RCRIS-LG is a listing of all large quantity (LG) generators of hazardous waste. A large quantity generator is one that produces more than 1,000 kilograms of hazardous material per month.

There are no sites listed within the 0.25-mile radius.

No orphan facilities were identified.

5. RCRIS-SG is a listing of small quantity (SG) generators. A small quantity generator is one that reports generating between 100 and 1,000 kilograms of hazardous material per month.

There are no sites listed within the 0.25-mile radius.

No orphan facilities were identified.

6. ERN is the USEPA database of sudden and/or accidental releases of hazardous substances or petroleum.

FirstSearch reported no listing of a sudden release of petroleum or hazardous chemicals/wastes on the subject property.

No orphan facilities were identified.

7. WDNR lists all registered USTs. These include all active, non-exempt tanks. Sites with ASTs and/or with USTs, which have not been used since 1988 or are exempt, and may not be included. These sites are significant, as they may be a potential REC.

There are three (3) sites listed within the 0.25-mile radius.

**City of Montreal
161 Wisconsin Avenue
Montreal, Wisconsin 54550**

**Daniel Turner
164 Wisconsin Avenue
Montreal, Wisconsin 54550**

**Jon Berquist
3 Nimikon Avenue
Montreal, Wisconsin 54550**

8. WDNR maintains a list of the LUST Incident Reports. This includes only those tanks that for some reason have been found to be leaking and have been reported to the WDNR. Most leaking tanks are not easily detected without subsurface exploration.

Leaking tanks can be a source of environmental concern since soil and groundwater could potentially be contaminated by a release of product into the environment. A property could also become impacted by such release due to contaminated groundwater migrating from an off-site LUST site. The probability that the subject property could have been impacted includes many variables, including but not limited to the direction of groundwater flow, the location of the release, the type of product released, and the amount of product released. Determination of whether or not the subject property has been impacted by an off-site LUST site is beyond the scope of this assessment.

No sites are listed within a 0.5-mile radius of the subject property.

However, the subject property is listed with the WDNR as a LUST site BRRST # 03-26-000778, list printout included in Appendix F.

Two (2) orphan facilities were identified, one is the subject property. The other orphan facility is listed as;

**Town of Pence Garage
Maple Street
Pence, Wisconsin 54550**

9. WDNR SHWS list summarizes facilities deemed contaminated.

There are no SHWS sites reported within the 1.0-mile radius.

No orphan facilities were identified.

10. WDNR SWL list summarizes all current and historic waste disposal sites within the State. This includes not only permitted landfills, but also any incident involving illegal or improper solid waste disposal known to exist.

There are no sites listed within a 0.5-mile radius.

Five (5) orphan facilities were identified; none of the orphan sites is believed to be within the 0.5-mile radius.

11. Additional databases were searched and are listed with results presented below:

NFRAP (Comprehensive Environmental Response Compensation and Liability Information System Archived Sites)

There are no sites listed within a 0.5-mile radius.

Two (2) orphan facilities were identified; none of the orphan sites is believed to be within the 0.5-mile radius.

CORRACTS (List of Waste Handlers with RCRA Corrective Action Activity)

There is no CORRACT site reported within a 1.0-mile radius.

No orphan facilities were identified.

Coal Gas

There are no sites listed within a 1.0-mile radius.

No orphan facilities were identified.

AST (Aboveground Storage Tanks)

There are no sites listed for ASTs.

No orphan facilities were identified. There is no search radius for ASTs listed in ASTM E 1527-05 Standard Practice for Phase I ESAs. However, there is a propane gas AST located on the property.

BRRTS (Bureau of Remediation & Redevelopment Tracking System)

There are no sites listed for BRRTS.

No orphan facilities were identified. There is no search radius for BRRTS listed in ASTM E 1527-05 Standard Practice for Phase I ESAs.

WI Spills (Wisconsin Spills Database)

There are no sites listed for WI Spills.

There were no orphan sites identified.

There is no search radius for WI Spills listed in ASTM E 1527-05 Standard Practice for Phase I ESAs.

TRIBAL UST (Underground Storage Tanks on Indian Land)

There are no sites listed for INDIAN UST within a 0.25-mile search.

There are no orphan sites identified within a 0.25-mile radius.

TRIBAL LANDS (Indian Reservations)

There are no sites listed for TRIBAL LANDS within a 2.0-mile radius.

One (1) orphan facility was identified.

**Bureau of Indian Affairs
BIA-54550**

There is no search radius for **TRIBAL LANDS** listed in ASTM E 1527-05 Standard Practice for Phase I ESAs.

WI WDS (Wisconsin Registry of Waste Disposal Sites)

There are no sites listed for WI WDS within a 1.5-mile search radius.

No orphan facilities were identified. There is no search radius for WI WDS listed in ASTM E 1527-05 Standard Practice for Phase I ESAs.

WI ERP (Wisconsin Environmental Repair Program Database)

There are no sites listed for WI ERP within a 1.5-mile search radius.

No orphan facilities were identified. There is no search radius for WI ERP listed in ASTM E 1527-05 Standard Practice for Phase I ESAs.

EPA Brownfield

There are no sites listed for EPA Brownfield within a 1.5-mile search radius.

Two (2) orphan facilities were identified:

Powers Building
6771 State Highway 77
Montreal, Wisconsin 54550
0726544288/GenProp

Hi Way 77 W Mini Mart
6832 State Highway 77
Montreal, Wisconsin 54550
0326000788/open

4.2 Historical Aerial Photographs

The historical aerial photographs from 1938, 1954, 1972, 1983, 1999, and 2006 are presented as part of Appendix C. A review of the photographs yielded the following:

1938 Aerial Photograph

On the 1938 photo the subject property appears to have a structure, however, the scale of the photo is too large to be definite. The property adjacent to the east appears to have some type of development. The mine developments east and southwest of the subject property are easily seen.

1954 Aerial Photograph

The subject property is not discernible in the photo. However, approximately 100 yards east of the subject property it appears there is a mine poor rock dump area that has been developed.

1972 Aerial Photograph

The former service station building and pump island can be observed on this photo; the area immediately around the subject property appears to be undeveloped.

1983 Aerial Photograph

The 1983 aerial photo shows the former service station building (faintly); there also appears to be some additional development approximately ¼ mile northeast and northwest of the subject property.

1999 Aerial Photograph

In the 1999 it appears the former service station building has been razed.

2006 Aerial Photograph

The 2006 aerial photo displays the site as it appears today, no structures are visible.

4.3 Sanborn Maps

Sanborn maps were provided for the Montreal area; however, the subject property was not included in them.

5.0 SITE RECONNAISSANCE

The site reconnaissance serves several purposes. It allows the investigator to gain first-hand knowledge of the property. Only by a site reconnaissance can the investigator observe the property for signs of environmental concern, such as stained soils/buildings or stressed vegetation. A site walkover also allows the investigator to correlate historical record information with current site conditions and may provide for identification of items requiring further investigation.

Ms. Lily Palmer and Mr. John Hunt conducted the reconnaissance of the property on June 16, 2010. Ms. Lily Palmer and Mr. John Hunt were accompanied by Mr. Robert Thomas, the former owner of the subject property. The temperature was 60° Fahrenheit, cloudy and wet. The walkover included observations of current use and indications of prior use of the subject property and, to a limited extent, adjoining properties. Site photos of the site reconnaissance are provided as Appendix D.

5.1 Subject Property Site Reconnaissance

The subject property is shown on the figures in Appendix A and the site photos in Appendix D. The subject property includes approximately 0.4 acres in the City of Montreal, Wisconsin.

The subject property is flat, the north half has gravel and paved surface cover, and the south half is vegetated by shrubs, small, trees weeds and brush. No structures were observed. An uplifted concrete slab was observed which apparently covered two (2) 1,000 gallon USTs. A fill pipe was uncovered and liquid was observed in one of the USTs. Mr. Robert Thomas indicated in an interview that the USTs were filled with water and an anti-corrosive compound when the service station was closed.

5.1.1 Building

There are no buildings on the subject property.

5.2 Additional Site Information

5.2.1 Utilities

- Gas and electric power in the area is supplied by Xcel Energies.
- Sewer and water in the area are provided by the City of Montreal
- There is no telephone or cable service to the property.

5.2.2 Hazardous Substance/Waste Storage

No hazardous substances were observed with the possible exception of fluid noted in USTs.

5.2.3 Underground Storage Tanks (UST)

Two (2) USTs were reported to be on the subject property located under a concrete slab. During the site reconnaissance a fill pipe was observed and opened, fluid was noted in one of the tanks. Mr. Robert Thomas stated in an interview at closing of the station the USTs were filled with water and an anti-corrosive liquid. A petroleum odor was observed from the tank.

5.2.4 Aboveground Storage Tanks (ASTs)

No AST(s) were observed on the subject property.

5.2.5 Solid Waste Disposal

There is no solid waste service to the subject property.

5.2.6 Storm Water

Storm water on the property flows overland to the gutter on Highway 77 or to the Montreal River.

5.2.7 Water Wells

No potable water well was observed on the subject property.

5.2.8 Polychlorinated biphenyls (PCBs)

PCBs are a potential carcinogen formerly used in the dielectric fluid in transformers. The USEPA has ruled that in concentrations above 50 parts per million, PCBs are considered hazardous. Electric utility companies have been testing the transformer oil and labeling the

transformers accordingly. Utility companies are responsible for releases of hazardous substances from transformers. There are no transformers located on the subject property.

5.2.9 Air Permits

There is no air permits issued for the subject property.

6.0 INTERVIEWS

6.1 Site Owner/Representative

CEC contacted Mr. Robert Thomas on June 16, 2010 about the subject property. Mr. Thomas said he had lived near the subject property since birth (1941) and had always remembered the subject property as a gasoline retailer and automobile service station. Mr. Thomas owned the property from the early 1980's until 2010; Iron County received ownership of the subject property earlier this year through tax default. He operated his business, Thomas Service Station, during the 1980's. He recalled replacing the USTs, bedrock was shallow and the USTs were set in a "cradle" in the rock. A concrete slab was poured over the tanks to hold them in place. He retained the property after he closed the business. He indicated one winter there was a problem with the wastewater not draining and found that wastewater discharged directly into the West Branch of the Montreal River. Costs to hook up to the City services were prohibitive so Mr. Thomas closed the business. Upon closing the business, the USTs were filled with water and an anti-corrosive fluid. The building and pump islands were later razed and removed from the subject property.

6.2 State Government

In addition to State databases reviewed by FirstSearch, the local WDNR field offices were contacted to determine if any problems have either arisen in the vicinity of the subject property after the development of the databases or are known to exist but not included in the databases.

The following State regulatory personnel were contacted concerning known environmental concerns on or near the subject property:

CEC contacted Mr. Philip Richard, WDNR Remediation and Redevelopment, Park Falls office, on June 30, 2010 regarding the subject property. Mr. Richard knew the subject property was an open, listed LUST site (BRRTS # 03-26-000788). The BRRTS listing is included in Appendix F. Mr. Richard also indicated that the Wisconsin Department of Transportation (WDOT) had performed some work at the site during the mid-1990's including a Phase II ESA, a Phase II½ ESA and a Phase IV ESA. These documents were obtained from the WDNR and are included in Appendix F of this report. Also a soil removal effort overseen by the WDOT occurred during Highway 77 construction activities in 1996. Mr. Richard was not aware of any other incident site near the Former Thomas Service Station Site.

6.3 County and Local Government

The following County and Local Government personnel were contacted concerning any known environmental concerns on or near the site:

Mr. Thomas Bergman, Iron County Land and Zoning Administrator, was contacted on June 15, 2010. Mr. Bergman indicated Iron County received ownership of the subject property earlier this year through tax default. He was aware the subject property was a listed LUST site with the WDNR but was also aware environmental liability exemption for local units of government under Wisconsin State Statutes. He also indicated knowledge of contamination found during Highway 77 construction activities. He was also not aware of any emergency response to the subject property.

7.0 NON-SCOPE ISSUES

The subject property is within 100 feet of the West Branch of the Montreal River and possibly within the river's floodplain.

8.0 FINDINGS AND CONCLUSIONS

CEC has performed a Phase I ESA in conformance with the Scope and Limitations of ASTM E 1527-05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process at the Former Thomas Service Station (subject property). Any exceptions or deletions from the ASTM E 1527-05 practice are revealed in Section 1.0 of this report.

This assessment has revealed no evidence of RECs in connection with the subject property with the exception of the following:

- The subject property is listed by the WDNR as a LUST site (BRRTS # 02-26-000788). This indicates the subject property is a source of a release of a hazardous substance(s) to the environment and is, therefore, considered a REC.
- USTs were reported and observed on the subject property. The presence of a petroleum retailer indicates large quantities of hazardous materials had been stored on the subject property in USTs and ASTs. The presence of these USTs containing fluid presents evidence for the potential of a release of a possible petroleum product and a material threat of a release of a petroleum product to the environment at the subject property and is, therefore, considered a REC.
- The subject property was an operating service station from the 1940s (or before) to the mid-1980s. Automotive fluids disposal at service stations of the 1940s through the 1960s was often via on-site land application. The presence of this historic former service station

site presents evidence for the potential of a release of possible petroleum products to the environment at the subject property and is, therefore, considered a REC.

- The wastewater discharge from the service station was reportedly directly into the West Branch of the Montreal River until the station closed in the 1980s. This indicates the subject property was a source of a release of potentially hazardous substance(s) to the environment and is, therefore, considered a REC.

In addition, a non-REC item was observed approximately 100 yards east of the subject property. A mine poor rock dump area had been developed between 1938 and 1954. This is discussed in Section 2.7 and 4.2; a photo is included in Appendix D.

Although ASTM E 1527-05 Standard does not require a demonstration of appropriate inquiry beyond scope considerations, there may be standards or protocols for assessment of potential hazards and conditions associated with beyond scope conditions developed by government entities, professional organizations, or other private entities.

No efforts have been expended to investigate the potential for off-site, third-party impacts. Further investigation of REC's may require site sampling and analysis. These activities are all beyond the defined scope of this investigation. The Client may, however, wish to undertake these activities. Only the Client is capable of determining the relevancy of information presented and the need to pursue items of concern further. Qualifications of Environmental Professionals conducting this assessment are provided as Appendix G. Additional Limitations are provided as Appendix H.

9.0 REFERENCES

FirstSearch Technology Corp., June 14, 2010. The Environmental FirstSearch Report is for Thomas Service Station.

Sanborn Maps and Aerial Photography are from FirstSearch Technology.

Interviews/Contacts

Mr. Phil Richard, WDNR Hydrogeologist, Park Falls Office

Mr. Robert Thomas, Former Property Owner

Mr. Thomas Bergman, Iron County Zoning Administrator

F:\Data\10000\10201 - Iron County WI - Thomas Service Phase I ESA\Report\Thomas Ph I ESA V1.5.doc

APPENDIX A

FIGURES

- Figure 1 – Project Location Map**
- Figure 2 – Site Location Map**
- Figure 3 – Site Aerial Photo**

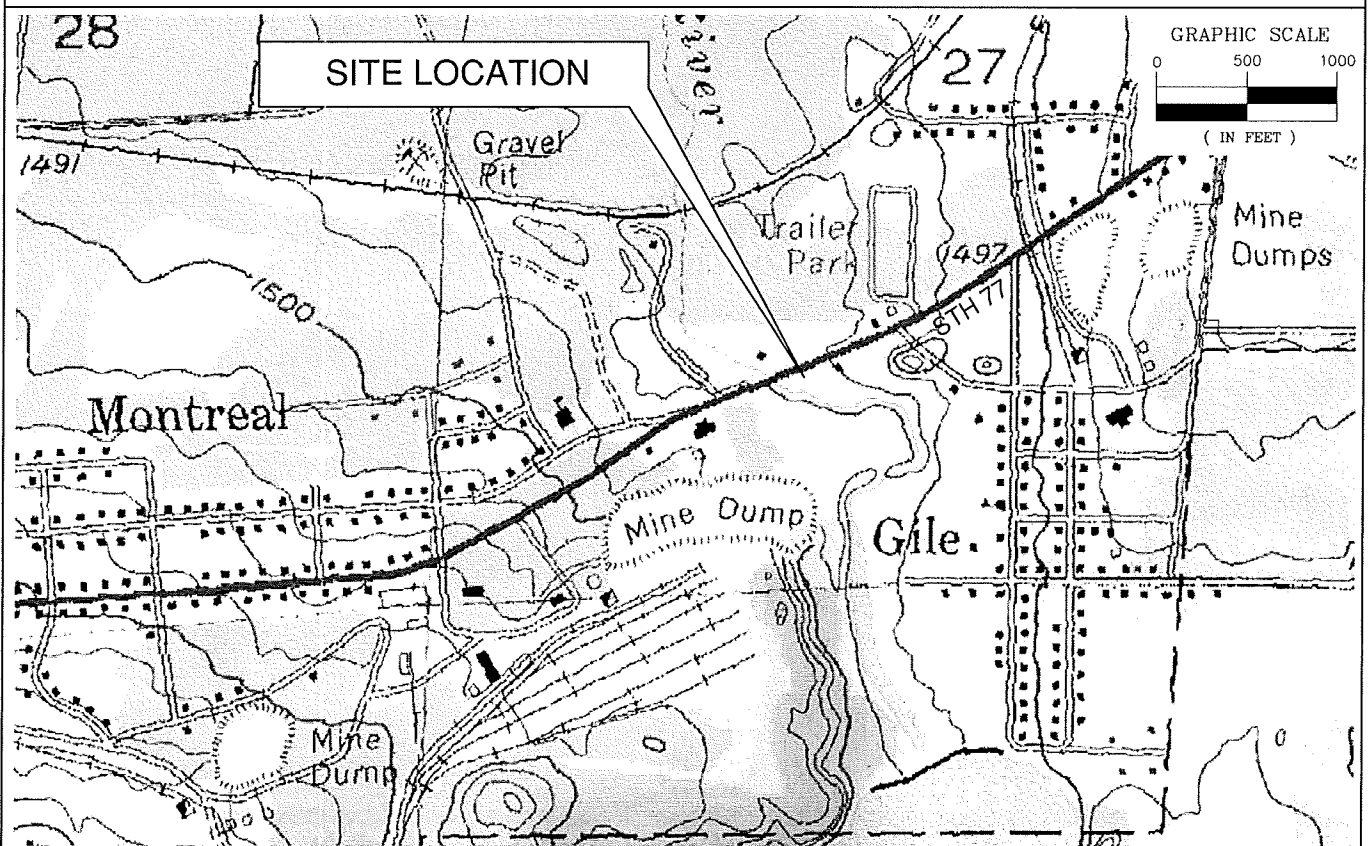
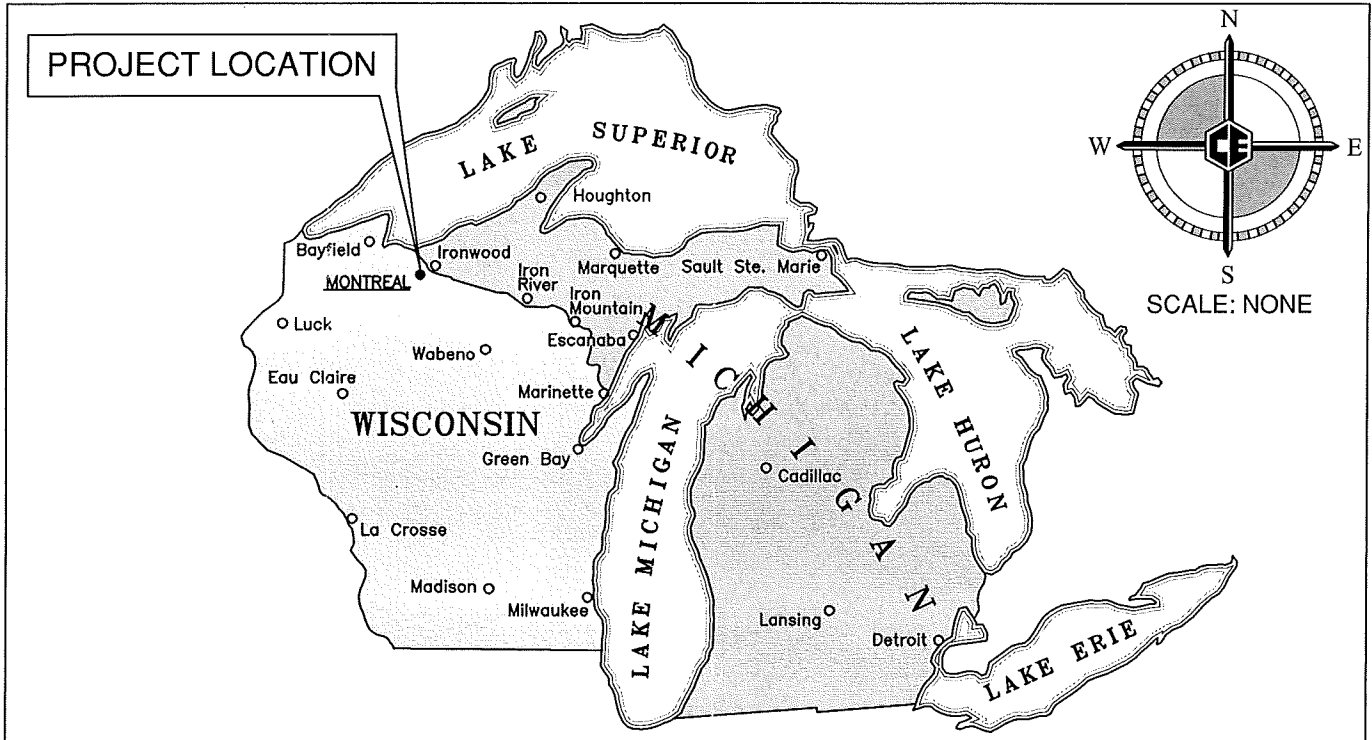


FIGURE 1 - PROJECT LOCATION MAP
FORMER THOMAS SERVICE STATION
PHASE I ENVIRONMENTAL SITE ASSESSMENT
MONTREAL, WISCONSIN

3D TOPOQUADS



COLEMAN ENGINEERING COMPANY
 635 CIRCLE DRIVE - IRON MOUNTAIN, MICHIGAN 49801 (906) 774-3440
 200 EAST AYER STREET - IRONWOOD, MICHIGAN 49938 (906) 932-5048

DATE 6/25/10
 JOB NO 10201
 CADD FILE 10201-WIW-WIQ.DWG
 PDF FILE 10201-WIW-WIQ.PDF

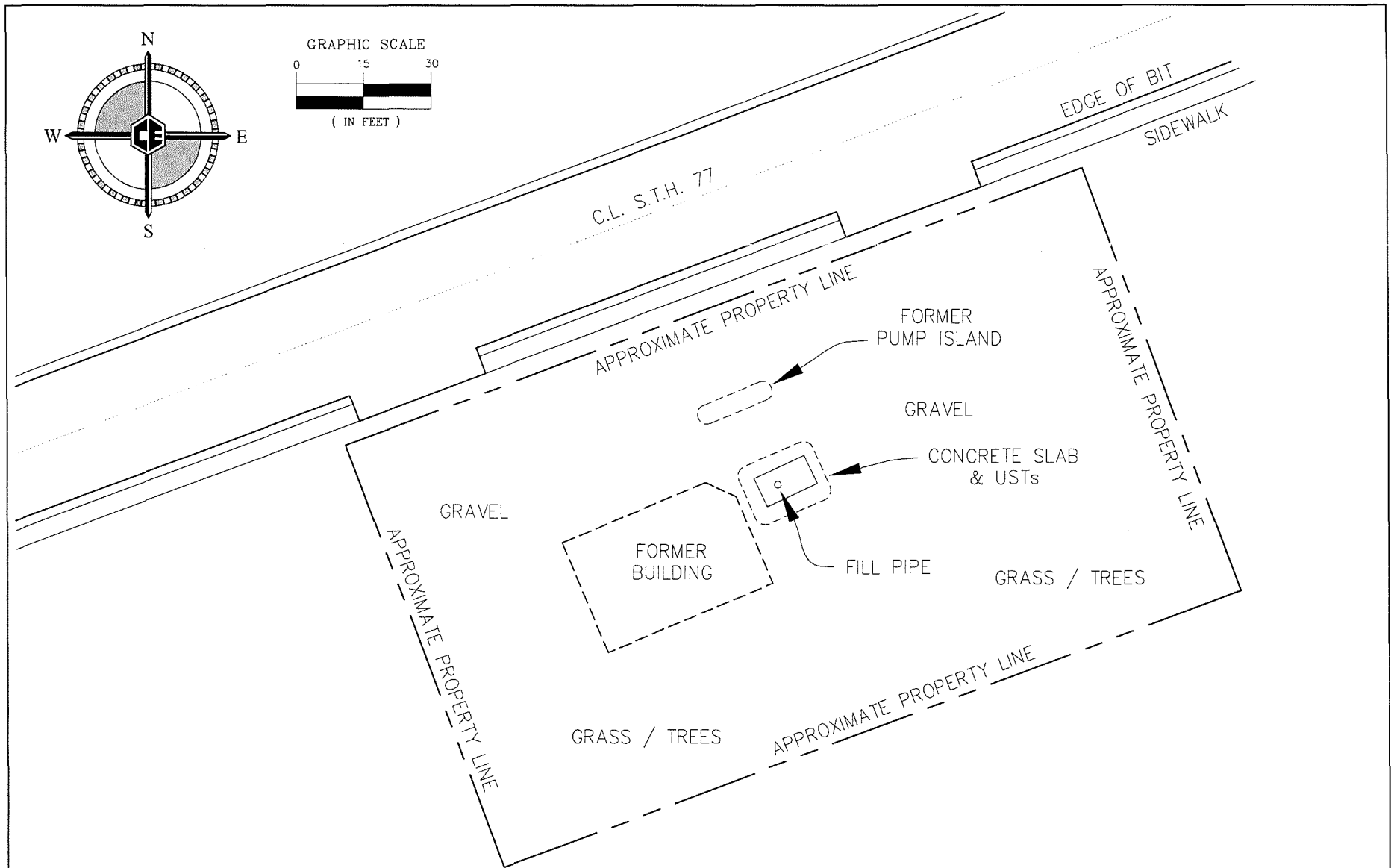
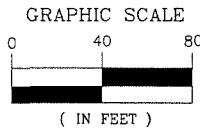
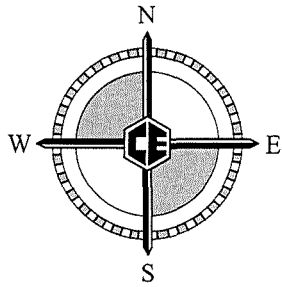


FIGURE 2 - SITE MAP
FORMER THOMAS SERVICE STATION
PHASE I ENVIRONMENTAL SITE ASSESSMENT
MONTREAL, WISCONSIN

DATE 11/19/10
 JOB NO 10201
 CADD FILE 10201-SITE.DWG
 PDF FILE 10201-SITE.PDF



COLEMAN ENGINEERING COMPANY
 635 CIRCLE DRIVE - IRON MOUNTAIN, MICHIGAN 49801 (906) 774-3440
 200 EAST AYER STREET - IRONWOOD, MICHIGAN 49838 (906) 932-5048



**FIGURE 3 - AERIAL PHOTO
FORMER THOMAS SERVICE STATION
PHASE I ENVIRONMENTAL SITE ASSESSMENT
MONTREAL, WISCONSIN**

DATE 7/7/10
JOB NO 10201
CADD FILE 10201-AERIAL.DWG
PDF FILE 10201-AERIAL.PDF



COLEMAN ENGINEERING COMPANY
635 CIRCLE DRIVE - IRON MOUNTAIN, MICHIGAN 49801 (906) 774-3440
200 EAST AYER STREET - IRONWOOD, MICHIGAN 49938 (906) 932-5048

APPENDIX B

ENVIRONMENTAL FIRSTSEARCH REPORT

FirstSearch Technology Corporation

Environmental FirstSearch™ Report

Target Property: THOMAS SERVICE STATION

55 WISCONSIN AVE

MONTREAL WI 54550

Job Number: EE-10201

PREPARED FOR:

Coleman Engineering Company

635 Circle Drive

Iron Mountain, MI 49802

06-14-10



Tel: (317) 823-3500

Fax: (317) 823-3535

Environmental FirstSearch Search Summary Report

Target Site: 55 WISCONSIN AVE
MONTREAL WI 54550

FirstSearch Summary

Database	Sel	Updated	Radius	Site	1/8	1/4	1/2	1/2>	ZIP	TOTALS
NPL	Y	05-01-10	1.00	0	0	0	0	0	0	0
NPL Delisted	Y	05-01-10	0.50	0	0	0	0	-	0	0
CERCLIS	Y	04-29-10	0.50	0	0	0	0	-	0	0
NFRAP	Y	04-29-10	0.50	0	0	0	0	-	0	0
RCRA COR ACT	Y	04-21-10	1.00	0	0	0	0	0	0	0
RCRA TSD	Y	04-21-10	0.50	0	0	0	0	-	0	0
RCRA GEN	Y	04-21-10	0.25	0	0	0	-	-	0	0
Federal IC / EC	Y	04-19-10	0.50	0	0	0	0	-	0	0
ERNS	Y	04-29-10	0.12	0	0	-	-	-	0	0
Tribal Lands	Y	12-01-05	1.00	0	0	0	0	0	1	1
State/Tribal Sites	Y	09-20-00	1.00	0	0	0	0	0	0	0
State Spills 90	Y	04-26-10	0.12	0	0	-	-	-	0	0
State/Tribal SWL	Y	10-01-09	0.50	0	0	0	0	-	0	0
State/Tribal LUST	Y	04-26-10	0.50	0	0	0	0	-	2	2
State/Tribal UST/AST	Y	04-16-10	0.25	0	2	1	-	-	0	3
State/Tribal EC	Y	03-01-10	0.50	0	0	0	0	-	0	0
State/Tribal IC	Y	03-01-10	0.25	0	0	0	-	-	0	0
State/Tribal VCP	Y	04-26-10	0.50	0	0	0	0	-	0	0
State/Tribal Brownfields	Y	06-01-10	0.50	0	0	0	0	-	2	2
State Other	Y	04-26-10	0.25	0	0	0	-	-	0	0
- TOTALS -				0	2	1	0	0	5	8

Notice of Disclaimer

Due to the limitations, constraints, inaccuracies and incompleteness of government information and computer mapping data currently available to FirstSearch Technology Corp., certain conventions have been utilized in preparing the locations of all federal, state and local agency sites residing in FirstSearch Technology Corp.'s databases. All EPA NPL and state landfill sites are depicted by a rectangle approximating their location and size. The boundaries of the rectangles represent the eastern and western most longitudes; the northern and southern most latitudes. As such, the mapped areas may exceed the actual areas and do not represent the actual boundaries of these properties. All other sites are depicted by a point representing their approximate address location and make no attempt to represent the actual areas of the associated property. Actual boundaries and locations of individual properties can be found in the files residing at the agency responsible for such information.

Waiver of Liability

Although FirstSearch Technology Corp. uses its best efforts to research the actual location of each site, FirstSearch Technology Corp. does not and can not warrant the accuracy of these sites with regard to exact location and size. All authorized users of FirstSearch Technology Corp.'s services proceeding are signifying an understanding of FirstSearch Technology Corp.'s searching and mapping conventions, and agree to waive any and all liability claims associated with search and map results showing incomplete and or inaccurate site locations.

**Environmental FirstSearch
Site Information Report**

Request Date: 06-14-10
Requestor Name: Chuck Saari
Standard: AAI

Search Type: COORD
Job Number: EE-10201
Filtered Report

Target Site: 55 WISCONSIN AVE
MONTREAL WI 54550

Demographics

Sites: 8	Non-Geocoded: 5	Population: NA
Radon: NA		

Site Location

	<u>Degrees (Decimal)</u>	<u>Degrees (Min/Sec)</u>	<u>UTMs</u>
Longitude:	-90.228425	-90:13:42	Easting: 712936.214
Latitude:	46.43184	46:25:55	Northing: 5145544.483
Elevation:	1462		Zone: 15

Comment

Comment:

Additional Requests/Services

Adjacent ZIP Codes: 0 Mile(s)	Services:																																		
<table border="1"> <thead> <tr> <th>ZIP Code</th> <th>City Name</th> <th>ST</th> <th>Dist/Dir</th> <th>Sel</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	ZIP Code	City Name	ST	Dist/Dir	Sel						<table border="1"> <thead> <tr> <th></th> <th>Requested?</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Fire Insurance Maps</td> <td>Yes</td> <td>06-14-10</td> </tr> <tr> <td>Aerial Photographs</td> <td>Yes</td> <td>06-14-10</td> </tr> <tr> <td>Historical Topos</td> <td>No</td> <td></td> </tr> <tr> <td>City Directories</td> <td>No</td> <td></td> </tr> <tr> <td>Title Search/Env Liens</td> <td>No</td> <td></td> </tr> <tr> <td>Municipal Reports</td> <td>No</td> <td></td> </tr> <tr> <td>Online Topos</td> <td>No</td> <td></td> </tr> </tbody> </table>		Requested?	Date	Fire Insurance Maps	Yes	06-14-10	Aerial Photographs	Yes	06-14-10	Historical Topos	No		City Directories	No		Title Search/Env Liens	No		Municipal Reports	No		Online Topos	No	
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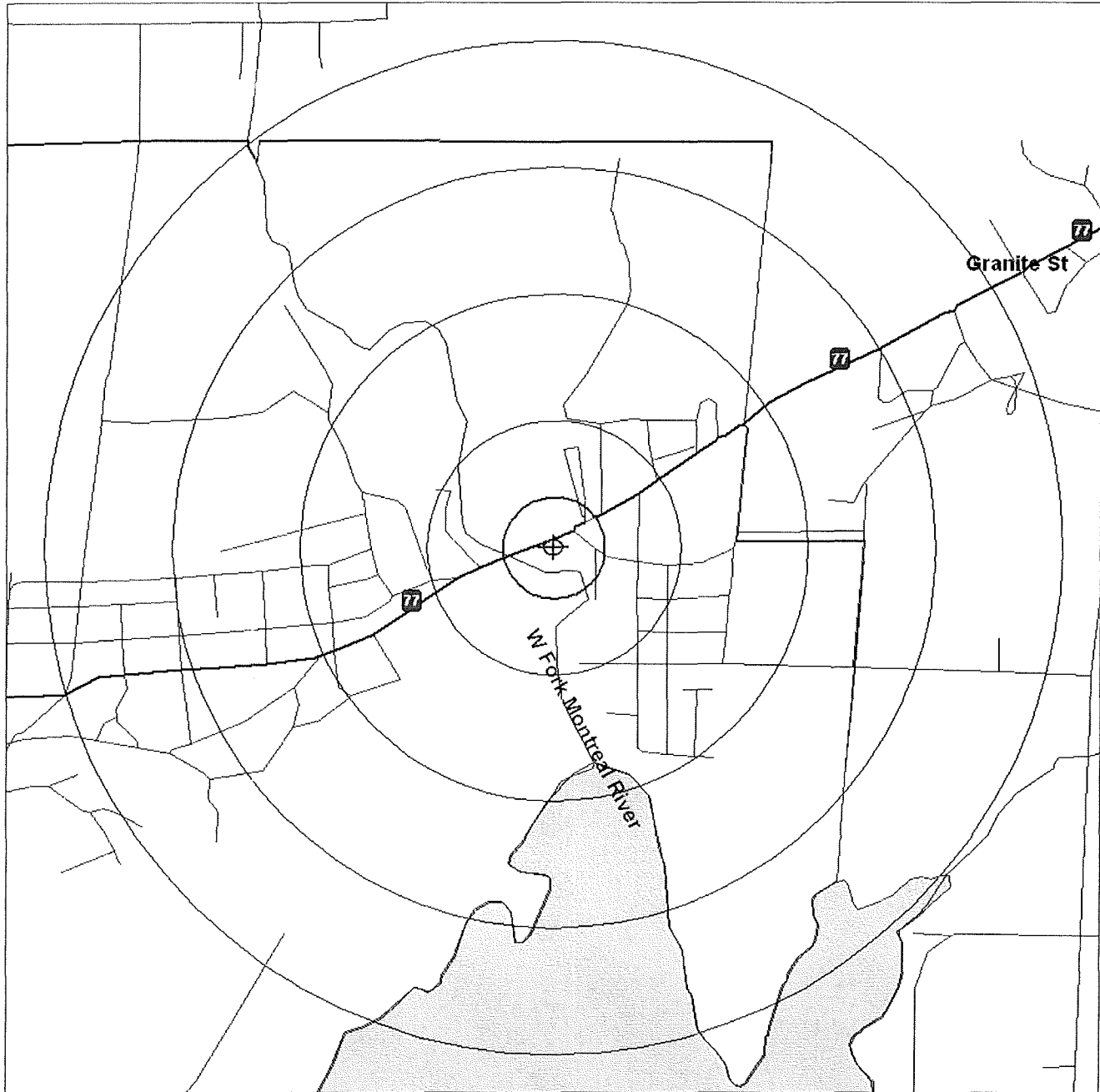
Environmental FirstSearch

1 Mile Radius








AAI: NPL, RCACOR, STATE



55 WISCONSIN AVE, MONTREAL WI 54550



Source: 2005 U.S. Census TIGER Files

- Target Site (Latitude: 46.43184 Longitude: -90.228425) 
 - Identified Site, Multiple Sites, Receptor   
 - NPL, DELNPL, Brownfield, Solid Waste Landfill (SWL), Hazardous Waste 
 - Triballand 
 - Railroads 
- Black Rings Represent 1/4 Mile Radius; Red Ring Represents 500 ft. Radius