

June 2, 2004

Ms. Gina Keenan
Hydrogeologist
Wisconsin Department of Natural Resources
2300 N. Dr. Martin Luther King Jr. Drive
Milwaukee WI 53212-3196

**Re: Site Investigation Work Plan
Former Bostik Findley, Inc Facility
2930 West Center Street
Milwaukee, Wisconsin
WDNR BRRTS #03-41-00530**

06-41-526102
241024740

Dear Ms. Keenan:

ENSR Corporation (ENSR) has prepared the enclosed Site Investigation Work Plan for your review. This Work Plan was prepared in accordance with applicable sections of Wisconsin Administrative Code Chapter NR 716.09 and includes the investigation activities discussed in our March 25, 2004 meeting with you and Ms. Margaret Brunette addressing concerns regarding potential impacts to the soils underlying the Middle Parcel in the historical print shop and laundry area and in the manufacturing process areas of the Main Parcel. The results of the information obtained during this and previous investigation phases will be utilized to evaluate potential options for the Site. As we discussed in our telephone conversation yesterday, we will forward copies of the related historical investigation reports to your attention under separate cover.

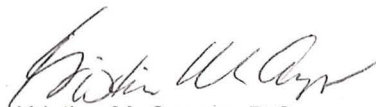
Bostik Findley is planning on entering this Site into the Voluntary Party Liability Exemption (VPLE) Program and has submitted the application form and application fee. The \$3000.00 advance deposit fee will be forwarded this week.

We would appreciate your expediting review of this Work Plan so work can begin and we can maintain our projected schedule to return the property to beneficial use. If you have any questions, or require additional information, please contact either of us at your convenience.

Sincerely,

ENSR Corporation

William C. Looney
Senior Program Manager



Kristine M. Casper, P.G.
Program Manager

cc: Mr. Bruce Keyes, Esq., Foley & Lardner
Mr. Geoff Pyka, Bostik Findley, Inc.

Enclosures: as



**Bostik Findley, Inc.
c/o Foley & Lardner, LLP
777 East Wisconsin Avenue
Milwaukee, Wisconsin**

**Site Investigation Work Plan
Former Bostik Findley, Inc.
Facility
2930 West Center Street
Milwaukee, Wisconsin
BRRTS #03-41-00530**

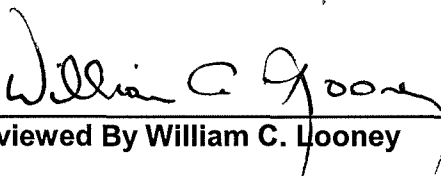
**ENSR Corporation
June 2004
Project Number 00963023**

**Bostik Findley, Inc.
c/o Foley & Lardner, LLP
777 East Wisconsin Avenue
Milwaukee, Wisconsin**

**Site Investigation Work Plan
Former Bostik Findley, Inc.
Facility
2930 West Center Street
Milwaukee, Wisconsin
WDNR BRRTS #03-41-00530**



Prepared By Richard Mazurkiewicz



Reviewed By William C. Looney

**ENSR Corporation
June 2004
Project Number 00963023**

CONTENTS

1.0	INTRODUCTION.....	1
1.1	Background	1
1.2	Site Location and Ownership	4
1.3	Consultant Identification.....	4
1.4	Physical Settings	4
1.5	Geological and Hydrogeological Settings.....	5
2.0	SCOPE OF WORK	6
2.1	Site Safety	6
2.2	Field Methodologies.....	6
2.2.1	Soil Sample Collection and Handling.....	6
2.2.2	Decontamination Procedures	7
2.2.3	Investigative Waste Management.....	7
2.3	Laboratory Analytical Samples.....	7
2.4	Quality Assurance/Quality Control Methods.....	8
2.4.1	Chain of Custody Procedures.....	8
2.4.2	Duplicate, Field, and Trip Blank Samples	8
2.4.3	Field Documentation	9
2.5	Reporting	9
2.6	Schedule.....	9

LIST OF FIGURES

Figure 1	Site Location Map
Figure 2	Site Layout Map
Figure 3	RECs, HRECs and Proposed Soil Boring Location Map

LIST OF ATTACHMENTS

Attachment A Excerpt from GZA GeoEnvironmental, Inc., September 3, 2003, "Phase I Environmental Site Assessment Report – Bostik Findley 2930 West Center Street Milwaukee, Wisconsin"

Bostik Findley, Inc. Facility
2930 West Center Street
Milwaukee, Wisconsin

Site Investigation Work Plan
WDNR BRRTS #03-41-00530

June 2004

CERTIFICATION – PROFESSIONAL GEOLOGIST/HYDROGEOLOGIST

I, Kristine M. Casper, hereby certify that I am a hydrogeologist as that term is defined in Ch. NR 712.03 (1), WAC and a registered professional geologist in the State of Wisconsin, registered in accordance with the requirements of ch. A-E 4, WAC; that this document has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, WAC; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, WAC.

REPORT: 9 pages
FIGURES: 3 pages
ATTACHMENTS: 30 pages

Kristine M. Casper *Site Investigation Manager* *6-2-04*

Signature and Title Date
Stamp


WISCONSIN
PROFESSIONAL GEOLOGIST
★
CASPERS
G-256
MILWAUKEE,
WI

Bostik Findley, Inc. Facility
2930 West Center Street
Milwaukee, Wisconsin

Site Investigation Work Plan
WDNR BRRTS #03-41-00530

June 2004

CERTIFICATION – ENVIRONMENTAL SCIENTIST

I, William C. Looney, hereby certify that I am a scientist as that term is defined in s. NR 712.03 (3), Wis. Adm. Code and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code.

REPORT: 9 pages
FIGURES: 3 pages
ATTACHMENTS: 30 pages

William C. Looney Sr. Program Manager
Signature and Title

6/2/04
Date

1.0 INTRODUCTION

At the request of the Bostik Findley, Inc. (Bostik), ENSR Corporation (ENSR), has prepared the following site investigation work plan to define soil impacts identified at the Bostik property located at 2930 West Center Street in Milwaukee, Wisconsin (Site, Figure 1). The scope of this investigation is based on our understanding of discussions during the March 25, 2004 meeting with representatives of the Wisconsin Department of Natural Resources (WDNR) concerning the Site and its inclusion in the Wisconsin Voluntary Party Liability Exemption (VPLE) Program. All proposed investigation activities will be performed in accordance with WDNR requirements set forth in Wisconsin Administrative Code (WAC) Chapter NR 716.

We request approval of this work plan for purposes of the VPLE program.

1.1 Background

The Site consists of three adjoining parcels. Buildings constructed on the parcels are interconnected. The first parcel, containing the main facility and a covered parking area (a total of approximately 38,600 square feet of floor space), occupies approximately 39,000 square feet ("Main Parcel"). The second parcel contains an approximately 6,000 square foot warehouse building with an outdoor dock and storage area of approximately 16,000 square feet ("Dock Parcel"). The third parcel, located between the first and second parcels, contains a two story leased building of approximately 4,800 square feet of floor space with a footprint of approximately 3,700 square feet ("Middle Parcel"). The Middle Parcel is currently leased, but under the terms of the lease, the Middle Parcel could be, and is expected to be, conveyed to Bostik at any time (including in furtherance of completing VPLE). A Site Layout Map is included as Figure 2.

A creamery operated on the Main Parcel from the late 1800s or early 1900s until the 1960s, when Findley Adhesives (predecessor of Bostik) began operations. A laundry reportedly operated on the Middle Parcel from the 1930s until the 1960s, then a printing company operated on the Middle Parcel from the 1960s until the mid-1990s. Available information indicated that several residential structures (some of which may have been used as a tavern, real estate office or insurance office) were located on the Dock Parcel from the 1930's until about 1998 when the dock, and warehouse were constructed.

The surrounding areas in the vicinity of the Site are heavily developed and contain a number of residential, commercial and industrial properties. The Site and the areas in the vicinity are serviced by public electrical and natural gas utilities and the municipal sewage system. Potable water is provided to the area by the City of Milwaukee and the groundwater yields from the shallow groundwater aquifer in the area of the Site are insufficient for domestic or industrial use. No surface-water features to which groundwater could discharge exist in the Site area. Risks associated with potentially impacted groundwater are minimal.

Bostik utilized the Site to manufacture hot melt adhesives until suspension of operations in July 2003. The manufacturing process included combining wax, resins and polymers in mixing vessels at elevated temperatures. The finished product was stored at the Site and shipped to customers. The Site is currently closed and the hot melt process equipment has been removed

from the Site. Limited quantities of solvents were used on site for clean-up. No solvent-based adhesives were ever produced at this facility.

Several environmental-related activities have been accomplished at the Site including:

- GZA GeoEnvironmental, Inc. (GZA) completed a "*Phase I Environmental Site Assessment Report*", for the Site on September 3, 2003. The GZA report identified the soil impacts discovered during the 1995 underground storage tank (UST) removal performed by Swanson Environmental, Inc. (Swanson) and associated historical use of chemicals at the Site as recognized environmental conditions (RECs). Also identified as a REC was a small area (approximately one foot by one foot) of soil stained with what appeared to be hardened fuel oil or similar petroleum product located directly below a fill pipe for a former UST on the northwest portion of the Site.
- A Site map identifying the Site features and processes that are recognized as possible sources for hazardous substance discharges is included as Figure 3.

Main Parcel

- CBC Environmental Services (CBC) supervised the removal of one, 8,000-gallon mineral oil UST at the Site in October 1990. Soil samples collected during the removal were analyzed for Total Petroleum Hydrocarbons (TPH). No TPH was detected in any sample.
- In November 1995, Braun Intertec Corporation (Braun) performed an investigation of two out-of-service sumps located in the sub-basement under the main facility. Both concrete sumps (crocks) are approximately four-feet in diameter and extend beneath the sub-basement floor approximately seven-feet. The crocks are connected by a three-inch diameter pipe. Reportedly, liquid from floor cleaning was collected in floor drains in the main facility and transferred via gravity flow through pipes to the easternmost crock. Overflow from the easternmost crock was transferred through the connecting pipe to the westernmost crock. Overflow from the westernmost crock was connected to another smaller diameter concrete catch basin located west of the westernmost crock. This catch basin discharged to the sanitary sewer.

At the time of the 1995 inspection, the bottom of both crocks contained sludge. This sludge was removed (eight, 55-gallon drums) and the interior of the crocks pressure washed. The sludge was subsequently classified as a hazardous waste due to the presence of tetrachloroethylene above the characteristic hazardous waste limits and was properly transported and disposed.

After sludge removal and cleaning, the crocks were taken out of service by sealing the pipes with concrete plugs. The use of chlorinated solvents was terminated prior to decommissioning the crocks in 1995. There is no visible evidence of cracks or damage to the interior of the crocks. As the crocks were found to be intact, this is not considered a REC.

- In November 1995, impacts to the subsurface soils were noted by Swanson during removal of two, 300-gallon USTs; one UST was gasoline and the other was a diesel fuel UST. These USTs had been installed under the Main Parcel floor by the creamery prior to 1956. Bostik was subsequently notified of the results and the release was reported to the WDNR in December 1995. In January 1996, Swanson removed and disposed of approximately 39 tons of impacted soil. Concerns of damage to the building limited the excavation.

Following the tank and soil removal, further investigation beneath the Main Parcel building floor revealed soil impacts of petroleum constituents such as gasoline range organics (GRO), diesel range organics (DRO), benzene, ethyl benzene, toluene, xylenes and naphthalene and various chlorinated volatile organic compounds (VOCs) such as tetrachloroethylene (PCE), trichloroethylene (TCE), and methylene chloride. Several of these constituents exceeded the WAC NR 720 generic clean-up criteria.

Modeling of both the direct contact hazard of the constituents and the potential for the constituents to impact groundwater was completed. The results indicated that none of the constituents would pose a threat to human health from direct contact (industrial use) or be expected to impact groundwater.

At the request of WDNR, additional investigation activities to better define the extent of impacts of chlorinated VOCs to the subsurface were conducted and the results submitted to WDNR. In June 1997, a "conditional no further action" letter was issued by WDNR requiring a deed restriction. This restriction would include the provisions that "any future subsurface work on this property shall include an investigation of the degree and extent of PCE contamination" and further that "the contamination shall be properly treated or disposed in accordance with applicable law". A deed restriction or geographic information system (GIS) registration has not been filed.

Middle Parcel

- No intensive investigative activities have been conducted to date.

Dock Parcel

- In March 1998, Braun removed one, 550-gallon fuel oil UST from the Dock Parcel (likely a heating oil UST associated with a former residence). Soil samples obtained from beneath the UST were analyzed for DRO and no detections were reported. A "clean" UST closure report was filed with the WDNR.

On March 25, 2004, representatives of Bostik, Foley & Lardner, LLP and ENSR met with WDNR representatives - Ms. Gina Keenan and Ms. Margaret Brunette - to discuss concerns regarding potential impacts to soils underlying the building in the former print shop area and in the process areas of the Site. As discussed in the meeting, additional investigation activities will be initiated to address WDNR concerns and to close the Site through the VPLE program. It is our understanding that no further investigation is required for purposes of the VPLE program in locations where closures or conditional closures have been granted. Consequently, no further

investigation is planned for the locations where underground storage tanks were previously removed, as identified in Figure 3.

1.2 Site Location and Ownership

The Bostik Site is located at 2930 West Center Street in Milwaukee, Milwaukee County, Wisconsin. The Site occupies a portion of the northeast quarter of the southeast quarter of Section 13, Township 7 North and Range 21 East (NE ¼, SE ¼ of Sec. 13, T7N, R21E). The Site location is depicted on Figure 1.

Bostik Findley, Incorporated of Milwaukee, Wisconsin, is the Site owner. The contact is:

Bostik Findley, Inc.
c/o Mr. Bruce A. Keyes, Esq.
Foley & Lardner, LLP
777 East Wisconsin Avenue
Milwaukee, WI 53202
(414) 297-5885

1.3 Consultant Identification

The Site investigation activities will be conducted by:

ENSR Corporation
W239 N2890 Pewaukee Road, Unit D
Pewaukee, WI 53072
Attention: William C. Looney, Jr.
(262) 523-2040 - phone
(262) 523-2059 - fax

Subcontractors anticipated as providing services for this project are identified below. The subcontractors selected to conduct the work may change due to availability or changes in the scope of work.

Drilling
On-Site Environmental
Services
P.O. Box 280
Sun Prairie, WI 53590
608-837-8992

Laboratory
Test America, Inc.
602 Commerce Drive
Watertown, WI 53094
800-833-7036

1.4 Physical Settings

The Site is situated in an urban area in the City of Milwaukee, and is bounded to the north by residential properties, to the east by North 29th Street beyond which are residential properties, to the south by West Center Street beyond which are residential properties, and North 30th Street to the west. The Site has little topographic relief, but slopes gently east toward the Milwaukee River and Lake Michigan. The Site elevation is approximately 670 feet above mean sea level.

The Site is presently vacant; however, the City of Milwaukee provides potable water and sanitary sewer service to the area. Storm water that does not percolate into the unpaved surfaces leaves the Site via sheet flow.

1.5 Geological and Hydrogeological Settings

See Section 3.20 of the excerpt from GZA GeoEnvironmental, Inc., September 3, 2003, *"Phase I Environmental Site Assessment Report, Bostik Findley, 2930 West Center Street, Milwaukee, Wisconsin"*, provided as Attachment A.

2.0 SCOPE OF WORK

The purpose of the Site investigation is to address WDNR concerns regarding potential impacts to the soils underlying the Middle Parcel in the historical print shop and laundry area and in the manufacturing process areas of the Main Parcel. Locations where closure or conditional closures have been granted in association with a tank removal are not included in this further investigation.

Five soil borings will be advanced utilizing Geoprobe® boring technology. Each of the borings will be advanced to a depth of 16 feet below ground surface (bgs). Three soil samples will be obtained from each boring at depths of 3, 8 and 16 feet bgs. Additionally, to address the REC identified in GZA's September 2003, "*Phase I Environmental Site Assessment Report*" associated with soil staining directly below a fill pipe for a former UST on the northwest portion of the Site, a Geoprobe® or hand augur will be used to obtain a shallow subsurface sample (6 to 12 inches bgs) from this area. The proposed boring locations are presented in Figure 3. The final boring locations will be selected in the field to ensure the locations are as close as possible to preferential subsurface contaminant transport pathways (e.g. underground drain lines).

The laboratory will analyze only the samples obtained from the 3-foot bgs interval and place the remainder of the samples on hold. If significant detections are found in any of the 3-foot bgs samples, deeper samples will be analyzed in an effort to define the vertical extent of impacts above groundwater. Soil samples that are to be evaluated will be analyzed for VOCs by EPA Method 8260B and the eight Resource Conservation and Recovery Act (RCRA) metals by EPA SW-846 Method 6010B (arsenic, barium, cadmium, chromium, lead, silver and selenium) and EPA Method 7471A (mercury). The shallow Geoprobe®/hand augur sample will be analyzed for VOCs by EPA Method 8260B and for diesel range organics (DRO) by the Wisconsin Modified DRO Method.

2.1 Site Safety

ENSR will prepare a Site Health and Safety Plan (HASP) to meet the standards outlined in 29 CFR 1910.120 (Hazardous Waste Operations and Emergency Response) and will review HASP requirements with all personnel involved with the fieldwork prior to commencing the activities. A qualified ENSR employee will be designated to perform as the Site Health and Safety Officer and will be present during all fieldwork. ENSR will contact Digger's Hotline to locate utilities that may affect the proposed boring locations.

2.2 Field Methodologies

2.2.1 Soil Sample Collection and Handling

The Geoprobe® unit consists of a hydraulic ram with a hydraulic hammer and driving rods. The sampling probe is a one- or two-inch diameter stainless steel tube into which a disposable polyethylene liner is inserted prior to each sampling event. The sampler is then driven into the ground using the hydraulic ram or, when the hydraulic ram cannot exert enough pressure to continue to push the sampler into the ground, the hammer. Upon advancing the sampler, the entire sampler, with the plastic sleeve intact, is withdrawn. The plastic sleeve is then provided to the on-site geologist or scientist for soil classification and sample containerization.

ENSR will obtain soil samples from 3, 8 and 16 feet bgs at each boring. The boring locations are illustrated on Figure 3. Each boring will be sampled at continuous intervals to the termination depth of the boring.

Soil samples collected from each interval will be split for field screening and laboratory analysis. The soil samples intended for field screening will be contained in sealed plastic bags and allowed to warm to approximately 21 degrees Celsius. The bag will be opened enough for the probe of the photoionization detector (PID) to be inserted and the bag resealed around the probe. The PID will remain within the sample bag until the readings become steady or consistently decline. Peak PID readings will be recorded for each sample.

After collection, soil samples intended for laboratory analysis will be immediately sealed in appropriate laboratory-provided containers. A fresh pair of nitrile gloves will be used during handling of each sample to minimize the potential for cross-contamination. The samples intended for VOC analysis will be containerized in pre-tared four-ounce glass jars. Approximately 25 to 35 grams of soil will be placed in each jar. The sample will be preserved with laboratory-provided purge-and-trap grade methanol. Samples intended for RCRA metals and dry weight analyses will be collected in a separate four-ounce plastic container from each interval intended for laboratory analysis.

As quickly as possible following sample collection, the sample jars will be labeled with the sample location identification, depth of sample, date of sample collection and intended analysis. The sample jars will then be placed in re-sealable plastic bags and packed on ice in an insulated container. A chain-of-custody form will be filled out upon completion of sampling each day and will accompany each container of samples to the laboratory. Samples will be transported to the laboratory the next day via laboratory courier.

2.2.2 Decontamination Procedures

Sampling tools (e.g., spoons, knives, spatulas, etc.) will be cleaned in a solution of Alconox® and rinsed in known-clean water prior to collection of each sample. To minimize the potential for cross-contamination of samples, a clean pair of nitrile gloves will be used during collection of each sample.

2.2.3 Investigative Waste Management

All soil generated during investigative activities will be contained in appropriately labeled 55-gallon drums and stored on site. The investigative wastes appropriate for disposal as general refuse (e.g., sampling sleeves, used sampling gloves, etc.) will be disposed in ENSR's general-waste dumpster.

2.3 Laboratory Analytical Samples

The selected soil samples will be placed on ice and submitted to a Wisconsin-certified laboratory for analysis, following standard practice for chain-of-custody procedures. Soil samples will be analyzed for VOCs by EPA SW-846 Method 8260B and for RCRA metals. The laboratory will analyze only the samples obtained from the 3-foot bgs interval and place the remainder of the samples on hold. If significant detections are found in any of the 3-foot bgs samples, deeper samples will be analyzed in an effort to define the vertical extent of impacts above groundwater.

2.4 Quality Assurance/Quality Control Methods

The following quality assurance/quality control measures will be implemented during the Site investigation activities:

1. Decontamination procedures and measures to minimize the potential for cross contamination of samples will be followed as specified in Section 2.2.2 (Field Methodologies).
2. All Site activities will be recorded in a bound field notebook (see Field Documentation in Section 2.4.3).
3. Stringent chain of custody procedures will be followed (see Chain of Custody Procedures in Section 2.4.1).
4. Sample duplicates and blanks will be collected and analyzed (see 2.4.2 Duplicate, Field, and Trip Blank Samples in Section 2.4.2).

2.4.1 Chain of Custody Procedures

Chain-of-custody forms will be completed to the extent possible prior to sample shipment. Included on the form will be the sample identification (sample location identification, depth of sample and date of sample collection), sample type, sample container (type and number of containers), analytical method to be performed, preservatives, and name of sampler. The forms will be filled out in a legible manner, using blue or black waterproof ink.

A chain-of-custody document will accompany each sample shipment. The sampler will relinquish custody of the samples to the courier, retaining one copy of the record for the project file. Samples will be transported to the laboratory in containers that meet applicable state and federal standards for safe shipment.

2.4.2 Duplicate, Field, and Trip Blank Samples

The following quality assurance/quality control (QA/QC) samples will be submitted with the soil samples. If multiple days and/or containers are used, appropriate increases in the number of blanks will be made.

- Methanol blanks (for soil samples analyzed for VOCs only): The sample will be collected in the same manner as the soil samples with methanol preservation without placing soil into the container. One blank will be collected per sample shipment.
- Matrix Spike/Matrix Spike Duplicates (no additional samples required): One Matrix Spike/Matrix Spike Duplicate sample is prepared by and analyzed by the laboratory per every batch of 20 samples to evaluate data accuracy.
- Trip Blanks: A trip blank will be prepared by the laboratory and transported with the sample jars. One trip blank will be included in each sample shipment.

- Equipment Blanks: One equipment blank sample will be collected each day of sampling.
- Duplicate Samples: One duplicate sample will be collected for each 10 samples collected in the field.

2.4.3 Field Documentation

All Site activities will be documented in a bound field notebook. Included in the daily documentation are:

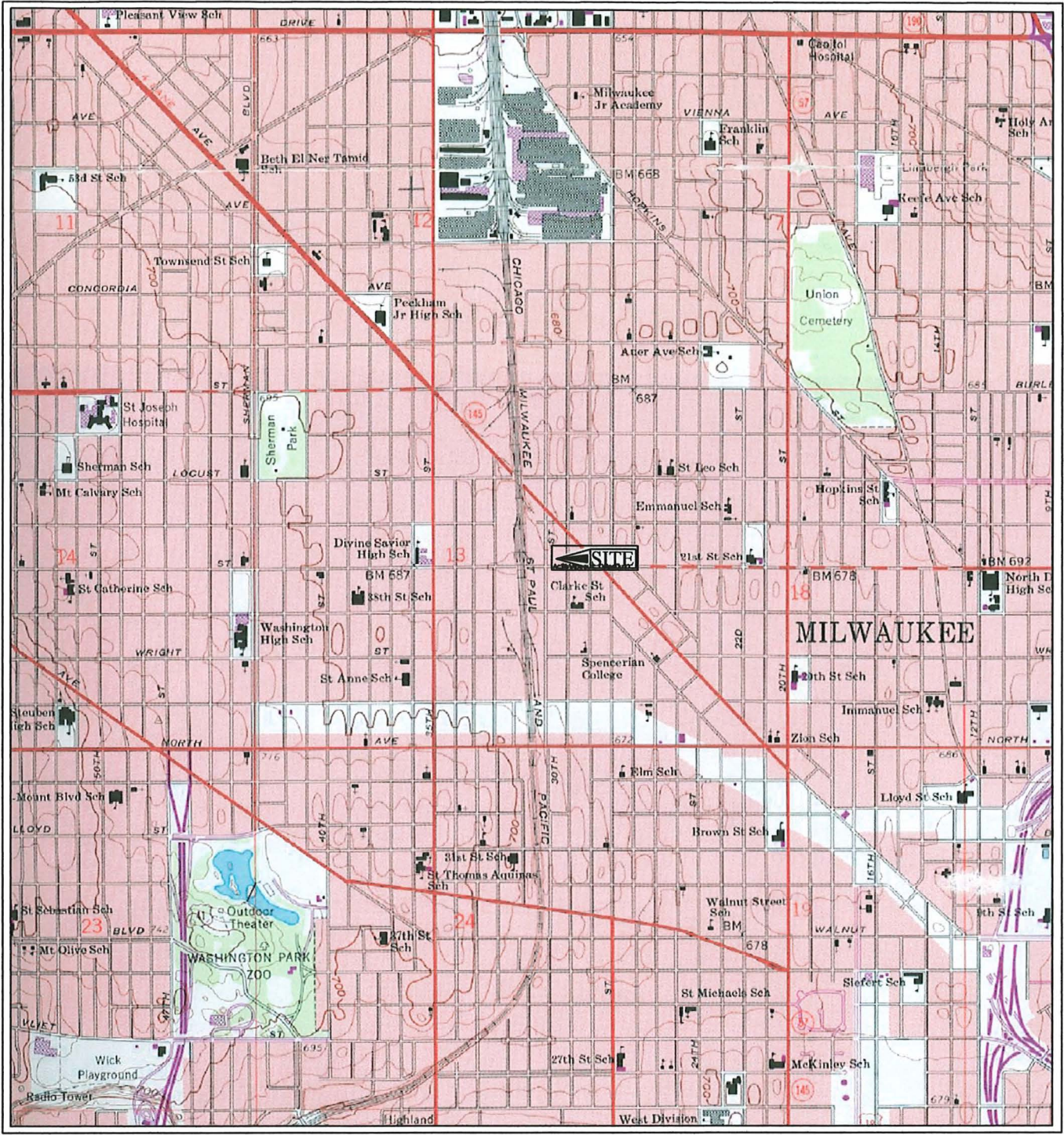
- Procedures for sampling and other routine activities associated with the Site investigation.
- Personnel working on the Site.
- Chronological log of Site activities.

2.5 Reporting

ENSR will prepare a report following receipt of laboratory analytical results in accordance with WAC NR 716.15. The Site investigation report will include details of the field investigation activities, boring logs, Site maps, Site specific and regional geology and hydrogeology, and conclusions and/or recommendations. Copies of the report will be submitted to the WDNR.

2.6 Schedule

The Site investigation activities will commence in June 2004. ENSR anticipates approximately one day to complete the field activities. Standard laboratory turn around time is ten business days following receipt of the samples. As required in WAC NR 716.15, ENSR will submit the site investigation report to the WDNR within 30 days of completion of the report.



Adapted from: USGS 7.5 minute series Milwaukee, Wisconsin topographic quadrangle dated 1958, Photorevised 1971.

SCALE 1:24,000

Figure 1

Site Location Map

Bostik Findley
2930 West Center Street, Milwaukee, Wisconsin



30th Street

29th Street

Residential

Parking
Garage

Residential

**MAIN
PARCEL**

Production
Area

**MIDDLE
PARCEL**

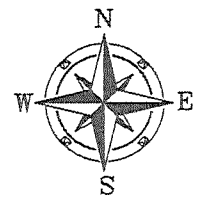
Leased
Building

**DOCK
PARCEL**

Warehouse
Building

Dock
Area

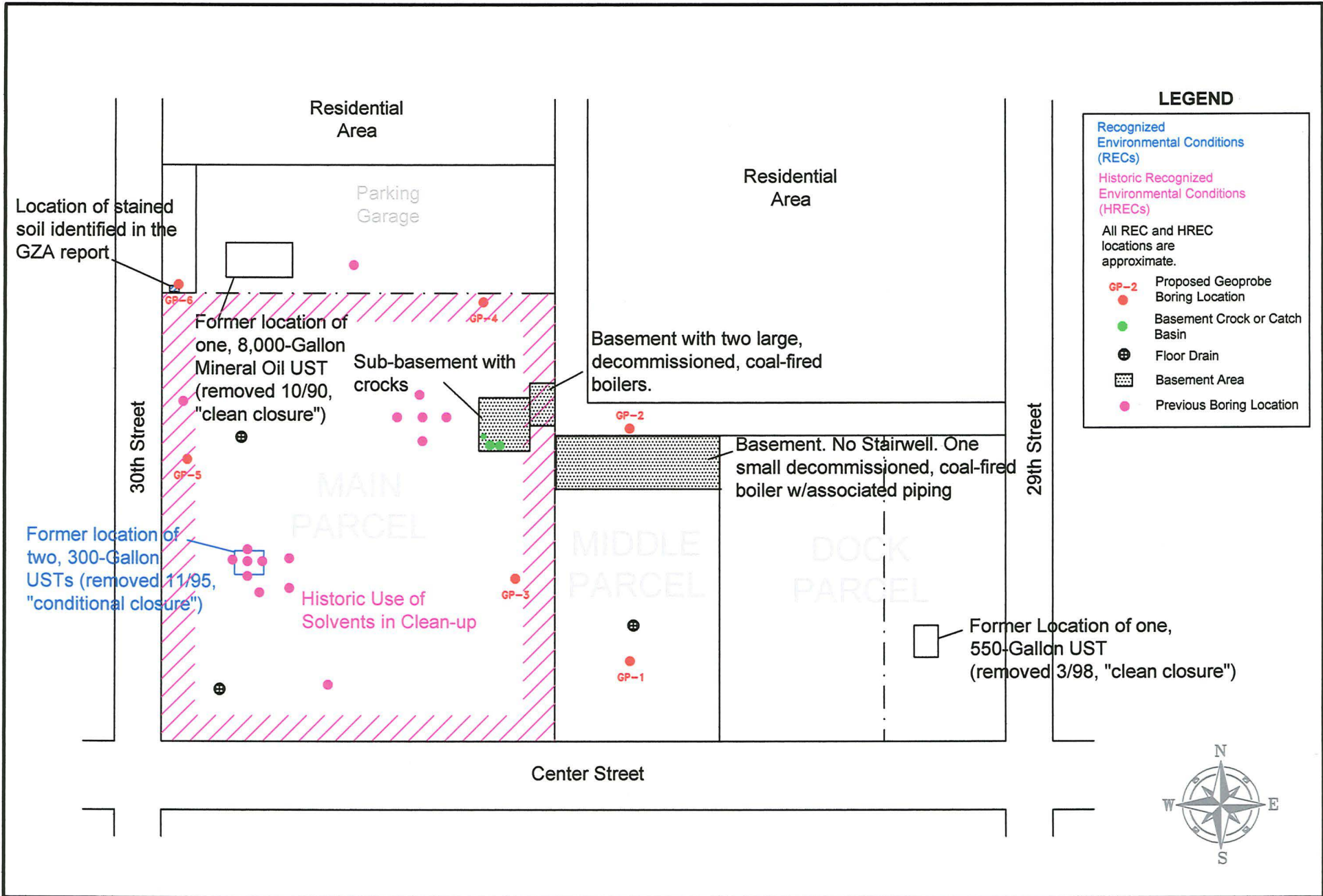
Center Street



Site Layout Map

Bostik Findley
2330 West Center Street
Milwaukee, Wisconsin

DRWN: HEP	NOT TO SCALE
CHK'D:	DATE: 04-28-04
APP'D:	FIGURE 2



RECs, HRECs and Proposed Boring Locations

Bostik Findley
2930 West Center Street
Milwaukee, Wisconsin

DRWN:	HEP	NOT TO SCALE
CHK'D:	WCL	DATE: 06-01-04
APP'D:	WCL	FIGURE 3

**ATTORNEY-CLIENT WORK PRODUCT
PRIVILEGED AND CONFIDENTIAL**



**PHASE I ENVIRONMENTAL SITE
ASSESSMENT REPORT**

**BOSTIK FINDLEY
2930 WEST CENTER STREET
MILWAUKEE, WISCONSIN**

PREPARED FOR:

Bostik Findley, Inc.
c/o Foley & Lardner
777 East Wisconsin Avenue, Suite 3800
Milwaukee, Wisconsin 53202-5367

PREPARED BY:

GZA GeoEnvironmental, Inc.
N4140 Duplainville Road
Pewaukee, Wisconsin 53072

September 3, 2003
GZA File No. 20.0150765.00

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**ATTORNEY-CLIENT WORK PRODUCT
PRIVILEGED AND CONFIDENTIAL**

September 3, 2003
GZA File No. 20.0150765.00



Bostik Findley, Inc.
c/o Foley & Lardner
777 East Wisconsin Avenue, Suite 3800
Milwaukee, Wisconsin 53202-5367

Attention: Ms. Leah Krider

Subject: Phase I Environmental Site Assessment Report
Bostik Findley
2930 West Center Street
Milwaukee, Wisconsin

731 North Jackson Street
Suite 830
Milwaukee, WI 53202
414-727-4017
FAX 414-727-4019
<http://www.gza.net>

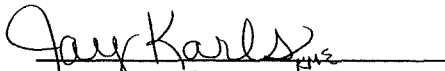
Dear Ms. Krider:

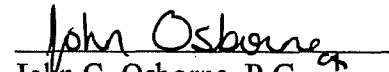
GZA GeoEnvironmental, Inc. (GZA) is pleased to present this Phase I Environmental Site Assessment Report for the Bostik Findley site at 2930 West Center Street in Milwaukee, Wisconsin. This report is based on our review of available historical information and visual observations of the Site and adjoining properties, and noted interviews. Section 9.00 of the report, Findings and Conclusions, is considered an Executive Summary and should be reviewed in conjunction with the entire report.

Should you have any questions or comments, please feel free to contact the undersigned at (262) 691-2662.

Very truly yours,

GZA GeoEnvironmental, Inc.


Jay Karls, Ph.D., P.E.
Senior Project Manager


John C. Osborne, P.G.
Principal
District Manager

J/150765/Phase I - Bostik Findley

Attachments

**ATTORNEY-CLIENT WORK PRODUCT
PRIVILEGED AND CONFIDENTIAL**

**PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT
BOSTIK FINDLEY
2930 WEST CENTER STREET
MILWAUKEE, WISCONSIN**

TABLE OF CONTENTS



	<u>Page</u>
1.00 INTRODUCTION	1
1.10 PROJECT AUTHORIZATION	1
1.20 PROJECT OBJECTIVE	1
1.30 SCOPE OF SERVICES	1
2.00 BACKGROUND SITE INFORMATION	2
2.10 SITE LOCATION	2
2.20 SITE DESCRIPTION	2
2.30 CURRENT SITE USE	3
2.40 ADJOINING PROPERTIES USE	3
2.50 AREA USE	3
2.60 SITE UTILITIES	3
3.00 REGIONAL GEOLOGICAL AND HYDROGEOLOGICAL CONDITIONS	3
3.10 TOPOGRAPHY AND SURFACE WATER CHARACTERISTICS	4
3.20 GEOLOGY AND GROUNDWATER CHARACTERISTICS	4
4.00 HISTORICAL USE INFORMATION	4
4.10 SITE AND AREA HISTORY SUMMARY	4
4.20 CITY DIRECTORIES REVIEW	5
4.2.1 2930 West Center Street	5
4.2.2 2918 West Center Street (Leased Portion of the Site)	5
4.2.3 2914 West Center Street	5
4.2.4 2910 West Center Street	6
4.2.5 2904 West Center Street	6

**ATTORNEY-CLIENT WORK PRODUCT
PRIVILEGED AND CONFIDENTIAL**

**PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT
BOSTIK FINDLEY
2930 WEST CENTER STREET
MILWAUKEE, WISCONSIN**

TABLE OF CONTENTS



	<u>Page</u>
4.2.6 Neighboring Properties	6
4.30 HISTORIC MAP REVIEW	6
4.40 AERIAL PHOTOGRAPH REVIEW	7
4.50 TITLE SEARCH AND HISTORY OF OWNERSHIP	8
4.60 BUILDING DEPARTMENT RECORDS	8
4.70 KEY SITE MANAGER AND OTHER INFORMATION	8
5.00 PREVIOUS SITE INVESTIGATIONS	10
6.00 SITE RECONNAISSANCE	11
6.10 EXTERIOR OBSERVATIONS	11
6.10.1 Underground Storage Tanks	11
6.10.2 Aboveground Storage Tanks	12
6.10.3 Chemical, Hazardous Substances, or Petroleum Products Use	12
6.10.4 Staining	12
6.10.5 Drywells and Sumps	12
6.10.6 Pits, Ponds and Lagoons	12
6.10.7 Wells	13
6.10.8 Solid Waste	13
6.10.9 Process Wastewater	13
6.10.10 Septic System	13
6.10.11 Stressed Vegetation	13
6.10.12 Soil and Water Sampling	13
6.10.13 Oil-Water Separators	13
6.10.14 Surface Water Runoff	14
6.10.15 Other Exterior Observations	14

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PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT
BOSTIK FINDLEY
2930 WEST CENTER STREET
MILWAUKEE, WISCONSIN

TABLE OF CONTENTS



	<u>Page</u>
6.20 INTERIOR OBSERVATIONS	14
6.20.1 Construction	14
6.20.2 Heating and Cooling	14
6.20.3 Current Site Use	14
6.20.4 Hazardous Wastes Generated and Waste Storage Areas	15
6.20.5 Stains or Corrosion	15
6.20.6 Floor Drains or Sumps	15
6.20.7 Suspect Asbestos-Containing Materials	15
6.20.8 Other Interior Observations	15
7.00 REGULATORY AGENCIES	15
7.10 FEDERAL AGENCY DATABASES	16
7.20 STATE AGENCY DATABASES	17
7.30 REGULATORY AGENCY INQUIRIES	19
7.30.1 Milwaukee City Clerk	19
7.30.2 Wisconsin Department of Natural Resources File Review	19
7.40 CREDENTIALS	19
8.00 INTERVIEWS	20
9.00 FINDINGS AND CONCLUSIONS	20
10.00 LIMITATIONS	24

FIGURES

FIGURE NO. 1	Site Location Map
FIGURE NO. 2	Site Plan

ATTORNEY-CLIENT WORK PRODUCT
PRIVILEGED AND CONFIDENTIAL

PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT
BOSTIK FINDLEY
2930 WEST CENTER STREET
MILWAUKEE, WISCONSIN

TABLE OF CONTENTS



Page

APPENDICES

APPENDIX A	Limitations
APPENDIX B	Site Photographs
APPENDIX C	EDR Radius Map With GeoCheck® Report

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1.00 INTRODUCTION

1.10 PROJECT AUTHORIZATION



This report presents the results of a Phase I Environmental Site Assessment (ESA) conducted by GZA GeoEnvironmental, Inc. (GZA) for Foley & Lardner (Foley) on behalf of Bostik Findley (Client) at the Bostik Findley site located at 2930 West Center Street in Milwaukee, Wisconsin (Site). Authorization to proceed on this project was granted in accordance with our Proposal No. 20.000164.04, dated June 5, 2003.

1.20 PROJECT OBJECTIVE

The purpose of the Phase I ESA is to render an opinion whether information collected or visual observations of the Site indicates the presence of recognized environmental conditions¹ (RECs) at the Site. The scope of work for this project has been developed in general accordance with the "Standard Practice for ESAs: Phase I ESA Process," established by ASTM, designated E-1527-00.

1.30 SCOPE OF SERVICES

GZA's scope of services consisted of the following activities:

- Review of federal and state regulatory agency databases, identified by ASTM for the Site and a selected radius around the Site;
- Review of Site plans and diagrams provided by Site representatives, Foley and Client;
- Contact with local agencies to inquire about environmental conditions at the Site and in its vicinity;
- Review of Site history through available ASTM standard historical sources;

¹ ASTM E-1527-00 defines the term "recognized environmental conditions" to mean 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 term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term 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 government agencies.

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- Review of previous studies conducted by others for the Site;
- A Site reconnaissance to make surficial observations for evidence of RECs;
- A vicinity reconnaissance of properties within ¼-mile of the Site;
- Observation of adjoining properties from the Site to identify the potential use of hazardous materials;
- Interviews with a key Site manager regarding current and past Site usage and operations; and
- Preparation of this report of our findings.

This report presents GZA's field observations, results and opinions and is subject to modification if subsequent information is developed by GZA or by any other party. This report is subject to the Limitations presented in Section 10.00 and Appendix A.

2.00 BACKGROUND SITE INFORMATION

The following information was obtained during GZA's reconnaissance and from interviews with people knowledgeable about the Site, including Site personnel. Additional information on Site use, area observations and activity at the Site is contained in Section 6.00.

2.10 SITE LOCATION

The Site is located in the City of Milwaukee, within the SE ¼ of the NE ¼ of Section 13 of Township 7 North, Range 21 East, Milwaukee County, Wisconsin (see Figure No. 1).

2.20 SITE DESCRIPTION

The Site consists of three adjoining parcels. The first parcel, containing the main facility and a covered parking area (a total of approximately 38,600 square feet of floor space), is approximately 39,000 square feet. The second parcel contains an approximately 6,000 square-foot warehouse building with an outdoor dock and storage area of approximately 16,000 square feet. The third parcel, located between the first and second parcels, contains

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a leased building with two levels totaling approximately 4,800 square feet of floor space with a footprint of approximately 3,700 square feet. A Site Plan is provided as Figure No. 2.



2.30 CURRENT SITE USE

As of July 31, 2003, the Site is closed. The Site was utilized as a manufacturer of hot melt adhesives until July 1, 2003. The manufacture process involved combining wax, resin and polymers at elevated temperatures. The finished product was stored in the on-Site warehouse for shipment. Shipping and limited warehousing activities associated with the finished product were also conducted at the Site.

According to the Site contact, the hot melt process equipment has been removed from the Site. In addition, Client is in the process of removing all equipment from the Site.

2.40 ADJOINING PROPERTIES USE

The Site is bordered to the north by residential properties. North 30th Street borders the Site to the west, beyond which is a We Energies, Inc. substation building. Center Street borders the Site to the south, beyond which are residential and commercial properties. North 29th Street borders the Site to the east, beyond which are residential properties.

2.50 AREA USE

The general area in the vicinity of the Site is a heavily developed, high-density area within the city of Milwaukee and contains a number of residential, commercial and industrial properties.

2.60 SITE UTILITIES

The Site is serviced with public electrical, natural gas and water utilities, and a municipal sewage system.

3.00 REGIONAL GEOLOGICAL AND HYDROGEOLOGICAL CONDITIONS

The following sections present the prominent surficial and natural subsurface features contributing to the environmental setting in the area of the Site.

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3.10 TOPOGRAPHY AND SURFACE WATER CHARACTERISTICS

Based on review of the United States Geological Survey (USGS) Topographic Map for Milwaukee, Wisconsin, the Site elevation is approximately 670 feet above Mean Sea Level (MSL). The closest large water body is the Milwaukee River, located approximately 3 miles east/southeast of the Site. The general Site area has very little topographic relief, but slopes gently east toward the Milwaukee River and Lake Michigan. The local area topography is presented on Figure No. 1.

Storm and surface water flow in the vicinity of the Site is toward the Milwaukee River and Lake Michigan via surface flow and the stormwater sewer system.

3.20 GEOLOGY AND GROUNDWATER CHARACTERISTICS

Shallow soil in the general Site area consists of poorly-drained, Morley series silty loams. The underlying unconsolidated deposits may be up to 100 feet thick in the Site vicinity and are underlain by Devonian-age carbonate bedrock. Based on information obtained from the Environmental Data Resources, Inc. (EDR) Radius Map, the Site is located in the Devonian system.

The Site is within the City of Milwaukee water service area. The City of Milwaukee water supply is obtained from Lake Michigan. Shallow groundwater is likely contained within perched zones in the unconsolidated soils and groundwater flow is estimated to be southeast.

4.00 HISTORICAL USE INFORMATION

Site history was developed from ASTM standard historical sources, available files and interviews with people familiar with the Site. A list of representatives interviewed is included in Section 8.00.

4.10 SITE AND AREA HISTORY SUMMARY

The Site was originally developed as a food company and residential properties. A creamery operated on the western portion of the Site from the late 1800s or early 1900s until the 1960s, when Findley Adhesives began operations.



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A printing company operated on the leased portion of the Site from the 1960s to mid-1990s. A laundry was located on the leased portion of the Site from at least the 1930s until the 1960s.



The surrounding area began development in the late 1800s, as a primarily residential area with limited industrial development.

4.20 CITY DIRECTORIES REVIEW

GZA visited the Milwaukee Library to review city directories for the Site. City directories were reviewed in approximately five-year intervals from 1920 until 2001. Please note that the Site has historically consisted of several properties. City directories revealed the following information related to the properties that make up the Site, as well as surrounding properties:

4.2.1 2930 West Center Street

Bostik Findley, ATO Findley, or Findley Adhesives are listed at 2930 West Center in the city directories reviewed from 1975 until 2001. A frozen foods wholesaler/grocer is listed from 1950 until 1970. A creamery/dairy food producer is listed at the address from 1930 until 1945. Zimmerman Soft Drinks is listed at the address in the 1921 city directory.

4.2.2 2918 West Center Street (Leased Portion of the Site)

There is no listing in the 2001 city directory for 2918 West Center Street. A printing company is listed at the address from 1965 until 1996. A laundry was listed at the address from 1930 to 1960.

4.2.3 2914 West Center Street

There is no listing for 2914 West Center Street in the city directories reviewed from 1985 to 2001. The address is listed as residential and/or an insurance/real estate office from 1930 to 1980.

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4.2.4 2910 West Center Street

There is no listing for 2910 West Center Street in the city directories reviewed from 1985 to 2001. The address is listed as residential and/or a tavern from 1935 to 1980.

4.2.5 2904 West Center Street

There is no listing for 2904 West Center Street in the city directories reviewed from 1985 to 2001. The address is listed as residential from 1935 to 1980.

4.2.6 Neighboring Properties

An auto salvage/recycler is listed at 3015 West Center Street from 1980 to 1996. A fuel company (coal and oil) is listed at 3019 West Center Street from 1921 to 1970. A chair manufacturer is listed at 3022 West Center Street from 1921 to 1965.

4.30 HISTORIC MAP REVIEW

A request was made to EDR to search for copies of historic maps, such as Sanborn Fire Insurance Maps (Sanborn Maps), available for the Site and adjoining properties. EDR provided Sanborn Maps from 1894, 1910, 1951 and 1969 for the Site, which revealed the following:

- 1894 - A single building, which appears to be a residential structure, is present on the Site. Milwaukee Chair Company is present west of the Site. The remaining area surrounding the Site is sparsely developed, primarily with residential structures.
- 1910 - The Site is subdivided into several (approximately 15 to 20) smaller lots. There are eight buildings present on the Site. There is no indication that manufacturing was conducted on the Site. Milwaukee Chair Company is present west of the Site and Center Street Fuel Company is present southwest of the Site. The remaining area surrounding the Site is primarily developed with residential structures.
- 1951 - Lambrecht Foods and Creamery is present on the western portion of the Site. A fuel oil tank and a gasoline tank are depicted in the northeast interior of Lambrecht Foods. Several smaller buildings are present on the Site east of the



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Creamery. Milwaukee Chair Company is present west of the Site and Center Street Fuel Company is present southwest of the Site. The remaining area surrounding the Site is primarily developed with residential/commercial structures.



- 1969 - Similar to 1951, except Milwaukee Chair Company is not identified west of the Site.

4.40 AERIAL PHOTOGRAPH REVIEW

Aerial photographs dated 1963, 1967, 1970, 1975, 1980, 1985, 1990, 1995 and 2000, were provided by the Southeastern Wisconsin Regional Planning Commission. Due to the quality and scale of the photographs, Site boundaries and details are not completely discernible, however, the aerial photographs indicated the following features:

- 1963 - The Creamery building and the laundry/printing facility are present on the Site. Residential structures are present on the southeast and northwest portions of the Site. There is a significant industrial facility (apparently Milwaukee Chair Company) west of the Site.
- 1967 - No significant changes from the 1963 aerial photograph are present.
- 1970 - The former industrial development west of the Site is no longer present. No other significant changes from the 1963 aerial photograph are present.
- 1975 - No significant changes from the 1970 aerial photograph are present.
- 1980 - The property west of the Site has been redeveloped with an apparently commercial/industrial structure. No other significant changes from the 1970 aerial photograph are present.
- 1985 - The residential structure on the northwest portion of the Site is no longer present. Additionally, several of the residential structures on the southeast portion of the Site are no longer present (two residential structures remain).
- 1990 - No significant changes from the 1985 aerial photograph are present.

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- 1995 - The indoor parking structure on the northwest portion of the Site is present. No other significant changes from the 1985 aerial photograph are present.
- 2000 - The two residential structures on the southeast portion of the Site are no longer present. The warehouse building on the southeast portion of the Site is present. Outdoor storage near the warehouse building is evident.

4.50 TITLE SEARCH AND HISTORY OF OWNERSHIP

GZA was not requested to obtain an abstract of title or environmental liens report for review.

4.60 BUILDING DEPARTMENT RECORDS

GZA personnel reviewed available City of Milwaukee inspection and permit records. The following information related to underground storage tanks (USTs) was obtained. The disposition of the USTs is discussed in greater detail in Sections 5.00 and 6.00.

- A permit dated April 23, 1929, for the installation of two 280-gallon gas tanks in the Lambrecht Creamery garage building was reviewed. Based on a handwritten note on the permit, it appears that these tanks were USTs.
- A permit dated June 8, 1981, for the installation of an 8,000-gallon storage tank was reviewed. The tank was apparently a UST installed for mineral oil storage.
- A permit dated November 20, 1995, for UST removal was reviewed. The permit was for the excavation, cleaning, removal and disposal of two 500-gallon USTs.
- A permit dated March 3, 1998, for UST removal was reviewed. The permit was for the excavation, cleaning, removal and disposal of one 550-gallon fuel oil UST.

4.70 KEY SITE MANAGER AND OTHER INFORMATION

Mr. Geoff Pyka, Environmental Coordinator with Bostik Findley's Corporate Environmental, Health and Safety Department, provided the following information to GZA:

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- Adhesive manufacturing operations were conducted at the Site from the 1960s to July 1, 2003.
- The floors are cleaned once a week with a degreaser. A citrus-based degreaser is currently being utilized at the Site.
- There are several floor drains in the manufacturing portion of the main building. The northernmost floor drain empties into two large crocks, reportedly constructed of concrete, in the basement of the main building. Water collected in the crocks is reportedly periodically pumped out and properly disposed of off-Site. The remaining floor drains are connected to the sanitary sewer system.
- Cooling water at the Site is discharged into the subbasement of the main building. Water collected in the subbasement is reportedly periodically pumped out and properly disposed of off-Site.
- The portion of the building currently housing the maintenance area was formerly a printing company and is leased by Bostik Findley.
- Water related to floor cleaning in the former print shop area drains into the basement. Water collected in the basement of the former printing company is reportedly periodically pumped out and properly disposed of off-Site.
- Several asbestos abatement mobilizations have been conducted at the Site. There is the potential that the boiler wrap on the boilers in the subbasement (no longer utilized) may contain asbestos.
- In the past, it was alleged that a UST related to a former residential structure may exist near the northeast corner of the print company building. This rumor is apparently based only on the fact that a residence previously existed at that location, and it may have had a fuel oil tank. There is no evidence that the residence utilized fuel oil for heating purposes and a 1996 electromagnetic survey did not find evidence of a UST.

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5.00 PREVIOUS SITE INVESTIGATIONS

GZA reviewed the following previous environmental documents associated with the Site:



- All American Environmental Specialists, Project Log, Findley Adhesives 2930 West Center Street, Milwaukee Wisconsin 53210, October 12, 1995.

All American Environmental Specialists (AAES) conducted asbestos abatement activities in 1995. The abatement activities consisted of the removal of visible, assessable asbestos-containing materials (ACMs) in the maintenance department, tank room and production area. The report does not reference an asbestos survey and does not state whether all asbestos was removed from the Site.

- CBC Environmental Services, A Report of an Underground Storage Tank Soil Assessment at Findley Adhesives, Milwaukee, Wisconsin, January 14, 1991.

CBC Environmental Services (CBC) supervised the removal of one 8,000-gallon mineral oil UST at the Site on October 29, 1990. The UST and associated piping were reportedly in good condition at the time of removal activities. Eight soil samples were collected and submitted to a laboratory for total petroleum hydrocarbon (TPH) analysis. TPH was not detected in any of the soil samples.

- Swanson Environmental, Inc., Report on Underground Storage Tank Removal, Site Investigation and Closure, Findley Adhesives, Inc., 2930 West Center Street, Milwaukee Wisconsin, March 25, 1996.

Swanson Environmental, Inc. (Swanson) removed two 300-gallon USTs that were previously abandoned in place. Additionally, Swanson excavated approximately 39 tons of visually-impacted soil. Additional excavation was not possible due to building constraints. Soil sampling results indicated that soil near the UST was impacted by volatile organic compounds (VOCs), most notably perchloroethylene (PCE) and trichloroethylene (TCE). Swanson conducted SESOIL modeling in order to predict the contaminant mobility in the unsaturated zone and determine whether the groundwater would likely be impacted by impacts to the soil. Based on results of the modeling, Swanson recommended no further action at the Site.

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- Braun Intertec, Tank Closure Report, ATO Findley, inc., Center Street Facility, 2930 West Center Street, Milwaukee, Wisconsin, April 1, 1998.

Braun Intertec (Braun) supervised the removal of one 550-gallon fuel oil UST at the Site. Two soil samples were collected, one beneath each end of the UST bed, and submitted for diesel-range organics (DRO) analysis. DRO was not detected in either of the soil samples.

- Midwest Geomar Geophysics, Electromagnetic Survey, Findley Adhesives, Inc. 2930 West Center Street, Milwaukee, Wisconsin, February 6, 1996.

Midwest Geomar Geophysics (Geomar) conducted an electromagnetic survey of the northeast corner of the former printing company building. The survey was conducted because it was rumored that a former fuel oil UST may have existed in the area. The survey did not positively identify a UST or an object large enough to be a UST.

6.00 SITE RECONNAISSANCE

The purpose of GZA's Site reconnaissance was to make surficial observations for evidence of RECs that could result in the presence of hazardous substances or petroleum products in the environment. GZA Senior Project Manager, Dr. Jay Karls, visited the Site. Selected photographs of portions of the Site are included in Appendix B. Observations were documented and are referenced in the text. A summary of each area assessed is presented below.

6.10 EXTERIOR OBSERVATIONS

The readily accessible periphery of the Site and those portions of the Site not occupied by structures were visually assessed for RECs.

6.10.1 Underground Storage Tanks

Fill pipes, which appeared to be related to current or former USTs, were noted on the western exterior of the production building. These fill pipes are reportedly related to the two 300-gallon and one 8,000-gallon USTs that have been previously removed. Additional evidence of USTs was not observed.

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6.10.2 Aboveground Storage Tanks

There is a bulk wax aboveground storage tank (AST) in the production area.



6.10.3 Chemical, Hazardous Substances, or Petroleum Products Use

Chemicals stored at the Site include various waxes, resins and polymers utilized in the adhesive manufacturing process. Additionally, drums of manufactured adhesive product were stored in the warehouse area. Drums of a citrus-based solvent, reportedly utilized for floor cleaning processes, were noted in the production area.

At the time of this Report, the Site contact indicated that all raw materials, chemicals, hazardous materials, petroleum products, plant waste and finished goods were in the process of being removed from the Site and transported to other Client facilities or properly disposed of off-Site.

6.10.4 Staining

Minor soil staining was observed on a grassy area in the northwest portion of the Site. An approximately 1-foot by 1-foot area of soil was stained with what appeared to be hardened fuel oil, or similar petroleum product. The stained area was directly below a fill pipe for a former UST, and is likely the result of historical minor spillage during fill operations.

6.10.5 Drywells and Sumps

Evidence of drywells and sumps was not observed.

6.10.6 Pits, Ponds and Lagoons

There are three crocks in the basement of the storage building. Two of the crocks, approximately 4 to 6 feet in diameter, contained a dark liquid with an oil-like odor, which was reportedly water related to the cleaning of the floors in the production area. A portion of the floor drains in the production area empty into the crocks. The third crock, approximately 3 to 5 feet in diameter, contained water with a waxy residue covering it. Due to the water in the crocks, the bottom of the crocks could not be observed, but is reportedly concrete.

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6.10.7 Wells

Surficial evidence of wells was not observed.

6.10.8 Solid Waste

Non-hazardous waste streams at the Site currently include general refuse, which is reportedly disposed in a landfill; cardboard and paper, which is recycled off-Site; and purge product, which is transported off-Site by Advanced Waste and incinerated at the American Ref-Fuel facility.

6.10.9 Process Wastewater

Surficial evidence of apparent process wastewater disposal was not observed. Water related to floor cleaning in the manufacturing area enters floor drains.

6.10.10 Septic System

Surficial evidence of septic systems was not observed.

6.10.11 Stressed Vegetation

A small area of stressed vegetation was observed related to the 1-foot by 1-foot stained area of soil in the northwest portion of the Site. The grass outside of that area was growing and appeared unstressed.

6.10.12 Soil and Water Sampling

No subsurface exploration or water sampling was included as part of GZA's Phase I ESA scope of services.

6.10.13 Oil-Water Separators

Evidence of oil/water separators was not observed.

6.10.14 Surface Water Runoff

Surface water exits the property via sheet flow or storm sewers, eventually entering Lake Michigan.



6.10.15 Other Exterior Observations

A pole-mounted transformer was noted west of the western exterior of the production building. The transformer was reportedly placed there by Wisconsin Electric (now known as We Energies) in the mid-1990s. Soil staining related to the transformer was not observed.

6.20 INTERIOR OBSERVATIONS

The interiors of the Site buildings were visually assessed for evidence of a release, use, storage, or generation of hazardous materials and petroleum product.

6.20.1 Construction

The Site consists of several interconnected buildings. Construction material utilized in the construction of Site buildings includes brick, steel and concrete. There is a partial basement and a subbasement beneath the production area, and a partial basement beneath the former print company building. The former printing building has two floors, and there is a partial second floor associated with the main (production) building. The indoor parking building and the warehouse building are single floor, slab-on-grade structures.

6.20.2 Heating and Cooling

The Site is heated via natural gas. The offices and the former printing company building are air-conditioned.

6.20.3 Current Site Use

The Site is closed, however, it was most recently utilized for the manufacture of industrial adhesives.

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6.20.4 Hazardous Wastes Generated and Waste Storage Areas

Hazardous wastes are reportedly not generated at the Site. Hazardous waste storage was not observed.

6.20.5 Stains or Corrosion

The floors of the production area were coated with varying thicknesses of a waxy substance, apparently related to the adhesive manufacturing process (spillage, atmospheric settling, etc.).

6.20.6 Floor Drains or Sumps

There are floor drains throughout the production area. The floor drains are utilized to collect water associated with floor cleaning. The northernmost floor drains empty into two large crocks in the basement of the main building. The remainder of the floor drains are connected to the sewer system.

6.20.7 Suspect Asbestos-Containing Materials

During our Site reconnaissance, GZA made casual observations for the presence of friable suspect ACMs. Readily apparent friable ACMs were not observed.

6.20.8 Other Interior Observations

The crocks, subbasement of the production building and basement of the former printing company building were flooded with approximately 1 to 3 feet of water, limiting inspection of the areas.

7.00 REGULATORY AGENCIES

The following sections are based on public information obtained from various federal, state and local agencies that maintain environmental regulatory databases. The primary databases provide information about the regulatory status of a property and incidents involving use, storage, spilling, or transportation of oil or hazardous materials. Information was gathered by GZA personnel and by a professional data search service, EDR. The EDR Radius Map with GeoCheck® report detailing the federal and state regulatory information is presented



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in Appendix C. A discussion of the information reviewed is presented in the following sections.

7.10 FEDERAL AGENCY DATABASES



ASTM standard databases, as defined below, were provided by EDR and reviewed by GZA. These reports and the search distances used to review these databases are presented below. Based on the initial database search results, additional supplemental federal databases were searched by EDR and are presented in Appendix C.

Database	Date	Radius Searched
National Priorities List (NPL) The NPL, or Superfund sites list, is the EPA's database of confirmed uncontrolled or abandoned hazardous waste sites identified for priority remedial actions under the Superfund program.	May 2003	1.00 mile
Proposed NPL	May 2003	1.00 mile
Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) The CERCLIS database is a compilation by the EPA of the sites, which the EPA has investigated or is currently investigating for a release or threatened release of hazardous substances.	March 2003	0.50 mile
CERCLIS No Further Remedial Action Planned (NFRAP) Database NFRAP sites are those facilities removed from the CERCLIS system.	March 2003	0.25 mile
RCRA Corrective Action Database (CORRACTS) The RCRA CORRACTS list is the EPA's list of treatment, storage, or disposal facilities subject to corrective action under RCRA.	March 2003	1.00 mile
Resource Conservation and Recovery Information System (RCRIS) Treatment, Storage and Disposal (TSD) Facility Database The RCRIS TSD Facilities database is a compilation by EPA of reporting facilities that store, treat or dispose of hazardous waste.	March 2003	0.50 mile

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Database	Date	Radius Searched
RCRIS Generator Database The EPA's RCRIS program identifies hazardous waste generators and tracks hazardous waste from the point of generation to the point of disposal. Facilities are identified as small quantity generators (RCRIS-SQG) or large quantity generators (RCRIS-LQG).	May 2003	0.25 mile
Emergency Response Notification System (ERNS) The ERNS list is a national database used to collect information on reported releases of oil and hazardous substances. The database contains information from spill reports made to federal authorities including the EPA, the U.S. Coast Guard, the National Response Center, and the Department of Transportation.	April 2003	Target Property

A review of the federal regulatory databases indicate the following:

- The Site is listed on the RCRIS-SQG and FINDS databases. The Site, identified as Bostik Findley, is listed as a SQG. Please note that Bostik Findley reportedly no longer generates hazardous waste. No violations were listed.
- Other SQGs listed within 1/8 mile of the Site include American Recycling and Auto at 3015 West Center Street and Bostik Findley at 3033 West Pemberton Avenue.

7.20 STATE AGENCY DATABASES

ASTM standard databases, as described below, were provided by EDR and reviewed by GZA. These reports and the search distances used to review these databases are presented below. Based on the initial database search results, additional supplemental state databases were searched by EDR and are presented in Appendix C.

Database	Date	Radius Searched
Wisconsin Hazard Ranking List (SHWS) SHSW is the state equivalent to CERCLIS where priority sites are identified for cleanup in the state of Wisconsin	April 2003	1.00 mile

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Database	Date	Radius Searched
Wisconsin Registry of Waste Disposal Sites (SWF/LF) The State Landfill is a list of solid and hazardous waste disposal sites located within the State of Wisconsin	May 2003	0.50 mile
Wisconsin Leaking USTs (LUST) The LUST database contains an inventory of reported LUST incidents in the state of Wisconsin	May 2003	0.50 mile
Wisconsin UST Report (UST) The UST database, provided by the Wisconsin Department of Commerce, is a listing of registered USTs within the State of Wisconsin	April 2003	0.25 mile
USTs on Indian Land (Indian UST) Indian UST contains an inventory of USTs located on Indian Land in the state of Wisconsin	May 2003	0.25 mile

A review of the state regulatory databases indicates the following:

- The Site is listed on the UST and LUST databases. The UST database lists an 8,200-gallon industrial UST, a 550-gallon fuel oil UST, a 300-gallon diesel UST and a 300-gallon gasoline UST. The USTs are listed as Closed/Removed. The LUST file, started in December 1995, is listed as open. The listing is for soil impacts related to a leaded gasoline UST. There is a note in June 1997, that closure, pending a deed restriction, has been approved. The deed restriction had not been submitted as of the date of the LUST database download to EDR.
- American Recycling and Auto, listed at 3015 West Center Street, is listed on the WI ERP database. Contamination was discovered in June 1991, and the listing is currently open. Based on the distance of American Recycling and Auto from the Site, the clay soil types in the area of the Site and the likely southeast groundwater flow direction, it is unlikely that impacts related to American Recycling and Auto represent a material liability to the Site.
- Bostik Findley, located at 3033 West Pemberton (Pemberton Facility) is listed on the LUST and WI ERP databases. The LUST listing is related to a former fuel oil tank, and is listed as closed. The WI ERP listing is related to chlorinated solvent impacts to the soil and groundwater. The status of the investigation is open. The

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listing includes a note, stating that an incomplete site investigation was received and more information is required. Based on the distance of the Pemberton Facility from the Site, the clay soil types in the area of the Site and the likely southeast groundwater flow direction, it is unlikely that impacts related to the Pemberton Facility represent a material liability to the Site.



7.30 REGULATORY AGENCY INQUIRIES

To obtain information concerning the possible release of hazardous material or oil at or near the Site, GZA contacted the Milwaukee City Clerk and conducted a file review at the Wisconsin Department of Natural Resources (WDNR), Southeast District Office.

7.30.1 Milwaukee City Clerk

GZA reviewed publicly accessible files at the City of Milwaukee. Information obtained is discussed in Section 4.60, Building Department Records.

7.30.2 Wisconsin Department of Natural Resources File Review

GZA conducted a file review at the WDNR, Southeast District Office. The file contained information relating the PCE and TCE soil impacts at the Site, including an investigation report, a SESOIL model and various correspondence. Included in the correspondence is a June 11, 1997 letter authored by the WDNR, stating that closure will be granted contingent on obtained a deed restriction related to the impacted soil that remain inaccessible at the Site.

7.40 CREDENTIALS

In accordance with ASTM E-1527 Section 11.12, the following credentials statements are provided for GZA and the Assessor for the Site. GZA is a full-service consulting firm providing environmental and geotechnical engineering services since 1964, and has extensive ESA expertise. The GZA representative responsible for completion of the Phase I ESA was Dr. Jay Karls. Dr. Karls is a Senior Project Manager with GZA with over nine years experience in environmental matters.

8.00 INTERVIEWS

GZA interviewed the following people as part of this Phase I ESA:

- Mr. Geoff Pyka, Environmental Coordinator with the Corporate Environmental Health and Safety group.

The information provided by Mr. Pyka is discussed and referenced in the text.

9.00 FINDINGS AND CONCLUSIONS

A Phase I ESA was conducted in general accordance with ASTM Phase I Standard Practice E 1527-00 at 2930 West Center Street in Milwaukee, Wisconsin. The Phase I ESA included a Site reconnaissance, a review of Site history, a review of selected local, state and federal regulatory records and interviews with persons and agencies familiar with the Site. The findings provided below are based on work conducted as part of this Phase I ESA.

- The Site consists of three adjoining parcels. The first parcel, which contains the main facility and a covered parking area (a total of approximately 38,600 square feet of floor space), is approximately 39,000 square feet. The second parcel contains an approximately 6,000 square-foot warehouse building with an outdoor dock and storage area of approximately 16,000 square feet. The third parcel, located between the first and second parcels, contains a leased building with two levels totaling approximately 4,800 square feet of floor space and with a footprint of approximately 3,700 square feet.
- There are several interconnected buildings on the Site. Material utilized in the construction of Site buildings includes brick, steel and concrete. There is a partial basement and a subbasement beneath the production area and a partial basement beneath the former print company building. The former printing building has two floors and there is a partial second floor associated with the main (production) building. The indoor parking building and the warehouse building are single floor, slab-on-grade structures.
- The Site was closed on July 31, 2003. The Site was utilized as a manufacturer of hot melt adhesives from the 1960s until July 1, 2003. The manufacture process

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involved combining wax, resin and polymers at elevated temperatures. The hot metal process equipment has reportedly been removed from the Site. Shipping and limited warehousing activities were also conducted at the Site. Client is reportedly in the process of removing all equipment from the Site.



- The Site is bordered to the north by residential properties. North 30th Street borders the Site to the west, beyond which is a We Energies substation building. Center Street borders the Site to the south, beyond which are residential and commercial properties. North 29th Street borders the Site to the east, beyond which are residential properties.
- The southwest portion of the Site was originally developed as a food company and residential properties. A creamery operated on the western portion of the Site from the late 1800s or early 1900s, until the 1960s, when Findley Adhesives began operations.
- A printing company operated on the leased portion of the Site from the 1960s to mid-1990s. A laundry was located on the leased portion of the Site from at least the 1930s until the 1960s.
- The surrounding area began development in the late 1800s, as a primarily residential area, with limited industrial development.
- Historically, it was alleged that a UST related to a former residential structure may exist near the northeast corner of the print company building. This rumor is apparently based only on the fact that a residence previously existed at that location, and it may have had a fuel oil tank. There is no direct evidence that the residence utilized fuel oil for heating purposes. Geomar conducted an electromagnetic survey of the northeast corner of the former printing company building to determine whether a former fuel oil UST existed in the area. The survey did not positively identify a UST or an object large enough to be a UST.
- A permit dated June 8, 1981, for the installation of an 8,000-gallon storage tank was reviewed. The tank was apparently a UST installed for mineral oil storage. CBC supervised the removal UST on October 29, 1990. The UST and associated piping were reportedly in good condition at the time of the removal activities. Eight soil

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samples were collected and submitted to a laboratory for TPH analysis. TPH was not detected in any of the soil samples.



- A permit dated March 3, 1998, for the excavation, cleaning, removal and disposal of one 550-gallon fuel oil UST was reviewed. Braun supervised the removal of the 550-gallon fuel oil UST. Two soil samples were collected, one beneath each end of the UST bed, and submitted for DRO analysis. DRO was not detected in either of the soil samples. Please note that a permit related to the installation of the fuel oil UST was not available for review.
- A permit dated April 23, 1929, for the installation of two reportedly 280-gallon gas tanks in the Lambrecht Creamery garage building was reviewed. Based on a handwritten note on the permit, it appears that these tanks were USTs.
- A permit dated November 20, 1995, for the excavation, cleaning, removal and disposal of two 500-gallon USTs was reviewed. Based on the date of the permit and the reported contents and location of the USTs, it appears that the permit was for the removal of the approximately 300-gallon USTs installed in 1929. Swanson removed two approximately 300-gallon USTs that were previously abandoned in place. Impacts were noted during the excavation of the two approximately 300-gallon USTs.
- Swanson removed two 300-gallon USTs that were previously abandoned in place. Additionally, Swanson excavated approximately 39 tons of visually-impacted soil. Additional excavation was not possible due to building constraints. Soil sampling results indicated that soils near the UST were impacted by VOCs, most notably PCE and TCE. Swanson conducted SESOIL modeling in order to predict the contaminant mobility in the unsaturated zone and determine whether the groundwater would likely be impacted by impacts to the soils. Based on the results of the modeling, Swanson recommended no further action at the Site.
- GZA conducted a file review at the WDNR, Southeast District Office. The file contained information relating the PCE and TCE soil impacts at the Site, including an investigation report, a SESOIL model and various correspondences. Included in the correspondence is a June 11, 1997 letter authored by WDNR, stating that

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closure will be granted, contingent on obtaining a deed restriction related to the impacted soils that remain inaccessible at the Site.



- A small area of soil staining was observed on a grassy area of the northwest portion of the Site. An approximately 1-foot by 1-foot area of soil was stained with what appeared to be hardened fuel oil or a similar petroleum product. The stained area was directly below a fill pipe for a former UST, and is likely the result of historical minor spillage during fill operations. Stressed vegetation was observed related to the soil staining. There is no grass growing in the 1-foot by 1-foot stained area of soil, and the grass outside of that area was growing and appeared unstressed.
- There are several floor drains in the manufacturing portion of the main building. The northernmost floor drain empties into two large crocks in the basement of the main building. The crocks were observed to contain a dark liquid with an oil-like odor. There is a smaller, third crock in the basement as well. Water with a waxy residue on the water surface was observed in the third crock. The crocks are reportedly constructed of concrete. The water that is collected in the crocks is reportedly periodically pumped out and properly disposed of off-Site.
- A pole-mounted transformer was noted west of the western exterior of the production building. The transformer was reportedly placed there by Wisconsin Electric (now known as We Energies) in the mid-1990s. Soil staining related to the transformer was not observed.
- Several asbestos abatement mobilizations have been conducted at the Site. There is the potential that the boiler wrap on the boilers in the subbasement (no longer utilized) may contain asbestos. During our Site reconnaissance, GZA made casual observations for the presence of friable suspect ACMs. Readily apparent friable ACMs were not observed.

We have performed a Phase I ESA in general conformance with the scope and limitations of ASTM Practice E-1527 of the Site located at 2930 West Center Street in Milwaukee, Wisconsin. There were no noteworthy exceptions to, or deletions from the ASTM practice. The ESA has revealed the following evidence of RECs in connection with the Site:

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1. There is the potential that limited ACMs are present in the building, particularly related to the boiler wrap. The potential ACMs represent an REC.
2. VOCs, particularly PCE and TCE, were discovered during the excavation of the two 300-gallon USTs. Soil impacts were reported to the WDNR, and the investigation is currently open, pending the submittal of a deed restriction (or GIS registration). The soil impacts and associated historical use of chemical at the Site represents an REC.
3. There is a small area of stained soil and stressed vegetation on the northwest portion of the Site, which represents an REC.

10.00 LIMITATIONS

GZA's Site assessment was performed in accordance with generally accepted practices of other consultants undertaking similar studies at the same time and in the same geographical area, and GZA observed the degree of care and skill generally exercised by other consultants under similar circumstances and conditions. GZA's findings and conclusions must be considered not as scientific certainties, but rather as our professional opinion concerning the significance of the limited data, gathered during the course of the environmental Site assessment. No other warranty, express or implied, is made. Specifically, GZA does not and cannot represent that the Site contains no hazardous material, oil or other latent condition beyond that observed by GZA during its Site assessment. This report is also subject to the specific limitations contained in Appendix A.

This study and report have been prepared on behalf of and for the exclusive use of the Client, solely for use in an environmental assessment of the Site. This report and the findings contained herein shall not, in whole or in part, be disseminated or conveyed to any other party, nor used by any other party in whole or in part, without the prior written consent of the Client.