Phase I Environmental Site Assessment

Century Casting Corporation 1200 East 15th Street Neillsville, Wisconsin

Prepared for:

Century Casting Corporation Neillsville, Wisconsin

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Executive Summary

Century Casting Corporation retained Ayres Associates to conduct a Phase I Environmental Site Assessment (ESA) of the Century Casting Corporation facility at 1200 East 15th Street in Neillsville, Wisconsin. The property is in the NE ¼ of the NE ¼ in Section 14, T24N, R2W, City of Neillsville, Clark County, Wisconsin. The facility is referred to as the subject facility in this Phase I ESA report.

This report has been prepared following procedures established by the American Society for Testing and Materials (ASTM). The ASTM publication that documents the ESA procedures is entitled *E1527-97 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.* The scope of services is in Appendix A.

The following summary of findings is based on our site reconnaissance visit, document review, and interviews conducted during this ESA:

- The subject facility is a low- and medium-volume gray and ductile iron foundry, Standard Industrial Classification (SIC) code 3321, and has been operated as such since 1970. Century Casting Corporation purchased the foundry assets in 1998. Century Casting Corporation leases the property from O'Neill Industries. At the time of purchase, the foundry was in a state of disrepair after the eviction of the previous owner. After renovating the foundry, Century Casting Corporation poured their first casting in January 1999.
- The foundry is located on a 40-acre parcel owned by O'Neill Industries. The foundry is an approximately 44,000-square-foot block and metal frame building. This ESA addresses the area of the current foundry operation, which is approximately 4.5 acres. This ESA does not address the entire 40-acre parcel.
- Waste foundry sand was historically dumped on the property on the south side of the building. The waste sand was dumped from approximately 1970 to 1996. The previous owner of the foundry, Mr. Charles Armitage, was notified in 1982 by the Wisconsin Department of Natural Resources (WDNR) that waste foundry sand could no longer be dumped on site and must be disposed of at a landfill. Due to Mr. Armitage's lack of compliance, the Wisconsin Department of Justice intervened and allowed Mr. Armitage a monetary settlement. In return, Mr. Armitage was absolved of environmental liability associated with the property. The WDNR has since taken the lead in evaluating the environmental impact of the foundry sand dumped on the property. The current owner of the foundry, Century Casting Corporation, has no liability for the foundry sand previously dumped on the property.
- Waste foundry sand currently produced by Century Casting Corporation is legally disposed of by Superior Services.
- The WDNR is in the process of conducting a Supplemental Site Investigation and Remedial Action Options Analysis at the site to address the solid waste issue. The results of additional soil and ground water testing to be conducted at the site will determine the ultimate remedial action at the site.
- Potential buyers of the property would assume the responsibility for the long-term operation and maintenance associated with the landfill. The WDNR currently

envisions some type of capping at the facility and that the site could ultimately reach no further action status. If that is the case, long-term operation and maintenance may be minimal.

 Hazardous substance use and containers at the foundry consist primarily of chemical bonding agents used to produce molds and cores. The chemical bonding agent material is delivered and stored in 55-gallon drums at the foundry. The chemical binding agents include the following:

> Part 1 binding agent (Liquid Phenolic Resin) Part 2 binding agent (Liquid Isocyarate Resin) A catalyst (Pyridine Solution)

Several 55-gallon drums of the chemical bonding agents and catalyst are present at the foundry. According to Century Casting Corporation personnel, the entire contents of the drums are ultimately utilized. No disposal of residual material as waste is required.

- In some processes, the catalyst used is amine gas, a mixture of nitrogen and dimethylethylamine. Several cylinders of the two gases used for the amine gas mixture are present in the foundry.
- Various other hazardous substances are present at the foundry including the following:

One 55-gallon drum and three 5-gallon pails of liquid parting agent called Zip Stik

One 55-gallon drum of fire retardant hydraulic fluid (Glycol FR Fluid)

Several bags of resin coated sand

One 55-gallon drum of diesel fuel is present just inside the south shop door

One propane tank is present on the southwest side of the building

All of these substances are consumed in the process of use. No waste disposal of these materials is required. No secondary containment for these products is present. Secondary containment, particularly for the 55-gallon drum of diesel fuel, is advisable.

- General housekeeping at the facility is good. No evidence of spills or mishandling of containers was visible.
- Two induction furnaces are present at the foundry. One is a 9-ton ABB and the other
 is a 1,500-pound Pillar. Both furnaces are operational; however, only the 1,500pound Pillar is currently being used. Several larger capacitors are required to
 provide electrical power to the furnaces and are located in the electrical control room.
 According to Century Casting Corporation personnel, the capacitors are PCB-free.

- A diesel fuel spill occurred at the facility on March 31, 1999, near the southwest corner of the building. Approximately 80 to 90 gallons were released from a 250gallon aboveground storage tank into the gravel drive area. The contaminated gravel was excavated and disposed of at the Jackson County biopile. After the excavation, the WDNR required no further action for the spill. Vandalism is suspected as the cause of the spill. The aboveground tank has since been removed.
- Two former 10,000-gallon leaded gasoline underground storage tanks have been identified at the Neillsville School District Bus Garage. The bus garage is adjacent to the subject facility north across East 15th Street. The tanks were removed in 1990 or 1991. The bus garage site was not identified in the WDNR Leaking Underground Storage Tank (LUST) data base and were presumably clean closures when the tanks were removed.
- One LUST site has been identified within 0.5 mile of the subject property. The Neillsville City Cemetery site is approximately 2,000 feet west-northwest of the subject facility and has been closed by the Wisconsin Department of Commerce (COMM). This site presents minimal environmental risk to the subject facility.
- Two landfills have been identified in the vicinity of the subject facility. The Registry of Waste Disposal Sites in Wisconsin lists both an active and inactive City of Neillsville site in the NW ¼ of the SE ¼ of Section 12, Township 24 North, Range 2 West. The SE ¼ of Section 12 is at least 3,000 feet east-southeast of the subject facility. These sites are more than 0.5 mile from the subject facility and present minimal environmental risk to the subject facility.
- A search of the Environmental Protection Agency (EPA) Hazardous Waste Data
 Resource Conservation and Recovery Information System (RCRIS) data base
 identified the subject facility as a conditionally exempt small quantity generator under
 Mr. Armitage's operation. According to Wendy Anderson, WDNR, the classification
 was due to the presence of a parts washer. The current owners, Century Casting
 Corporation, do not have a parts washer and are not classified as a waste generator.
 Ms. Anderson knew of no other hazardous waste issues associated with the current
 operation of the foundry.
- A search of the Environmental Protection Agency (EPA) Aerometric Information Retrieval System (AIRS) data base identified the subject facility as a point source for air pollution emissions.
- According to Mr. Tom Ponty, WDNR, the subject facility is classified as a minor air emission source and needs to follow up on several air permitting requirements including the following:

Submit the State Only Operation Permit (if it has not been done already)

Submit a Malfunction Prevention and Abatement Plan

Submit the 1999 Annual Air Emissions Inventory

The City of Neillsville's public water/sewer system is available in the area.

Ayres Associates has performed a Phase I ESA, in conformance with the scope and limitations of ASTM Practice E 1527-97, on the Century Casting Corporation facility at 1200 East 15th Street in Neillsville, Wisconsin. Any exceptions to, or deletions from, this practice are described in the "Limitations and Exceptions of Assessment" section of this report.

This Phase I ESA revealed the following recognized environmental conditions on the subject property:

- Waste foundry sand has been dumped by former operators on the property for 25 years or more. The dumping has resulted in the WDNR assigning the site landfill status. The extent and degree of environmental impact of the foundry sand is not known and is currently under investigation by the WDNR.
- Remedial action required at the site is not known at this time and could potentially lead to long-term operation and maintenance of the foundry sand landfill. Potential buyers of the property would become responsible for operation and maintenance of the landfill upon purchase.