



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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February 27, 2006

Ms. Helen E. Goldberg
1550 11th Avenue
Grafton, WI 53024

Subject: Voluntary Party Liability Exemption (VPLE) Phase I and Phase II Review for the former Plymouth Foundry property, 1019 N. 11th Avenue, Grafton, WI
WDNR FID#246148100 BRRTS#06-46-544458

Dear Ms. Goldberg:

The Wisconsin Department of Natural Resources (the Department) has received and reviewed the VPLE application and letter report dated October 24, 2005 submitted on your behalf by Alpha Terra Science. We have also reviewed the following previously submitted documents:

Phase I and Phase II Environmental Site Assessment prepared by Key Environmental Services, Inc., June 24, 1993

Former Plymouth Foundry Additional Soil VOC Investigation Results, report dated September 6, 2002, prepared by Alpha Terra Science

Case Closure Summary: BRRTS#02-46-189401 and #02-46-189396, Former Plymouth Foundry, report dated May 18, 2000 prepared by Alpha Terra Science, Inc.

Case Closure: BRRTS#02-46-189401 and BRRTS#02-46-189396 Former Plymouth Foundry, report dated May 28, 2004 prepared by Alpha Terra Science

Case Closure and GIS Packet Submittal: BRRTS#02-46-189401 and BRRTS#02-46-189396, Former Plymouth Foundry, dated June 24, 2004 prepared by Alpha Terra Science

Although investigation of contaminant releases related to former underground and above-ground storage of petroleum products at this property has been completed, participation in the VPLE program will require a more thorough investigation of potential contamination based on historic use of the property, recognized environmental concerns and the potential for releases of hazardous substances into structures, into the ground or groundwater at the property. Based on our review of available information, we are requesting that the following information be provided.

Phase I Report – The Department requires submittal of an updated Phase I investigation. The following items will need to be addressed:

- A more thorough discussion regarding historic use of the property including a timeline of occupants and a description of their business operations at the property. Clarify when Plymouth Foundry and Machine Company ceased operations. One report says operations ceased in approximately 1980 (10/24/05 VPLE application/report) while the Sept. 13, 2004 "Additional Historic Information" letter states that foundry operations ceased in 1968.
- Include a discussion of Plymouth Foundry's manufacturing operations, use of raw materials, waste generation, waste storage and discuss processes, i.e. rolling mill, wheelabrator, tumbling mill, grinding wheels, acid tanks? Source of PCBs, heavy metals, cyanide contamination in dust collected from foundry?
- Provide information on the current condition of the property – both inside and out (and pole building) including identifying exterior doors, concrete pads, location of sewer connections, floor drains, condition of floors, stains, location of pits, oil reservoirs, status of asbestos containing material identified previously, presence of machinery, hazardous substances, stressed vegetation, etc.
- Provide disposal information regarding asbestos, dust and/or other hazardous materials removed from the property since the 1993 Phase I report.
- The Department's solid and hazardous waste database (SHWIMS) contains hazardous waste manifest records for EPA ID: WIT560010415, Rexnord Plastics Division/Former Plymouth Foundry at 1019 N. 11th Ave., Grafton. Listed are six manifest records from 1993 for Non-listed ignitable wastes; one record from 1992 listed as benzene; and one record dated 6/14/1983 for spent halogenated solvents used in degreasing. Please discuss both the source of waste and generator information. Was Rexnord Plastics leasing the property (Rexnord Senn Tool?) in 1983?
- Please discuss municipal records review. Information obtained from WDNR Tecumseh Products File FID#246009170 indicates that site information may be available in municipal records (that is in addition to the tank permits that were included in the Phase I report). Were insurance maps reviewed? Are historic facility maps or building plans available?
- Based on the revised Phase I investigation, identify recognized environmental concerns (RECs). Your assessment should include evaluating the following:
 - Transformer – current and former – PCBs?
 - Other sources of PCBs, generators, hydraulics?
 - Foundry sand fill identified in numerous soil borings throughout property
 - Drain vaults, pits
 - Dust accumulation/disposal areas?
 - Locations outside doors, loading docks, beneath vents, materials handling areas, rail spur
 - Asbestos in soil – vicinity of former ASTs on west side of property?
 - Storm sewer catch basins.
 - Elevator pit
 - Sumps, oil reservoirs and underground pipes
 - Acid bath?

Waste storage, raw product storage locations
Degreasers

- Please update a site map that identifies all above-ground and underground storage tanks by number and match to a corresponding numbered list with tank description/removal dates. Also identify all other RECs on a site map.

Based on the results of the revised Phase I review, submit a Phase II sampling plan to evaluate identified RECs. Include rationale for sample parameters and depths as well as sample locations. At a minimum, you will be expected to assess soil conditions near doors, loading docks, beneath dust collectors, vents, foundry sand fill, beneath pits, degreasers, etc.

Completion of a thorough Phase I and Phase II investigation is important given the long history of industrial use of this property. Please feel free to contact me, or have your environmental consultant contact me at (920) 892-8756 ext. 3025 with any questions or concerns regarding this letter. The Department appreciates your participation in the VPLE program and we look forward to working with you as you move through the VPLE process.

Sincerely,

Nancy D. Ryan, Hydrogeologist
Remediation and Redevelopment

Cc: SER site file
Ken Ebbott, Alpha Terra Science 1237 S. Pilgrim Road, Plymouth, WI 53073