



07-09-547883 File  
State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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August 23, 2006

BRRTS No. 07-09-547883  
FID No. 609077590

MR. JOHN GRYZBOWSKI  
PDM BRIDGE, LLC  
2800 MELBY STREET  
EAU CLAIRE, WI 54703

**Subject: Clarification of Environmental Liability and Present Environmental Status of the PDM Bridge, LLC Site, 2800 Melby Street, City of Eau Claire, Chippewa County, Wisconsin**

Dear Mr. Gryzbowski:

**Purpose**

The purpose of this letter is to provide you with clarifications regarding the current environmental status and the need for additional environmental investigation at the PDM Bridge, LLC site located at 2800 Melby Street, Eau Claire, Wisconsin. The PDM Bridge, LLC site consists of approximately 61 acres and is located in a part of the North  $\frac{1}{2}$  of the Southeast  $\frac{1}{4}$  of Section 33, Township 28 North, Range 9 West, City of Eau Claire, Chippewa County, Wisconsin, referred to hereinafter in this letter as "the Property". The Property is located in an industrial park on the north side of the City of Eau Claire.

**Request**

You have requested that the Wisconsin Department of Natural Resources ("the Department") review limited sections of a Phase I Environmental Site Assessment report and the entire Phase II Environmental Site Assessment report, with a determination whether further response actions are needed based on the release or presence of one or more hazardous substances, in accordance with the NR 700 series, Wis. Adm. Code. The Department received the appropriate fee for review of the report and drafting of a *general liability clarification letter*, pursuant to s. NR 749.04 (1), Wis. Adm. Code.

Determinations made by the Department in this letter are based solely on the review of information contained in the following submittals:

- "Phase I Environmental Site Assessment, PDM Bridge Site, 2800 Melby Street, Eau Claire, Wisconsin" prepared by Ayres Associates and dated August 2001.
- "Phase II Environmental Site Assessment, PDM Bridge Site, 2800 Melby Street, Eau Claire, Wisconsin" prepared by Ayres Associates and dated November 2001.

### **Summary of Environmental Conditions**

Based on information contained in the aforementioned reports, the Property is home to PDM Bridge, Inc., a steel fabricator capable of producing steel components for the most complex bridge structure. A steel fabrication plant (f.k.a. Phoenix Steel, Inc.) has operated on the Property since the late 1960s. The Property contains seven main steel-framed buildings with metal siding used for steel fabrication, painting, maintenance shop, and material storage and two brick-and-block buildings used as an administrative office and scale office. The buildings cover approximately 10% of the total acreage while the remainder of the Property is used for open storage of tractor trailers, equipment, raw materials, and finished products.

Ayres Associates, on behalf of Pitt-Des Moines, Inc., conducted a Phase I Environmental Site Assessment ("ESA") of the Property in 2001. The purpose of a Phase I ESA is to identify *recognized environmental conditions* ("REC"). The term *recognized environmental conditions* means "the presence or likely presence of any hazardous substances, or petroleum products, on a property under conditions that indicate an existing release, a past release, or a material threat of a release into structures on the property or into the ground, groundwater, or surface water of the property."

Based upon historical use research, government records review, site reconnaissance, and interviews, Ayres Associates identified four *recognized environmental conditions* on the Property, as follows:

- The subject property is a large quantity hazardous waste generator due to painting activities.
- Petroleum products stored in nine above ground storage tanks ("ASTs") on the subject property.
- National Presto Industries (NPI) is affecting groundwater beneath the subject property.
- The south adjoining property, Max Phillips & Son salvage yard, currently contains two underground storage tanks ("USTs") and heavy metal and organic soil contamination that could potentially migrate to the subject property.

Ayres Associates also identified a number of historical recognized environmental conditions on the Property, defined as an environmental condition that in the past would have been considered a REC, however, due to remediation or case closure the condition is not currently considered to be a REC.

Based on the presence of *recognized environmental conditions*, Ayres Associates was retained to conduct a Phase II ESA to determine whether contamination was absent or present on the Property. Ayres Associates conducted the Phase II ESA on the Property in October 2001. Four Geoprobe® borings and two hand auger borings were advanced for the purposes of assessing soil conditions and characterizing a waste material at locations as follows:

- Two Geoprobe® borings were advanced in an area previously used for the disposal of waste paint in unlined pits.
- Two Geoprobe® borings were advanced in a refueling area with two above ground petroleum storage tanks.
- One hand auger boring was advanced in an area used for the storage or disposal of shot blasting material.
- One hand auger boring was advanced in an area not used for industrial purposes to assess background conditions.

The former waste paint disposal pits were cleaned up years ago but the effort was never documented. Therefore, two soil samples were collected for laboratory analysis from each boring advanced in two areas used for disposal. Soil samples were collected from a depth of 4 to 6 feet below ground surface ("bgs") and 18 to 20 feet bgs in the first boring and 6 to 8 feet bgs and 18 to 20 feet bgs in the second boring. Soil samples were analyzed for the presence of volatile organic compounds ("VOCs") and for Resource Conservation and Recovery Act ("RCRA") metals that included arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver.

The refueling area with two above ground petroleum storage tanks was selected for sample collection based on the presence of surface soil staining. Two soil samples were collected for laboratory analysis from each of two soil borings. Based on the results of field screening for organic vapors, soil samples were collected from 12 to 14 feet bgs and 18 to 20 feet bgs in both borings. Soil samples were analyzed for the presence of gasoline range organics ("GRO"), diesel range organics ("DRO"), and petroleum volatile organic compounds ("PVOCs").

One hand auger boring was advanced in the area used for the storage or disposal of shot blasting material. The soil boring was advanced through the shot blasting material until native soils were encountered at a depth of three feet bgs. The sample collected for laboratory analysis was not soil but rather the shot blasting material and was used to characterize the material. The sample was collected at a depth of 0 to 2 feet bgs and analyzed for total RCRA metals. The sample was also analyzed using the toxicity characteristic leaching procedure ("TCLP") for barium, chromium, and lead to determine if shot blasting material was a hazardous waste.

One hand auger boring was advanced in a vacant area of the Property for the purpose of defining background conditions. One soil sample was collected for laboratory analysis from a depth of 1.5 feet bgs and was analyzed for total RCRA metals.

Analytical results from soil samples collected for the purpose of assessing the paint disposal areas showed the presence of only low levels of toluene, total xylenes, and 1,2,4-trimethylbenzene in one of four soil samples. The levels detected are well below soil cleanup standards established in ch. NR 720, Wis. Adm. Code. The levels of RCRA metals found in the soil samples were near or below the levels found in the background soil sample. Low levels of acetone and methylene chloride were also detected in three of four soil samples but these compounds are common artifacts from the laboratory.

Analytical results from soil samples collected for the purpose of assessing the refueling area showed the presence of only low levels of DRO, GRO, and 1,2,4-trimethylbenzene in two of four soil samples. Again, the levels detected are well below soil cleanup standards established in ch. NR 720, Wis. Adm. Code.

Analytical results from the sample of shot blasting material showed that the material contains relatively high levels of barium but is not a hazardous waste based on TCLP for barium, chromium, and lead.

Based on the low level impacts to soil on the Property, Ayres Associates concluded that additional site investigation activities were not warranted.

### **Liability Determination**

The Wisconsin Hazardous Substance Spills Law, s. 292.11, Wis. Stats., commonly called the Spills Law, requires those who cause, possess or control a hazardous substance discharge to "take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands or waters of this state." Wisconsin Statute s. 292.55 authorizes the Department to issue letters concerning liability for environmental pollution.

The data summarized above indicates that one or more hazardous substances were detected on the Property. The levels of GROs, DROs, toluene, xylenes, 1,2,4-trimethylbenzene, and metals detected in soil samples collected from the Property were low and below soil cleanup standards. Based on s. NR 716.05(2)(a), Wis. Adm. Code, and the criteria in ss. NR 708.09(1) and (2), Wis. Adm. Code, the Department hereby determines that further site investigation activities are not warranted at this time under the NR 700 rule series, Wis. Adm. Code.

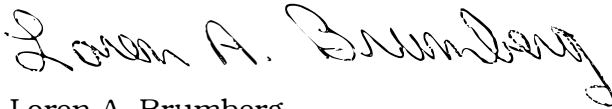
The determinations contained herein are based solely on information provided in the submitted reports and the nature and degree of contaminants as reported to the Department. The Department makes no determination concerning the presence or absence of hazardous substances on the Property, other than those reported in the documents identified above. In the future, if the Department becomes aware of new information concerning the contaminants referenced above, or the presence of other contaminants on the Property not previously identified, the Department will need to evaluate that data to determine if additional response actions may be required.

The identification number shown at the top of this letter is from the Bureau of Remediation and Redevelopment Tracking System ("BRRTS"). The Department tracks information on all regulatory actions that occur at a property, and this information is available to you on the Internet at <http://dnr.wi.gov/org/aw/tr/>. See "BRRTS on the web" under "Contaminated Land Databases".

I hope this letter provides you with clarifications as to the results of the environmental investigations conducted on the Property and provides you with the level of comfort you need to proceed with your plans for the Property.

If you have any additional questions or further concerns, please feel free to contact Pat Collins, Hydrogeologist, at 715-684-2914, extension 117, or myself at 715-839-3770.

Sincerely,



Loren A. Brumberg  
Waste Management Specialist  
Remediation & Redevelopment Program

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