P/F on BRRTS
12/24/12
(29)

November 16, 2012

Phillips Plating Corporation
Attn: Mr. Darin Baratka
984 N. Lake Avenue
Phillips, WI 54555

Subject:

Phase II Environmental Site Assessment
Phillips Plating Corporation
984 N. Lake Avenue
Phillips, WI 54555

Dear Darin,

This letter and enclosed information will serve to summarize the results of Phase II Environmental Site Assessment involving the advancement of soil boring and the collection of soil and groundwater samples, as well as the removal of the Underground Storage Tank (UST), at the above referenced site.

BACKGROUND

According to the Price County Land Records, the site's legal description is NW ¼, SW ¼, S07, T37N, R01E, City of Phillips, Price County, WI. The property is 3.463 acres. REI conducted a review of the Wisconsin Department of Safety and Professional Services registered storage tanks database as part of the records review for the Phase I Environmental Site Assessment. This review did not reveal any indication of a registered storage tank associated with the property. However the site reconnaissance for the Phase I Environmental Site Assessment did reveal the presence of an underground storage on the south side of the west building and six underground tanks which are utilized as part of the onsite wastewater treatment system.

The purpose of the Phase II Environmental Site Assessment was to determine if environmental liabilities are associated with this property in the form of petroleum related soil or groundwater contamination related to the presence of an underground storage tank; or metals related soil or groundwater contamination related to the presence of six underground tanks which are part of the wastewater treatment system for the plating process. REI prepared a proposal on September 17, 2012 with a scope of work to conduct eight (8) hydraulic push soil borings and collect soil and groundwater samples for submittal to a state certified laboratory for analysis of petroleum related compounds and metals. In conjunction with the soil boring event removal of the UST south of the west building was to be completed and soil samples collected for submittal to a state certified laboratory for analysis of petroleum related compounds.

SUMMARY OF SOIL BORING FIELDWORK

On October 4, 2012 REI mobilized to the site to oversee the placement of hydraulic push probe soil borings. REI's methods and procedures for soil and groundwater sampling are included as an attachment to this letter report. REI retained the services of Geiss Soil and Samples, LLC, Merrill, Wisconsin to advance the soil borings. Digger's Hotline was contacted to located underground public utilities greater than three days in advance of the site work. Underground utility lines were clearly marked and identified upon arrival. The location of the subject property is identified on the site vicinity map identified as Figure 1. The location of the soil borings on the subject property is identified on Figure 2.

Soil boring (GP1) was advanced to the west of the building just northwest of the loading dock. The boring was advanced to a depth of eight (8) feet below land surface (BLS). Soil samples collected in four (4) foot intervals and were field screened with a Photoionization Detector (PID). Field screening readings did not indicate evidence of petroleum in this boring and a sample from the 4-8' interval was submitted for laboratory analysis. No saturated soils or groundwater was encountered in this boring and the borehole was abandoned without collection of a groundwater sample.

Soil boring GP2 was advanced along the south side of the building towards the west end. This boring was advanced to a depth of eight (8) feet BLS. Field screening readings did not indicate evidence of petroleum in this boring and a sample from the 4-8' interval was submitted for laboratory analysis. No saturated soils or groundwater was encountered in this boring and the borehole was abandoned without collection of a groundwater sample.

Soil boring GP3 was advanced along the south side of the building toward the east end of the building. This boring was advanced to a depth of eight (8) feet BLS. Field screening readings did not indicate evidence of petroleum in this boring and a sample from the 4-8' interval was submitted for laboratory analysis. No saturated soils or groundwater was encountered in this boring and the borehole was abandoned without collection of a groundwater sample.

Soil boring GP4 was advanced along the east side of the building towards the south end. This boring was advanced to a depth of eight (8) feet BLS. Field screening readings did not indicate evidence of petroleum in this boring and a sample from the 4-8' interval was submitted for laboratory analysis. No saturated soils or groundwater was encountered in this boring and the borehole was abandoned without collection of a groundwater sample.

Soil boring GP5 was advanced along the east side of the building towards the north end of the building. This boring was advanced to a depth of twenty (20) feet BLS. Field screening readings did not indicate evidence of petroleum in this boring and a sample from the 16-20' interval was submitted for laboratory analysis. Saturated soils were encountered at eighteen (18) feet and a groundwater sample was submitted for laboratory analysis.

Soil boring GP6 was advanced along the north side of the building towards the east end. This boring was advanced to a depth of thirteen (13) feet BLS where bedrock refusal was encountered. Field screening readings did not indicate evidence of petroleum in this boring and a sample from the 8-12' interval was submitted for laboratory analysis. No saturated soils or groundwater was encountered in this boring and the borehole was abandoned without collection of a groundwater sample.

Soil boring GP6B was advanced to the northwest of GP6. This boring was advanced to a depth of twelve (12) feet BLS where bedrock refusal was encountered. Field screening readings did not indicate evidence of petroleum in this boring. No saturated soils or groundwater was encountered in this boring and the borehole was abandoned without collection of a groundwater sample.

Soil boring GP6C was advanced approximately 30' southwest of GP6B. The boring was advanced to a depth of thirteen (13) feet BLS where bedrock refusal was encountered. Field screening readings did not indicate evidence of petroleum in this boring. No saturated soils or groundwater was encountered in this boring and the borehole was abandoned without collection of a groundwater sample.

Soil boring GP6D was advanced off the northwest corner of the building. The boring was advanced to a depth of eighteen (18) feet BLS where bedrock refusal was encountered. Saturated soil was encountered at sixteen (16) feet and a groundwater sample was submitted for analysis. Field screening readings did not indicate evidence of petroleum in this boring and a sample from the 12-16' interval was submitted for laboratory analysis.

Soil boring GP7 was advanced along the west side of the building towards the north end of the building. The boring was advanced to a depth of seven (7) feet BLS where bedrock refusal was encountered. Field screening readings did not indicate evidence of petroleum in this boring. No saturated soils or groundwater was encountered in this boring and the borehole was abandoned without collection of a groundwater sample.

Soil boring GP7B was advanced twenty (20) feet to the southeast of GP7. The boring was advanced to a depth of twelve (12) feet BLS where bedrock refusal was encountered. Field screening readings did not indicate evidence of petroleum in this boring. No saturated soils or groundwater was encountered in this boring and the borehole was abandoned without collection of a groundwater sample.

Soil boring GP7C was advanced to the southeast of GP7B. The boring was advanced to a depth of twelve (12) feet BLS where bedrock refusal was encountered. Field screening readings did not indicate evidence of petroleum in this boring and a soil sample was collected from the 8-12' interval. No saturated soils or groundwater was encountered in this boring and the borehole was abandoned without collection of a groundwater sample.

Soil and groundwater samples were submitted for laboratory analysis of Volatile Organic Compounds (VOC) and Metals including Zinc, Nickel, and Chromium. The groundwater samples were collected from GP5 and GP6D using a peristaltic pump which was lowered into the well screen placed into the borehole. The well was purged for 10 minutes. The sample was then collected in the appropriate containers. Upon collection of the sample, the well screen was removed and the boring was abandoned with granular bentonite. All samples were submitted to a state certified laboratory for analysis. Soil boring logs and borehole abandonment forms are included as Attachment B.

SOIL BORING SOIL ANALYTICAL RESULTS

Soil samples collected from soil borings GP1, GP2, GP3, GP4, GP5, GP6, GP6D, and GP7C did not reveal evidence of petroleum or metals contamination. Analytical results did not reveal detections above laboratory detection limits for Petroleum Volatile Organic Compounds (PVOCs). Analytical results did reveal detections for total chromium, nickel, and zinc in soil samples from borings: GP1, GP2, GP3, GP4, GP5, GP6, GP6D, and GP7C. The results also revealed a detection for hexavalent chromium in GP5. However, these detections did not exceed the Wisconsin Administrative Code Chapter NR 720 RCLs. Trivalent chromium is from total chromium minus hexavalent chromium. Since there were no detections for hexavalent chromium in GP1, GP2, GP3, GP4, GP6, GP6D, and GP7C calculation of trivalent chromium is not possible. The soil analytical results are summarized on Table 1. Laboratory analytical report is included with this letter as Attachment C.

GROUNDWATER ANALYTICAL RESULTS

Groundwater samples were collected from the borings at GP5 and GP6D. The groundwater samples from GP5 and GP6D were analyzed for Volatile Organic Compounds (VOCs) and metals including: total chromium, nickel, and zinc. Analytical results revealed no detections for VOCs in GP5. There was a detection for chloromethane in the sample from GP6D; however this detection was below Wisconsin Administrative Code Chapter NR 140 (NR 140) Enforcement Standards (ES). Metals analysis from GP5 and GP6D revealed detections below the ES and Preventative Action Limits (PAL) from NR 140 for zinc. Groundwater analytical results from borings GP5 and GP6D revealed detections above both the ES and PAL for total chromium and nickel. The groundwater analytical results are summarized on Table 2. Laboratory analytical report is included with this letter as Attachment C.

UNDERGROUND STORAGE TANK REMOVAL

On October 4, 2012 the Underground Storage Tank (UST) was removed from the south side of the west building. Tank Removal Site Assessment soil samples were collected from below the tank (CSS1) and below the dispenser pad (CSS2). The samples were submitted to a state certified lab for analysis for Petroleum Volatile Organic Compounds and Naphthalene (PVOC+N) and Gasoline Range Organics (GRO). CSS1 did not reveal any detections. Low level contamination was revealed in CSS1. This location was resampled at a depth of three (3) feet and this sample did not reveal any concentrations above laboratory detection limits. Additional information regarding the UST removal and UST site assessment is contained in a separate report.

CONCLUSIONS AND RECOMMENDATIONS

Based on the data collected, REI has identified slight soil contamination directly under the dispenser pad. Additional testing revealed this to be localized and not extensive.

Groundwater contamination has been identified related to the underground tanks which are used as part of the wastewater treatment system, as evidenced by groundwater total chromium and nickel concentrations above NR 140 ES. Thus it appears there has been a leak from the system which has resulted in this release to the environment. State law requires notification to the Wisconsin Department of Natural Resources (WDNR) when soil and groundwater contamination is identified above state standards. REI recommends notification of WDNR and can assist you with this process if requested.

Thank you for giving REI the opportunity to assist you with this project. Please contact me with questions or to discuss further at (715) 675-9784.

Sincerely,

REI Engineering, Inc.

Adam T. Scheunemann
Environmental Scientist

REI Engineering, Inc.

Kenneth J. Lassa, P.S.
Environmental Scientist/Department Manager

Attachments

Table 1 Summary of Soil Analytical Results
Table 2 Summary of Groundwater Sampling Results
Figure 1- Site Vicinity Map
Figure 2- Site Map
Attachment A- Methods and Procedures
Attachment B- Soil Boring Logs and Borehole Abandonment Forms
Attachment C- Laboratory Analytical Report

TABLE 1
SOIL SAMPLE ANALYTICAL RESULTS
Phillips Plating, North Lake Avenue, Phillips, WI

			Date-->	*10/4/12*	*10/4/12*	*10/4/12*	*10/4/12*	*10/4/12*	*10/4/12*	*10/4/12*	*10/4/12*
			Boring-->	*GP-1*	*GP-2*	*GP-3*	*GP-4*	*GP-5*	*GP-6*	*GP-6D*	*GP-7C*
			Sample Depth--(Feet)>	*4-8*	*4-8*	*4-8*	*4-8*	*16-20*	*8-12*	*12-16*	*8-12*
Petroleum VOC's (ug/kg)	RCL	Table 1	Table 2								
Benzene	5.5	8,500	1,100	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0
Ethylbenzene	2,900	4,600	NS	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0
Toluene	1,500	38,000	NS	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0
Xylenes (Total)	4,100	42,000	NS	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0
Methly tert Butyl Ether	NS	NS	NS	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0
1,2,4-Trimethylbenzene	NS	83,000	NS	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0
1,3,5-Trimethylbenzene	NS	11,000	NS	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0
Naphthalene	NS	2,700	NS	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0
Metals (mg/kg)											
Total Chromium	NS	NS	NS	14.40	16.90	12.90	25.50	52.50	21.60	20.30	25.60
Hexavalent Chromium	3,050	NS	NS	<2.69	<2.74	<2.77	<2.66	2.40	<2.67	<2.73	<2.64
Trivalent Chromium	1,530,000	NS	NS	NC	NC	NC	NC	50.10	NC	NC	NC
Nickel	19,700	NS	NS	12.20	11.80	8.90	15.60	17.20	19.00	14.70	16.40
Zinc	307,000	NS	NS	18.60	19.30	18.90	21.80	16.90	28.20	27.20	24.90

Notes:

RCL - NR 720 Soil Residual Contaminant Level
Table 1 - SPS 746 Table 1 Value - Indicates Petroleum Product in Soil Pores
Table 2 - Direct Contact Standard
< - Concentration below listed laboratory detection limit
NS - No Standard
NC - Not Calculated
J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

Bold	Exceeds RCL
Outline	Exceeds Table 1
Italic	Exceeds Table 2

TABLE 2
GROUNDWATER SAMPLING RESULTS SUMMARY- METALS & VOCs
Phillips Plating, North Lake Avenue, Phillips, WI

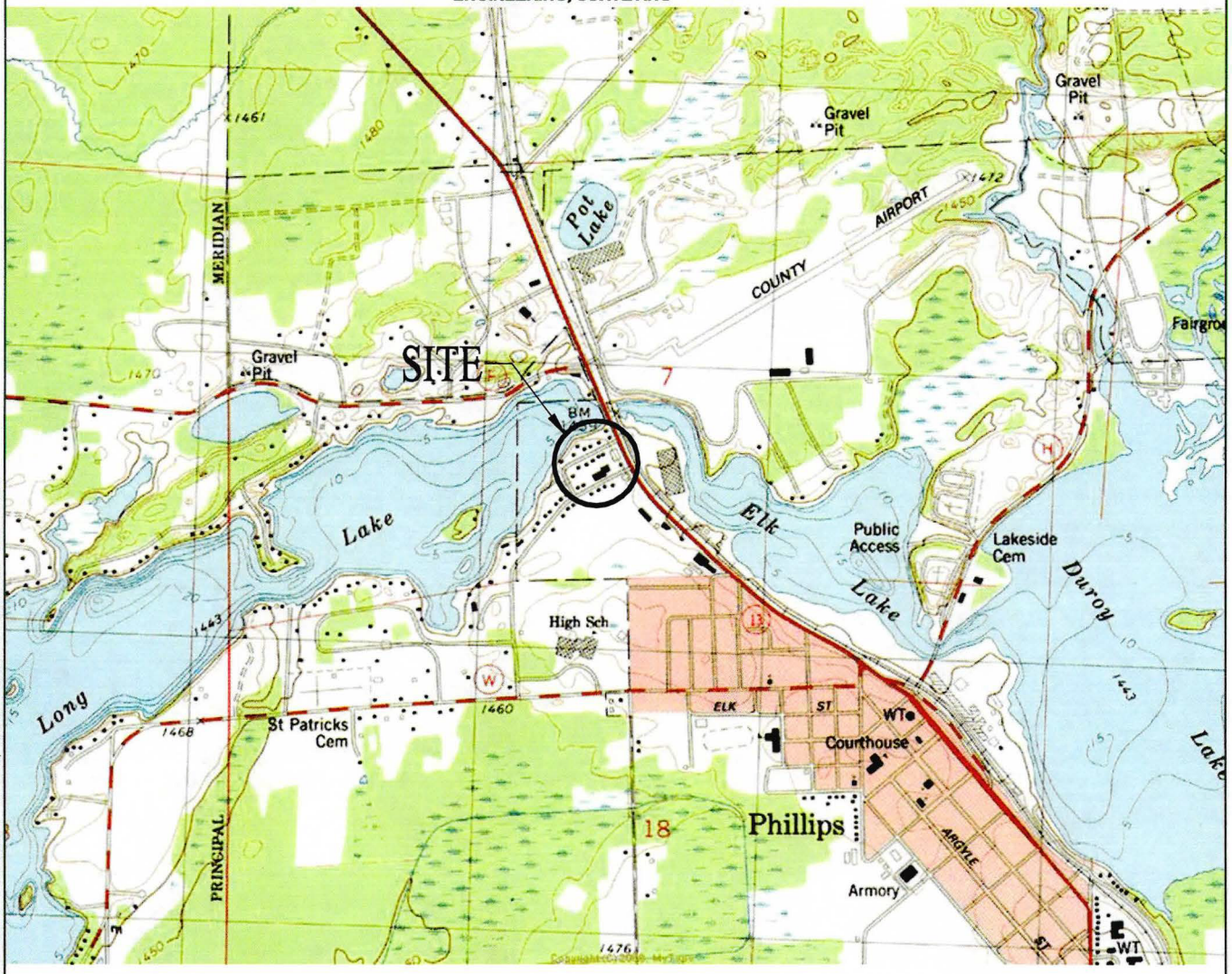
	Sample Location		GP5	GP6D
	Date		10/4/2012	10/4/2012
PARAMETER	ES	PAL		
Metals (ug/L)				
Total Chromium	100	10	**1,300**	**4,040**
Chromium, Hexavalent (mg/L)			1.2	<0.0039
Nickel	100	20	**2,530**	**1,700**
Zinc	5,000	2,500	41.6	1,460
Detected VOC's (ug/L)				
1,1,1,2 - Tetrachloroethane	70	7	<0.92	<0.92
1,1,1-Trichloroethane	200	40	<0.90	<0.90
1,1,2,2-Tetrachloroethane	0.2	0.02	<0.20	<0.20
1,1,2-Trichloroethane	5	0.5	<0.42	<0.42
1,1-Dichloroethane	850	85	<0.75	<0.75
1,2,3-Trichloropropane	60	12	<0.99	<0.99
1,2,4-Trichlorobenzene	70	14	<0.97	<0.97
Total Trimethylbenzenes	480	96	<0.97	<0.97
1,2-Dibromo-3-chloropropane	0.2	0.02	<1.7	<1.7
1,2-Dibromoethane	0.05	0.005	<0.56	<0.56
1,2-Dichlorobenzene	600	60	<0.83	<0.83
1,2-Dichloroethane	5	0.5	<0.36	<0.36
1,2-Dichloropropane	5	0.5	<0.49	<0.49
1,3-Dichlorobenzene	1,250	125	<0.87	<0.87
1,4-Dichlorobenzene	75	15	<0.95	<0.95
2,2-Dichloropropane			<0.62	<0.62
2-Chlorotoluene			<0.85	<0.85
4-Chlorotoluene			<0.74	<0.74
4-Isopropyltoluene			<0.67	<0.67
Benzne	5	0.5	<0.41	<0.41
Bromobenzene			<0.82	<0.82
Bromochloromethane			<0.97	<0.97
Bromodichloromethane	0.6	0.06	<0.56	<0.56
Bromoform	4.4	0.44	<0.94	<0.94
Bromomethane	10	1	<0.91	<0.91
Butylbenzene			<0.93	<0.93
Carbon Tetrachloride	5	0.5	<0.49	<0.49
Chlorobenzene			<0.41	<0.41
Chloroethane	400	80	<0.97	<0.97
Chloroform	6	0.6	<1.3	<1.3
Chloromethane	3	0.3	<0.24	*0.39J*
cis-1,2-Dichloroethylene	70	7	<0.83	<0.83
cis-1,3-Dichloropropylene	0.2	0.02	<0.20	<0.20
Dibromochloromethane	0.6	0.06	<0.81	<0.81
Dibromomethane		6	<0.60	<0.60
Dichlorodifluoromethane	1,000	200	<0.99	<0.99
Ethylbenzene	700	140	<0.54	<0.54
Hexachlorobutadiene			<0.67	<0.67
Isopropylbenzene			<0.59	<0.59
Total Xylenes	2,000	400	<1.8	<1.8
Methylene Chloride	5	0.5	<0.43	<0.43
Methyl-tert-Butyl Ether	60	12	<0.61	<0.61
Naphthalene	100	10	<0.89	<0.89
Propylbenzene			<0.81	<0.81
sec-Butylbenzene			<0.89	<0.89
Styrene	100	10	<0.86	<0.86
tert-Butylbenzene			<0.97	<0.97
Tetrachloroethene	5	0.5	<0.45	<0.45
Toluene	800	160	<0.67	<0.67
trans-1,2-Dichloroethylene	100	20	<0.89	<0.89
trans-1,3-Dichloropropylene	0.2	0.02	<0.19	<0.19
Trichloroethene	5	0.5	<0.48	<0.48
Trichlorofluoromethane	3,490	698	<0.79	<0.79
Vinyl Chloride	0.2	0.02	<0.18	<0.18

PAL = Preventive Action Limit
ES = Enforcement Standards

BOLD	= Exceeds Enforcement Standard
Italic	= Exceeds Preventative Action Limit

NA - Not Analyzed
< - Concentration less than listed detection limit

REI
CIVIL & ENVIRONMENTAL
ENGINEERING, SURVEYING



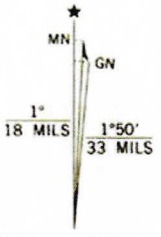
SCALE 1:24 000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929



UTM GRID AND 1984 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET

PHILLIPS, WIS.
NW/4 PHILLIPS 15' QUADRANGLE
45090-F4-TF-024

1984

DMA 2975 III NW-SERIES V861

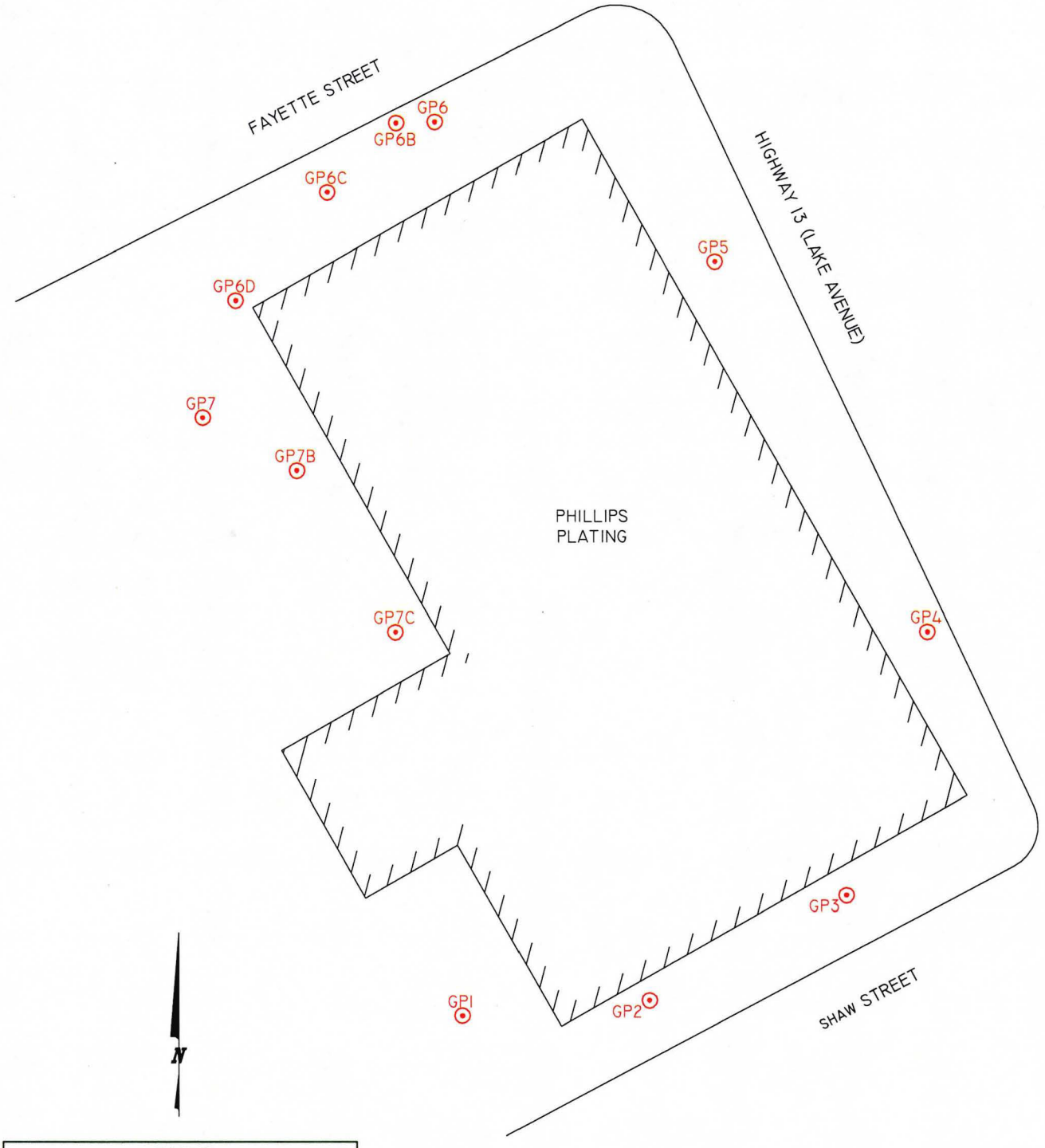
QUADRANGLE LOCATION

REI Engineering, INC.

PHILLIPS PLATING CORP. 984 N LAKE AVENUE PHILLIPS, WISCONSIN	FIGURE 1 : SITE VICINITY MAP		
	PROJECT NO. 6134	DRAWN BY: ARH	DATE: 08/16/12

DRAWING FILE: J:\DRAFTING\6134 PHILLIPS PLATING CORP\DWG\6134-VICN.DWG LAYOUT: VICINITY PLOTTED: Nov 14, 2012 - 8:56PM PLOTTED BY: TODDW

REI
CIVIL & ENVIRONMENTAL
ENGINEERING, SURVEYING



LEGEND

0 50

SCALE: 1" = 50'

⊙ GEOPROBE SOIL BORING

REI Engineering, INC.

PHILLIPS PLATING CORP.
984 N LAKE AVENUE
PHILLIPS, WISCONSIN

FIGURE 2 : SITE MAP

PROJECT NO.	DRAWN BY:	DATE:
6134	TAW	11/14/2012

DRAWING FILE: J:\DRAFTING\6134 PHILLIPS PLATING CORP\DWG\6134-SITE.DWG LAYOUT: SITE PLOTTED: NOV 14, 2012 - 8:56PM PLOTTED BY: TODDW

METHODS AND PROCEDURES

FOR

GEOPROBE SOIL SAMPLING

The Geoprobe unit hydraulically advances threaded, two-inch diameter, four-foot long, steel rod sections into the subsurface. A four-foot sampler, consisting of a drive shoe, a steel tube with a clean acetate liner, and a drive-head retractable piston, is attached to the leading Geoprobe rod. The sampler is driven down to the top of the interval to be sampled. The stop-pin is removed to release the drive head piston, which retracts as the sampler is advanced. When the sampler has been advanced four feet, the rods are retracted from the hole and the soil in the acetate liner is recovered. The acetate liner is split open and the soil is visually and manually classified by the field geologist/technician in accordance with **ASTM:D2488-84**. Logs of the borings are filled out indicating the depth and identification of the various strata, water level information, and pertinent information regarding the method of maintaining and advancing the borings.

Immediately after identification, the soil is quickly divided into two portions. One portion is prepared for potential laboratory analysis. The other portion is placed into a clean one-quart Ziploc bag for field screening. See the section "Soil Headspace Analysis" for field screening procedures.

HEADSPACE ANALYSIS

The soils were screened with a Mini-RAE photoionization detector (PID) equipped with an 10.6 eV lamp. The detector was calibrated in instrument units for Total Organic Vapors using an isobutylene standard. The soil sample, sealed in a Ziploc bag, was shaken vigorously to promote volatilization of the contaminant into the headspace of the bag. The sample was allowed to rest for at least ten minutes and then shaken again before screening. When ambient temperatures were below 60 degrees F, soil samples were allowed to warm for a minimum of 10 minutes in a heated environment prior to headspace development. The Ziploc bag was punctured with the PID probe and the resulting meter reading was recorded.

SAMPLING AND CHAIN OF CUSTODY

Soil samples for laboratory analysis were collected into laboratory prepared vials. Each vial was labeled and placed directly into a cooler pending delivery to the laboratory. Latex gloves were worn during all sample collection procedures.

An entry on a Chain of Custody log was completed as each sample was collected. The Chain of Custody included the following information: project name, work order number, shipped by, shipped to, sampling point, location, field ID number, date and time taken, sample type, number of containers, analysis required, sampler (s) signature (s), etc. As few people as possible handled the samples. The Chain of Custody log was sent to the laboratory with each cooler of samples.

DECONTAMINATION

Sampling equipment was decontaminated prior to sampling. Steel rod sections were washed after every sample collected.