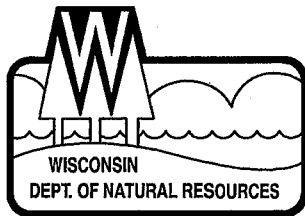


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State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott Walker, Governor
Cathy Stepp, Secretary
John Gozdziwski, Regional Director

Park Falls Service Center
875 S. 4th Ave
Park Falls, Wisconsin 54552
Telephone 715-762-4684
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December 20, 2013

Mr. Darin Baratka
Phillips Plating Corporation
984 N. Lake Avenue
Phillips, Wisconsin 54555

SUBJECT: Technical Assistance Review of Site Investigation Report, Phillips Plating Corporation, 984 N. Lake Ave., Phillips, WI, WDNR BRRTS Activity # 02-51-559634

Dear Mr. Baratka:

The Department of Natural Resources' Remediation and Redevelopment program (the Department) has received the *NR 716.15 Site Investigation Report / Remedial Action Plan*, prepared for the above named site by REI Engineering, Inc. and dated October 2013. The report was also accompanied by the appropriate review fee submitted pursuant to s. NR 749.04, Wis. Adm. Code. The report describes investigative work performed to further define contamination that was identified during the collection of samples as part of a Phase II Environmental Site Assessment in October 2012. This work included the installation and sampling of twelve geoprobe soil borings, twelve monitoring wells, one piezometer, and up to five rounds of groundwater samples from the monitoring wells.

Based upon a review of this report, the Department considers the requirements for a site investigation under ch. NR 716, Wis. Adm. Code, to have been substantially met. However, as part of our review, we offer the following comments.

1. The main issue that arose during this review concerned the lateral extent of groundwater contamination beyond the site's property boundaries. Specifically, there was a question about whether the full extent of contamination had been defined. I discussed this issue with the Department's Northern Region Closure Committee, and we agreed that additional groundwater monitoring points are needed to better define the extent. The Department recommends installation of a monitoring well/piezometer nest northeast of the Shamrock Oil building and installation of a second piezometer nested with MW-10. These wells should be sampled with the rest of the monitoring network. Additional wells may be necessary pending future results. In future sampling rounds, PH measurements should also be collected from the well network on a consistent basis.

2. The Department is concerned that there could be other sources of contamination, and that soil impacts under the building are not well defined. We understand access is an issue, but we recommend additional soil sampling to better define the extent and identify any other possible sources of contamination. You also may want to consider collecting more of a background soil and groundwater sample for future comparisons to existing data.
3. The Department agrees that monitored natural attenuation appears to be an acceptable remedial alternative at this time, as long as the source of contamination has been stopped and the groundwater contaminant plume remains stable. If the tanks and piping are removed in the future, removal of any accessible soil would likely help reduce the length of time the groundwater would have to be monitored. You should also continue to look at options of source control and/or immobilizing the metals.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at 715 762 1352.

Thank you for your cooperation.

Sincerely,



Philip E. Richard
Hydrogeologist
Remediation and Redevelopment Program

C: Ken Lassa
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