



April 22, 2024

Mr. Darin Baratka
Phillips Plating Corporation
984 N. Lake Avenue
Phillips, Wisconsin 54555
Via electronic mail only to darin.baratka@phillipsplatingcorp.com

Subject: Technical Assistance Request
Phillips Plating, 984 North Lake Avenue, Phillips, WI
BRRTS #: 02-51-559634

Dear Mr. Baratka:

On February 22, 2024, the Wisconsin Department of Natural Resources (DNR) received a request for technical assistance, per Wisconsin Statutes (Wis. Stats.) § 292.55, for the Phillips Plating site, located at 984 North Lake Avenue, Phillips, Wisconsin (Site). The request was submitted on your behalf by Matt Michalski, REI, and included the appropriate Wisconsin Administrative (Wis. Admin.) Code ch. NR 749 review fee. The technical assistance request is tracked under the DNR's Bureau of Remediation and Redevelopment Tracking System (BRRTS) as Phillips Plating Corp (BRRTS # 02-51-559634). Included with the technical assistance request for review was a site update report dated February 20, 2024.

In the technical assistance request REI asked for comment on the site update report for three specific items; the completeness of the emerging contaminant statement, verification that the degree and extent of contamination has been adequately defined, and a pathway to case closure based on the overall stable to decreasing contaminant concentrations. The DNR discussed the site on April 11, 2024 and provides the following comments:

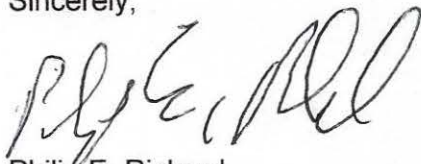
- Completeness of the emerging contaminant statement: The DNR does not believe the emerging contaminant statement is adequate. As stipulated in Wis. Admin. Code § NR 716.07 and Wis. Admin. Code § NR 716.09, information should be provided on the evaluation of potential per- and polyfluoroalkyl substances (PFAS) that were historically or are presently produced, used, handled, or stored at the site. The evaluation should include any available information on whether any products containing PFAS were utilized in any production process, the duration of PFAS use, the type of PFAS utilized, and any areas of the site where PFAS may have been used, stored, or discarded. In addition, the February 20, 2024 report stated that an effluent sample that was collected from the site, and samples collected from the two City of Phillips municipal wells showed no exceedances for PFAS. Phillips Plating believes that the results of this sampling demonstrate that PFAS is not an issue at the site, and that the emerging contaminants question has been satisfied. However, based on a review of the information presented, the sampling completed does not directly assess potential historic PFAS discharges to groundwater beneath the facility. A groundwater sampling plan for evaluating PFAS compounds at the site should be submitted. Samples should be collected at/near the source area from select wells.

- Verification that the degree and extent of contamination has been adequately defined: The DNR agrees the degree and extent of contamination has been adequately defined at this time.
- Pathway to case closure based on the overall stable to decreasing contaminant concentrations: Because several of the wells show nonstable or increasing trends, the site does not meet NR 726 closure requirements at this time. A sampling plan for continued groundwater monitoring of the well network should be submitted. Based on the recent and historical data, reducing the number and/or frequency of wells sampled may be appropriate. Information on the utilities located at the site and Highway 13 should also be provided and shown on appropriate figures, along with a discussion of groundwater flow as it relates to them.

In addition to the ongoing site investigation activities, the DNR is requesting that you submit a work plan for future groundwater monitoring for the compounds currently sampled, and PFAS by May 30, 2024.

The DNR appreciates the opportunity to provide technical assistance for this project. If you have any questions regarding anything outlined in this letter, or would like to arrange a meeting, please contact me, the DNR Project Manager, at 715-661-0125 or at philip.richard@wisconsin.gov.

Sincerely,



Philip E. Richard
Hydrogeologist
Remediation & Redevelopment Program

cc: Matthew Michalski-REI (via email)