

PHASE I ENVIRONMENTAL SITE ASSESSMENT

FOR

FORMER LINDY CLEANERS 34 S. STEVENS STREET RHINELANDER, WISCONSIN

With limited appendices to minimize file size

NOVEMBER 2013

Prepared for: City of Rhinelander Rhinelander, Wisconsin

Prepared by: Sand Creek Consultants, Inc. Rhinelander, Wisconsin





108 E. Davenport Street • Rhinelander, WI 54501 • Tel. 715.365.1818

November 12, 2013

Mr. Blaine Oborn, Administrator City of Rhinelander 135 S. Stevens Street Rhinelander, WI 54501

Re: Former Lindy Cleaners

34 S. Stevens Street, Parcel # RH 185

Rhinelander, Wisconsin

Subject: Phase I Environmental Site Assessment

Dear Mr. Oborn:

Attached is the Phase I Environmental Site Assessment (ESA) for the Former Lindy Cleaners facility at 34 S. Stevens Street in Rhinelander, Wisconsin. The assessment was prepared under the proposal approved by Mr. Blaine Oborn/City of Rhinelander on September 17, 2013.

We note this report is designed to be delivered and viewed electronically. The record search report (in **Appendix D**), for example, has hyperlinks to relevant web resources links to case files from adjoining sites, neither of which are available in a hard copy format. This document, if printed as-is, is more than 100 pages. Adding the other resources and case files would add at least 500 pages to it.

Thank you for allowing us the opportunity to prepare this Phase I ESA for the City of Rhinelander. If you have any questions or concerns, please contact me via phone at 715.365.1828 or by email at christopher.rog@sand-creek.com. Your call or email with questions on this matter will receive my prompt response.

Sincerely,

SAND CREEK CONSULTANTS, INC.

Christopher Rog, PG Senior Project Manager

Enclosures: Phase I Environmental Site Assessment

Via electronic delivery only

SIGNATURE PAGE

This Phase I Environmental Site Assessment was prepared by Christopher Rog of Sand Creek Consultants, Inc. A resume of the environmental professional conducting the site reconnaissance, report preparation, and interviews is provided in **Appendix A**.

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental professional as defined in §312.10 of 40 CFR 312 and I have the specific qualifications based on education, training, and experience to assess a *property* of the nature, history, and setting of the subject *property*. I have developed and performed the all appropriate inquires in conformance with the standards and practices set forth in 40 CFR Part 312.

11/12/2013

Christopher J. Rog, PG Senior Project Manager

Date

Table of Contents

Sur	/MAR	Υ	IV				
1	INTE	RODUCTION	1				
	1.1	Purpose	1				
	1.2	Scope of Service	2				
	1.3	Significant Assumptions	2				
	1.4	Limitations and Exceptions	2				
	1.5	Special Terms and Conditions	4				
		User Reliance					
2	SITE	SITE DESCRIPTION					
		Location and Legal Description					
	2.2	Site and Vicinity General Characteristics	5				
	2.3	Current Use of the Property	5				
	2.4	Descriptions of Structures, Roads, and Other Improvements on the Site	5				
	2.5	Current Uses of the Adjoining Properties	5				
3	USE	Jser Provided Information					
	3.1	Source	7				
	3.2	Title Records	7				
	3.3	Environmental Liens or Activity and Use Limitations	7				
	3.4	Specialized Knowledge	7				
	3.5	Commonly Known or Reasonably Ascertainable Information	7				
		Valuation Reduction for Environmental Issues					
	3.7	Owner, Property Manager, and Occupant Information	7				
	3.8	Reason for Performing Phase I ESA	7				
4		ORDS REVIEW					
	4.1	Standard Environmental Record Sources	8				
	4.2	Database Listings for the Subject Property	8				
	4.3	Other Databases Searches Summarized	10				
	4.4	Additional Environmental Record Sources	11				
	4.5	Records Review Summary Sources	11				
	4.6	Physical Setting Sources	12				
	4.7	Historical Use Information	12				
5	SITE	ITE RECONNAISSANCE					
	5.1	Methodology and Limiting Conditions	15				
	5.2	General Site Setting	15				
	5.3	Exterior Observations	15				
	5.4	Interior Observations	15				
6		Interviews					
		Interview with Owner					
	6.2	Interview with Site Manager and Occupants	17				
	6.3	Interviews with Local Government Officials	17				
	6.1	Interviews with Others	17				

Asbestos Assessment Report

Miscellaneous UST/AST Information

Appendix I

Appendix J

<u>Rhine</u>	<u>lander,</u>	. Wisconsin November 201	<u>.3</u>			
7	PHASE	I ESA RESULTS	8			
-	_		_			
		Opinions1				
	7.3 C	Conclusions	9			
		Additional Services2				
	7.5 [Deviations2	0			
8	Referi	ENCES	1			
		List of Figures				
Figur	e 1	Site Location Map				
Figur	e 2	Tax Parcel Map				
Figure 3		2013 High-Resolution Google Earth Aerial Photo				
Figure 4		Existing Floor Plan				
Figure 5		(5a) Basement Floor Plan; (5b) Upstairs Floor Plan				
Figure 6		Recognized Environmental Condition Summary				
		List of Appendices				
Appe	ndix A	Qualifications of the Environmental Professional and Personnel				
Appendix B		Property Maps				
Appendix C		User Provided Information				
Appendix D		D EDR Database Search Report				
Appendix E		Historical Air Photos				
Appendix F		Sanborn Maps				
Appe	ndix (Sanborn Maps: Enlarged for Property Detail				
Appendix H		Subject Property Photolog (October and November 2013)				

Page iii Sand Creek Consultants, Inc.

SUMMARY

This report is an instrument of service of Sand Creek Consultants, Inc. (Sand Creek). The report presents the results of a Phase I Environmental Site Assessment (ESA) of the Former Lindy Cleaners (the "Property"). The Phase I ESA was performed for the City of Rhinelander, Wisconsin (the "User") over the period September 20 to November 11, 2013. The services performed included a review of environmental databases, site reconnaissance, interviews with persons knowledgeable of the Property, and the preparation of the Phase I ESA Report.

In essence, a Phase I ESA is a service, the basic elements of which are determined by the standard of care prevailing at the time that the service was rendered, in the area in which the service was performed. Because standards of care can be identified only through retrospective inquiry, Sand Creek has assumed that the standard of care is that which is articulated by the American Society for Testing and Materials (ASTM) Standard E 1527-05.

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527 of 34 S. Stevens Street, Rhinelander, Wisconsin, 54501, the *Property*. This assessment has revealed evidence of recognized environmental conditions in connection with the *Property* including the following (in no particular order):

- 1. The historical use of at least eight underground solvent storage tanks on the 0.15 acre property (only two of which are known to have been removed, one was abandoned in place, and the current status of the other five are unknown) constitutes a REC.
- 2. The observed presence of numerous containers, ranging in size from a few quarts to 50 gallons, many of which are open, some of which are outside and in a rapid state of rust and deterioration, some clearly labeled as "hazardous waste" (suspected as waste solvent, yet with specific contents not known) constitutes a REC.
- 3. The observation of a potential waste disposal area in the current dry cleaning operational area, where an older, leaky brick sewer has a hose discharging to it that is observed to be draining from the solvent filter tank, could cause solvent contamination to leak from the sewer into in soils outside the sewer, and constitutes a REC.
- 4. The observation of an earthen "pit" penetrating the basement concrete slab, located immediately adjacent to the solvent/water distillation unit, and with a hose running to the pit, constitutes a REC.
- 5. The observed earthen pit in the current shop, on the first floor, could have been used for waste disposal. This constitutes a REC since the concrete floor in this area has direct access to the soil in an area where dry cleaning machines were operating for almost 30 years.
- 6. The history of use of the *Property* as a dry cleaner since at least 1920, and at its peak (in the 1870s -1990s) operating as many as four dry cleaner machines at once, with over 90 years of hazardous waste generation and limited records of evidence of off-site or lawful disposal, constitutes a REC.
- 7. Sanborn maps showing underground gasoline tanks in the mid to late twentieth century along the east side of Stevens Street (immediately east of the *Property* associated with what is now McDonald's at 25 and 33 S. Stevens) and north (currently the antique dealer at 28 S. Stevens) could present an off-site impact if leakage from those tanks occurred, reached groundwater, and flowed to the west or southwest onto the subject *Property*.

1 Introduction

1.1 Purpose

1.1.1 <u>General Purpose</u>

Sand Creek Consultants, Inc. (Sand Creek) completes a Phase I Environmental Site Assessment (ESA) to determine if a parcel of real property (including improvements) has identifiable recognized environmental conditions. A Phase I ESA was performed at the Former Lindy Cleaners (hereinafter referred to as the "*Property*"), located at 34 S. Stevens Street in the City of Rhinelander, Oneida County, Wisconsin (Parcel ID RH 185). The *Property* is shown on a USGS Topographic Map on **Figure 1**.

The following definitions are from American Society for Testing and Materials (ASTM) Standard Practice E 1527-05. Italicized words are further defined in the ASTM document.

Recognized Environmental Conditions (RECs) are defined as:

"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 of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis are not recognized environmental conditions."

Historical Recognized Environmental Condition (HREC) is defined as:

An "environmental condition which in the past would have been considered a *recognized* environmental condition, but which may or may not be considered a *recognized environmental* condition currently."

1.1.2 Purpose of Performing this Phase I ESA

The primary purpose of this Phase I ESA is to provide the City of Rhinelander, Wisconsin (hereinafter referred to as the "User") with information about the general environmental character of the Property.

To the extent applicable, another purpose was to permit the *User* to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) liability (also known as the "landowner liability protections"). A Phase I ESA in conformance with ASTM E 1527-05 constitutes "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice" as defined at 42 U.S.C. §9601(35)(B).

1.2 Scope of Service

The scope of service conducted was in accordance with ASTM standard E 1527-05, and included the four main components outlined below:

- A records review of appropriate environmental databases maintained by state and federal
 agencies. Sand Creek obtained the database search from a commercial database service.
 Once the database search was obtained, Sand Creek conducted a review of these databases
 and assessed their applicability to the findings and conclusions in this report.
 - Other appropriate and available data were also reviewed, which typically includes fire insurance maps, historical and recent aerial photos, historical city directories, current and historical topographic maps, and/or records from others.
- 2. A **site reconnaissance** including a walk-through of the *Property*, site photography, and observations of general site conditions. Adjoining properties were also observed from the *Property* or from public thoroughfares.
- 3. **Interviews** with representatives who were identified to Sand Creek by the *User*, or who were identified by Sand Creek in the course of the assessment, as having information regarding historical use of the *Property*.
- 4. Evaluation of the information gathered during the subsequent components and preparation of a **report** summarizing the Phase I ESA findings.

1.3 Significant Assumptions

The findings and opinions conveyed in this Phase I ESA report are based on information obtained from a variety of sources enumerated herein, and which Sand Creek believes is reliable. Nonetheless, Sand Creek cannot and does not guarantee the authenticity or reliability of the information it has relied upon.

1.4 Limitations and Exceptions

No Phase I ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. Performance of a Phase I ESA is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with a property while recognizing the reasonable limits of time and cost. Note that our findings and opinions are based upon information that we obtained on given dates, through records review, site review, sample collection, and related activities. It is possible that other information exists, or has subsequently become known, just as it is possible for conditions to have changed after our observation.

Sand Creek has not found indicators suggesting that hazardous substances exist (other than those exceptions noted in the report) at the site at levels likely to warrant mitigation. Not finding such indicators does not mean that hazardous substances do not exist at the site.

Phase I ESAs, by their very nature, are limited. Sand Creek has endeavored to meet what it believes is the applicable standard of care and, in so doing, is obliged to advise the parties involved of Phase I ESA limitations. Sand Creek believes that providing information about limitations is essential to help identify

and thereby manage its risks. These risks can be mitigated, but they cannot be eliminated through additional research.

1.4.1 Data Gaps

Per the ASTM standard, a data gap is the lack of or inability to obtain information required by this practice despite good faith efforts to gather such information. A data gap carries risk that the missing data could find an undiscovered REC. The data gaps encountered during this Phase I ESA are described below.

Sand Creek researched the history of the *Property* from present back to 1889 using the standard historical sources listed in Section 4.4. By 1889 (the first data available for this site) the *Property* was already developed. Sand Creek did not review other historical sources back to a time when the *Property* was undeveloped, because other sources were not reasonably ascertainable or likely to be useful.

Intervals greater than five years are present in the historical record sources reviewed; however, the *Property* use does not appear to have significantly changed during these time periods.

It is Sand Creek's opinion that the data gap(s)/data failures do not represent a significant limitation to this assessment.

1.4.2 Non-Scope Issues

There may be environmental issues or conditions at a property that parties may wish to assess in connection with commercial real estate that are outside the scope of a standard Phase I ESA (i.e., the "non-scope" considerations). Some substances may be present on a property in quantities and under conditions that may lead to contamination of the *Property*, or of nearby properties, but are not included in CERCLA's definition of hazardous substances (42 USC § 9601(14)) or do not otherwise present potential CERCLA liability. In any case, they are beyond the scope of this practice.

Whether or not a user elects to inquire into non-scope considerations in connection with this practice or any other environmental site assessment, no assessment of such non-scope considerations is required for appropriate inquiry as defined by this practice.

Non-scope considerations (issues not evaluated in this Phase I ESA, but which can be added at the request of the *User*) include, but are not limited to, asbestos-containing building materials, radon, lead-based paint, lead in drinking water, wetlands, regulatory compliance, cultural and historic resources, industrial hygiene, health and safety, ecological resources, endangered species, indoor air quality, biological agents, mold, and high voltage power lines.

No implication is intended as to the relative importance of inquiry into such non-scope considerations.

As part of this Phase I, an asbestos assessment of the *Property* was completed. Asbestos containing materials, including friable materials, were identified in the building on the *Property*. The asbestos assessment report is in **Appendix I**.

1.5 Special Terms and Conditions

There were no special terms or conditions between the *User* and Sand Creek.

1.6 User Reliance

This report is an instrument of service prepared by Sand Creek for the exclusive use of the City of Rhinelander, the User. With the written permission of the User, Sand Creek will meet with a third party to help identify the additional services required, if any, to permit such third party to rely upon the information contained in this report, but only to the same extent of the User's reliance, and subject to the same contractual, technological, and other limitations to which has been agreed upon.

2 SITE DESCRIPTION

2.1 Location and Legal Description

The address of the *Property* is 34 S. Stevens Street, Rhinelander, Wisconsin. The *Property* is located near the center of the City of Rhinelander. The public land survey system legal location is the SW ¼ of the NW ¼, Section 6, T 36 N, R 9 E, in the City of Rhinelander, Oneida County, Wisconsin.

The *Property* is comprised of one parcel of approximately 0.15 acre. **Figure 2** shows the tax parcel map for this *Property*.

A map of the *Property* showing the Wisconsin Department of Natural Resources (WDNR) Bureau for Remediation and Redevelopment Tracking System (BRRTS) is provided in **Appendix B**.

2.2 Site and Vicinity General Characteristics

The 0.15-acre *Property* is located near the center of the City of Rhinelander along Stevens Street. The *Property* is surrounded primarily by commercial property, with one residential property immediately to the south. **Figure 3** is a current Google Earth image of the *Property* and vicinity.

2.3 Current Use of the *Property*

At the time of the site visits (October and November 2013), the *Property* limits were completely occupied by buildings, all of which had been vacant since approximately 2010. The main floor building and basement, at the time of most recent use (2010) were, as observed during the site visits, used as a dry cleaner and steam laundry. The upstairs was an apartment, but based on the degree of disrepair, had probably not been used for living quarters in decades.

2.4 Descriptions of Structures, Roads, and Other Improvements on the Site

The building is approximately 151 feet by 40 feet. At the time of the site visit, neither the heat nor any of the utilities were in service, having been disconnected at the time the *Property* was abandoned by the owner in 2010.

2.5 Current Uses of the Adjoining Properties

The surrounding properties can, at times, affect the environmental conditions of a given subject property. Current uses of the adjoining properties listed below are from observations made by Sand Creek on the day of the site visit. No RECs were identified with the current uses of the adjoining properties.

2.5.1 <u>North</u>

The adjoining property to the north is a 2-story older brick building, currently used as an antique store.

2.5.2 <u>East</u>

The adjoining property to the east is Stevens Street. Across Stevens Street is a McDonald's restaurant.

2.5.3 <u>South</u>

Immediately south of the *Property* is an older, 2-story, brick building currently housing the Grey Wolf Nature Store, a retail shop for items of outdoor interest.

2.5.4 <u>West</u>

To the west of the *Property* is the alley between Brown and Stevens Street. West of the alley are downtown retail stores such a music shop, clothing stores, and other typical main street retail storefronts.

3 USER PROVIDED INFORMATION

3.1 Source

The *User* information was provided by the City of Rhinelander, via discussions with Mr. Blaine Oborn, the City Administrator. *User* provided information is included in **Appendix C**. The *User* did not provide any other information that was material to this Phase I ESA.

3.2 Title Records

The *User* was not asked to provide any title records or comparable legal records of current and/or historical ownership. The ownership of the *Property* is known to have been in the Lindgren family for over 90 years.

3.3 Environmental Liens or Activity and Use Limitations

The *User* did not report any environmental lien, activity use limitation, or comparable encumbrance on the *Property*. The User did report that the *Property* is in arrears on tax payments and penalties totaling roughly \$72,000, covering five years of non-payment of taxes, water utilities, penalties, and other fees.

3.4 Specialized Knowledge

The *User* did not report any specialized knowledge or experience that was material to RECs in connection with the *Property*. The User did provide a letter issued to the Property owner (in **Appendix C**) which the City used to gain access to the *Property* for this Phase I ESA.

3.5 Commonly Known or Reasonably Ascertainable Information

The *User* did not convey any commonly known or reasonably ascertainable information material to RECs in connection with the *Property*.

3.6 Valuation Reduction for Environmental Issues

The *User* did not provide any numerical information related to the value of the *Property* due to environmental issues. However, the *User* did report the *Property*, in its current state of disrepair (observed during a site walk-through), combined with the perception that the *Property* may be contaminated (citing long-known use as a dry cleaner) would probably have a very significant affect in reducing the value of the *Property* well below the currently assessed value of \$122,000. Current tax assessment information is included in **Appendix C.**

3.7 Owner, Property Manager, and Occupant Information

Mr. Carl A Lindgren is the *Property* owner. There currently are no occupants. Mr. Lindgren is in a nursing home and of limited capacities and was not able to contribute to this Phase I ESA.

3.8 Reason for Performing Phase I ESA

This Phase I ESA was performed because the *User* is considering a foreclosure action (in conjunction with Oneida County). After the City acquires the *Property*, the plan is to proceed with remediation and redevelopment of the *Property*. And as part of the remediation and redevelopment, Site Assessment Grants, Brownfield Grants, and possibly EPA grants are being sought. Some or all of these grant programs require a Phase I ESA to be completed.

Secondly, the City of Rhinelander is performing this Phase I ESA to qualify for the innocent landowner defense to CERCLA liability.

4 RECORDS REVIEW

4.1 Standard Environmental Record Sources

A search was conducted of governmental databases to obtain information about potential or reported environmental problems associated with the *Property* or other properties within the ASTM E 1527-05 minimum search distances. Sand Creek subcontracted the database search to Environmental Data Resources, Inc. (EDR®) of Milford, Connecticut. A copy of the EDR Radius MapTM Report is provided in **Appendix D**. The EDR report in **Appendix D** is a web-based document, with many links to on-line files and other documents. Hard copy versions of this report will not have access to the hyperlinked data.

Federal databases searched included, but are not limited to, the following: NPL (National Priority List), Delisted NPL, CERCLIS (Comprehensive Environmental Response, Compensation, and Liability Information System), CERCLIS-NFRAP (CERCLIS No Further Remedial Action Planned), RCRA CORRACTS (Resource Conservation and Recovery Act Corrective Action Report), RCRA TSD (Treatment, Storage, and Disposal Facilities), RCRA Generators, Federal Institutional Controls (IC), Federal Engineering Controls (EC), and ERNS (Emergency Response Notification System) and Tribal Lands.

State databases searched included, but are not limited to, the following: SHWS (State Hazardous Waste Sites), ERP (Environmental Repair Program), SWF/LF (Licensed Landfills), WDS (Registry of Waste Disposal Sites), LUST (Leaking Underground Storage Tanks), UST (Registered Underground Storage Tanks), AST (Registered Aboveground Storage Tanks), AUL (Deed Restriction at Closeout Sites), VCP (Voluntary Party Liability Exemption Sites), and BEAP (Brownfields Environmental Assessment Program). State tribal sites are included in the above state lists.

The information in the EDR Radius Map^{TM} Report has been evaluated in conjunction with the results of the *Property* inspection and the evaluation of its setting. Except as specifically discussed below, listed sites that were not located on the *Property* or were estimated not to be actually or potentially upgradient of the *Property* were judged not to represent an environmental concern with respect to the *Property*.

The database search identified 54 sites with environmental listings within the ASTM search distances from the *Property*. The search also identified 26 orphan sites that could not be mapped due to inadequate address information. No information gathered during this assessment indicated that any of the orphan sites was associated with the *Property* or the adjoining properties. The following sections summarize the results of the record search.

4.2 Database Listings for the Subject Property

The *Property* was listed in the following databases:

4.2.1 EDR US Historical Cleaners: EDR Exclusive Dry Cleaner Sites

This is a non-ASTM database which lists former dry cleaner properties known to EDR. This site is listed, correctly as it is a former dry cleaner.

4.2.2 RCRA Generator Sites

The *Property* is listed as a Conditionally Exempt Small Quantity Generator. This listing was initiated in 1987, probably in response to directives from WDNR to register for small quantity waste generation associated with dry cleaning agents. However, the *Property* was listed as a RCRA non-generator as of December 30, 2009, indicating no hazardous waste is presently generated. The 2009 date is approximately the date the cleaners closed their business.

4.2.3 <u>FINDS: Facility Index System/Facility Registry System</u>

The *Property* is listed in the Wisconsin – Environmental System Registry database and the RCRA program. The FINDS database lists both facility information and 'pointers' to other sources that contain more detail.

4.2.4 BRRTS: Bureau for Remediation and Redevelopment Tracking System

The BRRTS tracking system lists contaminated sites in Wisconsin. It holds key information for finding out more about a site or an activity.

The *Property* was listed in the BRRTS tracking system with a start and end date of August 18, 1992, the date on which two underground storage tanks were removed from the *Property*. Low-level soil contamination was discovered and reported to the WDNR, which resulted in this listing. See the Tank Closure Assessment report in **Appendix J**.

4.2.5 <u>UST: Underground Storage Tank Database</u>

One registered UST was listed for the *Property*. A 2,500-gallon tank was listed as removed in 1999. In fact, this tank was actually closed in place. The documentation for this closure activity in in **Appendix J**, however, the file information does not indicate the location of this tank. As of this writing, the location of the sand-filled heating oil tank is not known. Soil sampling is not known to have been completed as part of this tank closure-in-place.

4.2.6 MANIFEST: Hazardous Waste Manifest Information

The WDNR operates a federally authorized hazardous waste regulatory program. The MANIFEST lists hazardous waste generators and facilities to ensure hazardous wastes are properly managed.

The *Property* was listed as a very small hazardous waste generator. A very small quantity generator generates 100 kilograms (220 pounds) or less of non-acutely hazardous waste in a month. This listing is typical for dry cleaning facilities.

4.2.7 SHWIMS: Solid and Hazardous Waste Information Management System

SHWIMS provides access to information on sites that are regulated by the WDNR Waste and Materials Management program. Activities that occur at facilities include landfill operation, waste transportation, hazardous waste generation, wood burning, waste processing, sharps collection and many more.

The *Property* was listed on the SHWIMS list as being closed.

4.3 Other Databases Searches Summarized

This section contains only a partial list of the other databases searched. Refer to **Appendix D** for the complete list of databases searched.

4.3.1 NPL and Delisted NPL Sites (1 mile)

No NPL or Delisted NPL sites were identified within the search radius are considered to pose a material environmental concern to the *Property*.

4.3.2 <u>CERCLIS and CERCLIS NFRAP Sites (½ mile)</u>

No CERCLIS NFRAP sites were identified within the search radius which are considered to pose a material environmental concern to the *Property*.

4.3.3 RCRA CORRACTS Sites (1 mile)

No RCRA CORRACTS within the search radius were identified which are considered to pose a material environmental concern to the *Property*.

4.3.4 RCRA TSD Sites (½ mile)

No RCRA TSD sites were identified within the search radius which are considered to pose a material environmental concern to the *Property*.

4.3.5 RCRA Generator Sites (Adjoining Properties)

No adjoining properties were listed as a RCRA generator site.

4.3.6 Federal, State, and Tribal IC/EC List (Property only)

The *Property* was not identified as a site with engineering or institutional controls.

4.3.7 ERNS List (Property only)

The Property was not identified as an ERNS site.

4.3.8 Federal Tribal Lands (1 mile)

No federal tribal land sites were identified within the search radius which are considered to pose a material environmental concern to the *Property*.

4.3.9 State Hazard Ranking List (1 mile)

No state hazardous waste sites were identified within the search radius which are considered to pose a material environmental concern to the *Property*.

4.3.10 State SWL (½ mile)

No active or closed, registered, or permitted solid waste landfills were identified within the search radius which are considered to pose a material environmental concern to the *Property*.

4.3.11 State LUST or LAST Sites (½ mile)

No LUST or LAST sites within the search radius are considered to pose a material environmental concern to the *Property*.

One LUST site is quite close, the former SuperAmerica LUST site (Comm ID 54501345748, closed with GIS Registration for groundwater contamination), is located less than 300 feet in the side-gradient/downgradient location. Based on local groundwater flow directions obtained from nearby LUST site data, groundwater flow from the *Property* is expected to be more westerly, and not be comingled with the SuperAmerica plume. See **Appendix D** for a list of all known LUST and LAST sites within the search radius.

4.3.12 State Registered UST and AST Sites (Adjoining Properties)

No registered UST or AST sites within the search radius are considered to pose a material environmental concern to the *Property*. All adjoining properties with registered UST sites have been closed/removed.

See **Appendix D** for a list of all known UST and AST sites within the search radius. (We note that other sources, i.e. Sanborn maps, indicate USTs in close proximity to the subject *Property*. Those tanks are not registered, and do not appear in the search data, and are listed in this report later in the appropriate section).

4.3.13 ERP Sites

No ERP sites identified within the search radius are considered to pose a material environmental concern to the *Property*.

4.3.14 Spill Sites

No spill incidents were listed for the *Property* or the adjoining properties.

4.3.15 VCP and Brownfield Sites (½ mile)

No VCP or Brownfield sites were identified within the search radius which are considered to pose a material environmental concern to the *Property*. The *Property* itself may at some time become a brownfield, but as of this writing it is not formally designated as such.

4.4 Additional Environmental Record Sources

Sand Creek reviewed on-line WDNR BRRTS mapping to determine more accurate locations of database sites identified in close proximity to the *Property* in the EDR Radius Map^{TM} Report.

4.5 Records Review Summary Sources

The objective of the environmental records review is to obtain and review records that will help identify RECs in connection with the *Property*. It is Sand Creek's opinion that the objective has been met, and no additional environmental record source review is warranted.

4.6 Physical Setting Sources

Information regarding the physical setting of the *Property* was obtained from observations made during the site visit, a current USGS topographic map, the Natural Resources Conservation Service Web Soil Survey (WSS), and other hydrogeological data available on-line.

The general setting of the *Property* is discussed in Section 5.2.

The *Property* is located near the center of Rhinelander, along the main north-south thoroughfare. Other land use in the area consists of the downtown commercial district, which in Rhinelander is exclusively retail as of 2013 with industrial or light industrial in the immediate vicinity of the *Property*. There are also residential properties to the east, and some residential property intermixed with the downtown business district where second floor apartments often overlie main-floor storefronts. The property immediately adjoining to the south is a storefront on the main floor and a residence (apartment) on the second floor.

The topography of the area is flat with surface water flowing into storm sewers end eventually discharging to the Wisconsin River. The elevation of the site is approximately 1,552 feet above mean sea level.

The *Property* is located approximately 975 feet east of the Wisconsin River. Regional groundwater flow is estimated to be to the west, directly toward the river. Based on information from nearby LUST site work, groundwater in the vicinity of the *Property* is estimated to be at an elevation of approximately 1,535 feet MSL, or roughly 17 feet below ground surface.

Soils on the site are mapped as the Padus Sandy Loam. Subsurface materials in the area are generally fluvial deposits of sand. The underlying bedrock is likely Penokean metavolcanc in origin, at depths estimated at between 20 and 50 feet below ground surface.

4.7 Historical Use Information

Sand Creek researched the history using the standard historical sources listed below:

- Aerial photos from the years 1938, 1948, 1960, 1964, 1979, 1980, 1986, 1992, 1998, 2005, 2006, 2008, and 2010, provided by EDR, which are found in **Appendix E**.
- Sanborn Fire Insurance Maps from the years 1889, 1894, 1900, 1908, 1920, 1929, 1946, and 1960; Sanborn Fire Insurance Maps provided by EDR are in **Appendix F**. Enlargements of the Sanborn maps showing detail for the subject *Property* are in **Appendix G**.

Historical summaries of the *Property* and the adjoining properties are included in the following sections. All dates are approximate.

4.7.1 <u>History of the *Property*</u>

See **Appendix G** for enlarged Sanborn maps, which are the basis for much of the interpretation in this section.

Prior to 1889

The Property was a mix of storefronts and outbuildings.

1894

The *Property* is being used as a print shop, barber shop, and a plumbers shop. Several other unnamed outbuildings appear.

1900

The *Property* is again indicated as a print shop with a "water motor." The barber shop remains from 1894 as do several outbuildings.

1908

The Property is indicated as a steam laundry in the northeastern part of the building.

<u> 1920 – Present</u>

The *Property* is known from maps and other sources to have been a dry cleaner operation through all of this period. The dry cleaning operations apparently moved around within the building, starting in the front and gradually expanding and moving to the back (west) side of the *Property*. **Figure 4** shows the location of the dry cleaning operational areas over the evolution of the *Property*.

At least 8 USTs and 1 AST are known to have been used on this *Property* since 1920. A summary of the tanks used, and their current status, is in the table below. Note that the locations of all tanks are not known. We also note there is no available information to indicate which tanks were removed as the *Property* was redeveloped. In the table below, "unknown" in the removal date column means the tanks could have been removed or could be still in place. **Figure 4** shows the locations of the USTs with known locations.

Lindy Cleaners
Summary of Known UST/AST Information

Tank #1	Installed ²	Removed ³	Size (gal)	UST/AST	Contents	Info Source
1	~1917	unknown	100	UST	DC Solvent	1920 Sanborn Map
2	~1925	unknown	unknown	UST	DC Solvent	1929 Sanborn Map
3	~1925	unknown	unknown	UST	DC Solvent	1929 Sanborn Map
4	~1925	unknown	unknown	UST	DC Solvent	1929 Sanborn Map
5	~1925	unknown	unknown	UST	DC Solvent	1929 Sanborn Map
6	~1965?	1993	550	UST	DC Solvent	MSA Report 9/92 (App J)
7	~1965?	1993	1,000	UST	DC Solvent	MSA Report 9/92 (App J)
8	Unknown	2002	1,000	AST	DC Solvent	Rhi Fire Dept Files (App J)
9 4	Unknown	AIP 1999	2,500	UST	Fuel Oil	Rhi Fire Dept Files (App J)

Notes: 1. Tank Number refers to locations shown on Figure 4.

- 2. Installed year and removal years (where known) are approximate.
- 3. Tanks with "unknown" as removal date may still be in place.
- 4. Not shown on Figure 4 because location unknown.

A milk depot and other forms of cold storage shared the *Property* use in the middle of the twentieth century.

No other historic uses of the *Property* were identified from historic documents or interviews.

4.7.2 <u>History of Adjoining Properties</u>

The current uses of adjoining properties were discussed in Section 2.5. The history of adjoining properties is gleaned from a review of the historical aerial photos and Sanborn maps. Only those property uses which may indicate the potential for environmental impacts to the subject *Property* are discussed. Relatively benign uses (i.e., hotels, bowling alleys, etc.) are not discussed. Refer to the Sanborn maps for more detail on benign uses of the adjoining properties.

To the north is an antique dealer. The history of this property is of an auto garage and gas station in the mid-twentieth century. Underground tanks are known to have been present to the east side of the property (see 1946 Sanborn map). Also, this property was a printer/print shop for several decades in the 1920s and 1930s.

To the west is the alley. West of the alley are downtown storefronts. There is no historical information that suggests the storefront properties to the immediate west have any issues of environmental concern associated with them.

To the east is the McDonald's restaurant. This property was also a filling station, with underground tanks shown on Sanborn Maps from the 1920s to 1946. No environmental investigation or testing is known to have been completed on this property.

To the south is the Grey Wolf Nature Store. The history of this property includes a bakery and an ice cream shop, among other things. No environmental impacts are expected to affect the subject *Property* from the known uses of this property.

No other historic uses of adjoining properties were identified from historic documents or interviews.

5 SITE RECONNAISSANCE

5.1 Methodology and Limiting Conditions

On October 3, 2013, Christopher Rog of Sand Creek performed a site reconnaissance of the *Property*. Mr. Rog was accompanied by the *User* (the City of Rhinelander, represented by Mr. Blaine Oborn). The site reconnaissance included a walk through all areas of the *Property*, including observations of the *Property* perimeter; and observations of adjoining properties from the *Property* and public right of ways.

With all utilities turned off, the lighting in the basement was difficult. The area was inspected with flashlights, but without broadcast lighting.

5.2 General Site Setting

Based on the site reconnaissance, the following observations were made. The *Property* is vacant, with dry cleaning operations having ceased in early 2010. The *Property* is completely covered with buildings. Based on the site visit observations and on Sanborn maps, the current buildings on the site are a conglomeration of additions and modifications to pre-existing structures. The main floor is of solid, concrete, and steel girder construction. The basement occupies less than a quarter of the total acreage, and is of fieldstone and mortar construction. The second floor is a stick-built apartment.

Water and sewer is provided by the City of Rhinelander. Electricity and natural gas is provided by Wisconsin Public Service. All utilities were disconnected at the time of the site visit, and are believed to have been disconnected since approximately 2010.

5.3 Exterior Observations

The *Property* is completely covered by building structures.

5.4 Interior Observations

Figure 4 show a floor plan of the main floor of the building, and **Figure 5a** and **5b** show the floor plans for the basement and second floor apartment, respectively. The annotated photolog, in **Appendix H**, is an integral part of the reporting on the site visit. Additional information from the site visit is in the photolog which may or may not be discussed in this section of the report.

During the visit, the *Property* was observed to be in a state of gross disrepair, with the roof leaking in more than a dozen places. Rain was observed to be pouring into the structure from the second floor to the basement.

Most or all of the machines used for the dry cleaning process and steam laundry were in place during the visit. At least two of the dry cleaner machines were observed to still be loaded with solvent. Other machines that were not accessible may have product in them.

In more than a dozen locations throughout the building cans, bottles, and drums containing liquids were observed. Some of the containers are in their original containers clearly labeled and apparently non-hazardous (i.e., laundry soap). However, numerous containers, some up to 30 gallons, have what appears to be solvent from the dry cleaning process. Some of these containers are uncovered and

outside, allowing rain to enter them and displace the contents. Drums labeled 'hazardous waste' were observed storing smaller containers with unknown contents. In general, the site is loaded with containers of known and unknown contents throughout all parts of the building (except the upstairs).

Several 1 gallon containers of Picrin, a trade name for a product that contains 75 percent trichloroethelyene, were noted.

During the asbestos inspection, friable asbestos was clearly observed as pipe wrap throughout most of the steam laundry. Most of the wrap was wet and sagging from the piping runs.

Waste generated from the filter cakes and other process wastes from the dry cleaning operations were observed, albeit in small quantities. Not all of the filter systems for the dry cleaning cycle were readily inspectable, and additional hazardous waste may be in machines not inspected.

In the small space in between the two buildings, there is a pipe sticking up from the ground which looks much like a UST vent pipe. Access to this area is limited.

At least three potential waste disposal areas were identified:

- On the main floor, the large floor drain in the dry cleaning room is a brick-lined, sewer, apparently connected to the sanitary sewer. Observations are that this brick sewer leaks to some degree (water level in the sewer falls below the outlet after it rains). A small hose draining into the sewer was followed to its source: the solvent tank filer. Therefore, it is reasoned that the owner appears to have regularly opened a valve on the solvent tank filter to discharge spent solvent to this 'leaky' sanitary sewer. The area beneath this sewer is likely to have been impacted by solvent discharges to this sewer.
- East of the boiler room is a former dry cleaning operations area where the concrete slab is apparently not present, and the 'floor' is earthen. Since there is no basement beneath this area, the possibility exists that this soil area was a discharge point for waste solvent (accidental or intentional) when the dry cleaner was operating in this room, from roughly 1926 to 1953.
- In the basement is another earthen sump, located in the north central part of the *Property*. This area is directly beneath the dry cleaning operations area for the period 1915 to 1953. Moreover, the current (apparently) solvent distillation unit is located immediately adjacent to this sump. Since discharge of any solvent contaminated water from the distillation unit is lower than the sanitary sewer line, a possible gravity-flow place for disposal of this waste would be the adjacent sump. A hose was observed hanging over the sump, and was traced to an open end with no evidence of what the hose was draining.

Taken together, the observations are that the owners of the dry cleaner simply 'walked away' on the last day of operations, making no effort whatsoever to close the business, sell the machines, salvage any product, or take any other steps other than to lock the door on their way out.

While the doors are locked, several trespass entry points are noted. Evidence of trespass includes beer cans strewn in the courtyard (shown as "open storage" on **Figure 4**).

6 Interviews

Pertinent information obtained during the interviews is summarized here and in other sections of the report, as noted.

6.1 Interview with Owner

Mr. Carl Lindgren is the current owner of the subject *Property.* Mr. Lindgren was not available for interview for this report (he is in a nursing home with limited capacities).

6.2 Interview with Site Manager and Occupants

The *Property* is currently vacant with no active Site Manager.

6.3 Interviews with Local Government Officials

Terry Williams, Rhinelander Fire Department (RFD) Chief, was interviewed. Mr. Williams was aware of two UST removals from the *Property*, and was able to provide the RFDs paperwork on the removals. The dates and contents of the tanks were in the materials, but the locations of the tanks were not in the RFD files. The removals (one in 1999, another in 2002) were overseen by an RFD employee who is retired and no longer in the state. Other than the tank information, Mr. Williams had no other information of relevance on the *Property*.

6.4 Interviews with Others

Sand Creek interviewed (and toured the building) with Mr. Dan Brunette, owner of the only other dry cleaner facility in Rhinelander. Mr. Brunette had a long historical knowledge of the *Property*, his grandfather having worked at Lindy Cleaners in the mid-twentieth century before starting City Cleaners across town. Mr. Brunette was able to show the various working areas of the dry cleaner, and point out the machines, their function, and which of the many piping runs were likely to contain solvent vs. steam.

Mr. Brunette also confirmed that this dry cleaner never made the switch to perchloroethylene (perc) in the 1930s when almost all other dry cleaners nationwide did. Lindy Cleaners used a gasoline-type solvent, sometimes called Stoddard Solvent, a product similar to mineral spirits with high benzene and naphthalene contents (The main reason this type of solvent was phased out was its very low flash point of approximately 100 to 140° F, which caused many of these operations to catch fire or explode). Inspecting some of the machines, Mr. Brunette pointed to the solvent in one of the machines and identified it as Stoddard/Mineral Spirits, confirming it appears, that Mr. Lindgren in fact never did make the switch to perc.

Further evidence that this dry cleaner used petroleum-based solvents and not perc is the well-known petroleum odor that clothing cleaned at Lindy Cleaners always had (perc is a low or no-odor product whereas Stoddard Solvent smells of petroleum, even after cleaning).

Finally, the Sanborn maps show tanks on the *Property*, and lists then as underground G.Ts., which is short for gasoline tanks. Taken together, the information available is consistent and indicates this *Property* is not likely a major user of the chlorinated solvent perc, but instead is a major user of benzene-containing Stoddard Solvent (several 1-gallon cans of a product containing TCE were observed, but these were likely for spot stain removal and not for dry cleaning machine use, as Mr. Brunette indicated).

7 PHASE I ESA RESULTS

7.1 Findings

7.1.1 <u>Recognized Environmental Conditions</u>

Known RECs identified include (in no particular order):

- 1. The historical use of at least eight underground solvent storage tanks on the 0.15 acre property (only two of which are known to have been removed, one was abandoned in place, and the current status of the other five are unknown), constitutes a REC.
- 2. The observed presence of numerous containers, ranging in size from a few quarts to 50 gallons, many of which are open, some of which are outside and in a rapid state of rust and deterioration, some clearly labeled as "hazardous waste" (suspected as waste solvent, yet with specific contents not known) constitutes a REC.
- 3. The observation of a potential waste disposal area in the current dry cleaning operational area, where an older, leaky brick sewer has a hose discharging to it that is observed to be draining from the solvent filter tank, could cause solvent contamination to leak from the sewer into soils outside the sewer, and constitutes a REC.
- 4. The observation of an earthen "pit" penetrating the basement concrete slab, located immediately adjacent to the solvent/water distillation unit, and with a hose running to the pit, constitutes a REC.
- 5. The observed earthen pit in the current shop, on the first floor, could have been used for waste disposal. This constitutes a REC since the concrete floor in this area has direct access to the soil in an area where dry cleaning machines were operating for almost 30 years.
- 6. The history of use of the *Property* as a dry cleaner since at least 1920, and at its peak (in the 1870s -1990s) operating as many as four dry cleaner machines at once, with over 90 years of hazardous waste generation and limited records of evidence of off-site or lawful disposal, constitutes a REC.

Figure 6 shows the location of these RECs on the site plan.

7.1.2 Potential Recognized Environmental Conditions (PRECs):

Sanborn maps showing underground gasoline tanks in the mid to late twentieth century along the east side of Stevens Street (immediately east of the *Property* associated with what is now McDonald's at 25 and 33 S. Stevens) and north (currently the antique dealer at 28 S. Stevens) could present an off-site impact if leakage from those tanks occurred, reached groundwater, and flowed to the west or southwest onto the subject *Property*.

7.1.3 <u>Historical Recognized Environmental Conditions</u>

No known or suspect HRECs were identified in connection with the Property.

7.1.4 <u>De Minimus Conditions</u>

No known de minimus conditions were identified in connection with the *Property*. However, the presence of dozens of solvent containers on the *Property* (used for stain removal), some of which are

known to be hazardous substances, suggests that de minimus spills may have been present in the 90+ year operational period of this dry cleaner.

7.1.5 <u>Potential Environmental Concerns</u>

A total of seven known or suspect potential environmental concerns were identified in connection with the *Property*, as described in Section 7.1.1 and 7.1.2.

7.2 Opinions

Based upon information obtained during this assessment, it is Sand Creek's opinion that all seven of the findings listed in Section 7.1.1 and 7.1.2 represent RECs.

From the database search, several sites located within one mile or less of the subject *Property* are listed in various databases. However, none of the sites listed is known or suspected to have impacted the subject Property.

7.3 Conclusions

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-05 of the Former Lindy Cleaners, located at 34 S. Stevens Street, Rhinelander, Wisconsin, the *Property*. Any exceptions to, or deletions from, this practice are described in Section 7.5 of this report. This assessment has revealed evidence of recognized environmental conditions in connection with the *Property* including the following (in no particular order):

- 1. The historical use of at least eight underground solvent storage tanks on the 0.15 acre property (only two of which are known to have been removed, one was abandoned in place, and the current status of the other five are unknown) constitutes a REC.
- 2. The observed presence of numerous containers, ranging in size from a few quarts to 50 gallons, many of which are open, some of which are outside and in a rapid state of rust and deterioration, some clearly labeled as "hazardous waste" (suspected as waste solvent, yet with specific contents not known) constitutes a REC.
- 3. The observation of a potential waste disposal area in the current dry cleaning operational area, where an older, leaky brick sewer has a hose discharging to it that is observed to be draining from the solvent filter tank, could cause solvent contamination to leak from the sewer into in soils outside the sewer, and constitutes a REC.
- 4. The observation of an earthen "pit" penetrating the basement concrete slab, located immediately adjacent to the solvent/water distillation unit, and with a hose running to the pit, constitutes a REC.
- 5. The observed earthen pit in the current shop, on the first floor, could have been used for waste disposal. This constitutes a REC since the concrete floor in this area has direct access to the soil in an area where dry cleaning machines were operating for almost 30 years.
- 6. The history of use of the *Property* as a dry cleaner since at least 1920, and at its peak (in the 1870s -1990s) operating as many as four dry cleaner machines at once, with over 90 years of hazardous waste generation and limited records of evidence of off-site or lawful disposal, constitutes a REC.

7. Sanborn maps showing underground gasoline tanks in the mid to late twentieth century along the east side of Stevens Street (immediately east of the *Property* associated with what is now McDonald's at 25 and 33 S. Stevens) and north (currently the antique dealer at 28 S. Stevens) could present an off-site impact if leakage from those tanks occurred, reached groundwater, and flowed to the west or southwest onto the subject *Property*.

7.4 Additional Services

Additional services beyond the scope of this Phase I Environmental Site Assessment were requested by the client and are underway. Sand Creek is preparing several applications for the state (WEDC and WDNR, Site Assessment and Brownfield Grants) and Federal (EPA) grants to assist in financing the completion of a Phase II, and possibly remedial actions, building demolition, asbestos removal, hazardous substance removal, and other activities to return this *Property* to a useable state.

7.5 Deviations

This ESA was conducted in general conformance with practice ASTM E1527-05, with no significant deletions or deviations therefrom.

8 REFERENCES

American Society for Testing and Materials (ASTM) Standard E 1527-05, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, July 20, 2006.

Brunette, Dan, City Cleaners (competing dry cleaner owner), in-person interview, October 18, 2013.

Environmental Data Resources, Inc., Certified Sanborn® Map Report, Lindy Cleaners, 34 S. Stevens Street, Rhinelander, WI 54501, October 11, 2013.

Environmental Data Resources, Inc., The EDR Aerial Photo Decade Package, Lindy Cleaners, 34 S. Stevens Street, Rhinelander, WI 54501, October 11, 2013.

Environmental Data Resources, Inc., The EDR Radius Map[™] Report, Lindy Cleaners, 34 S. Stevens Street, Rhinelander, WI 54501, October 11, 2013.

Google Earth, reviewed on-line October 2013.

Oborn, Blaine, City of Rhinelander, User, October and November 2013.

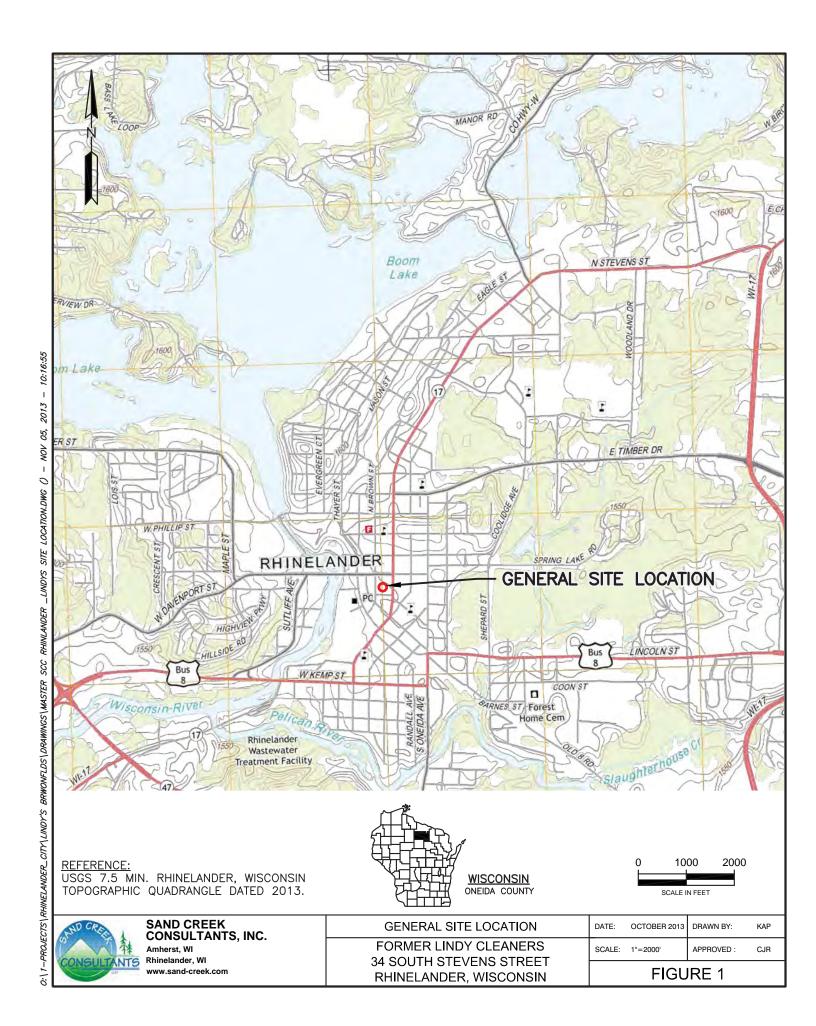
Oneida County GIS system, reviewed on-line between October 15 and November 4, 2013.

WDNR BRRTS Database and Mapping, reviewed on-line, October 2013.

United States Department of Agriculture, Natural Resources Conservation Service Web Soil Survey (WSS), Oneida County, Wisconsin, October 2013.

Williams, Terry, Rhinelander Fire Department, telephone interview, October 2013.

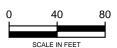
Figures





NOTE:

GOOGLE EARTH IMAGE DATED 05/19/2013.





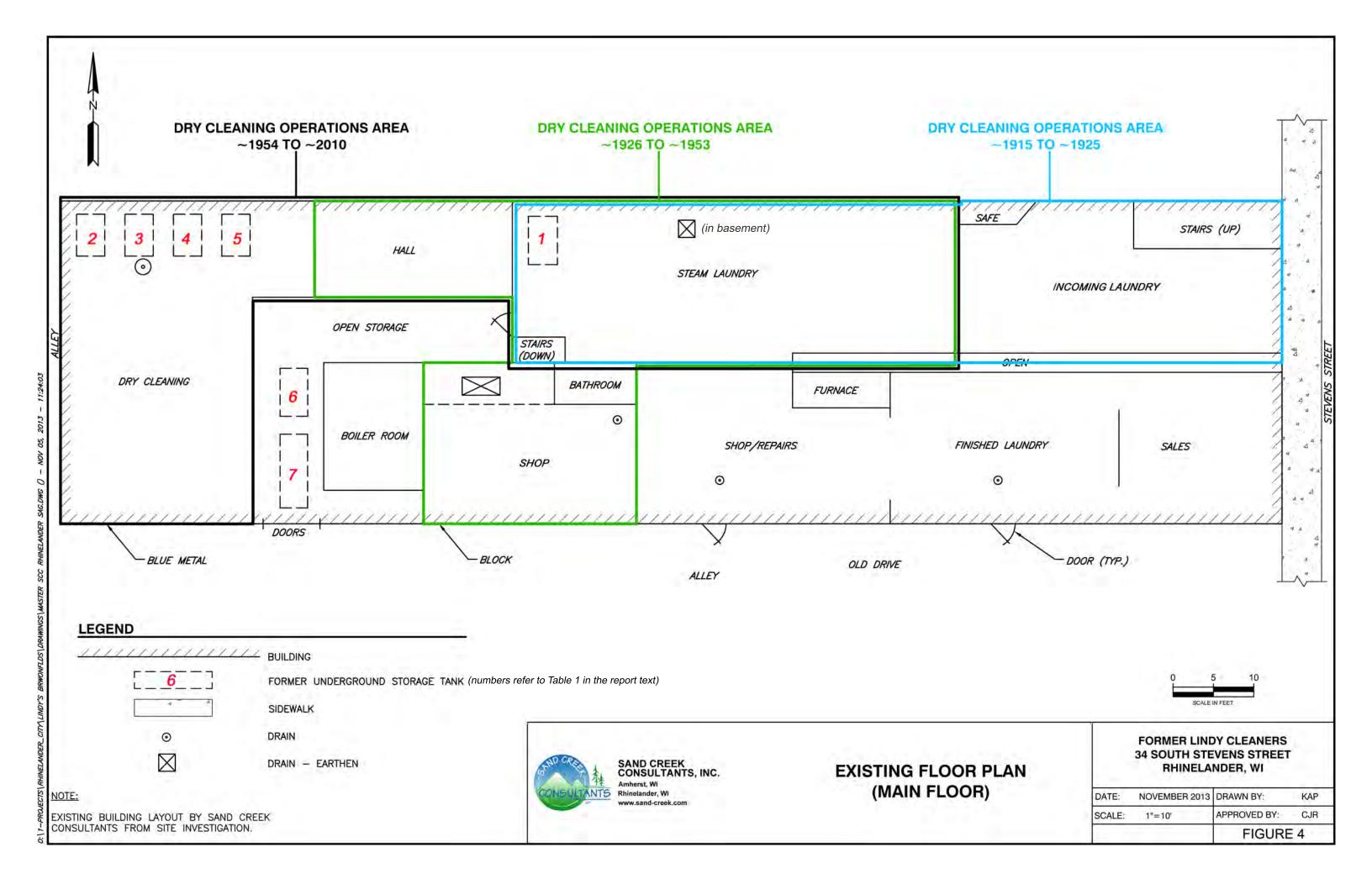
SAND CREEK CONSULTANTS, INC.

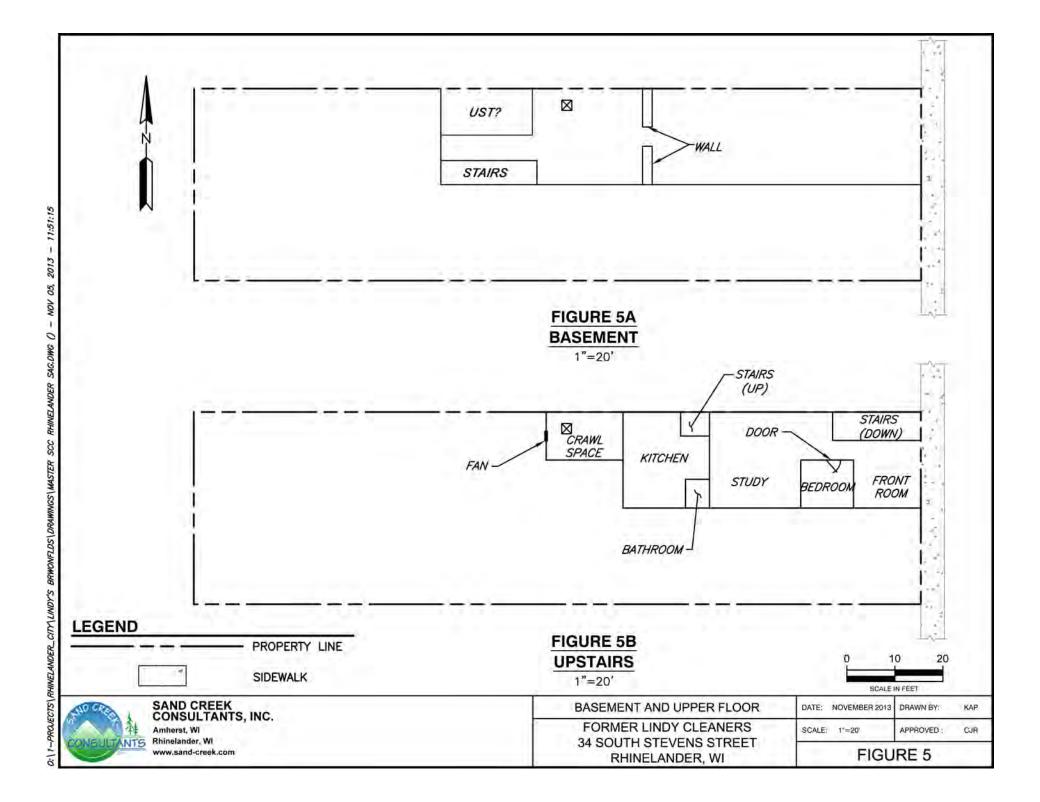
Amherst, WI Rhinelander, WI www.sand-creek.com

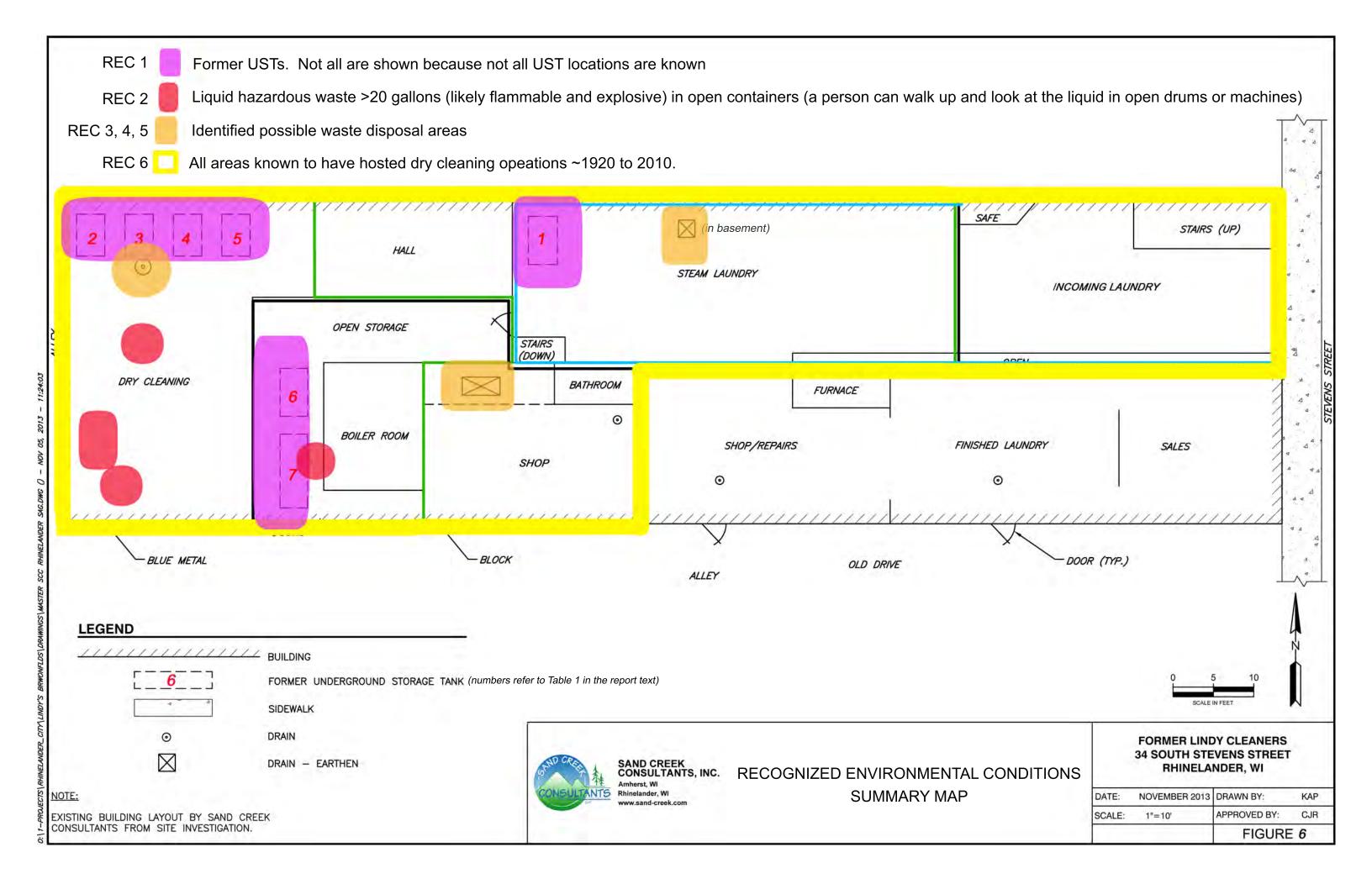
AERIAL PHOTO
FORMER LINDY CLEANERS
34 SOUTH STEVENS STREET
RHINELANDER, WI

DATE:	NOVEMBER 2013	DRAWN BY:	KAP
SCALE:	1"=80'	APPROVED :	CJR

FIGURE 3







THE FOLLOWING APPENDIX ARE ON THE CD ROM VERSION ONLY

Appendix A Qualifications of the Environmental Professional and Personnel

Appendix B
Property Maps

Appendix C
User Provided Information

Appendix D
EDR Database Search Report

Appendix E
Historical Air Photos

Appendix F
Sanborn Maps

Appendix G
Sanborn Maps: Enlarged for Property Detail

Appendix I
Asbestos Assessment Report

Appendix H

Photo Log



Photo #1 Looking west at the storefront, from across Stevens Street. Both the low brick building and the blue two- story building are the Lindy Cleaners Property.

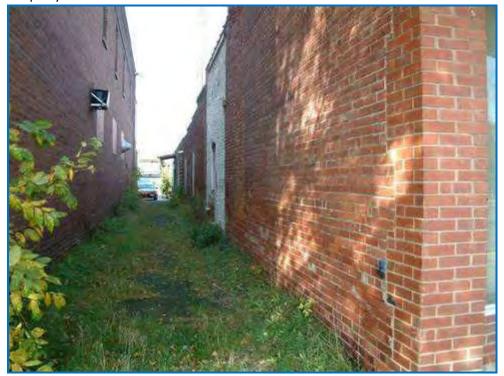


Photo #2 Alley on the south side of the building. The second floor of the building on the left is residential (upstairs of the Grey Wolf Nature Store).

Sand Creek Consultants, Inc. Page 1 of 26



Photo #3 Second floor apartment on the *Property*. Windows are completely gone.



Photo #4 Between the two buildings on the *Property*. Note what looks like a UST vent about 5 feet high against the brick wall in the back. No known UST that this would be connected to.

Sand Creek Consultants, Inc. Page 2 of 26



Photo #5 Looking at the southwest corner of the Lindy Cleaners building.



Photo #6 Broken glass is noted in the storefront and could pose a safety hazard or point of illegal entry.

Sand Creek Consultants, Inc. Page 3 of 26



Photo #7 Back of the building. Open windows are allowing rain to pour in, and could be an entry point for illegal access.



Photo #8 Basement, looking east. Lots of miscellaneous stuff in the basement.

Sand Creek Consultants, Inc. Page 4 of 26



Photo #9 Basement. Structure is old, dingy, and wet, but solid. No rats.



Photo #10 Basement. Evidence of water damage.

Sand Creek Consultants, Inc. Page 5 of 26



Photo #11 Basement hall, looking east toward Stevens Street.



Photo #12 Basement front room, along Stevens Street in the background.

Sand Creek Consultants, Inc. Page 6 of 26



Photo #13 Twin compressors in the basement near the stairs.



Photo #14 Basement, the solvent condenser/distillation unit. The sanitary sewer pipe is higher than the solvent condenser/distillation unit; therefore, there is no obvious place to discharge solvent-contaminated water to the sewer. A small pit (not visible here, see Photo #15) is adjacent and on the right side of the distillation unit.

Sand Creek Consultants, Inc. Page 7 of 26



Photo #15 Small pit in the basement cited as a REC. This sump is adjacent to the solvent distillation unit shown in Photo #14, and could have been used to discharge solvent/water mixtures. Note the black hose discharging to the sump on the left.



Photo #16 In the outside storage, a 30 -gallon drum with unknown liquid. The drum was covered after the photo to prevent rain from displacing the product. Cited as a REC with outer open containers.

Sand Creek Consultants, Inc. Page 8 of 26



Photo #17 In the outdoor storage, beer can is possible evidence of trespass.



Photo #18 Entrance to the outdoor storage area.

Sand Creek Consultants, Inc. Page 9 of 26



Photo #19 Outdoor storage area. The two cones represent former USTs Nos. 6 (foreground) and 7 (background) on Figure 4.



Photo #20 Outdoor storage area. More abandoned containers.

Sand Creek Consultants, Inc. Page 10 of 26



Photo #21 Dry cleaning equipment room, solvent filter.



Photo #22 Looking southwest. General view of recent dry cleaning area. The two large older dry cleaning machines on the right have solvent in them.

Sand Creek Consultants, Inc. Page 11 of 26



Photo #23 Dry cleaning machines on the left. These are newer variety, with built-in distillation units.



Photo #24 Drum (90% full) of unknown contents adjacent to one of the older dry cleaning machines. Likely to be spent solvent from the machine.

Sand Creek Consultants, Inc. Page 12 of 26



Photo #25 General view of current dry cleaning area. Spin machine in foreground and newer machines in the background.



Photo #26 The entire dry cleaning area floods when it rains from leaks in the roof, walls, and windows.

Sand Creek Consultants, Inc. Page 13 of 26



Photo #27 Old brick sanitary sewer (36-inch) in modern dry cleaning room. This brick sewer leaks, as evidenced during rain storms and dropping water levels. Notice the yellow hose draining into the sewer (see Photo 28 for more).



Photo #28 This is the other end of the yellow hose in Photo 27. Note it is permanently connected to the solvent filter tank, suggesting spent solvent may have been discharged to the sewer regularly.

Sand Creek Consultants, Inc. Page 14 of 26

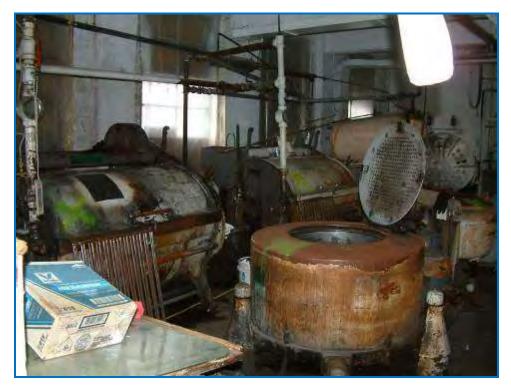


Photo #29 Another view of the dry cleaning area, looking northwest. Yellow paint denotes machines with visible solvent in them.



Photo #30 The "Petro-Miser" another aged dry cleaning machine in the current dry cleaning area.

Sand Creek Consultants, Inc. Page 15 of 26



Photo #31 Roof drain pluming in the dry cleaning room is severed, and all rain comes directly into the building, washing whatever is on the floor into the drain.

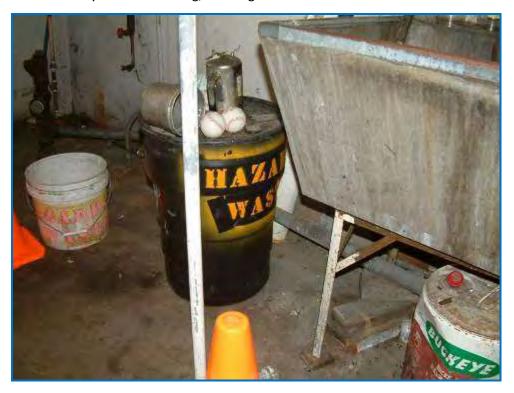


Photo #32 More waste, this is the dry cleaning area near the northwest corner of the building. Drum is not full and the contents are unknown.

Sand Creek Consultants, Inc. Page 16 of 26



Photo #33 In the shop/repair room.



Photo #34 Spot cleaning chemicals. Some of these jugs are labeled, and some are not. Some are non-hazardous (i.e., citric acid) and others may be solvents.

Sand Creek Consultants, Inc. Page 17 of 26



Photo #35 The roof in the steam laundry is in rough shape. The rain falls on the asbestos and causes it to disintegrate.

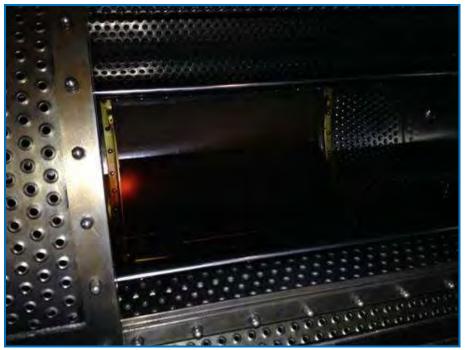


Photo #36 Dry cleaning solvent is seen in the bottom of this dry cleaning machine (the red hue). This is likely Stoddard Solvent and has a flash point of ~140 Degrees F. This and other open exposures to solvents and unknowns is cited as a REC.

Sand Creek Consultants, Inc. Page 18 of 26



Photo #37 Lint and button filter in the dry cleaning cycle. Filter materials are hazardous waste.

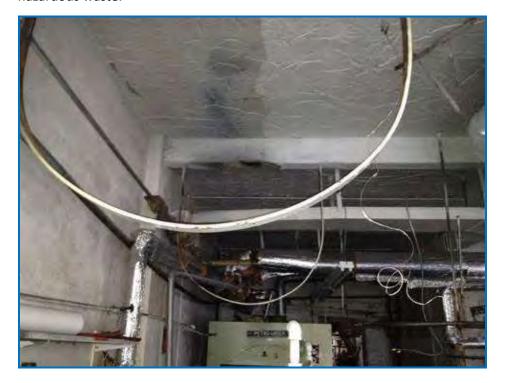


Photo #38 Dry cleaning room. Stirrups are what used to hold an aboveground solvent tank.

Sand Creek Consultants, Inc. Page 19 of 26



Photo #39 The cones represent solvent UST locations for Tank Nos. 2, 3, 4, and 5 in the dry cleaning room on Figure 4. Whether the tanks are still in place or not is currently unknown.



Photo #40 In the shop near the boiler room, another washing machine.

Sand Creek Consultants, Inc. Page 20 of 26



Photo #41 In the shop, near the boiler room. The earthen opening in the concrete cited as a REC is located under the white 5-gallon pails in the background.



Photo #42 General view of the finished laundry area, looking east toward Stevens Street.

Sand Creek Consultants, Inc. Page 21 of 26



Photo #43 Miscellaneous stain removers. Jugs like these are throughout the building. Assuming the labels accurately reflect content, not all of them are hazardous substances.



Photo #44 More spot removers and other chemicals, some are labeled (known) and some are not.

Sand Creek Consultants, Inc. Page 22 of 26



Photo #45 In the steam laundry. Steam piping runs are covered with asbestos (the white material). Some have an extra, outer wrapping of fiberglass (the metallic material).

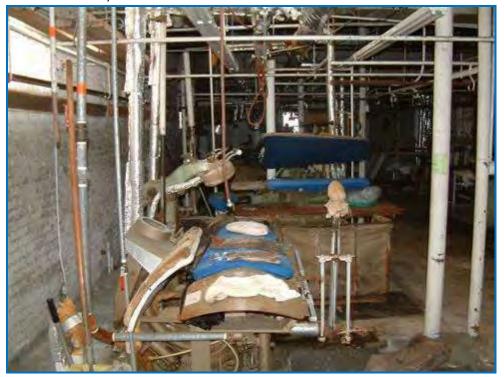


Photo #46 More of the steam laundry and asbestos piping wrap.

Sand Creek Consultants, Inc. Page 23 of 26



Photo #47 More of the steam laundry.



Photo #48 Electrical panel in the hall between the steam laundry and the dry cleaning room.

Sand Creek Consultants, Inc. Page 24 of 26



Photo #49 Back (west) side of the steam laundry. The cone is the location of Tank 1 on Figure 4. Whether this tank is still in place or not is unknown.



Photo #50 Second floor, odd crawl space off the kitchen.

Sand Creek Consultants, Inc. Page 25 of 26



Photo #51 Second floor, kitchen. Water damage is everywhere.



Photo #52 Second floor apartment. Water damage looks like this throughout the second floor, and indicates failure of the second floor structure is in progress.

Sand Creek Consultants, Inc. Page 26 of 26