



Matthew Thompson
Department of Natural Resources
1300 W Clairemont Avenue
Eau Claire, WI 54701-6127

May 20, 2021

Dear Mr. Thompson,

Thank you for providing Citizens for a Clean Wausau (CCW) with the opportunity to submit comments on the Site Investigation Work Plans (SIWPs) for both 1300 Cleveland Avenue and the Former CN/WCL Railroad Track in Wausau, portions of which reside in very close proximity to one another.

We appreciate the department's continued inclusion of community input related to Environmental Repair Program sites on Wausau's southwest side, especially since these sites are surrounded by formally identified Environmental Justice populations.

As you know, CCW is a grassroots environmental group in Central Wisconsin. We are comprised of area volunteers. CCW works primarily on issues related to defining the extent and nature of industrial contamination in a footprint on Wausau's southwest side, so that it can and will be remediated.

COMMENTS RELEVANT TO BOTH THE GEI SIWP AND ARCADIS SIWP

Comment #1: Analysis of soil and groundwater for bis(2-ethylhexyl) phthalate should occur on 3M's Lot 3 proposed samples, and all of GEI's proposed samples for 1300 Cleveland Avenue.

Results from 3M's 9/30/2020 soil analysis on Lot 3 indicated the presence of a substantial concentration of bis(2-ethylhexyl) phthalate in the soil at SB-05, which we feel is significant given the well-documented association of bis(2-ethylhexyl) phthalate with the lacquer and varnish materials used by Connor Forest Industries (CFI) at its Wausau plant, and found at other CFI sites in Wisconsin where the company was required to perform investigations.

The association of bis(2-ethylhexyl) phthalate with Connor Forest Industries' lacquer and varnish is well-documented in the following records, with relevant pages from the records extracted and attached to this document as an addendum.



1. The March 4, 1986 Geraghty & Miller In-Field Assessment Report for the CFI Wausau Cabinet Plant
2. 1986 Compendium of Chemicals Called “Materials Used at Connor Forest Industries, Inc., Wausau, Wisconsin Cabinet Division”
3. The December 3, 1985 Presentation to the WDNR on Wisco Properties Drum Removal and Site Investigations, Laona, Wisconsin

Perhaps unrelated, but still interesting, is the fact that in a 2014 WPDES permit application for Wausau’s Wastewater Plant that sits a few blocks east of 1300 Cleveland Avenue, required effluent monitoring results for Outfall 001 resulted in the flagging of only one pollutant, and that pollutant was bis(2-ethylhexyl) phthalate.

While groundwater analysis in monitoring well W19 related to Associated Bank’s assessment dated January 11, 2013 for the Rose Garden indicated that the level of detection for bis(2-ethylhexyl) phthalate was higher than the most sensitive state regulatory standard, it did not consider it an exceedance. In retrospect, given the now known and strong association of bis(2-ethylhexyl) phthalate with the former Connor Forest Industries property, we believe that the past result should have been considered an exceedance.

And given this well-documented association of bis(2-ethylhexyl) phthalate with CFI – specifically, the company’s lacquer and varnish – we feel strongly that analysis for the contaminant should occur in the soil and groundwater testing for both sites at hand moving forward.

COMMENTS ON THE GEI SITE INVESTIGATION WORK PLAN FOR 1300 CLEVELAND AVENUE

Comment #1: The industrial zoning characterization of the property by GEI is incorrect. The property is zoned residential.

On page 12, in Section 2.1, GEI characterizes the current zoning for 1300 Cleveland Avenue as Medium Industrial (MI). This characterization is outdated and incorrect. The property is currently zoned as a MRL-12, Multi-Family Residential-12 Zoning District. This is an important distinction because we believe that current residential zoning and future non-industrial land use should frame the clean-up requirements to come.

Related Reference:

<https://wsau.com/2021/04/13/wausau-city-council-approves-rezone-of-1300-cleveland-avenue-property/>

Comment #2: We believe that sampling to date and the proposed future sampling in the GEI SIWP are insufficient to adequately define soil contamination in the northwest area of the site.

Sampling and proposed sampling in the northwest corner of the site are extremely limited, especially given 1) it is one of the few areas on the property where there had historically been a

manufacturing structure present and 2) should zoning and land use change in the future (e.g., 3M's proposal for rail operations), there is an extremely high chance of soil disturbance and disruption. Therefore, we feel that this portion of the property should undergo – at the very least – an equal level of sampling and investigation as the rest of the property, particularly in light of the bis(2-ethylhexyl) phthalate recently identified in nearby soil on the adjacent property – a phthalate with strong, documented associations with the lacquer/varnish products used by Connor Forest Industries.

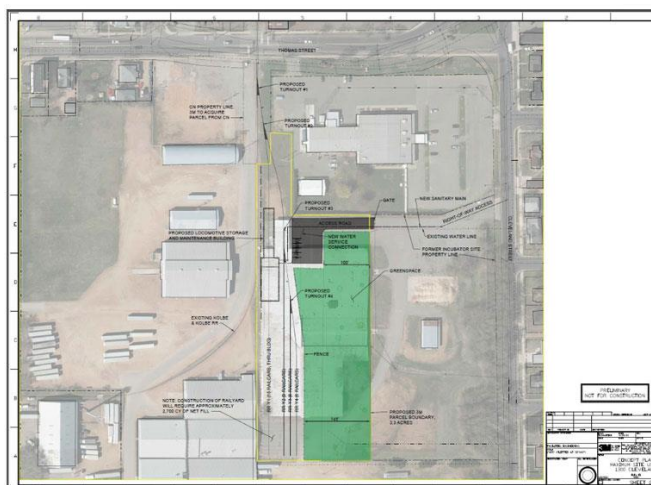


Figure 2.1 - 3M Wausau Maximum Plan for Locomotive Rail and Storage Property

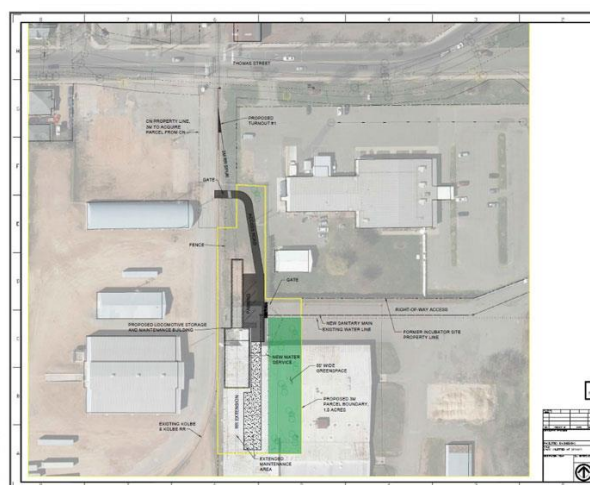


Figure 2.2 - 3M Wausau Minimum Plan for Locomotive Rail and Storage Property



Comment #3: While GEI's sampling depth of 0-4 feet may fall within the department's definition of surface, we would like to see "true" surface sampling added to the SIWP so that one discrete sample taken from the top 2-3 inches of soil is gathered for each proposed sampling location.

The significance of contaminants in surface soils is based on their relationship to the WDNR direct contact residual contaminant levels (RCLs) and, for example, the exposure assumptions and calculations used by the Wisconsin Department of Health Services (WDHS).

No true surficial soil samples have been taken on the property, despite the fact that it is zoned residential and is surrounded by residential properties in close proximity.

We believe that 1) the sampling method used by GEI in the top four feet of soil cannot effectively identify "hotspots" of exceedances in surficial soils because the aggregate method essentially dilutes concentrations of contaminants in the soil at any specific depth point in the 0-4 feet range (or deeper ranges), and that 2) this sampling method used by GEI is not appropriate to assess the potential impact of the aerial deposition of contaminants on the site in the top 2-3 inches of soil from the historical burning of waste by CFI that is well-documented in DNR records (records can be provided to the department upon request).

Comment #4: We feel that aluminum and barium should be added to the metals for proposed sample analysis, given the significant amounts of each documented in historical CFI glue and glue dumping areas, per WDNR records.

Jim:

Your first question, how much waste has been disposed at the location, is the key issue to figuring further action. That, plus concentration of those wastes, will give us total loading values (estimates).

Sample from dump area (freshly dumped liquids) *totals

pH	5.9
Al	340 ppm
Ba	20
Cd	.12
Cr	.7
Pb	1.9
Ag	Trace - undetected

According to Gary Nest of Connor Forest:

8 (55) gallon drums/week for four years assuming 52 weeks = 91,520 gallons

$$91,520 \text{ gal} \times \frac{4 \text{ qt}}{\text{gal}} \times \frac{1.06 \text{ l}}{\text{qt}} = 388,045 \text{ l}$$



Comment #5: We feel that offsite testing to rule out contaminant deposition or migration on nearby residential yards and gardens is both reasonable and warranted.

Given the proximity of residential properties to 1300 Cleveland Avenue, and documented historical burning of waste on the site that would be very difficult for the department to now rule out as a contribution to the identified contamination, we believe that testing yards and gardens of the residential properties in closest proximity to the site for thallium and PAHs is logical and prudent.

COMMENTS ON ARCADIS SITE INVESTIGATION WORK PLAN FOR THE FORMER CN/WCL RAILROAD TRACK

Comment #1: There appear to be an insufficient number of sample locations to date and proposed future sample locations to fully and adequately define the extent and area of soil contamination.

While the 3M-owned properties are rail lots, they border commercial and residential properties (1300 Cleveland Avenue is zoned residential), therefore we feel that it is important to better define the area of contaminated soil exceeding state regulatory standards, in part, to ensure that it is has not or will not migrate onto the adjacent non-industrial properties. Thus far, the number of sample locations and proposed sample locations from 3M and its consultant, Arcadis, appear remarkably limited.

Comment #2: We feel that thallium should be included in the metals analysis for Lot 3.

Thallium is one of the 13 priority pollutant metals, highly toxic, and extensive thallium contamination has been identified in the soil on the property (1300 Cleveland Avenue) bordering 3M's lot 3.

Thank you very much for your and the department's consideration.

Sincerely Submitted on Behalf of Citizens for a Clean Wausau,

Terry Kilian
Randy Radtke
Co-Spokespersons

GERAGHTY & MILLER, INC.

IN-FIELD ASSESSMENT
CONNOR FOREST INDUSTRIES, INC.
WAUSAU CABINET PLANT
WAUSAU, WISCONSIN

GERAGHTY & MILLER, INC.

material was generally dealt with by one of three methods: 1) the residue was collected in cloth rags which were picked-up by Industrial Towel & Uniform of Neenah, Wisconsin, for cleaning and reuse; 2) solidified material, including ash from the boiler, was stored in drums after cleanup, then removed for disposal, or; 3) cheese-cloths, which were used to wipe frames, were burned when dirty.

The chemical composition of each of the various finishes or additives differs from product to product. A typical product, lacquer sealer, contains:

1. Toluene
2. Isopropanol
3. BIS Phthalate
4. 2-Butanone
5. 2-Butoxyethanol
6. Butanol
7. Methyl Alcohol
8. Dimethyl Ketone

A compendium of information related to chemicals used at the Wausau Plant is included in "Materials Used at Connor Forest Industries, Inc., Wausau, Wisconsin, Cabinet Division." The following paragraphs summarize information from the report.

Glues and Additives

Two different types of glues were used in the manufacturing operations. Urea formaldehyde resin was used to laminate wood veneer to core stock in the manufacture of plywood, and polyvinyl acetate was used as an assembly glue in the manufacturing process. Any residue of the glues was collected in drums and analyzed for proper disposal.

Additives added to the glues included an ammonium salt compound (used to speed curing time of the glue) containing 100 ppm of ammonia and 500 ppm of ammonium thiocyanate, and furfuryl alcohol (used to slow curing time of the glue). These additives were consumed in the manufacturing process. Approximately 815 gallons of glues and additives were used each month.

Petroleum Products

Petroleum Products used at the Wausau Plant site include motor oils used as engine and transmission lubricants for all gasoline and diesel powered vehicles, lubricants for air compressors, bearing grease, pipe cutting fluid, gear lubricants, brake fluids and antifreeze. Any residues or used fluids which were not sent to a recycling center on Town Line Rd., were generally small

MATERIALS USED AT
CONNOR FOREST INDUSTRIES, INC.
WAUSAU, WISCONSIN
CABINET DIVISION

CHEMICALS, FINISHES AND PETROLEUM BASED PRODUCTS

USED AT: Wausau

PRODUCT:

#421-0126 Lacquer Sealer (Exhibit M, M-1)

SUPPLIER:

Reliance Universal
1915 Industrial Ave.
Zion, IL 60099

USE IN OPERATION:

Used for finishing wood kitchen cabinets by spraying in an open front spray booth.

DISPOSAL PRACTICE:

Consumed in the manufacturing process. No residue is produced in normal use. At the time of the plant shut down in June, 1985, we had ten (10) drums of solidified material on hand that was collected from the clean-up around the bulk storage tanks. This material was analyzed for disposal in authorized disposal site.

USAGE:

1,200 gallons/month

MATERIAL SAFETY DATA SHEET

Exhibit M

DATE PREPARED 06/17/85
JMD

SUPERSEDES :

SECTION I - IDENTIFICATION OF PRODUCT

RELIANCE UNIVERSAL INC.
1915 INDUSTRIAL AVE
MORRISON, IL 60099

EMERGENCY NO. (312) 872-1000
INFORMATION NO.
MANUFACTURER'S CODE 421- C27-0126

PRODUCT CLASS:
TRADE NAME: SANDING SEALER

SECTION II - HAZARDOUS INGREDIENTS

INGREDIENT	CAS #	% WEIGHT	TLV PPM	TLV MG/M3	LEL	VAPOR PRESSURE
Toluene	108880	145-	551	100.001	1.21	38.0@ 68
ISOPROPANOL	0000676301	5-	101	400.001	2.31	32.0@ 68
BIS(2-ETHYLHEXYL) PHTHALATE	117817	<	51	5.001		2.0@ 392
2-BUTANONE	0000789331	5-	101	200.001	1.81	75.0@ 68
BUTYL ACETATE	0001238641	<	51	150.001	1.71	8.0@ 68
2-BUTOXYETHANOL	0001117621	<	51	25.001 SKIN	1.11	8.0@ 68
BUTANOL	71363	<	51	50.001 SKIN	1.71	5.5@ 68
METHYL ALCOHOL	0000675611	5-	101	200.001 SKIN	6.01	97.6@ 68
DIMETHYL KETONE	0000676411	<	51	750.001	2.61	186.0@ 68
		-				@ 68
		-				@ 68
		-				@ 68
		-				@ 68
		-				@ 68
		-				@ 68

SECTION III - PHYSICAL DATA

BOILING RANGE 131 - 724 F VAPOR DENSITY HEAVIER THAN AIR. U.O.C. 5.96
EVAPORATES SLOWER THAN ETHER. % VOLATILE (VOL) : 84.90 WT/GAL 7.45

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLAMMABILITY CLASS: FLAMMABLE LIQUID - 1B FLASH POINT 15 LEL 1.10

EXTINGUISHING MEDIA: ALCOHOL FOAM, DRY CHEMICAL, CO2.

UNUSUAL FIRE AND EXPLOSION HAZARDS: BURNING MAY PRODUCE OXIDES OF NITROGEN AND CARBON.

SPECIAL FIRE FIGHTING PROCEDURES: USE NIOSH APPROVED FULL-FACED SELF-CONTAINED BREATHING APPARATUS TO ENTER AREA.

DRAFT

WISCO PROPERTIES DRUM REMOVAL AND SITE INVESTIGATION

I. INTRODUCTION

A. Site Location

1. Bohannon Lake Site

2. Birch Lake Site

3. Section 22 Site

4. Section 23 Site

5. Section 24 Site

6. Section 25 Site

7. Section 26 Site

8. Section 27 Site

9. Section 28 Site

10. Section 29 Site

11. Section 30 Site

12. Section 31 Site

13. Section 32 Site

14. Section 33 Site

15. Section 34 Site

16. Section 35 Site

17. Section 36 Site

18. Section 37 Site

19. Section 38 Site

20. Section 39 Site

21. Section 40 Site

22. Section 41 Site

23. Section 42 Site

24. Section 43 Site

25. Section 44 Site

26. Section 45 Site

PRESENTATION TO
THE WISCONSIN DEPARTMENT OF
NATURAL RESOURCES
ON
WISCO PROPERTIES
DRUM REMOVAL
AND SITE INVESTIGATIONS
LAONA AREA, WISCONSIN

DATE: DECEMBER 3, 1985
BY: GERAGHTY & MILLER, INC.
MILWAUKEE, WISCONSIN

AS-4 (Gray Stained Soil)

	Volatiles
Toluene	0.0027 mg/Kg
Total Xylenes	0.015 mg/Kg
	Base/Neutral
Dimethyl Phthalate	0.67 mg/Kg
BIS (2-ethylhexyl) Phthalate	7.7 mg/Kg
	No pesticides/PCB's detected

Birch Lake Site

Sample Number

BS-1
(From Pit Area)

Compounds Detected

	Volatiles
Acetone	3.8 mg/Kg
2-Butanone	0.55 mg/Kg
4-Methyl-2 Pentanone	0.056 mg/Kg
Toluene	0.0072 mg/Kg
Total Xylenes	0.02 mg/Kg
	Base/Neutrals
BIS (2-ethylhexyl) Phthalate	1.4 mg/Kg
	No pesticides/PCB's detected
BS-D (Bottom of Pit)	No volatiles or pesticides/PCB's detected

BIS (2-Ethylhexyl)
Phthalate

1.5 mg/Kg

BS-R (Composite Sample)

Base/Neutral Fraction

(BIS (2-Ethylhexyl)
Phthalate

1.7 mg/Kg

No Volatiles or pesticides/PCB's
detected

BS-Spill (Drum Spill)

2-butanone	24.5 mg/Kg
1,1,1-Trichloroethane	21.0 mg/Kg
Toluene	220.0 mg/Kg
Total Xylenes	41.0 mg/Kg
	Base/Neutrals

Di-N-Butylphthalate	0.57 (est.) mg/Kg
Butylbenzylphthalate	12.0 mg/Kg
BIS (2-ethylhexyl) Phthalate	46.0 mg/Kg

No pesticides/PCB`s detected

BS-T (Surface Soils)

Acetone	0.011 mg/Kg
Toluene	0.0062 mg/Kg

No base/neutral or pesticides/PCB`s detected

Section 22 Site.

CS-1

Methylene Chloride	0.015 mg/Kg
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Base/Neutrals

Di-N-Butylphthalate	0.47 mg/Kg
Bis(2-ethylhexyl)phthalate	2.1 mg/Kg

no pesticides/PCBs detected

CS-2

Methylene Chloride	0.018 mg/Kg
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Base/Neutrals

Bis(2-ethylhexyl)phthalate	1.0 mg/Kg
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no pesticides/PCBs detected

CS-3

Methylene Chloride

Volatiles

0.018 mg/Kg

Base/Neutrals

Bis(2-ethylhexyl)phthalate

0.36 mg/Kg

no pesticides/PCBs detected

PREPARED BY
THE WISCONSIN DEPARTMENT OF
NATURAL RESOURCES
ON
WATER PROTECTIVE
DUST ANALYSIS
AND DUST INVESTIGATIONS
LADENA AREA, WISCONSIN

DATE: DECEMBER 1, 1988
BY: GEORGE E. MILLER, INC.
MILWAUKEE, WISCONSIN

Wisconsin Pollutant Discharge Elimination System (WPDES) Wastewater Discharge Individual Permit Application

Permittee Name: **Wausau Water Works**
Facility Name: **Wausau Water Works WW Treatment Facility**
Address: **City Hall, Wausau, WI 54403**
WPDES Permit Number: **0025739**
Proposed Permit Expiration Date: **12/31/2014 12:00:00 AM**
FID #: **737008690**

Important - Please Read These Instructions

Completion of this application is required pursuant to ss. 283.37 and 283.53, Stats., and ch. NR 200, Wis. Adm. Code. Failure to provide the requested information may result in fines, forfeitures or other penalties pursuant to ss. 283.89 and 283.91, Stats. Personally identifiable information is not likely to be used by the Department of Natural Resources (DNR) for any purpose other than the reasons stated in the form or for the purpose the form is being submitted.

You must use this form (or a department-approved modification to this form) to apply for an initial permit or a reissued permit for a discharge that the DNR determines requires an individual permit under ss. NR 200.03(1)(a), (b) and (c), Wis. Adm. Code.

- Initial permit - If you are applying for an initial permit, s. NR 200.04(3), Wis. Adm. Code, requires that you file a complete application with the DNR no later than 180 days prior to the date you intend to commence discharging.
- Reissued permit - If you have an existing permit and wish to continue to discharge after expiration of the permit, s. NR 200.06, Wis. Adm. Code, requires that you must file a complete application with the DNR no later than 180 days prior to the current permit expiration date.

The application for a given permittee consists of a number of sections that may differ from another permittee's application, based on discharge type (municipal, industrial, surface water, land treatment, land application, stormwater). If you have made changes to your facility since the last time the DNR reissued your permit and you did not inform the DNR of those changes, this application may not contain all of the correct applicable sections. The correct discharge type and number of outfalls should appear in the menu bar to the left. If the proper sections do not appear at the left, you should notify the department or you may complete this application, indicating what changes have occurred in answer to questions that ask you to report changes.

You must answer every question on the sections that apply to your facility. If you try to submit the application with required fields missing, an error message will alert you. The DNR may contact you to request additional information. Your application will not be considered complete until you supply this required information.

For some outfall types, effluent monitoring for a list of pollutants is required as part of the application. Please plan accordingly so results are available to submit with the application. Note, that some pollutants require multiple tests.

To begin, check to see if the Permittee and the Facility name shown at the top of this page are correct. If the facility name and permittee name are not correct, please report the problem to the DNR using the **Contact Us** button in the left menu. If the information is correct:

- Click on the various sections in the menu bar to the left one at a time and complete the information requested by checking boxes, clicking buttons or entering words and numbers.
- If you have questions about what information to supply for a certain question as you go about filling out the form, click on the **Instructions** button in the left menu bar to reveal instructions for the section you are working on. Useful tip: After you bring up the instructions, you may print them. However, you should understand that, the complete instructions are about 40 pages long.
- Use the **save** button as you go or as requested. Your work will automatically be saved upon exiting. You may complete some parts of the application and come back at another time to finish.
- To print a section or multiple sections at any time use the **PDF Print** button in the left menu bar, select the section(s) you want to print, open the PDF document and use the normal print function.
- When you believe a section is complete, click on the **validate** button in the left menu bar. If information is missing, a message will inform you what you need to do. If all the required information has been supplied, a red check mark will appear in the left menu bar next to the section. You may change your answer to a question in a validated section up until you **submit** your application.
- When all sections are complete and have been validated, use the **submit** button to send your application to the DNR. The Permit Application Certification Statement must be printed and then signed by the Authorized Representative. Mail the Certification Statement to the address given.

Facility Information					
1.	Permittee name: Wausau Water Works				
2.	Facility Site Name: Wausau Water Works WW Treatment Facility Site Address: 435 Adrian Street, Wausau, WI 54403 MCD: City of WAUSAU County: Marathon				
3.	Other environmental permits or approvals Has the facility received or applied for coverage under any general WPDES permit or any other environmental permits, such as for management of hazardous wastes, emission of air pollutants or underground injection? <input checked="" type="radio"/> No <input type="radio"/> Yes If yes, give the permit number(s) and briefly describe the discharge(s)				
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Permit Number</th> <th>Description of Discharge</th> </tr> </thead> <tbody> <tr> <td style="height: 100px;"> </td> <td> </td> </tr> </tbody> </table>	Permit Number	Description of Discharge		
Permit Number	Description of Discharge				
4.	Native American Lands a. <input type="radio"/> Yes <input checked="" type="radio"/> No Is any portion of the facility located on Native American lands? b. <input type="radio"/> Yes <input checked="" type="radio"/> No Does the receiving stream flow through Native American lands after it receives discharge from the treatment facility? c. <input type="radio"/> Yes <input checked="" type="radio"/> No Are biosolids stored on, disposed of, or land applied on Native American lands? If yes, to any of the above, please identify those portions of the facility or wastewaters located on Native American lands. <div style="border: 1px solid black; height: 40px; width: 100%;"></div>				
5.	Site Map Attach to this application a detailed site map, such as a USGS topographic map, showing the area extending to at least one (1) mile beyond property boundaries. This map must show the outline of the facility, the locations of incoming wastewater, including hauled waste receiving stations, the locations of all surface water discharge points (e.g., to rivers, lakes, streams etc) and all land treatment sites (e.g., seepage cells). For surface water discharges, estimate the approximate distance from the plant to the receiving waters. For groundwater discharges, include all groundwater monitoring wells, nearby residences and all potable wells within 1,000 feet of all land treatment sites. Number all discharge points and sampling points on the map. Include the map scale and a meridian arrow showing north. <input checked="" type="checkbox"/> Site map is attached to the Certification Statement				

Code	Name	Sample Result	Units	QC Flag	LOD	LOQ	Analytical Method	Sample Collection Date	Sample Type	Lab ID
[Redacted]										
Base/Neutral Compounds										
4	Acenaphthylene (208-96-8)	<0.23	ug/L	<input type="checkbox"/>	0.23	0.73	8270C	3/16/2009	Comp	445037560
42	Benzidine (92-87-5)	<8.78	ug/L	<input type="checkbox"/>	8.78	27.9	8270C	3/16/2009	Comp	445037560
61	Bis(2-Chloroethoxy) methane (111-91-1)	<0.31	ug/L	<input type="checkbox"/>	0.31	0.98	8270C	3/16/2009	Comp	445037560
62	Bis(2-Chloroethyl)ether (111-44-4)	<0.61	ug/L	<input type="checkbox"/>	0.61	1.94	8270C	3/16/2009	Comp	445037560
63	Bis(2-Chloroisopropyl) ether (66-56-8)	<0.63	ug/L	<input type="checkbox"/>	0.63	1.99	8270C	3/16/2009	Comp	445037560
64	Bis(2-Ethylhexyl) phthalate (117-81-7)	1.85	ug/L	<input checked="" type="checkbox"/>	0.6	1.91	8270C	3/16/2009	Comp	445037560
621	4-Bromophenyl-plenyl ether (101-55-3)	<0.45	ug/L	<input type="checkbox"/>	0.45	1.44	8270C	3/16/2009	Comp	445037560
84	Butyl benzyl phthalate (85-68-7)	<0.3	ug/L	<input type="checkbox"/>	0.3	0.96	8270C	3/16/2009	Comp	445037560
591	2-Chloronaphthalene (91-58-7)	<0.28	ug/L	<input type="checkbox"/>	0.28	0.9	8270C	3/16/2009	Comp	445037560
622	4-Chloro-phenyl-phenyl ether (7005-72-3)	<0.56	ug/L	<input type="checkbox"/>	0.56	1.78	8270C	3/16/2009	Comp	445037560
617	3,3'-Dichlorobenzidine (91-94-1)	<1.47	ug/L	<input type="checkbox"/>	1.47	4.69	8270C	3/16/2009	Comp	445037560
178	Diethyl phthalate (84-66-2)	<0.28	ug/L	<input type="checkbox"/>	0.28	0.88	8270C	3/16/2009	Comp	445037560
181	Dimethyl phthalate (131-11-3)	<0.29	ug/L	<input type="checkbox"/>	0.29	0.92	8270C	3/16/2009	Comp	445037560
167	Di-n-butyl phthalate (84-74-2)	<0.54	ug/L	<input type="checkbox"/>	0.54	1.73	8270C	3/16/2009	Comp	445037560
606	2,4-Dinitro- toluene (121-14-2)	<0.3	ug/L	<input type="checkbox"/>	0.3	0.94	8270C	3/16/2009	Comp	445037560



Environmental Engineers, Geologists and Scientists

Tel 847.573.8900
Fax 847.573.8953

Polo Park Business Center
27834 N. Irma Lee Circle
Lake Forest, Illinois 60045-5130

**PHASE I ENVIRONMENTAL SITE ASSESSMENT
THE ROSE GARDEN BANQUET & CATERING
131 WEST THOMAS STREET
WAUSAU, WISCONSIN 54401**

January 11, 2013

DAI PROJECT NO. 6109

**Prepared for:
Associated Banc-Corp
330 East Kilbourn Avenue
Milwaukee, WI 53202**

**Prepared by:
DAI Environmental, Inc.
Polo Park Business Center
27834 N. Irma Lee Circle
Lake Forest, Illinois 60045**

Table 3 shows the results of the VOC analyses. The results from W19 show concentrations of Chloroform and Trichloroethene detected above the PALs, but below the ESs. Additionally, Bromodichloromethane, Chloromethane, 1,2-Dibromoethane, 1,3-Dichloropropene (cis & trans), 1,1,2,2-Tetrachloroethene and Vinyl chloride were reported with concentrations below the LOD in an undiluted sample, but above the most stringent applicable criteria. Based on a lack of observations of these compounds on-site and the laboratory reporting to the lowest possible limits, these compounds are not considered exceedances.

SVOC analytical results in Table 4 indicate an exceedance of Pentachlorophenol above both the PAL and the ES. Additionally, 2,4-Dinitrotoluene, 2,6-Dinitrotoluene, bis-(2-Ethylhexyl)phthalate, Hexachlorobenzene, and N-Nitrosodiphenylamine were reported at concentrations below LODs, but above the most stringent applicable criteria. Based on a lack of observations of these compounds, no known source, and the laboratory reporting close to the lowest achievable limits, these compounds are not considered exceedances. Figure 3 provides the location of the well and the identified exceedances. A summary of observed groundwater sample results above the most stringent applicable cleanup objective is included below in Table 3.3.

Table 3.3. Observed Groundwater Exceedances

Contaminant	Sample Location	Concentration (mg/L)	Applicable Cleanup Criteria ^{1,2} (mg/L)
Chloroform	W19	0.0017	0.0006 ¹
Trichloroethene	W19	0.0006	0.0005 ¹
Pentachlorophenol	W19	0.182	0.0001 ¹ /0.001 ²

¹ – Preventive Action Limits taken from Wisconsin Administrative Code, Chapter NR 140, Table 1

² – Enforcement Standard taken from Wisconsin Administrative Code, Chapter NR 140, Table 1