Analysis of Brownfield Cleanup Alternatives – Asbestos Abatement of Buildings

Former Phillips Lionite Wood Products Facility, Phillips, Wisconsin

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EXECUTIVE SUMMARY

Stantec Consulting Services Inc. (Stantec) prepared this Analysis of Brownfield Cleanup Alternatives (ABCA) for cleanup activities to be performed on a portion of a former board mill located at 115 Depot Road, Phillips, Wisconsin (the "Site" or "Property"). The Property as a whole is formed by two parcels (parcel identification numbers 50-272-4-37-01-18-5 15-002-30120 [Main Parcel] and 50-272-4-37-01-18-5 15-002-30400 with a combined area of 26.2 acres. The ABCA was prepared by Stantec on behalf of Price County United Limited (PCUL or the "Client') to satisfy a requirement for a United States Environmental Protection Agency (EPA) Brownfields Cleanup Grant awarded to PCUL in 2024. The specific area that is the focus for the cleanup grant and this ABCA is a 9.2-acre area in the north central portion of the Property within which all existing facility buildings are located (the "Project Area"). The 26.2-acre Property is located on the east side of downtown Phillips, bordered on the southwest by a railroad right-of-way, on the northwest by County Road H, on the southeast by Maple Street / Park Drive, and on the northeast by Duroy Lake.

The Property was formerly occupied by a board mill operated by Georgia-Pacific Wood Products LLC (Georgia-Pacific) which closed in October 2015. The Property and production facility were purchased by a local investment group (Phillips Lionite Wood Products LLC) on May 8, 2017, with the stated intention of reopening the facility for production.[1] Although production on a trial basis reportedly did resume for several weeks, financing necessary to fully reopen the plant was never secured, and the plant remained vacant and continued to slowly deteriorate until April 2023, when the roofs and portions of the walls for approximately 25% of the plant collapsed during a storm.[2] The building collapse initiated efforts by PCUL to acquire the facility, which together with several predecessor wood products facilities have separated downtown Phillips from its waterfront on Duroy Lake for over 140 years. The Property was acquired by PCUL on November 10, 2023.

The main parcel is occupied by the former production plant which includes at least 41 building areas with a combined floor area of 173,378 square feet, which were constructed between 1945 and 2008. The average clearance height is near 17 feet and most of the buildings are metal sided.

Use of the Property as a sawmill or wood products production facility dates back to 1883, approximately four years after the City of Phillips was founded. Several generations of mill buildings were constructed on the Property between 1883 and 1939, in response to the periodic destruction of the buildings by catastrophic fires. In 1945, the current office building was constructed near the south end of the Property. The initial section of the current production facility was constructed by the Wisconsin Wood Products company in 1957 and began operations in 1958. Major expansions were completed between 1965 and 1988. Wisconsin Wood Products operated the mill from 1958-1969, followed by Evans Product Company, Boise Cascade Corporation, and Koch Industries (which purchased Georgia-Pacific and its subsidiaries in 2005, but continued operating the plant under the Georgia-Pacific Wood Products LLC name until the plant closed in 2015.

[1] *Price County Review, "Former Georgia-Pacific plant sold to local group", May 18, 2017, https://shorturl.at/xbwNi*
[2] *My Northern Wisconsin, "Former Lionite / Georgia Pacific Building Partially Collapses", May 15, 2023, https://shorturl.at/ZvCEz*

ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES - ASBESTOS ABATEMENT OF BUILDINGS: FORMER PHILLIPS LIONITE WOOD PRODUCTS FACILITY, 115 DEPOT ROAD, PHILLIPS, WISCONSIN

A Natural Capital Assessment and a Phase I environmental site assessment (ESA) were completed by Stantec on behalf of PCUL in August and November 6, 2023. A Draft ABCA for the entire Property / project was prepared to satisfy a threshold requirement for PCUL to apply to the EPA for the FY 2024 Brownfields Cleanup Grant. The EPA Cleanup Grant was awarded to PCUL in the Spring of 2024.

This ABCA is focused on the primary cleanup objective of abatement-driven structural removal and off-site disposal of asbestos containing materials (ACM) either for future access to contaminated media, or in support of building renovations for future reuse. Primarily building sections of focus will be Building 6, 14, and Office, but tentatively other building sections may need to be abated similarly utilizing EPA funds. This ABCA will be applicable to all building sections within the 9.2-acre EPA project area in that event. It is anticipated that one or more future ABCAs will be prepared to address possible soil and/or groundwater cleanup activities.

Three alternatives are considered in this ABCA – a “no action” alternative (“Alternative 1”) and two action alternatives (Alternatives 2 and 3) that vary in the extent to which EPA Cleanup Grant funding is utilized to facility ACM removal (“limited” vs “comprehensive”). For the limited removal option (Alternative 2), abatement of ACMs would be performed only where equipment with ACMs are located inside buildings where abatement can be safely performed without potentially costly temporary shoring or other measures to stabilize the buildings. For the comprehensive alternative (Alternative 3), the scope of ACM abatement measures to include use of temporary shoring and other measures as necessary to perform safe abatement-driven structural removal and offsite disposal of ACMs.

Evaluation of the “no action” alternative is an EPA requirement for ABCAs and provides a baseline for comparison to the action alternatives. The three alternatives are evaluated based on their effectiveness, implementability, and cost. Consideration is also given to extreme weather events and natural disasters evaluation impacts, and green and sustainable remediation guidance. The recommended remedial alternative is Alternative 3 – comprehensive measures to support abatement-driven structural removal and safe removal of ACMs. Alternative 1 (no action) is the most easily implementable and has the lowest direct cost but is the least effective and will have the greatest long-term cost (considering “opportunity costs”) as well as a high potential for resulting in future releases of petroleum and hazardous substances to the environment. Alternatives 2 and 3 are similar in their effectiveness and implementability, but Alternative 3 is most effective.

1.0 INTRODUCTION AND BACKGROUND

Stantec Consulting Services, Inc. (Stantec) prepared this Analysis of Brownfield Cleanup Alternatives (ABCA) for cleanup activities to be performed within portions of a former board mill (the Phillips Lionite Wood Products Plant) located at 115 Depot Road, in the City of Phillips (the City), Price County, Wisconsin (the "Property"). The ABCA was prepared by Stantec on behalf of Price County United Limited (PCUL or the "Client") to satisfy a requirement for PCUL to utilize funding from a United States Environmental Protection Agency (EPA) Brownfields Cleanup Grant awarded to PCUL in 2024. The Cleanup Grant and the ABCA are focused on a 9.2-acre portion of the Property within which all of the former mill buildings are locates (the Cleanup Grant "Project Area"). The ABCA was prepared in part to inform the public regarding plans for cleanup of the Property and to solicit their comments and questions on the ABCA. The ABCA was developed in part using a draft ABCA that was submitted as part of the grant application submittal package in 2024.

1.1 GENERAL SITE INFORMATION

The Property is occupied by one office building, multiple industrial buildings, and industrial infrastructure. Major buildings at the Site include a hardwood production plant, a print plant, warehouses, maintenance buildings, a boiler plan, and offices. The buildings are serviced by electric, natural gas, propane, steam heat, city sewer and water, and multiple wastewater holding tanks.

A general Property Location and Local Topography map is provided as **Figure 1**, and a Property Features Map is provided as **Figure 2**.

1.2 SITE HISTORY AND PREVIOUS USE

Use of the Property as a sawmill or wood products production facility dates back to 1883, approximately four years after the City of Phillips was founded. The John R. Davis Lumber Co. reportedly ran its first log through a sawmill on the Property on October 1, 1883, and continued operating the mill through March 9, 1932, by which time the company was named the Kneeland-McLurg Lumber Company. Several generations of mill buildings were constructed on the Property during this period, in part due to their destruction by periodic catastrophic fires (including documented fires in September 1890, November 1892, June 1894, and July 1894 – the last of which resulted in destruction of more than 95% of the buildings in the City and the loss of 13 lives. The Property was largely cleared of buildings sometime between 1932 and 1939. In 1945, the office building was constructed near the south end of the Property. The initial section of the current production facility was constructed by the Wisconsin Wood Products company in 1957 and began operations in 1958. Major expansions were completed in 1965-66 and 1980-81, and smaller additions occurring in 1962, 1970, 1972, 1973-74, 1976, and 1987-88. Wisconsin Wood Products operated the mill from 1958-1969, followed by Evans Product Company, Boise Cascade Corporation, and Koch Industries (which purchased Georgia-Pacific and its subsidiaries in 2005, but continued operating the plant under the Georgia-Pacific Wood Products LLC name until the plant closed in 2015).

A group of local investors organized as the Phillips Lionite Wood Products LLC acquired the Property on May 7, 2017, but were unsuccessful in fully reopening the plant.

PCUL acquired the property on November 10, 2023, following completion of a Phase I ESA through which PCUL obtained status as a bona-fide prospective purchaser.

The Property was in continuous use as a lumber mill from 1883 through 2015, except for an approximate 13-year period between 1932 and 1945 when the Property appears to have been idle. The Property underwent numerous reconstructions during its 140-year industrial history. Based on review of historic maps, industrial areas or equipment associated with the first 50-years of industrial use included sawmills, planing mills, wood fiber mills, dry kilns, box factories, tramways, machine shops, refuse burners, black smiths, carpentry shops, engine houses, ash houses, oil houses, offices, a mill pond, and massive areas of sawdust and lumber storage. Industrial areas or facilities associated with the current plant include warehouses, offices, loading docks, truck scales, debarkers, chip silos, conveyor belts, dust collectors, silos, maintenance shops, dryers, cyclones, humidifiers, and a paint plant. Regulatory databases and recent Phase I environmental site assessments (ESAs) document the storage, handling, and use of a variety of hazardous wastes and petroleum products at the Property. With respect to bulk storage, seven removed/closed underground storage tanks (USTs), (2) closed aboveground storage tanks (ASTs), and 10 in-use ASTs containing these materials have been identified in these databases. In addition, there are records for at least six spills that were reported to the Wisconsin Department of Natural Resources (WDNR) and cleaned up.

1.3 HYDROGEOLOGIC SETTING

The following summary of hydrogeologic conditions is adapted from the Phase I ESA report by Stantec (Stantec, 2024b).

Topography and Surface Water Flow: The Property is located in the northeast quarter of Section 18, Township 37, Range 1 East in Phillips, Wisconsin. The Property is generally flat, with a gentle downward slope towards the east-adjacent Duroy Lake. The approximate topographic high is 1,461 feet above mean sea level (ft amsl) in the southwest portion of the Property with a gentle downward slope toward the shoreline (topographic low) at approximately 1,443 ft amsl. The mean Property elevation is approximately 1,452 ft amsl. Based on the topography, surface water on the property infiltrates the ground surface or flows overland into the east-adjacent Duroy Lake.

Regional and Property Geology: The Property is located in the area covered by the Laurentide Ice Sheet during the Wisconsin Glaciation (Wisconsin Geological and Natural History Survey [WGNHS], 2011) resulting in topography that is rolling, moderately hilly, and containing numerous drumlins. In general, the area is covered by greater than 50 feet of unconsolidated glacial till. Underlying the glacial till is Lower Proterozoic granite, diorite, gneiss, and basaltic to rhyolitic metavolcanic rock, with some metasedimentary rock that composes the bedrock geology of Price County (WGNHS, 2005).

Logs for eight soil borings sampled as part of a Phase II ESA completed by SET Engineering LLC (SET) in 2022 (SET, 2022) documented sand and sand and gravel soils to depths of 16 feet below ground surface (ft bgs) in six borings completed within the vicinity of buildings. A boring (SB7) completed within the center of the open grass area in the southern portion of the Property documented fill materials described as pale to dark brown wood mulch with some silt and sand to a depth of 12 ft bgs.

A boring (SB4) completed within a grass covered area at the northern portion of the Property documented sand mixed with wood mulch to a depth of 11 feet underlain by sand to a depth of 16 feet.

Regional and Property Hydrogeology: The shallow water table is often a subdued expression of surface topography. Shallow groundwater generally flows from areas of groundwater recharge, such as hills and broad uplands, to areas of groundwater discharge, such as wetlands, rivers, and lakes. Based on the local surface topography, local shallow groundwater is expected to flow towards the east-adjacent Duroy Lake. Other man-made features such as wells, roads, filled areas, buried utility lines and sewers, and drainage ditches may alter the natural shallow groundwater flow direction. Based groundwater data obtained as part of the Phase II ESA completed by SET in 2022 (SET, 2022), the depth to shallow groundwater is approximately six to 10 feet bgs throughout much of the Property but presumably decreases to 0 feet along the Property's shoreline on Duroy Lake.

1.4 PREVIOUS ACM ACTIVITIES AND CURRENT ENVIRONMENTAL CONDITIONS

This section presents a summary of previous asbestos-containing material (ACM) activities performed at the Property.

1.4.1 Hazardous Building Materials – 2023 Asbestos Containing Materials Survey

NorthStar Environmental Testing, LLC (NorthStar) performed inspection and sampling for ACMs on October 2-13, 2023. A total of 393 samples were analyzed for ACM. Building materials that were confirmed to contain asbestos in some areas, or which were assumed to contain asbestos are summarized on the table below. The report includes a detailed summary of the type, quantity and location of ACM within the buildings on the Property, and a copy of the report is provided in **Appendix A**.

Confirmed or Assumed ACM That Will Require Abatement Prior to Disturbance by Mechanical Demolition		
Confirmed ACMs	8" Boiler Breeching Insulation	8-12" Mag Pipe Insulation/Wrap
	Intake Duct Insulation	Blower Insulation
	4-6" Pipe Insulation/Wrap	Felt Paper Tank Covering
	Duct Insulation	Sink Undercoating
	Roofing Paint (silver)	Vinyl Sheet Flooring and Adhesive
	Equipment and Duct Canvas Insulation	Window Glazing
	1'X1' Ceiling Tile (Fissured and Worm Pattern)	Roofing Tar
	Roofing Seam Sealant	Floor Underlayment Adhesive
	Roof Flashing	Floor Tile Adhesive (Black)
	Building Base Sealant	Door Caulk
	Metal Seam Sealant	Siding Seam Sealant
	Penetration Caulk	Conduit Pipe Tar
	Penetration Tar and Caulk	9" Floor Tile (Brown and Tan Mottled)
Assumed ACMs	Boiler Components	Roof Paint (Silver)
	Electrical Panel Components	Roofing Seam Sealant

The report notes that the inspection was limited to building materials and did not include sampling of production equipment except where accessible and obvious suspect ACM was observed on this equipment. The report noted that the only basement area observed was in the "Building 6 Production Area" but was inaccessible and not assessed.

The report further noted there was no access to underground piping, and that if present, these should be assumed to contain asbestos until sampled and proven otherwise.

1.4.2 Hazardous Building Materials – 2025 Asbestos Containing Materials Survey

NorthStar conducted additional inspection and sampling for ACMs on June 5, 2025. A total of 80 samples were analyzed for ACM. Building materials that were confirmed to contain asbestos in some areas, or which were assumed to contain asbestos are summarized on the table below. The report includes a detailed summary of the type, quantity and location of ACM within the buildings on the Property, and a copy of the report is provided in **Appendix A**.

Confirmed or Assumed ACM That Will Require Abatement Prior to Disturbance by Mechanical Demolition						
Building Area	**Item Name**	**Suspect/ Confirmed ACM Noted On or Inside Equipment**	**Suspect ACM Noted Attached to Equipment**	**ACM Type**	**Quantity**	**Comments**
Exterior of Bldg. 30	Ladig Silo Mod 198	**Yes**	No	Caulking	10 SF	ACM Caulking (white) on top of silo
	Ladig Silo Mod 242	**Yes**	No	Caulking	10 SF	ACM Caulking (white) on top of silo
	Ladig Silo Mod 243	**Yes**	No	Caulking	10 SF	ACM Caulking (white) on top of silo
Exterior of Bldg. 26	Ladig Bark Silo Mod 198	**Yes**	**Yes**	Penetration Tar	20 SF	ACM black penetration tar on the South side of the silo and adjacent roof.
Building 26	Bark Hog and Blower System	No	No	n/a	n/a	ACM Caulk on Building Siding. **May need to be disturbed for removal.**
Exterior of Bldg. 4	Fluidized Sand Bed Burner	**Yes**	No	n/a		Possible Suspect Refractory Inside
Building 4	York Shipley Boiler	No	No	n/a	n/a	ACM Caulk on Building Siding. **May need to be disturbed for removal.**
Building 4	Cleaver Brooks Boiler	**Yes**	**Yes**	Breeching Pipe Exhaust Duct Insulation Pipe Insulation	20 LF 520 SF 90 LF	Boiler ACM Present – Interior Components Assumed. ACM Caulk on Building Siding. **May need to be disturbed for removal.**
Hardboard Plant (Building 6)	Digester	No	**Yes**	Pipe Insulation	80 LF	80 LF of associated ACM pipe insulation.
	Refiner	No	**Yes**	Pipe Insulation	15 LF	15 LF of associated ACM pipe
	Flash Tube Dryer	**Yes**	No	Duct and Blower Insulation	1,600 SF	1,600 SF of ACM Intake Duct and Blower Insulation
	Material Handling System	**Yes**	No	Tank Insulation	200 SF	Upper ACM Tank Insulation (near ceiling)
	Additives	No	**Yes**	Pipe Insulation	80 LF	80 LF of associated ACM pipe insulation
	Final Press	No	**Yes**	Pipe Insulation	280 LF	280 LF of associated ACM pipe insulation
Pre-Finishing (Building 14)	Gas Oven	**Yes**	No	Possible Interior Door Insulation	n/a	Possible untested insulation in door panels. **Not likely to be disturbed during dismantle.**
	Gas Oven	**Yes**	No	Possible Interior Door Insulation	n/a	Possible untested insulation in door panels. **Not likely to be disturbed during dismantle.**
	Solvent Emissions System	**Yes**	No	Equipment and Duct - Canvas and Insulation	4,950 SF	ACM Canvas and Insulation Covering Machine

SF = square feet; n/a = not applicable; LF = linear feet.

Confirmed or Assumed ACM That Will Require Abatement Prior to Disturbance by Mechanical Demolition						
Building Area	**Item Name**	**Suspect/ Confirmed ACM Noted On or Inside Equipment**	**Suspect ACM Noted Attached to Equipment**	**ACM Type**	**Quantity**	**Comments**
Misc.	Transformer Grid	**Yes**	No	Assumed Interior Components	n/a	Electrical Components not tested and assumed. **Not likely to be disturbed during dismantle.**
	Fiber Optic Network Grid	**Yes**	No	Assumed Interior Components	n/a	Electrical Components not tested and assumed. **Not likely to be disturbed during dismantle.**
	PLC Equipment	**Yes**	No	Assumed Interior Components	n/a	Electrical Components not tested and assumed. **Not likely to be disturbed during dismantle.**
	Motor Control Systems	**Yes**	No	Assumed Interior Components	n/a	Electrical Components not tested and assumed. **Not likely to be disturbed during dismantle.**
	Steam Heating Grid	**Yes**	No	Pipe Insulation	1,310 LF	All ACM Piping. All insulated piping except fiberglass insulation and Humidifier Area

SF = square feet; n/a = not applicable; LF = linear feet.

The report notes that the inspection was limited to areas of the building that were accessible to NorthStar during investigation. Areas that were inaccessible and not tested or inventoried during the investigation may have included: certain wall or ceiling cavities; electrical components/wiring; gasket material; fire door interiors; boiler, tank, and vessel interiors; equipment components and interiors; chimneys/flues/stacks; spaces requiring confined space entry procedures; structurally unsafe areas; isolated or inaccessible building areas; underground or buried components; and mechanical spaces or equipment that would require extensive demolition or dismantling to provide adequate access for material identification or sampling. Roofing materials including built-up and membrane roofs, and associated flashings and coatings may have been assumed to be ACM (see applicable inspection notes).

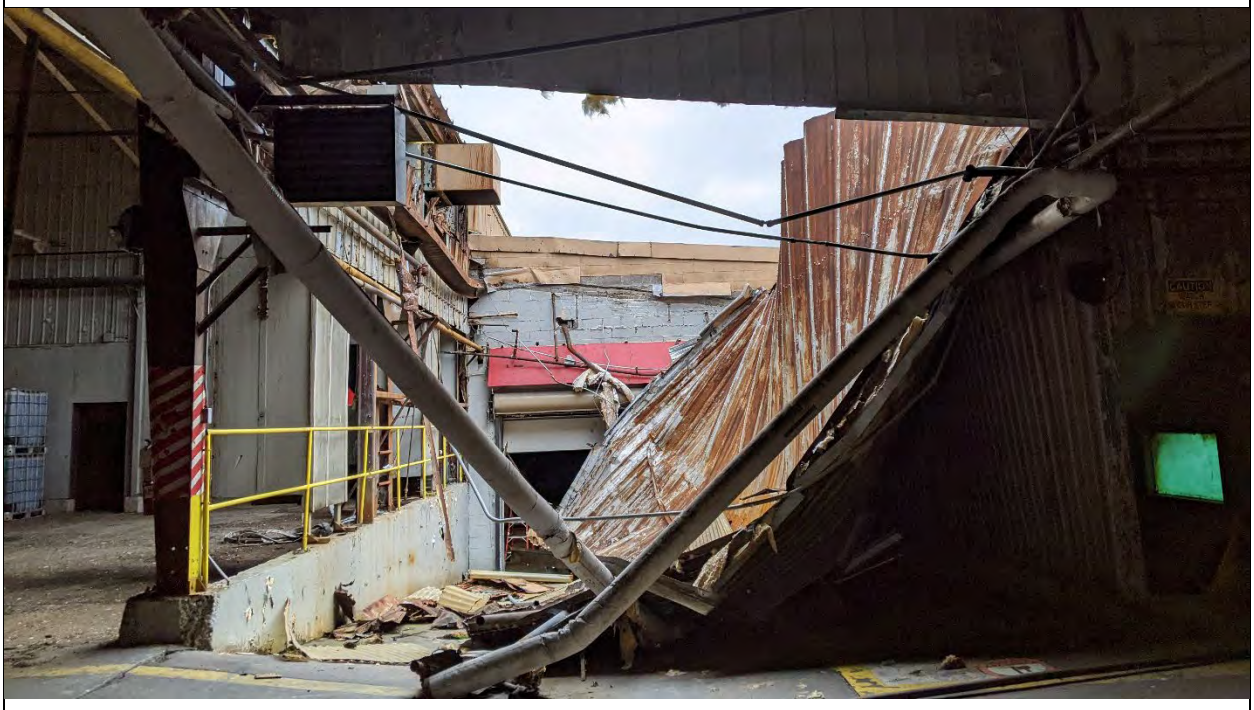
1.4.3 Unsafe Structures

The roofs and walls for two building areas at the north end of the facility collapsed in April 2023 during a Spring snowstorm. These included the 120-foot by 300-foot (36,000 ft^2) “New North Warehouse” constructed in 1981 and the 60-foot by 100-foot (6,000 ft^2) “Loading Dock” also constructed in 1981 located on the northwest side of the New North Warehouse. The roofs for three other smaller areas of the facility (approximately 30-foot by 30-foot, 25-foot by 60-foot, and 50-foot by 60-foot) also collapsed, although it is uncertain if this occurred during the same storm event.

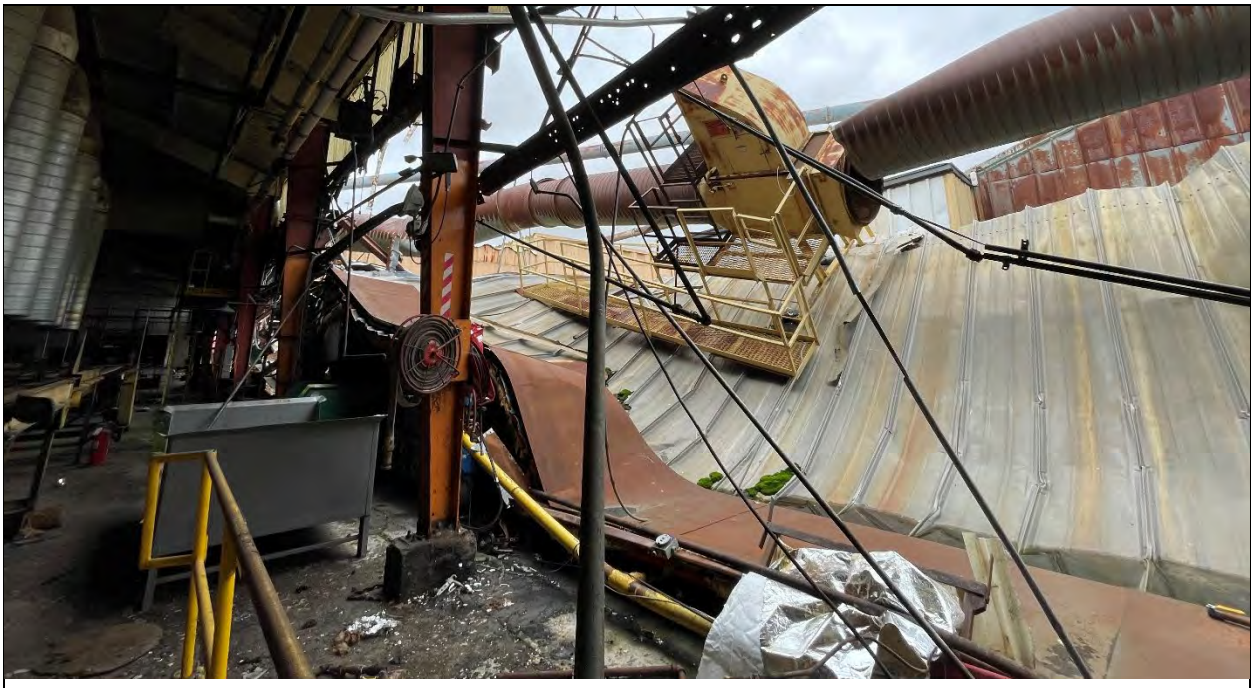
View facing southeast from Depot Road of north end of plant with Loading Dock building in foreground (5/4/2023).

View facing east of partially collapsed Loading Dock building and New North Warehouse (5/4/2023).

View of collapsed roof on New North Warehouse (9/28/2023).



View of collapsed roof in loading dock area Building 13 (9/28/2023).



View of collapsed roof in former maintenance building (9/28/2023).

The collapsed New North Warehouse and Loading Dock buildings were removed by a contractor hired by the City of Phillips in the Spring of 2024. The City assumed legal responsibility for appropriate abatement and disposal of hazardous materials associated with these buildings.

In order to evaluate potential safety concerns related to future hazardous materials abatement and removal activities within remaining buildings and building areas, an inspection and evaluation of these buildings/areas was completed by a Stantec structural engineer in May 2025 (Stantec, 2025). A summary of the overall level of structural-related safety concerns is provided below.

Concern Level for Structural Integrity	Associated Building Areas	Identified Abatement Needs[1]	Structural Recommendations Related to Building Abatement
Low	Bldg. 7	None	
	Bldgs. 11 & 23	All exterior roofing paint (silver) on metals	
Medium	Bldgs. 18, 19, 20, & 29	Roofing Paint (silver) on Metal	It appears that the structures are bearing on the tanks but verification is required prior to demolition.

Concern Level for Structural Integrity	Associated Building Areas	Identified Abatement Needs[1]	Structural Recommendations Related to Building Abatement
High	Office	1x1 ceiling tile & electrical panel components	
	Bldg. 5	8''- 12'' Mag Pipe Insulation/Wrap, Intake Duct Insulation, Blower Insulation, & Roofing Paint (silver) on Metal	Temporary shoring and lateral stabilization of the structure is recommended.
	Bldg. 8	14''- 6'' Mag Pipe Insulation/Wrap	Temporary shoring and lateral stabilization of the structure is recommended.
	Bldg. 13	Roofing paint (silver) on metal & vinyl sheet flooring (tan) and adhesive (tan) on concrete	Building 13 to be demolished when the collapsed interior structures are removed.
	Bldg. 14 (Print Plant)	4''- 6'' Mag Pipe Insulation/Wrap, equipment and duct canvas/insulation, & window glazing.	Appropriate care shall be taken before entering this building.
	Bldg. 14 Warehouse	None	Appropriate care shall be taken before entering this building.
Variable	Bldg. 4 (Heating Plant);	Boiler breeching pipe insulation, boiler exhaust duct insulation, & 16''- 10'' Mag Pipe Insulation/Wrap	Stabilization may be required depending on specific abatement plans.
	Bldg. 6 (Main Production Plant)	8''- 12'' Mag Pipe Insulation/Wrap, 4''- 6'' Mag Pipe Insulation/Wrap, Felt Paper Tank Covering, Duct Insulation, Sink Undercoating (Black), Roofing Paint (silver) on Metal, & Window Glazing.	General concern level is low but further evaluation is needed depending on specific equipment removal plans.

Note: *[1] = Electrical panel components throughout every building were not sampled due to potential electrical hazard. These components should be assumed to be asbestos containing unless sampled to prove otherwise.*

This analysis is a general assessment based on visual observations of the building areas, without the benefit of access to design plans or detailed inspection and evaluation of structural elements. Contractors performing abatement, removal of major equipment, and/or demolition will be responsible for making their own safety assessments and implementing temporary shoring and other stabilization measures they deem appropriate. Factors that could influence these decisions include the time of year and weather conditions when work is performed (e.g., snow loads or strong winds exacerbate levels of concern); the specific methods proposed for removal, abatement, or demolition activities; which equipment is sold versus designated for scrap or disposal; and other variables.

1.5 SUMMARY OF KEY ENVIRONMENTAL, SAFETY, AND OTHER CONCERNS RELEVANT TO ASSESSMENT OF CLEANUP ALTERNATIVES

The following is a summary of information related to key environmental liabilities associated with the Property.

ACM: Extensive ACM was documented by NorthStar (2023 & 2025) that will need to be abated prior to or in conjunction with demolition of the building or as a requirement in support of future renovation and reuse of select buildings. Roofs throughout the facility appear to contain ACM and will need to be removed in order to abate these materials. Another key consideration is that it is likely that underground utility or other tunnels are present as well as underground piping, and that some of these may also contain ACM. This ABCA is focused on the abatement of ACM confirmed or assumed to be present in various building components (and select equipment) located in the facility or within outdoor areas of the Project Area.

LBP: No LBP was documented by NorthStar (2023) on the surface of cementitious materials (i.e., poured concrete and concrete blocks), meaning that the estimated 8,000 cubic yards (CY) of these materials present in the building walls, floors, foundations, and parking lots can likely be crushed and stockpiled on site for future use as geotechnical fill during development (if demolition of these buildings or infrastructure components is necessary for future site use). No testing was conducted on other types of materials in the buildings, and it is assumed that these will be recycled or disposed of off-site. Additional future testing of other types of materials (such as wood) may be of use in enabling these materials to be disposed of at lower cost at a construction and demolition waste landfill instead of a sanitary landfill.

Universal Wastes: Forty different types of restricted wastes were identified in buildings on the Property by NorthStar (2023), including an estimated 1,720 fluorescent bulbs, 956 fire sprinkler heads, 542 ballasts, 452 electrical panels, 430 miscellaneous chemical containers, 217 pressure gauges, 210 electronics, 109 oil reservoirs, 87 halogen lights, 85 batteries, 83 fire extinguishers, 54 chemical barrels, 37 exit signs, 32 chemical vessels, 31 compact fluorescent bulbs, 28 emergency lights, 19 motors/oil, 17 mercury thermostats/switches, 15 transformers and chemical vessels, 14 hydraulic pumps, 13 air conditioners/HVAC units and non-mercury thermostats, 12 appliances, 9 fire suppression tanks and door closures, 8 tires, 7 fire alarms and tank cylinders, 6 emergency lights, 5 compressors and air compressors, 4 refrigerators, 3 gas cylinders, bubblers, and fuel tanks, and 1 radioactive sensor device, generator, hydraulics, and oil container. Stantec completed a drum inventory in April 2025 which included 209 containers ranging between less than two gallons to 12,000-gallons containing petroleum-based liquids, resin, paint, maintenance fluids, and/or other materials that will require proper management.

Appropriate management, recycling and/or disposed of these materials is on-going and was addressed by the initial ABCA.

2.0 REDEVELOPMENT PLAN

We understand that initial reuse plans for the Property are still in development but potentially will include a mix of commercial, residential, community, and recreational uses as well as potential restoration of the ecological function of the Property along portions of the waterfront. Demolition of a majority of the Site buildings is necessary to safely complete assessment of portions of the Property now occupied by these buildings. However, certain buildings may be renovated for future reuse for commercial, light-industrial, or residential purposes. Reuse plans will be finalized with consideration given to community input, the findings from additional assessment activities, funding availability, and market conditions. The general goal is to transform the Property and vacant industrial plant from an on-going source of blight, and a 140-year barrier separating the City from its downtown waterfront, to a multi-faceted community asset. Future reuse may include renovation and adaptive reuse of select buildings, or use of these buildings on a temporary basis as office, storage, or staging areas for future cleanup or construction activities.

3.0 APPLICABLE REGULATIONS AND CLEANUP STANDARDS

3.1 CLEANUP OVERSIGHT RESPONSIBILITY

Property cleanup and redevelopment should be conducted in compliance with applicable laws, regulations, and procedures outlined below.

3.2 APPLICABLE CLEANUP STANDARDS FOR KEY CONTAMINANTS

Cleanup standards for the key hazardous materials confirmed to be present at the Property are summarized below.

Asbestos – Cleanup standards for asbestos are based on the EPA Asbestos-Containing Materials in Schools, Final Rule and Notice (EPA, 1987). Although this rule is in place primarily to protect children in schools, following the guidelines within the rule is encouraged for all building renovations for the overall protection of human health.

3.3 LAWS AND REGULATIONS APPLICABLE TO CLEANUP

This section is provided for informational purposes only and the Property owner (or contractor implementing the cleanup) is responsible for ensuring compliance with all applicable laws and regulations.

Cleanup activities at the Property should be conducted by contractors operating in accordance with the U.S. Department of Labor Occupational Safety & Health Administration (OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER) standard codified at 29 Code of Federal Regulations 1910.120. The HAZWOPER standard likely applies to cleanup operations required by federal, state, local, or other governmental bodies involving hazardous substances.

National Emission Standards for Hazardous Air Pollutants (NESHAP) are outlined in the Code of Federal Regulations (CFR) Title 40 Chapter I Subchapter C Part 61 Subpart M. OSHA regulations regarding asbestos exposure during construction activities (i.e., renovation and demolition) are outlined in CFR Title 29 Subtitle B Chapter XVII Part 1926.1101, whereas OSHA regulations regarding respiratory protection are outlined in CFR Title 29 Subtitle B Chapter XVII Part 1910.134.

A NESHAP notification form must be submitted at least 10 working days prior to the beginning of renovation or demolition activities involving ACMs.

This notification form must include information regarding the company that performed the ACM survey, the analytical laboratory, the company performing the demolition or renovation activities, the company transporting waste that contains asbestos, and the landfill where the waste that contains asbestos will be disposed.

ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES - ASBESTOS ABATEMENT OF BUILDINGS: FORMER PHILLIPS LIONITE WOOD PRODUCTS FACILITY, 115 DEPOT ROAD, PHILLIPS, WISCONSIN

The Asbestos Hazard Emergency Response Act (AHERA) was designed to address the presence of asbestos in school buildings. AHERA also tasked the EPA with developing a plan for accrediting individuals responsible for performing asbestos surveys and remediation. AHERA protocols are considered the best industry practice for asbestos surveys and remediation, and these protocols are typically applied to non-school buildings. Although no school buildings are located at the Property, it is recommended that remediation be performed by a company that utilizes AHERA-certified personnel for asbestos demolition and remediation activities. AHERA is outlined in CFR Title 40 Chapter I Subchapter R Part 763 Subpart E.

Federal laws and regulations applicable to this cleanup include the Small Business Liability Relief and Brownfields Revitalization Act and the Davis-Bacon Act. Federal, state, and local laws regarding procurement of contractors to conduct the cleanup are also applicable.

4.0 EVALUATION OF BROWNFIELDS CLEANUP ALTERNATIVES

4.1 CLEANUP ACTION OBJECTIVES

This ABCA is focused on the primary cleanup objective of abatement-driven structural removal and off-site disposal of ACM for either: a) future access to contaminated media below the building for future cleanup, or b) future renovation and reuse. Buildings of primary focus will be Building 6, 14, and the Office, but tentatively other building sections may need to be abated in such a way utilizing EPA funds. This ABCA will apply to all building structures for which abatement is required within the 9.2-acre EPA project area.

It is anticipated that one or more future ABCAs will be prepared to address possible soil and/or groundwater cleanup activities.

4.2 CLEANUP ALTERNATIVES CONSIDERED

The primary variable associated with building abatement is the extent to which the EPA Cleanup Grant will be used to perform activities necessary to facilitate sale, removal, and salvaging and/or reuse of some buildings and safely access the subsurface below for future cleanup. The poor structural condition of several of the buildings is one primary consideration, and the recommendations by the structural engineer (Stantec, 2025) perform temporary shoring and other measures in select buildings to facilitate safe removal of ACMs. Another consideration is that ACM in some of the buildings may be integral to the site's future reuse. Some of the major pieces of the building are considered unlikely to have any sale value beyond the salvage value associated with the recyclable metals content.

Three alternatives are considered in this ABCA – a "no action" alternative and two action alternatives that vary in the extent to which EPA Cleanup Grant funding is utilized to facility equipment removal ("limited" vs "comprehensive"). Evaluation of the "no action" alternative is an EPA requirement for ABCAs and provides a baseline for comparison to the action alternatives.

A description of each alternative and the results of the comparative analysis are presented below.

4.2.1 Alternative 1 – No Action

The No Action Alternative is included as a baseline for comparison to the other proposed alternatives. The No-Action Alternative assumes: all buildings with ACM will remain.

4.2.2 Alternative 2 – Limited ACM Abatement Measures in Support of ACM Removal

Abatement of ACM would be performed only where buildings with ACM are located inside buildings where abatement can be safely performed without potentially costly temporary shoring or other measures to stabilize the buildings.

4.2.3 Alternative 3 – Comprehensive ACM Abatement Measures in Support of ACM Removal

The difference is that this alternative expands the scope of ACM abatement measures to include use of temporary shoring and other measures as necessary to perform safe abatement and removal of all buildings containing ACM via abatement-driven structural removal of ACM for future access to contaminated media below the building for future cleanup. Subject to EPA approval, select roofs may be replaced if removal and replacement is determined based on bids to be more cost effective than abatement in place.

4.3 EVALUATION OF CLEANUP ALTERNATIVES

The following criteria were used to evaluate the three cleanup alternatives:

- Effectiveness;
- Implementability; and
- Cost.

In addition, consideration was given to extreme weather events and natural disasters, equity concerns, and green and sustainable remediation guidance.

4.3.1 Effectiveness

Effectiveness has both short-term and long-term components. The short-term effectiveness of a remedial alternative is evaluated relative to its effect on human health and the environment during the implementation of the remedial action. Potential risks to the community, potential impacts on workers, the effectiveness and reliability of protective measures, potential environmental impact of the remedial action and the effectiveness/reliability of the mitigation measures during implementation, etc. are some of the factors that are typically considered. Long-term effectiveness and permanence of a remedial alternative are evaluated with respect to the following factors: magnitude of residual risk to human health and environment from the untreated or residual waste at the completion of remedial activities; an assessment of type, degree, and adequacy of long-term management (engineering controls, monitoring, maintenance, etc.) required for untreated or residual waste; an assessment of the long-term reliability of long-term management practices to provide continued protection from the untreated/residual waste; and the potential need for replacement of the remedy and continuing need for repairs to maintain the performance of the remedy.

4.3.1.1 Effectiveness – Alternative 1 (No Action)

No action is considered the least effective option as it would not address the threats to human health and the environment posed by the large quantity of petroleum products, chemicals, and universal wastes remaining from former operation of the board mill. It would also make it infeasible for the Project Area and Property as a whole to be redeveloped for other desired uses.

4.3.1.2 Effectiveness – Alternative 2 (Limited ACM Abatement Measures)

This alternative would be effective in facilitating the abatement of select ACMs and sale and reuse of select building sections associated with the former mill. However, other portions of the building and ACMs would remain in the buildings and continue to be a barrier to future abatement, demolition and cleanup activities below the building foundation and therefore desired future used for the Property.

4.3.1.3 Effectiveness – Alternative 3 (Comprehensive ACM Abatement Measures)

This alternative would be effective in facilitating the abatement of ACMs and sale and reuse of all building portions associated with the former mill. The abatement-driven structural removal and offsite disposal of ACM will also aid in future access to contaminated media below the building for future cleanup.

4.3.2 Implementability

Implementability refers to the technical and administrative feasibility of implementing an alternative, and the various materials and services required during its implementation. Examples of such factors for implementation of an alternative include ability to construct, operate and monitor; time required to obtain necessary permits and approval; and availability of equipment, materials, contractors, etc.

4.3.2.1 Implementability – Alternative 1 (No Action)

No action is the most easily implementable alternative because it involves no activities.

4.3.2.2 Implementability – Alternative 2 (Limited ACM Measures)

This alternative would be more complicated than Alternative 1, but less complicated than Alternative 3. However, none of the required activities are technically complex, and there are numerous fully qualified contractors and consultants in Wisconsin and the Midwest with the capabilities to implement the required work.

4.3.2.3 Implementability – Alternative 3 (Comprehensive ACM Measures)

This alternative would be more complicated than Alternative 1 or 2, as abatement would include installation of bracing and other measures necessary to address structural concerns in select buildings prior to abatement-drive structural removal and disposal of ACMs. It may also include replacement of roofs or sections of roofs on select buildings (subject to EPA approval). However, the added activities are not technically complex, and as with Alternative 2, there would be numerous fully qualified contractors in Wisconsin and the Midwest with the capabilities to implement the required work. Alternative 3 would enhance options for future required cleanup of the contaminated media below the building foundation.

4.3.3 Costs

Cost estimates are presented in this section based on estimates obtained from qualified contractors for this type of work.

4.3.3.1 Costs – Alternative 1 (No Action)

There is no direct cost associated with this alternative. However, it carries a significant opportunity cost given that it would preclude redevelopment of the Property for beneficial community uses as well as the costs associated with the blighting influence on downtown Phillips.

4.3.3.2 Costs – Alternative 2 (Limited ACM Measures)

A detailed cost estimate for Alternative 2 is not available, as PCUL is currently in the process of securing bids for performing abatement/disposal of building components containing ACMs. However, it is anticipated that costs will be between $100,000 and $150,000.

4.3.3.3 Costs – Alternative 3 (Comprehensive ACM Measures)

As was true for Alternative 2, a detailed cost estimate for Alternative 3 is not currently available. However, based on the performance of shoring and other measures as necessary to address structural concerns in select buildings, as well as to perform abatement of ACMs on pieces of equipment, costs are anticipated to be $75,000 to $125,000 higher.

Although costs as part of this initial phase of cleanup will be higher, it is anticipated that the vast majority of the shoring and other stabilization measures may already have been implemented and can be utilized from the equipment abatement already completed under this grant. Therefore, the overall difference in cost for the Cleanup Grant project as a whole may be much more limited.

4.3.4 Consideration of Impacts of Extreme Weather Events and Natural Disasters Evaluation

Scientific evidence demonstrates that the extreme weather events are changing at an increasingly rapid rate, outside the range to which society has adapted in the past. These changes can pose significant challenges to EPA's ability to fulfill its mission. EPA must adapt to extreme weather events if it is to continue fulfilling its statutory, regulatory, and programmatic requirements. EPA is therefore anticipating and planning for future extreme weather changes to ensure it continues to fulfill its mission of protecting human health and the environment even as the extreme weather changes.

The Property in its current condition includes approximately 8 acres of paved or impermeable surfaces, which contribute to both stormwater runoff (and flooding concerns) and heat island effects. Tree cover currently exists only along the extreme eastern edge of the Property, adjacent to Duroy Lake whose water level could be subject to increased flooding or variability. Redevelopment plans for the Property could help mitigate these vulnerabilities, through reduction in the amount of impermeable surfaces, increasing the tree cover, and potentially restoring wetlands along the Lake.

The storm that occurred in April 2023 and collapsed portions of the building are an example of an extreme storm event and document the risks of further collapse that would be associated with Alternative 1. The extreme weather risks add to the urgency for removing ACM from the Property (as part of either Alternative 2 or 3) as soon as possible.

4.3.5 Consideration of Green and Sustainable Remediation Guidance

When implemented effectively, green, and sustainable remediation practices enhance the environmental benefits offered by federal cleanup and redevelopment programs such as the EPA Brownfields Program.

The principles governing green and sustainable remediation for EPA cleanup programs have been outlined in greater detail in EPA's Principles for Greener Cleanups (EPA, 2009) but generally seek to "evaluate cleanup actions comprehensively to ensure the protection of human health and the environment and to reduce the environmental footprint of cleanup activities, to the maximum extent possible." The following five general elements were identified by EPA as principles to be considered in designing the cleanup process:

- Minimize total energy use and maximize use of renewable energy.
- Minimize air pollutants and greenhouse gas emissions.
- Minimize water use and impacts to water resources.
- Reduce, reuse, and recycle material and waste.
- Protect land and ecosystems.

EPA also references the ASTM International Standard Practice E2893-16 "Standard Guide for Greener Cleanups" as a guide to be considered in designing greener cleanups. The approach used to address equipment in the building, petroleum products and chemicals in containers and ASTs, and universal wastes will increase the extent to which materials are either reused as is (i.e., select equipment), beneficially reused (e.g., petroleum products which will be used as fuel at a concrete plant), and recycled, with disposal used where these other alternatives are not feasible or cost effective.

4.4 RECOMMENDED REMEDIAL ALTERNATIVE

The recommended remedial alternative is Alternative 3 – comprehensive measures to support abatement and safe removal of buildings containing ACMs via abatement-driven structural removal and offsite disposal of ACMs to either: 1) aid in future access to contaminated media below the building foundation for future cleanup or 2) support renovation and reuse. Alternative 1 (no action) is the most easily implementable and has the lowest direct cost but is the least effective and will have the greatest long-term cost (considering "opportunity costs") as well as a high potential for resulting in future releases of hazardous substances to the environment. Alternatives 2 and 3 are similar in their effectiveness and implementability, but Alternative 3 would be most effective and better supports future reuse plans.

5.0 DISCLAIMER AND LIMITATIONS

The conclusions in the Report titled “Analysis of Brownfield Cleanup Alternatives – Asbestos Abatement of Buildings: Former Phillips Lionite Wood Products Facility, Phillips, Wisconsin” are Stantec’s professional opinion, as of the time of the Report, and concerning the scope described in the Report. The opinions in the document are based on the conditions and information existing at the time the scope of work was conducted and do not consider any subsequent changes. The Report relates solely to the specific project for which Stantec was retained and the stated purpose for which the Report was prepared. The Report is not to be used or relied on for any variation or extension of the project, or for any other project or purpose, and any unauthorized use or reliance is at the recipient’s own risk.

Stantec has assumed all information received from Price County United Limited (the “Client”) and third parties in the preparation of the Report to be correct. While Stantec has exercised a customary level of judgment or due diligence in the use of such information, Stantec assumes no responsibility for the consequences of any error or omission contained therein.

This Report is intended solely for use by the Client in accordance with Stantec’s contract with the Client. While the Report may be provided by the Client to applicable authorities having jurisdiction and to other third parties in connection with the project, Stantec disclaims any legal duty based upon warranty, reliance or any other theory to any third party, and will not be liable to such third party for any damages or losses of any kind that may result.

6.0 REFERENCES

EPA. 1987. 40 Code of Federal Regulations (CFR) Part 763; Asbestos-Containing Materials in Schools; Final Rule. October.

EPA. 2009. Office of Solid Waste and Emergency Response. Principles for Greener Cleanups. August 27.

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WGNHS, 2011. Wisconsin Geological and Natural History Survey, Glaciation of Wisconsin, 2011.

FIGURES

Figure No.

1

Title

Property Location and Local Topography

Client/Project 193710983

Price County United Limited
Phillips Lionite Property
Analysis of Brownfield Cleanup Alternatives

Project Location
C. of Phillips
Price Co., WI

Prepared by AJS on 2023-10-31
TR by JS on 2023-10-31
IR by EG on 2025-07-08

N

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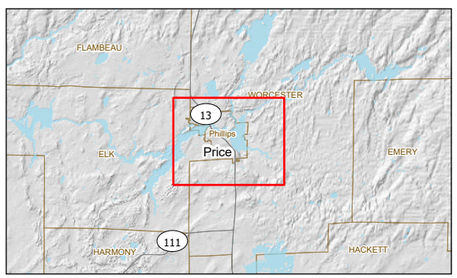
(At original document size of 11x17)
1:24,000

Legend

Property



Notes
1. Coordinate System: NAD 1983 StatePlane Wisconsin North FIPS 4801 Feet
2. Data Sources: Stantec, SCO, USGS, WisDOT, WDNR
3. Background: USGS 7.5' Topographic Quadrangles

Stantec

Figure No.
2

Title
Property Features Map

Client/Project 193710983
Price County United Limited
Phillips Lionite Property
Analysis of Brownfield Cleanup Alternatives

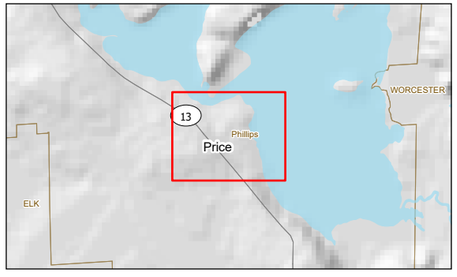
Project Location
C. of Phillips
Price Co., WI

Prepared by AJS on 2023-10-31
TR by JS on 2023-10-31
IR by EG on 2025-07-08

N

0 100 200 Feet
(At original document size of 11x17)
1:2,400

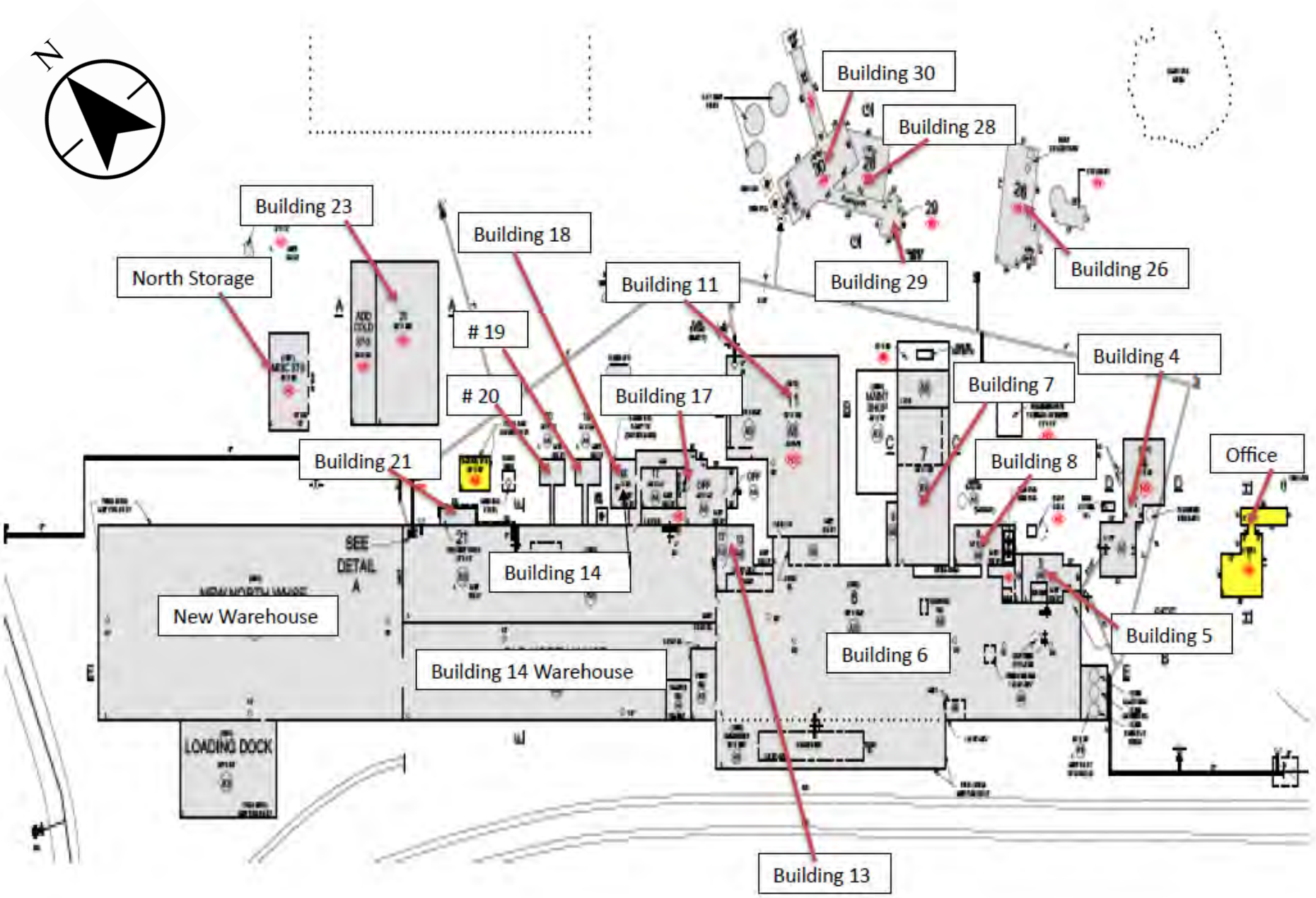
Legend
- Property
- Large Woodchip Pile
- Woodchip/Bark Silo
- Railroad Track
- Railroad Spur/Siding
- Boiler House
- Finished Goods Warehouse and Loading Dock
- Hardboard Plant
- Main Office
- Mill Buildings
- Miscellaneous Storage
- Print Plant
- Saw Building
- Warehouse



Notes
1. Coordinate System: NAD 1983 StatePlane Wisconsin North FIPS 4801 Feet
2. Data Sources: Stantec, SCO, USGS, WisDOT, WDNR
3. Orthophotography: WROC 2020

Stantec

Figure 3: Building Section Layout



Price County United Limited
115 Depot Road Phillips, WI

APPENDICES

APPENDIX A
ASBESTOS INSPECTION REPORTS

NORTHSTAR
ENVIRONMENTAL TESTING, LLC

www.NorthStarTesting.com

Asbestos • Lead Paint • Mold • Indoor Air Quality • Industrial Hygiene

PRE-DEMOLITION INSPECTION: *ASBESTOS, LEAD-BASED PAINT & RESTRICTED WASTE*

Price County United

Site:
Former Lionite Wood Products
115 Depot Road
Phillips, WI 54555

Inspection Date: October 2 - 13, 2023
Report Date: October 19, 2023

NorthStar No. 230-1101

Central Wisconsin 715.693.6112
Fox Cities 920.422.4888
Madison 608.827.6761
Sheboygan 920.422.4888

NORTHSTAR ENVIRONMENTAL TESTING, LLC
www.NorthStarTesting.com

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2109 Erie Avenue
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Sheboygan, WI 53081
Tel: 920.422.4888

Asbestos • Lead Paint • Mold • Indoor Air Quality • Industrial Hygiene

October 19, 2023

Price County United
c/o Lyn Ludwig
N9751 Bass Lake Lane
Phillips, WI 54555

Project:	Pre-Demolition Inspection: Asbestos, Lead Paint, Waste
Site:	Former Lionite Wood Products 115 Depot Road Phillips, WI 54555
Work Area:	Throughout
Site Date:	October 2 - 13, 2023
NorthStar No.	230-1101

NorthStar Environmental Testing, LLC (NorthStar) was contracted by Lyn Ludwig on behalf of Price County United to complete an inspection for the presence of asbestos materials, lead-based paint and restricted waste items prior to the demolition of a production facility with multiple outbuildings located at 115 Depot Road in Phillips, Wisconsin. The inspection was conducted by Andrew Schilling and Larry Pawlus of NorthStar on October 2 - 13, 2023.

Asbestos materials were identified which will require abatement prior to demolition. No lead-based paint was found for surfaces tested. Restricted waste items are present throughout the property. Please review the report in its entirety for more specific information.

Prepared by:
NorthStar Environmental Testing, LLC.
1006 Western Avenue
Mosinee, WI 54455

Provided to:
Price County United
c/o Lyn Ludwig
N9751 Bass Lake Lane
Phillips, WI 54555

NorthStar Environmental Testing, LLC.

David Barrett
Senior Project Manager

Andrew Schilling
Project Technician
AII-213175 / LRA-213175

TABLE OF CONTENTS

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Asbestos • Lead Paint • Mold • Indoor Air Quality • Industrial Hygiene

October 19, 2023

Price County United
c/o Lyn Ludwig
N9751 Bass Lake Lane
Phillips, WI 54555

Project:	Pre-Demolition Inspection: Asbestos
Site Address:	Former Former Lionite Wood Products Production Facility and Outbuildings 115 Depot Road Phillips, WI 54555
Survey Date:	October 2 - 13, 2023
NorthStar No.	230-1101

NorthStar Environmental Testing, LLC (NorthStar) was authorized by Lyn Ludwig on behalf of Price County United to conduct a pre-demolition survey for the presence of accessible suspect asbestos containing materials (ACM) for the following site:

INSPECTION SUMMARY:

Site Address:	115 Depot Road Phillips, WI 545556		
County:	Price		
Structure Type:	Former Former Lionite Wood Products (production facilities, storage facilities and office building)		
Building Age:	1940's to 1990's		
Size:	Production Facilities: 130,000 sf (approx. footprint) Storage Facilities: 20,000 sf (approx. footprint) Office Building: 4,000 sf (approx. footprint)		
Floors	2		
# of Structures:	26 (production facilities, storage facilities and office building) (see attached diagram for facility layout and building numbers)		
Inspector:	Andrew Schilling & Larry Pawlus	Certification:	AII-213175
Asbestos Company:	NorthStar Environmental Testing, LLC	Certification:	CAP-925800
Survey Date:	October 2 - 13, 2023		

INSPECTION SUMMARY (continued):

Comments:	The former Lionite Wood Products company was a wood paneling manufacturing facility that has been vacant for several years. The main production building runs North to South and is approximately 130,000 ft^2. Multiple outbuildings (storage sheds, wood chip production area, office building, fuel storage, etc.) are present, mostly East of the main production building. The North section (New Warehouse Section) collapsed and most of the building was inaccessible for inspection. Equipment, tools, forklifts, vehicles, production equipment, and other items remain throughout all buildings. Since the buildings have been unoccupied for years, damage (water leaks, wind, bird feces, etc.) was present throughout. **The inspection was limited to building materials (not machinery or equipment). Only accessible and obvious suspect asbestos items on production equipment were sampled (or assumed asbestos). Additional items may be present on or within production equipment and may require assumption to contain asbestos, lead or hazardous waste.** Please refer to the inaccessible areas note on page 16 of the report.

SAMPLING SUMMARY:

Number of Samples:	393		
Number Analyzed:	422 (layers)	Point Count:	3
Asbestos Materials:	**8'' Boiler Breeching Insulation**	**8''- 12'' Mag Pipe Insulation/Wrap**	
	Intake Duct Insulation	**Blower Insulation**	
	4''- 6'' Pipe Insulation/Wrap	**Felt Paper Tank Covering**	
	Duct Insulation	**Sink Undercoating**	
	Roofing Paint (silver)	**Vinyl Sheet Flooring and Adhesive**	
	Equipment and Duct Canvas /Insulation	**Window Glazing**	
	1'x1' Ceiling Tile (Fissured and Worm Pattern)	**Roofing Tar**	
	Roofing Seam Sealant	**Floor Underlayment Adhesive**	
	Roof Flashing	**Floor Tile Adhesive (Black)**	
	Building Base Sealant	**Door Caulk**	
	Metal Seam Sealant	**Siding Seam Sealant**	
	Penetration Caulk	**Conduit Pipe Tar**	
	Penetration Tar and Caulk	**9'' Floor Tile (Brown and Tan Mottled)**	
Assumed ACM:	**Boiler Components, Electrical Panel Components, Roof Paint (Silver) and Roofing Seam Sealant**		
Laboratory:	Eurofins CEI, Inc. NVLAP: 101768-0		
Analysis Date:	October 11,12,18, 2023	Point Count:	October 16, 2023

The attached Asbestos Sample Material Log details additional sample analysis data.

ASBESTOS MATERIAL SUMMARY:

Confirmed ACM, or **assumed ACM** that will require abatement prior to disturbance by mechanical demolition:

Material	Bldg. Level	Building Area	Quantity (Approx.)	Category/Comment
Building 4				
8'' Boiler Breeching Pipe Insulation	1	West Boiler Room	20 lf	Friable Good Condition
Boiler Exhaust Duct Insulation	1	West Boiler Room	520 ft^2	Friable Good Condition
[1]6''- 10'' Mag Pipe Insulation/Wrap (including any associated fittings) On Mag Insulated Line (most pipe under metal jacketing)	1	Center Boiler Room Maintenance Room (throughout)	90 lf	Friable Good Condition
[2]Boiler Interior Components (refractory and gaskets)	1	West Boiler (metal covered)	450 ft^2	Friable Good Condition Assumed ACM
Building 5				
[1]8''- 12'' Mag Pipe Insulation/Wrap (including any associated fittings) On Mag Insulated Line (most pipe under metal jacketing)	1	Tank Room <u>(upper pipe)</u>	20 lf	Friable Good Condition
Intake Duct Insulation	1	Blower Room (Large Duct Above Blower)	600 ft^2	Friable Good Condition
Blower Insulation	1	Blower Room (Center of Room)	450 ft^2	Friable Good Condition
[3]Roofing Paint (silver) on Metal	Ext	All Exterior Roofing	1,200 ft^2 (see diagram)	Cat II Non-Friable (Likely to become friable during demo)
Building 6				
[1]8''- 12'' Mag Pipe Insulation/Wrap (including any associated fittings) On Mag Insulated Line (most pipe under metal jacketing)	1	Tank Storage Room Wood Processing Room (Throughout – Mainly South Section and Center Section)	620 lf	Friable Good Condition

Material	Bldg. Level	Building Area	Quantity (Approx.)	Category/Comment
Building 6 (continued)				
[1]4''- 6'' Mag Pipe Insulation/Wrap (including any associated fittings) On Mag Insulated Line (most pipe under metal jacketing)	1	Wood Processing Room (Mainly South and Center Sections)	220 lf	Friable Good Condition
Felt Paper Tank Covering (over fiberglass insulation)	1	Wood Processing Room (Upper Tank Near Ceiling in South Section)	200 ft^2	Friable Good Condition
Duct Insulation	1	Wood Processing Room (Large Exhaust Duct in Center of South Section)	440 ft^2	Friable Good Condition
Sink Undercoating (Black)	1	Southwest Office	4 ft^2 (1 sink)	Cat II Non-Friable Good Condition
[3]Roofing Paint (silver) on Metal	Ext	Exterior Roof East Production Area & Collapsed Roofs	3,200 ft^2 (see diagram)	Cat II Non-Friable (Likely to become friable during demo)
Window Glazing (multipaned window) on Metal	1	East & South Section	3 ft^2 (3 each)	Cat II Non-Friable Good Condition
Building 8				
[1]4''- 6'' Mag Pipe Insulation/Wrap (including any associated fittings)	1	Office (Above Suspended Ceiling)	10 lf	Friable Good Condition
Building 11				
[3]Roofing Paint (silver) on Metal	Ext	All Exterior Roofing	13,500 ft^2 (see diagram)	Cat II Non-Friable (Likely to become friable during demo)
Building 13				
[3]Roofing Paint (silver) on Metal	Ext	Exterior Passageway Roof	100 ft^2	Cat II Non-Friable (Likely to become friable during demo)
Vinyl Sheet Flooring (Tan) and Adhesive (Tan) on Concrete	1	South Office	100 ft^2	Friable Good Condition On Concrete

Material	Bldg. Level	Building Area	Quantity (Approx.)	Category/Comment
Building 14				
[1]4''- 6'' Mag Pipe Insulation/Wrap (including any associated fittings)	1	East Production Area (Upper Pipe Running North to South)	330 lf	Friable Good Condition
Equipment and Duct Canvas/Insulation (White/Grey)	1	East Side Production Area on Production Machine (Dryer) – All Equipment and Duct Insulation (See Diagram)	4,950 ft^2	Friable Good Condition
Window Glazing (multipaned window) on Metal	1	Production Area East Windows	2 ft^2 (2 each)	Cat II Non-Friable Good Condition
Building 18				
[3]Roofing Paint (silver) on Metal	Ext	All Exterior Roofing	1,100 ft^2 (see diagram)	Cat II Non-Friable (Likely to become friable during demo)
Building 19 & 20				
[3]Roofing Paint (silver) on Metal (inaccessible, assumed ACM)	Ext	All Exterior Roofing	750 ft^2 (see diagram)	Cat II Non-Friable Assumed ACM (Likely to become friable during demo)
Building 23				
[3]Roofing Paint (silver) on Metal	Ext	All Exterior Roofing	9,500 ft^2 (see diagram)	Cat II Non-Friable (Likely to become friable during demo)
Building 29				
[3]Roofing Paint (silver) on Metal	Ext	All Exterior Roofing	1,100 ft^2 (see diagram)	Cat II Non-Friable (Likely to become friable during demo)
Office Building				
1x1 Ceiling Tile (Fissured and Worm Pattern)	1	Reception Area Southwest Office	430 ft^2	Friable Good Condition Nailed on
Throughout				
[4]Electrical Panel Components	1	Throughout Every Building – On Structure and Production Equipment Additional ACM sampled Isolators Identified in Building 23 (stock pile)	Unquantified	Cat II Non-Friable Good Condition

[1]The pipe was only observed in the above mentioned areas. Assumptions (presence or quantity) were made due to inaccessibility or due to height of ceilings. The 4'' pipe insulation in building 4 was mostly inaccessible. Calsil pipe insulation was identified inside the building. Calsil is a replacement insulation that has similar qualities to ACM Mag insulation. The Calsil insulation was mostly observed in Building 6 next to the kiln. Since all piping was not tested, some piping is assumed to contain ACM. More pipe insulation may exist and should be assumed to contain asbestos unless proven otherwise.

[2]The West boiler interior components were inaccessible and assumed to contain asbestos. At a minimum additional investigation and additional sampling during abatement will determine if any interior components will need to be abated prior to demolition.

[3]The silver roof paint was only observed in the above mentioned areas. Since the paint was noted to likely become friable during demolition, abatement is suggested. Some of the paint is covered with a white roof coating and may not become friable during demolition, but some areas of the coating are in poor condition and are not encapsulated by the coating. It is suggested that during abatement, the contractor should identify specific areas that will require abatement to allow mechanical demolition of the building. Additional methods (encapsulation of the material to provide non-friable mechanical demolition) can be further addressed with the Wisconsin DNR.

[4]Electrical panels, boxes or components were not sampled due to potential electrical hazard. These components should be assumed to be asbestos containing unless sampled to prove otherwise.

Non-Friable confirmed ACM, or **assumed ACM** on wood, concrete, or metal that *may remain in place for mechanical demolition unless the materials will be recycled or crushed:

Material	Bldg. Level	Building Area	Quantity (Approx.)	Category/Comment
Building 4				
Roofing Tar (Black and Silver) On Metal	Ext	Exterior Roof – Penetration	20 ft^2	Cat I Non-Friable Good Condition On Metal
[5]Siding Seam Sealant (White or Grey) On Metal	Ext	Exterior Sheet Metal Siding (in between seams)	60 ft^2 (on 7,000 ft^2 of Sheet Metal)	Cat II Non-Friable Good Condition On Metal
Building 6				
Roof Flashing (Black) on Metal	Ext	Collapsed Section Near Building 11	6 ft^2	Cat I Non-Friable Good Condition On Metal
Roofing Paint (silver) on Metal (under white encapsulant – adhered firmly)	Ext	Center Section (Main Area Above Production Area Catwalk)	3,000 ft^2 (see diagram)	Cat II Non-Friable (encapsulated and not likely to become friable during demo)
Building 7				
[5]Roofing Seam Sealant (Green)	Ext	All Exterior Roof (in between seams)	406 ft^2 (on 9750 ft^2 of Metal	Cat I Non-Friable Good Condition On Metal
Floor Paneling Adhesive (Black) on Wood	2	Mezzanine (under wood underlayment)	2,700 ft^2	Cat II Non-Friable Good Condition On Wood
[5]Siding Seam Sealant (White or Grey)	Ext	Exterior Sheet Metal Siding (in between seams)	383 ft^2 (on 9,200 ft^2 of Sheet Metal)	Cat II Non-Friable Good Condition On Sheet Metal
Building 13				
12'' Floor Tile Adhesive (Black) on Concrete	1	Lab Area & South Office	700 ft^2	Cat II Non-Friable Good Condition On Concrete
Building Base Sealant and Seam Caulk (Black) on Metal	Ext	Exterior Metal Knee Wall	10 ft^2	Cat II Non-Friable Good Condition On Metal
Building 14				
[5]Roofing Seam Sealant (Grey) on Metal	Ext	Exterior East and West Roof (in between seams)	1,583 ft^2 (on 38,000 ft^2 of Sheet Metal)	Cat I Non-Friable Good Condition On Metal

Material	Bldg. Level	Building Area	Quantity (Approx.)	Category/Comment
Building 17				
Roofing Tar (Black and Silver) On Metal	Ext	Exterior Passageway Roof	100 ft^2	Cat I Non-Friable Good Condition On Metal
Door Caulk (White) On Concrete Block	1	Entry Door (interior/exterior door)	1 ft^2 (1 door)	Cat II Non-Friable Good Condition On Concrete Block
[5]Metal Seam Sealant (Black)	1	Hallway (Interior Sheet Metal Wall)	10 ft^2	Cat II Non-Friable Good Condition On Sheet Metal
Building 19				
[5]Siding Seam Sealant (White or Grey) On Metal	Ext	Exterior Sheet Metal Siding (in between seams)	75 ft^2 (on 1,800 ft^2 of Sheet Metal)	Cat II Non-Friable Good Condition On Sheet Metal
[5]Roofing Seam Sealant (Grey) On Metal	Ext	All Exterior Roofing (in between seams)	15 ft^2	Cat I Non-Friable Assumed ACM
Building 20				
[5]Roofing Seam Sealant (Grey) On Metal	Ext	All Exterior Roofing (in between seams)	15 ft^2	Cat I Non-Friable Assumed ACM
Building 21				
[5]Roofing Seam Sealant (Grey) On Metal	Ext	All Exterior Roofing (in between seams)	13 ft^2 (on 300 ft^2 of Sheet Metal)	Cat I Non-Friable Good Condition On Metal
[5]Siding Seam Sealant (White or Grey) On Metal	Ext	Exterior Sheet Metal Siding (in between seams)	50 ft^2 (on 1,200 ft^2 of Sheet Metal)	Cat II Non-Friable Good Condition On Sheet Metal
Building 23				
[5]Roofing Seam Sealant (Grey) On Metal	Ext	All Exterior Roofing (in between seams)	395 ft^2 (on 9,500 ft^2 of Sheet Metal)	Cat I Non-Friable Good Condition On Metal
Building 26				
[5]Siding Seam Sealant (White or Grey) On Metal	Ext	Exterior Sheet Metal Siding (in between seams)	143 ft^2 (on 3,450 ft^2 of Sheet Metal)	Cat II Non-Friable Good Condition On Metal
Penetration Caulk (Grey) On Metal	Ext	Top of Metal Roof	20 ft^2	Cat I Non-Friable Good Condition On Metal
[5]Roofing Seam Sealant (Grey) On Metal	Ext	All Exterior Roofing (in between seams)	141 ft^2 (on 3,400 ft^2 of Sheet Metal)	Cat I Non-Friable Good Condition On Metal

Material	Bldg. Level	Building Area	Quantity (Approx.)	Category/Comment
Building 29				
[5]Roofing Seam Sealant (Grey) On Metal	Ext	Exterior South Roof (in between seams)	45 ft^2 (on 1,100 ft^2 of Sheet Metal)	Cat I Non-Friable Good Condition On Metal
Penetration Tar and Caulk (Black) On Metal	Ext	Exterior South Roof	10 ft^2	Cat I Non-Friable Good Condition On Metal Roof
Building 30				
Penetration Caulk (White) On Metal	Ext	White Penetration Caulk on Top of Silos (3)	30 ft^2	Cat II Non-Friable Good Condition On Metal
Conduit Pipe Tar (Black)	B	Wood Chip Processing Crawlspace (on Conduit Pipe)	5 ft^2	Cat II Non-Friable Good Condition On Metal
Penetration Tar and Caulk (Black) On Metal	Ext	Exterior Roof Penetration	3 ft^2	Cat I Non-Friable Good Condition On Metal Roof
New Warehouse (collapsed)				
[5]Roofing Seam Sealant (Grey) On Metal	Ext	All Exterior Roofing (in between seams)	1,750 ft^2 (on 42,000 ft^2 of Sheet Metal)	Cat I Non-Friable Good Condition On Metal
Weigh Station				
Roofing Tar (Black and Silver) On Metal	Ext	Exterior Roof – on Bolts	20 ft^2	Cat I Non-Friable Good Condition On Metal
Office Building				
9'' Floor Tile (Brown and Tan Mottled) On Wood	1	Southwest Office & West Storage Room	280 ft^2	Cat I Non-Friable Good Condition On Wood

[5]The seam sealant was only identified in the above mentioned areas. It was visible on the metal siding or roof of some of the buildings. Not all of the buildings had seam sealant/caulk and some that did were negative. Not all roofs were accessible and some were assumed to contain seam caulk. New metal roofing was observed over old metal roofing in some areas. Invasive sampling was not conducted on the roofing materials to maintain roof integrity. During demolition, if seam caulk exists behind the siding or roofing of a building that was not sampled, then it should be assumed to contain asbestos until proven otherwise.

***Any asbestos items allowed to remain in place during demolition must remain non-friable throughout the demolition process and would require proper landfill disposal. Abatement is recommended for any non-friable material having a high probability of becoming friable due to the demolition process. The Wisconsin Department of Natural Resources (WDNR) can be consulted with any specific questions regarding these issues.**

Material quantities are listed according to visible estimates at the time of the survey. It is recommended that all quantities be further verified by the building owner or an abatement contractor prior to project design, bidding, budgeting and/or WDNR notification purposes.

The following materials were found to be **non-asbestos** or **1% (or less)** by PLM analysis:

Non-ACM Materials	
Building 4	
Interior Boiler Insulation	Paint
Boiler Heat Seam Caulk	8” (Calsil) Pipe Insulation
Boiler Top Insulation	4” (Calsil) Pipe Insulation
Floor Tile	4” Fitting Insulation on (Calsil) Line
Floor Tile Adhesive	Brick Mortar
Paneling Adhesive	Exterior Tank Insulation
Drywall	Exterior Boiler Insulation
Ceiling Tile	Exterior Boiler Packing
Roofing Seam Sealant	Boiler Gasket
Penetration Caulk	Boiler Gasket
Roofing Paint	Interior Boiler Packing
Roofing Paint	Interior Boiler Door Refractory
Roofing Paint	Interior Boiler Refractory
Ductwork Insulation	Window Glazing
Siding Gasket	Seam Caulk
Stack Insulation	Window Caulk
Stack Seam Caulk	Ductwork Insulation
Gasket Caulk	Concrete Block Mortar
Duct Penetration Caulk	
Building 5	
Exhaust Duct Insulation	Drywall
Fiberboard	Ceiling Tile
Roof Seam Sealant	Peeling Paint
Building 6	
Phenolic Tank Gasket	3” Pipe Fitting Insulation on Fiberglass Line
Plug Water Tank Gasket	6” Pipe Fitting Insulation on Fiberglass Line
Cascowax Tank Gasket Caulk	12” Calsil Pipe Insulation
Cascowax Tank Insulation	Duct Insulation (1 type)
4” Calsil Pipe Insulation	Wood Panel Adhesive
6” Calsil Pipe Insulation	Drywall
Foam Block Insulation	Ceiling Tile
Foam Block Insulation	Floor Tile (2 types)
Peeling Paint	Floor Tile Adhesive (2 types)
Roof Seam Sealant	Exterior Duct Door Insulation
Outer Seam Sealant	Roof Coating/Paint
Stack Penetration Tar	Roof Coating
Roofing Texture	Concrete Block
Foam Adhesive	Concrete Block Mortar
Door Caulk	
Building 7	
Roof Texture	Outer Seam Sealant
Roofing Paint	Carpet Adhesive
Felt Paper Flooring	Ceiling Tile
Built-Up Roofing	Window Glazing
Drywall/Joint Compound	Floor Tile
Orange Peel Texture	Floor Tile Adhesive
Ceiling Tile	

Non-ACM Materials	
Building 8	
Drywall/Joint Compound	Carpet Adhesive
Ceiling Tile	Ceiling Tile 2x2
Wood Panel Adhesive	Roof Seam Sealant
Ceiling Tile	Peeling Paint
Building 11	
Peeling Paint	Window Caulk
Foam Wall Insulation	Building Seam Caulk
Foam Wall Adhesive	Roofing Sealant
Building 13	
Floor Tile	Drywall/Joint Compound (composite)
Carpet Adhesive	Ceiling Tile
Window Caulk	Roof Seam Sealant
Outer Seam Sealant	Penetration Caulk
Building 17	
Textured Coating	Floor Tile (2 types)
Building Seam Caulk	Floor Tile Adhesive (2 types)
Window Caulk	Foam Panel Adhesive
Door Caulk (1 type)	Wood Panel Adhesive
Seam Sealant	Ceiling Tile (2 types)
Penetration Caulk	Drywall/Joint Compound
Flashing Caulk	Peeling Paint
Building 18	
Building Base Sealant	Roofing Texture
Building Seam Caulk	Window Caulk
Building 14	
Door Caulk	Ceiling Tile
Epoxy Flooring	Drywall
Floor Tile	Hood Vent Caulk
Floor Tile Adhesive	Penetration Tar
Vinyl Baseboard	Rubber Seam Sealant
Vinyl Baseboard Adhesive	Ceiling Tile
Sealant	
Window Caulk	
Building 19	
Perimeter Caulk	
Building 20	
Seam Caulk	Penetration Caulk
Building 21	
Roof Texture	Window Caulk
Peeling Paint	Penetration Caulk
Building 23	
Roof Texture	Roofing Paint

Non-ACM Materials	
Building 26	
Roofing Seam Sealant (2 types)	Outer Seam Caulk
Roofing Tar	Siding Gasket
Building 28	
Flashing Caulk	Roofing Seam Sealant
Building 29	
Roofing Seam Sealant (1 type)	Peeling Paint
Building 30	
Gasket	Gasket Caulk
Seam Caul	Siding Gasket Material
Penetration Caulk	Spray-on Wall Insulation
Roofing Seam Sealant	
New Warehouse	
Roof Caulk	Rubber Seam Sealant
North Storage Building	
Roofing Seam Sealant	
Weigh Station	
Fiberboard	Vinyl Sheet Flooring
Ceiling Tile (2 types)	Door Caulk
Siding Seam Caulk	
Thermal Oxidizer Electrical Building	
Drywall/Joint Compound	Seam Caulk
Office Building	
Vinyl Baseboard	Ceiling Paneling
Vinyl Baseboard Adhesive	Vinyl Sheet Flooring (2 types)
Wood Panel Adhesive	Vinyl Sheet Flooring Adhesive
Drywall	Blown-In Insulation
Ceiling Tile (5 types)	Brick Mortar
Sink Undercoating	Tar Paper
Carpet Adhesive (2 types)	Foundation Skim Coat
Floor Tile Adhesive	Window Caulk
Ceiling Tile Adhesive	Asphalt Shingle
Foundation Stucco	Roofing Felt Paper
Thermal Oxidizer	
Upper Interior Insulation	Refractory
Lower Interior Insulation	Door Gasket

Please see attached *Asbestos Material Sample Log* for complete sample analysis data.

Materials containing any amount of asbestos including materials with 1% or less (trace amount), may still result in an exposure regulated by the Occupational Safety & Health Administration (OSHA). Protective equipment or a negative exposure assessment for personal exposure may be required.

For any material noted to contain less than one percent asbestos (trace amount), there is still a potential for occupation exposure at or above the OSHA Permissible Exposure Limit during any disturbance of the material. Therefore, personal protective equipment would be recommended. The Wisconsin Department of Health Services (DHS) requires that vermiculite be presumed to be an asbestos containing material, regardless of sample analysis, and that it be abated prior to any disturbance by renovation activity.

For mechanical demolition purposes, vermiculite may have an additional more precise “point count” analysis performed. If this secondary analysis confirms the vermiculite to be less than one percent asbestos, the material may remain in place for mechanical demolition (or for fire training burns).

The following areas were inaccessible or excluded at the time of inspection and may contain additional quantities of suspect asbestos containing materials:

Area
Any additional suspect materials, if encountered, which differ from those tested should be assumed to contain asbestos and sampled if/when necessary.
Silver paint was observed to be under existing metal roofing (double layered metal roofing). Invasive sampling was not performed during the inspection to protect the integrity of the roof and equipment below. Additional investigation during abatement is necessary to determine if additional paint exists. Areas of roofing were inaccessible and assumed to contain silver paint. If additional silver paint is identified during demolition, it should be assumed to contain asbestos and if the material is likely to become friable during machine demo, it should be abated.
The seam sealant was visible on the metal siding or roof of some of the buildings. Not all of the buildings had seam sealant/caulk. Not all roofs were accessible and assumed to contain seam caulk. New metal roofing was observed over old metal roofing in some areas. Invasive sampling was not conducted on the roofing materials to maintain the integrity. During demolition, if seam caulk exists behind the siding or roofing of a building that was not sampled, then it should be assumed to contain asbestos until proven otherwise.
The only basement observed was in the Building 6 production area. This basement was mostly inaccessible due to oil contamination inside. Additional underground structures, piping or materials may exist and any additional materials should be assumed to contain asbestos until proven otherwise.
Any underground piping could not be accessed at the time of the inspection. Underground transite piping may be present and should be assumed to contain asbestos.
Some of the burners, boilers, hoppers and equipment were internally accessed and visually examined or sampled during the inspection. Additional investigation is likely to be necessary for the areas that could not be accessed. Not all of the equipment (boilers, hoppers, equipment, etc.) could be accessed and additional materials may still exist. Any additional materials encountered that have not been sampled should be assumed to contain asbestos until proven otherwise.
The exterior piping that fed the buildings, oxidizers, burners and other equipment was observed to be fiberglass insulated with a metal covering. Although most areas were checked, additional suspect ACM insulation may be present. If additional insulation is identified that is not fiberglass insulation, it should be assumed to contain asbestos until proven otherwise.
The ACM pipe insulation was mainly observed in buildings 4, 5, 6 and 14. The Calsil pipe insulation was mostly observed in Building 6 next to the kiln. Calsil is a replacement insulation that has similar qualities to ACM Mag insulation. Since all piping was not tested, some piping is assumed to contain ACM. More pipe insulation may exist and should be assumed to contain asbestos unless proven otherwise.

ASBESTOS RECOMMENDATIONS:

All friable ACM as well as non-friable ACM that would likely be made friable by intended renovation or demolition processes are required to be abated prior to disturbance.

Non-friable ACM (confirmed or assumed) remaining during demolition must be disposed of properly as demolition debris at an approved landfill (landfill requirements vary). Non-friable materials typically require abatement prior to any material recycling procedure. For any building that will be subject to burning, all confirmed and assumed ACM must be removed.

Abatement shall be performed by an abatement company utilizing trained and certified worker/supervisor and further licensed as an asbestos company by the Wisconsin Department of Health Service (DHS), Asbestos Regulation 159.

Refer to WDNR 447; and WI DHS 159 for complete information on requirements for asbestos abatement and asbestos material disposal. Questions regarding asbestos abatement issues can be directed to the WDNR Asbestos Program Coordinator at (262) 574-2118. ***Important*** additional information on the proper management of asbestos, the demolition process, and other materials that need to be managed prior to demolition (light bulbs & ballasts, mercury & freon containing devices, etc.) can be found at:

- WI DHS http://dhs.wisconsin.gov/asbestos/
- WDNR http://dnr.wi.gov/topic/Demo/Asbestos.html
- WDNR http://dnr.wi.gov/files/PDF/pubs/wa/wa651.pdf

SURVEY LIMITATIONS:

Sample results, quantities and recommendations are for areas of the building that were accessible to us during the investigation. Additional assumed ACM that may have been located in spaces not accessible during our investigation, hidden from view, or not sampled at the client's request may require additional sampling prior to disturbance by renovation or demolition activity.

Areas that were inaccessible and not sampled during the investigation may include: certain wall or ceiling cavities; electrical components/wiring; gasket material; fire door interiors; boiler, tank, and vessel interiors; equipment components and interiors; chimneys/flues/stacks; spaces requiring confined space entry procedures; structurally unsafe areas; isolated or inaccessible building areas; underground or buried components; and mechanical spaces or equipment that would require extensive demolition or dismantling to provide adequate access for material identification or sampling.

Roofing materials including built-up and membrane roofs, and associated flashings and coatings may have been assumed to contain asbestos according to project scope.

Additional materials not accessible and not sampled during the survey included items such as miscellaneous caulkings, sealants and construction adhesives that were not readily accessible to sample (may have been located between layers of building components). These materials are typically non-friable in nature but may require further sampling to confirm or deny the presence of asbestos.

Building materials or substrates that were exempted from sampling may have included wood, concrete, glass, fiberglass and metal. Materials that were sampled and if found to contain one percent (1%) or less asbestos (confirmed by point count analysis as necessary) were not quantified.

Additional assumed ACM encountered during renovation or demolition activity that differs from materials sampled or described during this survey must be assumed to contain asbestos and be abated or be sampled to determine asbestos content prior to disturbance.

Material quantities are listed according to visible estimates at the time of the survey. It is recommended that all quantities be further verified by building owner or abatement contractor prior to project design, bidding, budgeting and/or WDNR notification purposes.

ANALYTICAL DISCUSSION:

Bulk sample analysis for asbestos was performed by polarized light microscopy (PLM); method Bulk EPA 600. Samples showing a result of "None Detected" were found to contain no asbestos in any analyzed portion of the sample.

USEPA defines an ACM as a material that contains asbestos unless the asbestos concentration is found to be one percent or less (≤1%) by a PLM point counting procedure. Materials with a point count result of ≤1% asbestos may be treated as a non-ACM. The building owner or client should be aware that exposure to asbestos is still possible when disturbing materials with ≤1% asbestos (trace amount) present and that OSHA worker protection procedures may be necessary.

REMARKS:

The survey and subsequent report have been performed according to applicable regulations and generally accepted industry standards and practices in this locality under similar conditions. Information provided to us by building owner/occupant, client or other interested party that may have been utilized in the performance and reporting of the survey was accepted in good faith and can only be assumed to be accurate. The findings and recommendations made are representative of our professional opinion based on currently available information; no other warranty is implied or intended.

Please contact us if you have any questions regarding the presented information or the project in general.

Sincerely,
NorthStar Environmental Testing, LLC.

David Barrett
Senior Project Manager

Andrew Schilling
Project Technician

Appendix A ASBESTOS MATERIAL SAMPLE LOG

Price County United

Former Lionite Wood Products
115 Depot Road
Phillips, WI 54555

October 2023

Client:	Price County United	**NorthStar No.:**	230-1101
Location:	115 Depot Road Phillips, WI	**Date Collected:**	October 2 - 13, 2023
Work Area:	Pre-Renovation	**Technician:**	A Schilling & L Pawlus

Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-1	1	Building 4 West Boiler Room	Interior Boiler Insulation (under metal jacketing)	Tan	None Detected
1101-2	1	Building 4 West Boiler Room	Boiler Heat Seam Caulk (on metal)	Red	None Detected
1101-3	1	Building 4 West Boiler Room	Boiler Top Insulation (under metal)	Tan	None Detected
1101-4	**1**	**Building 4 West Boiler Room**	**8" Boiler Breeching Piping Insulation**	**Gray**	**15% Amosite**
1101-5	1	Building 4 West Boiler Room	Paint (on exterior metal boiler)	Silver	None Detected
1101-6	1	Building 4 West Boiler Room	Paint (on exterior metal boiler)	Silver	None Detected
1101-7	1	Building 4 West Boiler Room	Paint (on exterior metal boiler)	Silver	None Detected
1101-8	**1**	**Building 4 West Boiler Room**	**Boiler Exhaust Duct Insulation**	**Gray**	**15% Amosite**
1101-9	1	Building 4 Center Room	8" (Calsil) Pipe Insulation	White	None Detected
1101-10 Layer 1	**1**	**Building 4 Center Room**	**8" Pipe Wrap (Mag) Line**	**Gray**	**5% Chrysotile**
1101-10 Layer 2	**1**	**Building 4 Center Room**	**8" Fitting Insulation on (Mag) Line**	**Gray**	**60% Chrysotile**
1101-10 Layer 3	**1**	**Building 4 Center Room**	**8" Fitting Insulation on (Mag) Line**	**Gray**	**10% Chrysotile**
1101-11	1	Building 4 Center Room	4" (CalSil) Pipe Insulation	White	None Detected
1101-12	1	Building 4 Center Room	4" Fitting Insulation on (CalSil) Line	Gray	None Detected
1101-13	1	Building 4 Center Room	Brick Mortar	Gray	None Detected
1101-14	1	Building 4 Center Room	Exterior Tank Insulation (under metal jacket)	Tan	None Detected
1101-15	1	Building 4 Boiler Office	Floor Tile	12" Gray	None Detected
1101-16	1	Building 4 Boiler Office	Floor Tile Adhesive (on wood)	Tan	None Detected
1101-17	1	Building 4 Boiler Office	Paneling Adhesive (on drywall)	Tan	None Detected
1101-18	1	Building 4 Boiler Office	Drywall	White	None Detected
1101-19	1	Building 4 Boiler Office	Ceiling Tile	2'x2' Pinhole Crater	None Detected

Client:	Price County United	**NorthStar No.:**	230-1101
Location:	115 Depot Road Phillips, WI	**Date Collected:**	October 2 - 13, 2023
Work Area:	Pre-Renovation	**Technician:**	A Schilling & L Pawlus

Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-20	1	Building 4 Maintenance Area	4” Calsil Pipe Insulation	Gray	None Detected
1101-21	**1**	**Building 4 Maintenance Area**	**8” Mag Pipe Insulation**	**Gray**	**20% Chrysotile**
1101-22	1	Building 4 East Boiler Rm	Exterior Boiler Insulation (under metal jacket)	Gray	None Detected
1101-23	1	Building 4 East Boiler Rm	Exterior Boiler Packing (under metal jacket)	Gray	None Detected
1101-24	1	Building 4 East Boiler Rm – S. End	Boiler Gasket (on metal)	White	None Detected
1101-25	1	Building 4 East Boiler Rm – N. End	Boiler Gasket (on metal)	White	None Detected
1101-26	1	Building 4 East Boiler Rm – N. End	Interior Boiler Packing	Gray	None Detected
1101-27	1	Building 4 East Boiler Rm – N. End	Interior Boiler Door Refractory	Tan	None Detected
1101-28	1	Building 4 East Boiler Rm – N. End	Interior Boiler Refractory	Tan	None Detected
1101-29	Ext	Building 4 West Side (double hung)	Window Glazing	Gray	None Detected
1101-30	**Ext**	**Building 4 Roof**	**Roofing Tar (on metal)**	**Black**	**10% Chrysotile**
1101-31	Ext	Building 4 Roof	Roofing Seam Sealant (on metal)	Tan	None Detected
1101-32	Ext	Building 4 Roof	Penetration Caulk (on metal)	Tan	None Detected
1101-33	Ext	Building 4 Roof	Roofing Paint (on metal)	Tan	None Detected
1101-34	Ext	Building 4 Roof	Roofing Paint (on metal)	Tan	None Detected
1101-35	Ext	Building 4 Roof	Roofing Paint (on metal)	Tan	None Detected
1101-36	Ext	Thermal Oxidizer West Side	Ductwork Insulation (under metal jacket)	Yellow	None Detected
1101-37	Ext	Thermal Oxidizer South Side	Siding Gasket (on metal)	White	None Detected
1101-38	Ext	Thermal Oxidizer Exhaust Stack	Stack Insulation	Tan	None Detected
1101-39	Ext	Thermal Oxidizer Exhaust Stack	Stack Seam Caulk (on metal)	Tan	None Detected
1101-40	Ext	Dust Cols	Ductwork Insulation (under metal jacket)	Yellow	None Detected

Client:	Price County United	**NorthStar No.:**	230-1101
Location:	115 Depot Road Phillips, WI	**Date Collected:**	October 2 - 13, 2023
Work Area:	Pre-Renovation	**Technician:**	A Schilling & L Pawlus

Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-41	Ext	Dust Cols	Seam Caulk (on metal)	Gray	None Detected
1101-42	Ext	Dust Cols	Window Caulk (on metal)	Clear	None Detected
1101-43	**1**	**Building 5 Blower Room**	**Intake Duct Insulation**	**Gray**	**20% Chrysotile**
1101-44	**1**	**Building 5 Blower Room**	**Blower Insulation**	**Gray**	**10% Chrysotile**
1101-45	1	Building 5 Blower Room	Exhaust Duct Insulation	Brown	None Detected
1101-46	1	Building 5 Electrical Room	Fiberboard	Tan	None Detected
1101-47	1	Building 5 Electrical Room	Drywall	White	None Detected
1101-48	1	Building 5 Office	Ceiling Tile	2'x4' Textured	None Detected
1101-49	1	Building 6 Tank Storage Rm	Phenolic Tank Gasket (on metal)	Gray	None Detected
1101-50	1	Building 6 Tank Storage Rm	Plug Water Tank Gasket (on metal)	Gray	None Detected
1101-51	1	Building 6 Tank Storage Rm	Cascowax Tank Gasket Caulk (on metal)	Red	None Detected
1101-52	1	Building 6 Tank Storage Rm	Cascowax Tank Insulation	Yellow	None Detected
1101-53	**1**	**Building 6 Tank Storage Rm**	**6" Mag Pipe Insulation**	**White**	**20% Amosite**
1101-54	1	Building 6 Tank Storage Rm	3" Pipe Fitting Insulation on Fiberglass Line	Gray	None Detected
1101-55	1	Building 6 Tank Storage Rm	6" Pipe Fitting Insulation on Fiberglass Line	Gray	None Detected
1101-56	**1**	**Building 6 Wood Processing Rm**	**6" Mag Pipe Insulation**	**White**	**20% Chrysotile**
1101-57	1	Building 6 Wood Processing Rm	12" CalSil Pipe Insulation (under metal jacket)	White	None Detected
1101-58	**1**	**Building 6 Wood Processing Rm**	**4" Mag Pipe Insulation**	**White**	**20% Chrysotile**
1101-59	**1**	**Building 6 Wood Processing Rm**	**Felt Paper Tank Covering Over Fiberglass Insulation**	**Black**	**5% Chrysotile**
1101-60 Layer 1	**1**	**Building 6 Wood Processing Rm**	**Duct Insulation**	**Gray/White**	**20% Chrysotile**
1101-60 Layer 2	1	Building 6 Wood Processing Rm	Duct Insulation	Grey	None Detected

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Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-61	1	Building 6 Near Kiln Wood Processing Rm	4" CalSil Pipe Insulation (under metal jacket)	White	None Detected
1101-62	1	Building 6 Near Kiln Wood Processing Rm	6" CalSil Pipe Insulation (under metal jacket)	White	None Detected
1101-63	**1**	**Building 6 SW Office**	**Sink Undercoating (on metal)**	**Black**	**2% Chrysotile**
1101-64	1	Building 6 West Restroom	Wood Panel Adhesive (on drywall)	Tan	None Detected
1101-65	1	Building 6 West Restroom	Drywall	White	None Detected
1101-66	1	Building 6 West Restroom	Ceiling Tile	2'x4' Pinhole Crater	None Detected
1101-67	1	Building 6 West Office (top layer)	Floor Tile	12" Gray	None Detected
1101-68	1	Building 6 West Office	Floor Tile Adhesive (on floor tile)	Tan	None Detected
1101-69	1	Building 6 West Office (bottom layer)	Floor Tile	12" Gray Mottled	None Detected
1101-70	1	Building 6 West Office	Floor Tile Adhesive (on concrete)	Tan	None Detected
1101-71	1	Building 6 West Office	Ceiling Tile	1'x1' Smooth	None Detected
1101-72	1	Building 6 Hydraulic Oil Room	Drywall	White	None Detected
1101-73	1	Building 6 Kiln	Foam Block Insulation	Black	None Detected
1101-74	1	Building 6 Kiln	Foam Block Insulation (on foam & concrete block)	Black	None Detected
1101-75	Ext	Building 6 West Side	Peeling Paint (on concrete)	Green/Silver	None Detected
1101-76	Ext	Building 6 West Side	Peeling Paint (on concrete)	Green/Silver	None Detected
1101-77	Ext	Building 6 West Side	Peeling Paint (on concrete)	Green/Silver	None Detected
1101-78	Ext	Building 6 West Side	Peeling Paint (on metal)	Tan/Silver	None Detected
1101-79	Ext	Building 6 West Side	Peeling Paint (on metal)	Tan/Silver	None Detected
1101-80	Ext	Building 6 South Side	Peeling Paint (on metal)	Tan/Silver	None Detected

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Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-81	Ext	Building 6 South Roof	Roof Seam Sealant (on metal)	Gray	None Detected
1101-82	Ext	Building 6 South Roof	Outer Seam Sealant (on metal)	Gray	None Detected
1101-83	Ext	Building 6 South Roof	Stack Penetration Tar (on metal)	Black	None Detected
1101-84 Layer 1	Ext	Building 6 South – Center Roof	Roofing Texture	White	None Detected
1101-84 Layer 2	Ext	Building 6 South – Center Roof	Roof Coating/Paint	Silver	None Detected
1101-84 Layer 3	Ext	Building 6 South – Center Roof	Roof Coating	Clear	None Detected
1101-85 Layer 1	Ext	Building 6 South – Center Roof	Roofing Paint (on metal)	White	None Detected
1101-85 Layer 2	Ext	Building 6 South – Center Roof	Roof Coating	Clear	None Detected
1101-86 Layer 1	Ext	Building 6 South – Center Roof	Roofing Texture	White	None Detected
1101-86 Layer 2	Ext	Building 6 South – Center Roof	Roofing Coating/Paint	Silver	None Detected
1101-87 Layer 1	**Ext**	**Building 6 South – Center Roof**	**Roofing Paint (on metal)**	**Silver**	**3% Chrysotile**
1101-87 Layer 2	Ext	Building 6 South – Center Roof	Roof Coating	White	None Detected
1101-88 Layer 1	Ext	Building 6 South – Center Roof	Roofing Texture	White	None Detected
1101-88 Layer 2	**Ext**	**Building 6 South – Center Roof**	**Roofing Paint**	**Silver**	**3% Chrysotile**
1101-89 Layer 1	**Ext**	**Building 6 South – Center Roof**	**Roofing Paint (on metal)**	**Silver**	**3% Chrysotile**
1101-89 Layer 2	Ext	Building 6 South – Center Roof	Roof Coating	White	None Detected
1101-90	1	Building 6 South Roof – North End	Roof Seam Sealant (on metal)	Gray	None Detected
1101-91	1	Building 6 Wood Processing Rm	Exterior Duct Door Insulation	White	None Detected
1101-92	Ext	Building 5 Roof	Roof Seam Sealant (on metal)	Gray	None Detected
1101-93	Ext	Building 5 South Side	Peeling Paint (on metal)	Tan/Gray	None Detected
1101-94	Ext	Building 5 South Side	Peeling Paint (on metal)	Tan/Gray	None Detected
1101-95	Ext	Building 5 South Side	Peeling Paint (on metal)	Tan/Gray	None Detected

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Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-96	1	Building 8 Break Room	Drywall/Joint Compound (composite)	White	None Detected
1101-97	1	Building 8 Break Room	Ceiling Tile	2'x2' Pinhole Crater	None Detected
1101-98	1	Building 8 Women's Restroom	Wood Panel Adhesive (on drywall)	Tan	None Detected
1101-99	1	Building 8 Women's Restroom	Ceiling Tile	2'x4' Textured	None Detected
1101-100	Ext	Building 8 Roof	Roof Seam Sealant (on metal)	Gray	None Detected
1101-101	Ext	Building 8 North Side	Peeling Paint (on metal)	Tan	None Detected
1101-102	Ext	Building 8 North Side	Peeling Paint (on metal)	Tan	None Detected
1101-103	Ext	Building 8 North Side	Peeling Paint (on metal)	Tan	None Detected
1101-104	Ext	Building East Side	Seam Caulk (on metal)	Clear	None Detected
1101-105	Ext	Building 7 South Side	Window Caulk (on metal)	White	None Detected
1101-106	Ext	Building 7 Main Roof	Roof Texture (on metal)	White	None Detected
1101-107	Ext	Building 7 Main Roof	Roofing Paint (on metal)	Silver	None Detected
1101-108	Ext	Building 7 Main Roof	Roof Texture (on metal)	White	None Detected
1101-109	Ext	Building 7 Main Roof	Roofing Paint (on metal)	Silver	None Detected
1101-110	Ext	Building 7 Main Roof	Roof Texture (on metal)	White	None Detected
1101-111	Ext	Building 7 Main Roof	Roofing Paint (on metal)	Silver	None Detected
1101-112	**Ext**	**Building 7 Main Roof**	**Roof Seam Sealant (on metal)**	**Green**	**10% Chrysotile**
1101-113	Ext	Building 7 Maintenance Garage Roof	Outer Seam Sealant (on metal)	Gray	None Detected
1101-114	1	Building 8 Office	Carpet Adhesive (on concrete)	Tan	None Detected
1101-115	1	Building 8 Office	Ceiling Tile 2x2	Textured Pinhole Crater	None Detected
1101-116	**1**	**Building 8 Office**	**3" Mag Pipe Insulation**	**White**	**45% Chrysotile**

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Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-117	1	Building 7 NE Office	Carpet Adhesive (on concrete)	Tan	None Detected
1101-118	1	Building 7 NE Office	Ceiling Tile	2'x2' Pinhole Crater	None Detected
1101-119	1	Building 7 Maintenance Garage	Window Glazing (slider windows)	Gray	None Detected
1101-120	1	Building 7 West Office	Floor Tile	12" Tan	None Detected
1101-121	1	Building 7 West Office	Floor Tile Adhesive (on concrete)	Tan	None Detected
1101-122	1	Building 7 West Office	Drywall/Joint Compound (composite)	White	None Detected
1101-123	1	Building 7 West Office	Orange Peel Texture (on drywall)	White	None Detected
1101-124	1	Building 7 West Office	Orange Peel Texture (on drywall)	White	None Detected
1101-125	1	Building 7 West Office	Wood Panel Adhesive (on drywall)	Tan	None Detected
1101-126	1	Building 7 SW Office	Orange Peel Texture (on drywall)	White	None Detected
1101-127	M	Building 7 Mezzanine	Felt Paper Flooring (under wood floor)	Black	None Detected
1101-128	**M**	**Building 7 Mezzanine**	**Flooring Panel Adhesive (backside of wood floor)**	**Black**	**10% Chrysotile**
1101-129	Ext	Building 7 Passage Way Roof	Built-Up Roofing	Black	None Detected
1101-130	1	Building 11 Storage Room	Peeling Paint (on metal)	Gray	None Detected
1101-131	1	Building 11 Storage Room	Peeling Paint (on metal)	Gray	None Detected
1101-132	1	Building 11 Storage Room	Peeling Paint (on metal)	Gray	None Detected
1101-133	1	Building 11 South Machine Room	Foam Wall Insulation	Tan	None Detected
1101-134	1	Building 11 South Machine Room	Foam Wall Adhesive (on wood)	Tan	None Detected
1101-135	Ext	Building 11 East Side	Window Caulk (on metal)	Gray	None Detected
1101-136	Ext	Building 11 North Side	Building Seam Caulk (on metal)	White	None Detected
1101-137	**Ext**	**Building 6 Collapsed Roof**	**Roof Flashing**	**Black**	**7% Chrysotile**

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Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-138	Ext	Building 6 Collapsed Roof	Roof Caulk (on metal)	White	None Detected
1101-139	**Ext**	**Building 6 Collapsed Roof**	**Roofing Paint (on metal)**	**Silver**	**3% Chrysotile**
1101-140	**Ext**	**Building 6 Collapsed Roof**	**Roofing Paint (on metal)**	**Silver**	**3% Chrysotile Point Count: 2.1%**
1101-141	**Ext**	**Building 6 Collapsed Roof**	**Roofing Paint (on metal)**	**Silver**	**3% Chrysotile**
1101-142 Layer 1	Ext	Building 6 Collapsed Roof	Roofing Texture (on metal)	White	None Detected
1101-142 Layer 2	**Ext**	**Building 6 Collapsed Roof**	**Roofing Paint (on metal)**	**Silver**	**3% Chrysotile**
1101-143 Layer 1	Ext	Building 6 Collapsed Roof	Roofing Texture (on metal)	White	None Detected
1101-143 Layer 2	**Ext**	**Building 6 Collapsed Roof**	**Roofing Paint (on metal)**	**Silver**	**3% Chrysotile**
1101-144 Layer 1	Ext	Building 6 Collapsed Roof	Roofing Texture (on metal)	White	None Detected
1101-144 Layer 2	**Ext**	**Building 6 Collapsed Roof**	**Roofing Paint (on metal)**	**Silver**	**3% Chrysotile**
1101-145	1	Building 13 Lab Area	Floor Tile	12” Tan	None Detected
1101-146	**1**	**Building 13 Lab Area**	**Floor Tile Adhesive (on concrete)**	**Black**	**5% Chrysotile**
1101-147	1	Building 13 Lab Area	Drywall/Joint Compound (composite)	White	None Detected
1101-148	1	Building 13 Lab Area	Ceiling Tile	2’x2’ Pinhole Crater	None Detected
1101-149	**1**	**Building 13 South Office**	**Vinyl Sheet Flooring (under floor tile)**	**Tan**	**20% Chrysotile**
1101-150	**1**	**Building 13 South Office**	**Vinyl Sheet Flooring Adhesive (on concrete)**	**Tan**	**3% Chrysotile**
1101-151	1	Building 13 East Office	Carpet Adhesive (on concrete)	Tan	None Detected
1101-152	**Ext**	**Building 13 East Side**	**Building Base Tar Sealant (on metal)**	**Black**	**10% Chrysotile**
1101-153	Ext	Building 13 East Side	Window Caulk (on metal)	Clear	None Detected
1101-154	**Ext**	**Building 13 East Side**	**Building Seam Caulk (on metal)**	**Black**	**10% Chrysotile**
1101-155	Ext	Building 13 Roof	Roof Seam Sealant (on metal)	White	None Detected

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Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-156	Ext	Building 13 Roof	Outer Seam Sealant (on metal)	Gray	None Detected
1101-157	Ext	Building 13 Roof	Penetration Caulk (on metal)	Gray	None Detected
1101-158	Ext	Building 17 West Side	Textured Coating (on concrete block)	Tan/White	None Detected
1101-159	Ext	Building 17 South Side	Textured Coating (on concrete block)	Tan/White	None Detected
1101-160	Ext	Building 17 South Side	Textured Coating (on concrete block)	Tan/White	None Detected
1101-161	Ext	Building 17 East Side	Textured Coating (on concrete block)	Tan/White	None Detected
1101-162	Ext	Building 17 East Side	Textured Coating (on concrete block)	Tan/White	None Detected
1101-163	Ext	Building 17 East Side	Building Seam Caulk (on concrete block)	White	None Detected
1101-164	Ext	Building 17 East Side	Window Caulk (on concrete block)	White	None Detected
1101-165	Ext	Building 17 East Side	Door Caulk (on concrete block)	White	None Detected
1101-166	Ext	Building 17 South Roof	Seam Sealant (on metal)	White	None Detected
1101-167	Ext	Building 17 South Roof	Penetration Caulk (on metal)	Gray	None Detected
1101-168	Ext	Building 17 South Roof	Flashing Caulk (on metal)	Gray	None Detected
1101-169	Ext	Building 17 North Roof	Seam Sealant (on metal)	Gray	None Detected
1101-170	Ext	Building 17 North Roof	Penetration Caulk (on metal)	Clear	None Detected
1101-171	**Ext**	**Building 17 Passage Way Roof**	**Roofing Tar (on metal)**	**Black**	**3% Chrysotile**
1101-172	Ext	Building 17 Passage Way Roof	Roofing Paint (on metal)	Silver	None Detected
1101-173 Layer 1	Ext	Building 17 Passage Way Roof	Roofing Paint (on metal)	Silver	None Detected
1101-173 Layer 2	**Ext**	**Building 17 Passage Way Roof**	**Roofing Tar (on metal)**	**Black**	**3% Chrysotile**
1101-174 Layer 1	Ext	Building 17 Passage Way Roof	Roofing Paint (on metal)	Silver	None Detected
1101-174 Layer 2	**Ext**	**Building 17 Passage Way Roof**	**Roofing Tar (on metal)**	**Black**	**3% Chrysotile**

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Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-175	1	Building 17 Women's Restroom	Floor Tile	12" Dark Tan	None Detected
1101-176	1	Building 17 Women's Restroom	Floor Tile Adhesive (on concrete)	Tan	None Detected
1101-177	1	Building 17 Women's Restroom	Foam Panel Adhesive (on concrete block)	Tan	None Detected
1101-178	1	Building 17 East Break Room	Floor Tile	12" Tan	None Detected
1101-179	1	Building 17 East Break Room	Floor Tile Adhesive (on concrete)	Tan	None Detected
1101-180	1	Building 17 East Break Room	Floor Tile	12" Black	None Detected
1101-181	1	Building 17 East Break Room	Wood Panel Adhesive (on drywall)	Tan	None Detected
1101-182	1	Building 17 East Break Room	Ceiling Tile	2'x2' Pinhole Crater	None Detected
1101-183	1	Building 17 West Break Room	Drywall/Joint Compound (composite)	White	None Detected
1101-184	1	Building 17 West Break Room	Ceiling Tile	2'x2' Pinhole Fissured	None Detected
1101-185	**1**	**Building 17 Entry**	**Door Caulk (on concrete block)**	**White**	**5% Chrysotile**
1101-186	1	Building 17 QC Office	Floor Tile	12" Tan Mottled	None Detected
1101-187	1	Building 17 QC Office	Floor Tile Adhesive (on concrete)	Tan	None Detected
1101-188	1	Building 17 Chemical Storage	Fiberboard	Tan	None Detected
1101-189	1	Building 17 Hallway	Peeling Paint (on metal)	Tan	None Detected
1101-190	1	Building 17 Hallway	Peeling Paint (on metal)	Tan	None Detected
1101-191	1	Building 17 Hallway	Peeling Paint (on metal)	Tan	None Detected
1101-192	**1**	**Building 17 Hallway**	**Metal Seam Sealant (on metal)**	**Black**	**5% Chrysotile**
1101-193	Ext	Building 18 West Side	Building Base Sealant (on metal)	Black	None Detected
1101-194	Ext	Building 18 North Side	Building Seam Caulk (on metal)	Clear	None Detected
1101-195	Ext	Building 18 North Side	Window Caulk (on metal)	Clear	None Detected

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Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-196	Ext	Building 18 Roof	Roofing Texture	White	None Detected
1101-197	**Ext**	**Building 18 Roof**	**Roofing Paint (on metal)**	**Silver**	**2% Chrysotile**
1101-198	Ext	Building 18 Roof	Roofing Texture	White	None Detected
1101-199	**Ext**	**Building 18 Roof**	**Roofing Paint (on metal)**	**Silver**	**2% Chrysotile**
1101-200	Ext	Building 18 Roof	Roofing Texture	White	None Detected
1101-201	**Ext**	**Building 18 Roof**	**Roofing Paint (on metal)**	**Silver**	**2% Chrysotile**
1101-202 Layer 1	1	Building 14 – East Side Production Area	Duct Insulation (above equipment dryer)	Gray	None Detected
1101-202 Layer 2	1	Building 14 – East Side Production Area	Duct Wrap	White	None Detected
1101-203 Layer 1	1	Building 14 – East Side Production Area	Duct Insulation (above equipment dryer)	Gray	None Detected
1101-203 Layer 2	1	Building 14 – East Side Production Area	Duct Wrap	White	None Detected
1101-204 Layer 1	1	Building 14 – East Side Production Area	Equipment Insulation (on equipment dryer)	Gray	None Detected
1101-204 Layer 2	**1**	**Building 14 – East Side Production Area**	**Duct Canvas**	**White**	**3% Chrysotile Point Count: 1.2%**
1101-205 Layer 1	1	Building 14 – East Side Production Area	Equipment Insulation (on equipment dryer)	Gray	None Detected
1101-205 Layer 2	1	Building 14 – East Side Production Area	Duct Wrap	White	None Detected
1101-206	**1**	**Building 14 – East Side Production Area**	**4" Mag Pipe Insulation**	**White**	**40% Chrysotile**
1101-207	**1**	**Building 14 – East Side Production Area**	**4" Mag Pipe Insulation**	**White**	**40% Chrysotile**
1101-208 Layer 1	**1**	**Building 14 – East Side Production Area**	**4" Pipe Fitting Insulation on Mag Line**	**Gray**	**20% Chrysotile**
1101-208 Layer 2	**1**	**Building 14 – East Side Production Area**	**4'' Pipe Wrap over fitting**	**Brown**	**2% Chrysotile**
1101-209 Layer 1	**1**	**Building 14 – East Side Production Area**	**4" Pipe Fitting Insulation on Mag Line**	**Gray**	**20% Chrysotile**
1101-209 Layer 2	**1**	**Building 14 – East Side Production Area**	**4'' Pipe Wrap over fitting**	**Brown**	**2% Chrysotile**
1101-210	**1**	**Building 14 – East Side Production Area**	**Window Glazing (metal 6 pane window)**	**Gray**	**3% Chrysotile**

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Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-211	1	Building 14 – East Side Production Area	Door Caulk (on metal)	Gray	None Detected
1101-212	1	Building 6 Wood Processing Rm	Epoxy Flooring (on concrete)	Red	None Detected
1101-213	1	Building 14 – East Side Office	Floor Tile	12” Tan Mottled	None Detected
1101-214	1	Building 14 – East Side Office	Floor Tile Adhesive (on wood)	Tan	None Detected
1101-215	1	Building 14 – East Side Office	Vinyl Baseboard	4” Brown	None Detected
1101-216	1	Building 14 – East Side Office	Vinyl Baseboard Adhesive (on wood)	Tan	None Detected
1101-217	1	Building 14 – East Side Office	Ceiling Tile	1’x1’ White	None Detected
1101-218	1	Building 14 – West Side Warehouse Shop Area	Fiberboard	Tan	None Detected
1101-219	1	Building 14 – West Side Warehouse	Concrete Block Mortar	Gray	None Detected
1101-220	1	Building 14 – West Side Warehouse Break Room	Floor Tile	12” Tan	None Detected
1101-221	1	Building 14 Warehouse Break Room	Floor Tile Adhesive (on wood)	Tan	None Detected
1101-222	1	Building 14 Warehouse Break Room	Ceiling Tile	2’x2’ Pinhole Crater	None Detected
1101-223	1	Building 14 Warehouse Break Room	Drywall	White	None Detected
1101-224	Ext	Building 14 East Roof	Hood Vent Caulk (on metal)	White	None Detected
1101-225	Ext	Building 14 East Roof	Penetration Tar (on metal)	Black	None Detected
1101-226	**Ext**	**Building 14 East Roof**	**Roof Seam Sealant (on metal)**	**Gray**	**10% Chrysotile**
1101-227	**Ext**	**Building 14 West Roof**	**Roof Seam Sealant (on metal)**	**Gray**	**10% Chrysotile**
1101-228	Ext	Building 14 West Roof	Rubber Seam Sealant (on metal)	Black	None Detected
1101-229	**Ext**	**New North Warehouse Roof**	**Seam Sealant (on metal)**	**Gray**	**10% Chrysotile**
1101-230	Ext	New North Warehouse Roof	Roof Caulk (on metal)	Gray	None Detected

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Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-231	Ext	New North Warehouse Roof	Rubber Seam Sealant (on metal)	Black	None Detected
1101-232	Ext	New North Warehouse North Side	Window Caulk (on metal)	Clear	None Detected
1101-233	Ext	New North Warehouse East Side	Window Caulk (on metal)	White	None Detected
1101-234	**Ext**	**Building 19 North Side**	**Siding Seam Sealant (on metal)**	**White**	**8% Chrysotile**
1101-235	Ext	Building 19 North Side	Perimeter Caulk (on metal)	Black	None Detected
1101-236	1	Building 20 Interior	Seam Caulk (on metal)	White	None Detected
1101-237	Ext	Building 20 West Side	Penetration Caulk (on metal)	Clear	None Detected
1101-238	Ext	Building 23 Roof	Roof Texture	White	None Detected
1101-239	**Ext**	**Building 23 Roof**	**Roofing Paint (on metal)**	**Silver**	**2% Chrysotile** **Point Count: 2.1%**
1101-240	Ext	Building 23 Roof	Roof Texture	White	None Detected
1101-241	**Ext**	**Building 23 Roof**	**Roofing Paint (on metal)**	**Silver**	**2% Chrysotile**
1101-242	Ext	Building 23 Roof	Roof Texture	White	None Detected
1101-243	Ext	Building 23 Roof	Roofing Paint (on metal)	Silver	None Detected
1101-244	**Ext**	**Building 23 Roof**	**Roof Seam Sealant (on metal)**	**Gray**	**10% Chrysotile**
1101-245	1	Building 21 Interior	Peeling Paint (on metal)	Tan	None Detected
1101-246	1	Building 21 Interior	Peeling Paint (on metal)	Tan	None Detected
1101-247	1	Building 21 Interior	Peeling Paint (on metal)	Tan	None Detected
1101-248	**Ext**	**Building 21 East Side**	**Roofing/Siding Seam Caulk (on metal)**	**Gray**	**3% Chrysotile**
1101-249	Ext	Building 21 East Side	Window Caulk (on metal)	Gray	None Detected
1101-250	Ext	Building 21 East Side	Penetration Caulk (on metal)	White	None Detected
1101-251	**Ext**	**Building 21 East Side**	**Perimeter Side Flashing (on metal)**	**Black**	**10% Chrysotile**

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Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-252	Ext	North Storage Building Roof	Roofing Seam Sealant (on metal)	White	None Detected
1101-253	1	Weigh Station Office	Fiberboard	Tan	None Detected
1101-254	1	Weigh Station Office (top layer)	Ceiling Tile	1'x1' White	None Detected
1101-255	1	Weigh Station Office (bottom layer)	Ceiling Tile	1'x1' Tan	None Detected
1101-256	1	Weigh Station Office	Vinyl Sheet Flooring (on wood)	Wood Pattern	None Detected
1101-257	Ext	Weigh Station South Side	Door Caulk (on metal)	Gray	None Detected
1101-258	Ext	Weigh Station South Side	Siding Seam Caulk (on metal)	Gray	None Detected
1101-259	**Ext**	**Weigh Station Roof**	**Roofing Tar (on bolts)**	**Silver**	**5% Chrysotile**
1101-260	**Ext**	**Weigh Station Roof**	**Roofing Seam Sealant (on metal)**	**White**	**5% Chrysotile**
1101-261	Ext	Building 30 Silos North Silo	Gasket (on metal)	White	None Detected
1101-262	**Ext**	**Building 30 Silos North Silo**	**Penetration Caulk (on metal)**	**White**	**3% Chrysotile**
1101-263	Ext	Building 30 Silos North Silo	Gasket Caulk (on metal)	Red	None Detected
1101-264	Ext	Building 30 Silos North Silo	Seam Caulk (on metal)	White	None Detected
1101-265	Ext	Building 30 Silos East Silo	Penetration Caulk (on metal)	White	None Detected
1101-266	Ext	Building 30 Silos East Silo	Siding Gasket Material (on metal)	Black	None Detected
1101-267	Ext	Building 30 Silos East Silo	Gasket (on metal)	White	None Detected
1101-268	Ext	Building 30 Silos East Silo	Seam Caulk (on metal)	White	None Detected
1101-269	Ext	Building 30 Silos South Silo	Seam Caulk (on metal)	White	None Detected
1101-270	Ext	Building 30 Silos South Silo	Penetration Caulk (on metal)	White	None Detected
1101-271	Ext	Building 30 Silos South Silo	Siding Gasket Material (on metal)	Black	None Detected
1101-272	1	Building 30 Electrical Room	Spray-on Wall Insulation (on metal)	Tan	None Detected

Client:	Price County United	**NorthStar No.:**	230-1101
Location:	115 Depot Road Phillips, WI	**Date Collected:**	October 2 - 13, 2023
Work Area:	Pre-Renovation	**Technician:**	A Schilling & L Pawlus

Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-273	1	Building 30 Electrical Room	Spray-on Wall Insulation (on metal)	Tan	None Detected
1101-274	1	Building 30 Electrical Room	Spray-on Wall Insulation (on metal)	Tan	None Detected
1101-275	1	Building 30 Wood Chip Processing	Spray-on Wall Insulation (on metal)	Tan	None Detected
1101-276	1	Building 30 Wood Chip Processing	Spray-on Wall Insulation (on metal)	Tan	None Detected
1101-277	1	Building 30 Wood Chip Processing	Spray-on Wall Insulation (on metal)	Tan	None Detected
1101-278	1	Building 30 Wood Chip Processing	Spray-on Wall Insulation (on metal)	Tan	None Detected
1101-279	**C**	**Building 30 Crawlspace**	**Conduit Pipe Covering (on metal)**	**Black**	**5% Chrysotile**
1101-280	**Ext**	**Building 30 Roof**	**Penetration Tar (on metal)**	**Black**	**5% Chrysotile**
1101-281	Ext	Building 30 Roof	Roofing Seam Sealant (on metal)	Gray	None Detected
1101-282	Ext	Building 29 Catwalk Roof	Roofing Seam Sealant (on metal)	Gray	None Detected
1101-283	**Ext**	**Building 29 South Roof**	**Roofing Seam Sealant (on metal)**	**Gray**	**5% Chrysotile**
1101-284 Layer 1	**Ext**	**Building 29 South Roof**	**Penetration Caulk (on metal)**	**Black**	**10% Chrysotile**
1101-284 Layer 2	**Ext**	**Building 29 South Roof**	**Silver Paint (on metal)**	**Silver**	**2% Chrysotile**
1101-285	Ext	Building 28 Roof	Flashing Caulk (on metal)	Silver	None Detected
1101-286	Ext	Building 28 Roof	Roofing Seam Sealant (on metal)	Gray	None Detected
1101-287	1	Tank Storage Building Interior	Peeling Paint (on metal)	Tan	None Detected
1101-288	1	Tank Storage Building Interior	Peeling Paint (on metal)	Tan	None Detected
1101-289	1	Tank Storage Building Interior	Peeling Paint (on metal)	Tan	None Detected
1101-290	**Ext**	**Building 26 West Side**	**Siding Seam Caulk (on metal)**	**Gray**	**5% Chrysotile**
1101-291	**Ext**	**Building 26 Top Roof**	**Roofing Seam Sealant (on metal)**	**Gray**	**5% Chrysotile**
1101-292	Ext	Building 26 Top Roof	Roofing Seam Sealant (on metal)	Gray	None Detected

Client:	Price County United	**NorthStar No.:**	230-1101
Location:	115 Depot Road Phillips, WI	**Date Collected:**	October 2 - 13, 2023
Work Area:	Pre-Renovation	**Technician:**	A Schilling & L Pawlus

Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-293	Ext	Building 26 Top Roof	Outer Seam Caulk (on metal)	Silver	None Detected
1101-294	Ext	Building 26 Silo/Electrical	Siding Gasket (on metal)	Black	None Detected
1101-295	**Ext**	**Building 26 Silo/Electrical**	**Silo Penetration Tar (on metal)**	**Gray**	**10% Chrysotile**
1101-296	Ext	Building 26 Silo/Electrical	Roofing Tar (on metal)	Black	None Detected
1101-297	Ext	Building 26 Silo/Electrical	Roofing Seam Sealant (on metal)	Tan	None Detected
1101-298	1	Thermal Oxidizer Electrical Bldg – Office	Drywall/Joint Compound (composite)	White	None Detected
1101-299	Ext	Thermal Oxidizer Electrical Bldg	Seam Caulk (on metal)	Clear	None Detected
1101-300	1	Office Building Break Room	Vinyl Baseboard	4” Brown	None Detected
1101-301	1	Office Building Break Room	Vinyl Baseboard Adhesive	Cream	None Detected
1101-302	1	Office Building Break Room	Wood Panel Adhesive (on drywall)	Tan	None Detected
1101-303	1	Office Building Break Room	Drywall	White	None Detected
1101-304	1	Office Building Break Room	Ceiling Tile	2’x4’ Textured	None Detected
1101-305	1	Office Building Break Room	Sink Undercoating (on metal)	Gray	None Detected
1101-306	1	Office Building Conference Room	Carpet Adhesive (on wood)	Tan	None Detected
1101-307	1	Office Building Conference Room	Wood Panel Adhesive (on drywall)	Brown	None Detected
1101-308	1	Office Building Conference Room	Ceiling Tile	1’x1’ Texture	None Detected
1101-309	1	Office Building SE Office	Carpet Adhesive (on wood)	Gray	None Detected
1101-310	1	Office Building SE Office	Ceiling Paneling	White	None Detected
1101-311	1	Office Building Janitor’s Closet	Vinyl Sheet Flooring	Tan Octagon Pattern	None Detected
1101-312	1	Office Building Janitor’s Closet	Vinyl Sheet Flooring Adhesive (on wood)	Tan	None Detected

Client:	Price County United	**NorthStar No.:**	230-1101
Location:	115 Depot Road Phillips, WI	**Date Collected:**	October 2 - 13, 2023
Work Area:	Pre-Renovation	**Technician:**	A Schilling & L Pawlus

Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-313	1	Office Building NE Office	Ceiling Tile	1'x1' Rough Texture	None Detected
1101-314	1	Office Building Entry	Vinyl Sheet Flooring	Gray Marble Pattern	None Detected
1101-315	1	Office Building East Storage	Ceiling Tile	1'x1' Pinhole Fissured	None Detected
1101-316	1	Office Building Main Hallway	Drywall/Joint Compound (composite)	White	None Detected
1101-317	1	Office Building Main Hallway	Ceiling Tile	1'x1' Pinhole	None Detected
1101-318	**1**	**Office Building Reception**	**Ceiling Tile**	**1'x1' Fissured**	**2% Chrysotile**
1101-319	1	Office Building Reception	Ceiling Tile	2'x2' Pinhole Crater	None Detected
1101-320	Attic	Office Building Attic	Blown-In Insulation	White	None Detected
1101-321	1	Office Building South Office	Ceiling Tile	1'x1' Crater	None Detected
1101-322	**1**	**Office Building SW Office**	**Floor Tile**	**9" Tan Mottled**	**3% Chrysotile**
1101-323	1	Office Building SW Office	Floor Tile Adhesive (on wood)	Tan	None Detected
1101-324	1	Office Building SW Office	Wood Paneling Adhesive (on drywall)	Dark Tan	None Detected
1101-325	**1**	**Office Building SW Office**	**Ceiling Tile**	**1'x1' Worm Pattern**	**2% Chrysotile**
1101-326	**1**	**Office Building West Storage**	**Floor Tile**	**9" Brown Mottled**	**2% Chrysotile**
1101-327	1	Office Building West Storage	Floor Tile Adhesive (on wood)	Tan	None Detected
1101-328	1	Office Building NW Office	Ceiling Tile Adhesive (on fiberboard)	Brown	None Detected
1101-329	B	Office Building Basement	Brick Mortar	Gray	None Detected
1101-330	B	Office Building Basement	Tar Paper	Black	None Detected
1101-331	B	Office Building Basement	Foundation Skim Coat	Gray	None Detected
1101-332	B	Office Building Basement	Foundation Skim Coat	Gray	None Detected
1101-333	B	Office Building Basement	Foundation Skim Coat	Gray	None Detected

Client:	Price County United	**NorthStar No.:**	230-1101
Location:	115 Depot Road Phillips, WI	**Date Collected:**	October 2 - 13, 2023
Work Area:	Pre-Renovation	**Technician:**	A Schilling & L Pawlus

Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-334	B	Office Building Basement	Foundation Skim Coat	Gray	None Detected
1101-335	B	Office Building Basement	Foundation Skim Coat	Gray	None Detected
1101-336	Ext	Office Building East Side	Window Caulk (on vinyl siding)	Gray	None Detected
1101-337	Ext	Office Building Roof	Asphalt Shingle	Tan	None Detected
1101-338	Ext	Office Building Roof	Roofing Felt Paper	Black	None Detected
1101-339	Ext	Office Building North Side	Foundation Stucco (on concrete block)	Gray	None Detected
1101-340	Ext	Office Building North Side	Foundation Stucco (on concrete block)	Gray	None Detected
1101-341	Ext	Office Building North Side	Foundation Stucco (on concrete block)	Gray	None Detected
1101-342	Ext	Building 4 Silo	Gasket Caulk (on metal)	Red	None Detected
1101-343	**Ext**	**Building 4 South Side**	**Siding Seam Caulk (on metal)**	**Gray**	**5% Chrysotile**
1101-344	Ext	Building 4 South Side	Concrete Block Mortar	Gray	None Detected
1101-345	**Ext**	**Building 7 South Side**	**Siding Seam Caulk (on metal)**	**Gray**	**10% Chrysotile**
1101-346	1	Building 7 SW Office	Ceiling Tile	1'x1' Swirl Pattern	None Detected
1101-347	1	Building 11 Storage	Seam Caulk (on concrete block)	Gray	None Detected
1101-348	Ext	Building 4 South Side	Duct Penetration Caulk (on metal)	Gray	None Detected
1101-349	Ext	West Side of Building 26 (on ground)	Refractory Brick	Tan	None Detected
1101-350	1	Building 14 Paint Storage Room	Sink Undercoating (on metal)	Gray	None Detected
1101-351	1	Building 6 Wood Production Area	8" CalSil Pipe Insulation (under metal jacket)	Pink	None Detected
1101-352	**1**	**Building 23 North Bay**	**Electrical Isolator**	**Tan**	**15% Chrysotile**
1101-353	Ext	Round Blue Storage Vessel	Gasket Caulk (on metal)	Silver	None Detected

Client:	Price County United	**NorthStar No.:**	230-1101
Location:	115 Depot Road Phillips, WI	**Date Collected:**	October 2 - 13, 2023
Work Area:	Pre-Renovation	**Technician:**	A Schilling & L Pawlus

Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-354	1	Thermal Oxidizer Boiler - Interior	Upper Interior Insulation	White	None Detected
1101-355	1	Thermal Oxidizer Boiler - Interior	Upper Interior Insulation	White	None Detected
1101-356	1	Thermal Oxidizer Boiler - Interior	Upper Interior Insulation	White	None Detected
1101-357	1	Thermal Oxidizer Boiler - Interior	Lower Interior Insulation	Tan	None Detected
1101-358	1	Thermal Oxidizer Boiler - Interior	Lower Interior Insulation	Tan	None Detected
1101-359	1	Thermal Oxidizer Boiler - Interior	Lower Interior Insulation	Tan	None Detected
1101-360	1	Thermal Oxidizer Boiler - Interior	Refractory	Tan	None Detected
1101-361	1	Thermal Oxidizer Boiler - Interior	Refractory	Tan	None Detected
1101-362	1	Thermal Oxidizer Boiler - Interior	Refractory	Tan	None Detected
1101-363	1	Thermal Oxidizer Boiler - Interior	Door Gasket	Tan	None Detected
1101-364	**1**	**Building 6 – East 10-12 in Pipe**	**Mag Insulation**	**White**	**3% Chrysotile 10% Amosite**
1101-365	**1**	**Building 6 – East 10-12 in Pipe On Mag**	**Pipe Fitting Insulation**	**White**	**3% Chrysotile 10% Amosite**
1101-366	1	Building 6 – West 4'' Pipe on Fiberglass	Pipe Fitting Insulation	Tan	None Detected
1101-367	1	Building 6 – West 12'' Jacket	Calsil Pipe Insulation	White	None Detected
1101-368	1	Building 6 – West On 8'' Pipe	Pipe Jacket Insulation	White	None Detected
1101-368	1	Building 6 – West On 8'' Pipe	Pipe Jacket Covering	Grey	None Detected
1101-369	1	Building 6 – West Digestor 12'' Pipe	Calsil Pipe Insulation	White	None Detected
1101-370	1	Building 6 Hopper	Textured Paint (on metal)	Brown	None Detected
1101-371	1	Building 6 Hopper	Textured Paint (on metal)	Brown	None Detected
1101-372	1	Building 6 Hopper	Textured Paint (on metal)	Brown	None Detected

Client:	Price County United	**NorthStar No.:**	230-1101
Location:	115 Depot Road Phillips, WI	**Date Collected:**	October 2 - 13, 2023
Work Area:	Pre-Renovation	**Technician:**	A Schilling & L Pawlus

Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-373	1	Building 6 Kiln – On Foam and Block	Foam Adhesive	Black	None Detected
1101-374	1	Building 6 Kiln – Door On Concrete Block	Door Caulk	Tan	None Detected
1101-375	1	Building 6 Kiln Wall	Concrete Block	Brown	None Detected
1101-376	1	Building 6 Kiln Wall	Concrete Block Mortar	Brown	None Detected
1101-377	1	Building 14 – North Blower Breach	Duct Insulation	Grey	None Detected
1101-378 Layer 1	1	Building 14 – North Duct on Side Wall	Duct Canvas	White	None Detected
1101-378 Layer 2	1	Building 14 – North Duct on Side Wall	Duct Insulation	Tan	None Detected
1101-379	1	Building 14 – North Blower	Duct Canvas/Encapsulant	White	None Detected
1101-380 Layer 1	1	Building 14 – North Blower	Duct Canvas	White	None Detected
1101-380 Layer 2	1	Building 14 – North Blower	Duct Insulation	Tan	None Detected
1101-381 Layer 1	1	Building 14 – North Upper Duct to Hood	Duct Canvas	White	None Detected
1101-381 Layer 2	1	Building 14 – North Upper Duct to Hood	Duct Insulation	Grey	None Detected
1101-382 Layer 1	**1**	**Building 14 – South Floor Deck**	**Equipment Canvas**	**White**	**3% Chrysotile**
1101-382 Layer 2	1	Building 14 – South Floor Deck	Equipment Insulation	Grey	None Detected
1101-383 Layer 1	**1**	**Building 14 – South Exhaust Duct**	**Duct Canvas/Insulation**	**Grey**	**65% Chrysotile**
1101-383 Layer 2	1	Building 14 – South Exhaust Duct	Duct Insulation	Grey	None Detected
1101-384 Layer 1	1	Building 14 – South Blower	Duct Canvas	White	None Detected
1101-384 Layer 2	1	Building 14 – South Blower	Duct Insulation	Tan	None Detected
1101-385	1	Building 14 – South Deck	Duct Insulation	Tan	None Detected
1101-386	1	Building 14 – South Blower	Canvas Encapsulant	White	None Detected

Client:	Price County United	**NorthStar No.:**	230-1101
Location:	115 Depot Road Phillips, WI	**Date Collected:**	October 2 - 13, 2023
Work Area:	Pre-Renovation	**Technician:**	A Schilling & L Pawlus

Sample ID	Bldg. Level	Material Location	Material Sample	Description	Asbestos Content
1101-387	**Ext**	**Building 11 Roof East**	**Roofing Paint** (on metal)	**Silver**	**2% Chrysotile**
1101-388	**Ext**	**Building 11 Roof East**	**Roofing Paint** (on metal)	**Silver**	**2% Chrysotile**
1101-389	**Ext**	**Building 11 Roof West**	**Roofing Paint** (on metal)	**Silver**	**2% Chrysotile**
1101-390	**Ext**	**Building 11 Roof West O**	**Roofing Paint** (on metal)	**Silver**	**2% Chrysotile**
1101-391 Layer 1	Ext	Building 11 Roof East	Roofing Sealant	Black	None Detected
1101-391 Layer 2	**Ext**	**Building 11 Roof East**	**Roofing Paint** (on metal)	**Silver**	**2% Chrysotile**
1101-392	Ext	Building 14 – On Concrete Parapet	Sealant (on concrete)	White	None Detected
1101-393	Ext	Building 6 – Collapsed Section On Metal	Roofing Paint (on metal)	Silver	None Detected

Appendix B LEAD PAINT TESTING REPORT

Price County United

Former Lionite Wood Products
115 Depot Road
Phillips, WI 54555

October 2023

NORTHSTAR ENVIRONMENTAL TESTING, LLC
www.NorthStarTesting.com

Corporate Office:
1006 Western Avenue
Mosinee, WI 54455
Tel: 715.693.6112
info@NorthStarTesting.com

Fox Cities Branch:
1835 E. Edgewood Drive
Suite 10542
Appleton, WI 54913
Tel: 920.422.4888

Madison Branch:
1310 Mendota Street
Suite 121
Madison, WI 53714
Tel: 608.827.6761

Sheboygan Branch:
2109 Erie Avenue
Suite 103
Sheboygan, WI 53081
Tel: 920.422.4888

Asbestos • Lead Paint • Mold • Indoor Air Quality • Industrial Hygiene

October 19, 2023

Price County United
c/o Lyn Ludwig
N9751 Bass Lake Lane
Phillips, WI 54555

Project:	Pre-Demolition Inspection: Lead Paint
Site:	Former Lionite Wood Products 115 Depot Road Phillips, WI 54555
Work Area:	Throughout
Site Date:	October 2 - 5, 2023
NorthStar No.:	230-1101

NorthStar Environmental Testing, LLC (NorthStar) was authorized by Lyn Ludwig on behalf of Price County United to perform limited, non-destructive testing for the presence of lead in paint on painted cementitious surfaces prior to potential disturbance by specific demolition activity.

Testing for lead-based paint was limited to accessible cementitious surfaces (concrete, concrete block, brick, etc.) likely to be impacted by the planned demolition. Testing for lead in paint was conducted to assist with planning in regards to lead-safe construction practices and/or disposal or recycling activities. A surface-by-surface visual assessment of painted components was conducted at the property to determine which surfaces to test.

Inaccessible areas hidden from view or contained within or behind other building materials may contain additional areas of suspect lead-based paint. Any additional surfaces not specifically identified should be assumed to contain lead-based paint unless tested and proven otherwise.

TESTING SUMMARY:

Testing Date:	October 5, 2023		
Building/Site:	115 Depot Road Phillips, WI 54555		
Building Type:	Former Lionite Wood Products	Building Age:	1940's – 1990's
Contact:	Lyn Ludwig (Price County United) Phone: 715.661.0178		
Work Area:	Pre-Demolition		
Materials Tested Pre-Demolition:	Testing was limited to representative painted cementitious surfaces only.		
Lead Paint for Demolition Items:	**No lead-based paint was identified for surfaces tested.**		
Visual Assessment:	No deteriorated lead-based paint was identified.		
Sampling Technician:	Andrew Schilling	Certification #:	LRA-213175
Lead Company:	DHS-925800	Expiration Date:	08/01/2025
Testing Equipment:	Heuresis PB 200i, Serial Number: 2311		

LEAD PAINT SUMMARY (positive testing locations):

Testing for lead-based paint analyzes all layers of paint on a particular surface area simultaneously. The testing does not specifically identify which layer or color of paint contains lead. A positive testing location entails that some layer of paint on that particular surface contains lead in paint in excess or equal to 1.0 mg/cm².

Reading No	Wall	Structure	Location	Member	Paint Condition	Substrate	Color	Lead (mg/cm²)
No LBP was detected at or above 1.0 mg/cm² for the surfaces tested.								

Notes:
- Wall A (West) is the road/street side (Depot Street) of the building. Walls B/C/D are determined clockwise from Wall A.
- All similar materials with the same paint history are to be categorized in the same manner. For example, if a window sill on side A is positive for lead-based paint, then all similar window sills are assumed to contain lead-based paint unless specifically tested and proven otherwise.
- Additional areas of lead-based paint are possible in inaccessible areas, areas hidden from view or materials/substrates contained behind or within other building materials.

Please see attached "Lead Paint XRF Testing Data" and site diagram for specific areas tested.

DISCUSSION:

The testing performed was limited in scope and does not constitute a full lead paint inspection. Demolition activity beyond the anticipated work scope specified at the time of our site visit may require additional testing prior to disturbance.

The United States Federal Government through the Environmental Protection Agency (EPA) and Housing and Urban Development (HUD) defines lead-based paint as equal to or greater than 1.0 mg/cm² measured by XRF analysis, or 0.5% (5000 ppm) measured by weight through laboratory analysis. The State of Wisconsin has adopted the same definition of lead-bearing paint (mainly for residential HUD applications) as that which is equal to or greater than 1.0 mg/cm² or 0.5% (5000 ppm) respectively.

Our non-destructive testing by X-ray fluorescence has been performed in an attempt to screen for areas with quantifiable lead above regulatory limits on painted substrates. The reportable limit of detection is essentially 1.0 mg/cm² by XRF analysis and therefore paint chip analysis would be recommended for a more accurate determination of lead in paint below this level or for results to rule out lead in any quantifiable amount. The testing equipment is calibrated against a known standard before and after actual substrate testing.

For worker exposure applications, lead in any quantifiable amount, and disturbance of the material creating dust and/or fumes and subsequent potential worker exposure would be regulated by the OSHA Lead in Construction Standard (29 CFR 1926.62).

Concrete, brick, or stone coated with LBP require disposal in a WDNR approved landfill and/or additional Toxicity Characteristic Leaching Procedure (TCLP) testing to further evaluate the waste. Concrete, brick, or stone that is not coated with LBP may be considered clean for recycling purposes **if other requirements are met**. Please refer to the WDNR Publication WA 605, Concrete Recycling and Disposal Fact Sheet, found at:

- https://dnr.wi.gov/files/PDF/pubs/wa/WA605.pdf

This publication contains **important** information on the recycling process along with who to contact at the WDNR for additional clarification, information, and approval.

REMARKS:

The testing and subsequent report has been performed according to applicable regulations and generally accepted industry standards and practices in this locality under similar conditions. Information provided to us by the building owner/occupant, client or other interested party that may have been utilized in the performance and reporting of the testing was accepted in good faith and can only be assumed to be accurate. The findings and recommendations made are representative of our professional opinion based on currently available information; no other warranty is implied or intended.

Please contact us if you have any questions regarding the presented information or the project in general.

Sincerely,

NorthStar Environmental Testing, LLC.

David Barrett
Senior Project Manager

Andrew Schilling
Project Technician

attach: Lead Paint XRF Testing Data

NORTHSTAR ENVIRONMENTAL TESTING, LLC
www.NorthStarTesting.com

LEAD PAINT XRF TESTING DATA

Client:	Price County United	**NorthStar No.**	230-1101
Location:	115 Depot Road Phillips, WI 54555	**Site Date:**	October 2 - 5, 2023
Work Area:	Pre-Demolition	**Technician:**	Andrew Schilling

Reading No	Wall	Structure	Location	Member	Paint Condition	Substrate	Color	Lead (mg/cm2)
Pre-Calibration								
1								**1.1**
2								**1.1**
3								**1.1**
4								0
Exterior Building 4								
5	A	Foundation	Rgt		Poor	Concrete	Green	0.2
6	A	Foundation	Rgt		Poor	Concrete	Tan	0.2
7	D	Foundation	Ctr		Poor	Concrete	Green	0.1
8	C	Foundation	Lft		Poor	Concrete	Green	0.2
9	C	Foundation	Lft		Poor	Concrete	Yellow	0.1
10	C	Foundation	Ctr		Poor	Concrete	Grey	0
11	B	Foundation	Lft		Poor	Concrete	Green	0.1
12	B	Foundation	Lft		Poor	Concrete	Tan	0.2
13	B	Wall	L Rgt		Poor	Conc Blk	Tan	0.2
14	A	Wall	L Lft		Poor	Conc Blk	Tan	0.2
15	D	Wall	L Lft		Poor	Conc Blk	Tan	0.2
Exterior Building 5								
26	D	Wall	L Ctr		Poor	Concrete	Green	0.1
27	C	Wall	L Lft		Poor	Concrete	Grey	0.3
Exterior Building 6								
46	D	Wall	L Lft		Poor	Concrete	Green	0.2
47	A	Wall	L Ctr		Poor	Concrete	Green	0.2
Exterior Building 11								
52	C	Foundation	Lft		Poor	Concrete	Grey	0.5
53	B	Foundation	Lft		Poor	Concrete	Grey	0.3
54	A	Foundation	Lft		Poor	Concrete	Grey	0.3
55	D	Foundation	Rgt		Poor	Concrete	Grey	0.3
Exterior Building 17								
56	A	Wall	L Rgt		Poor	Conc Blk	Tan	0.4
57	D	Wall	L Ctr		Poor	Conc Blk	Tan	0.1
58	C	Wall	L Lft		Poor	Conc Blk	Tan	0.3
59	B	Wall	L Rgt		Poor	Conc Blk	Tan	0.5
Exterior Building 18								
60	A	Foundation	Ctr		Poor	Concrete	Grey	0.4
61	B	Foundation	Ctr		Poor	Concrete	Grey	0.5
62	C	Foundation	Ctr		Poor	Concrete	Grey	0.5
63	D	Foundation	Ctr		Poor	Concrete	Grey	0.6
Exterior Building 20								
66	D	Foundation	Ctr		Poor	Concrete	Grey	0.4
67	A	Foundation	Ctr		Poor	Concrete	Grey	0.5
68	B	Foundation	Ctr		Poor	Concrete	Grey	0.4
69	C	Foundation	Ctr		Poor	Concrete	Grey	0.5

Exterior Garage Tank Spill Catch							
70	A	Wall	L Ctr	Poor	Concrete	Grey	0.2
71	C	Wall	L Ctr	Poor	Concrete	Grey	0.3
72	D	Wall	L Ctr	Poor	Concrete	Grey	0.1
Exterior Garage							
73	A	Foundation	Ctr	Poor	Concrete	Grey	0.1
74	B	Foundation	Ctr	Poor	Concrete	Grey	0
75	C	Foundation	Ctr	Poor	Concrete	Grey	0.1
Exterior Building 14							
77	C	Foundation	Ctr	Poor	Conc Blk	Grey	0.2
78	C	Foundation	Ctr	Poor	Concrete	Grey	0.2
79	C	Foundation	Ctr	Poor	Conc Blk	Tan	0.2
Exterior Building 14							
103	A	Foundation	Ctr	Poor	Concrete	Grey	0.2
104	A	Foundation	Ctr	Poor	Conc Blk	Grey	0.2
Exterior Thermal Oxidizor							
121	A	Foundation	Ctr	Poor	Concrete	Yellow	0.1
122	B	Foundation	Ctr	Poor	Concrete	Yellow	0.2
123	C	Foundation	Ctr	Poor	Concrete	Yellow	0
124	D	Foundation	Ctr	Poor	Concrete	Yellow	0.1
Exterior Building 7							
125	D	Foundation	Ctr	Poor	Concrete	Grey	0.3
Exterior Building 30							
126	A	Foundation	Lft	Poor	Concrete	Grey	0.3
127	B	Foundation	Rgt	Poor	Concrete	Grey	0.3
128	C	Foundation	Rgt	Poor	Concrete	Grey	0.3
Exterior Building 26							
129	C	Foundation	Lft	Poor	Concrete	Grey	0.2
130	D	Foundation	Rgt	Poor	Concrete	Grey	0.4
Exterior Building 26 Furnace Pad							
131	B	Foundation	Ctr	Poor	Concrete	Grey	0.1
132	B	Foundation	Ctr	Poor	Concrete	Yellow	0.2
Exterior Building 26 Loading Ramp							
133	C	Foundation	Ctr	Poor	Concrete	Yellow	0
134	A	Foundation	Ctr	Poor	Concrete	Yellow	0.3
135	A	Foundation	Ctr	Poor	Concrete	Grey	0.2
Interior Building 4 West Boiler Room							
16	A	Wall	U Ctr	Poor	Conc Blk	White	0
17	B	Wall	U Ctr	Poor	Conc Blk	Silver	0.4
18	C	Wall	U Ctr	Poor	Conc Blk	White	0.1
19	D	Wall	U Ctr	Poor	Conc Blk	White	0
20	C	Floor		Poor	Concrete	Grey	0.2
Interior Building 4 Center Room							
21	A	Wall	U Ctr	Poor	Conc Blk	White	0.2
22	B	Wall	U Ctr	Poor	Conc Blk	White	0.1
23	C	Wall	U Ctr	Poor	Conc Blk	White	0.2
24	D	Wall	U Ctr	Poor	Conc Blk	White	0
Interior Building 4 East Boiler Room							
25	A	Wall	U Rgt	Poor	Conc Blk	White	0.1
Interior Building 5 Blower Room							
28	D	Floor		Poor	Concrete	Grey	0.4
Interior Building 5 Electrical Room and Office							
29	A	Floor		Poor	Concrete	Grey	0.2
30	B	Floor		Poor	Concrete	Blue	0.3
31	A	Wall	L Ctr	Poor	Concrete	White	0.3

Interior Building 5 Wood Processing							
32	D	Wall	L Ctr	Poor	Concrete	Grey	0
33	C	Wall	L Ctr	Poor	Concrete	Grey	0.2
34	C	Pilliar	Ctr	Poor	Concrete	Grey	0.3
35	A	Ceiling		Poor	Concrete	Grey	0.2
36	A	Ceiling		Poor	Concrete	Tan	0.2
37	A	Ceiling		Poor	Concrete	D Grey	0.2
Interior Building 5 Southwest Office							
38	C	Floor		Poor	Concrete	Grey	0.2
Interior Building 5 Men's Restroom							
39	A	Floor		Poor	Concrete	Grey	0.3
Interior Building 5 Wood Processing							
40	A	Wall	L Ctr	Poor	Conc Blk	Brown	0.4
Interior Building 5 Kiln							
41	A	Wall	U Rgt	Poor	Conc Blk	Tan	0.3
42	A	Wall	U Rgt	Poor	Concrete	Tan	0.3
43	C	Wall	U Lft	Poor	Concrete	Tan	0.4
44	C	Wall	U Lft	Poor	Conc Blk	Tan	0.2
Interior Building 5 Wood Processing							
45	B	Wall	L Ctr	Poor	Conc Blk	Yellow	0.3
Interior Building 6 Storage							
48	C	Wall	U Ctr	Poor	Conc Blk	Grey	0.2
49	C	Floor		Poor	Concrete	Yellow	0.3
Interior Building 6 Production Room							
50	A	Wall	U Ctr	Poor	Conc Blk	White	0.2
51	A	Floor		Poor	Concrete	Grey	0.4
Interior Building 19							
64	D	Floor		Poor	Concrete	White	0.3
76	A	Floor		Poor	Concrete	Grey	0
Interior Building 20 and 21							
65	D	Floor		Poor	Concrete	White	0.1
80	A	Floor		Poor	Concrete	White	0.2
81	A	Wall	L Ctr	Poor	Conc Blk	White	0.4
82	A	Wall	L Ctr	Poor	Concrete	White	0.2
Interior Building 14 Production Room							
83	C	Wall	L Ctr	Poor	Concrete	Grey	0
84	C	Wall	L Ctr	Poor	Conc Blk	Grey	0
85	C	Wall	L Ctr	Poor	Conc Blk	Yellow	0.3
86	A	Floor		Poor	Concrete	Grey	0.4
87	A	Floor		Poor	Concrete	Yellow	0.1
88	A	Wall	L Ctr	Poor	Concrete	White	0.2
89	A	Wall	L Ctr	Poor	Conc Blk	Grey	0.1
90	D	Wall	L Ctr	Poor	Conc Blk	Grey	0.1
91	D	Wall	U Ctr	Poor	Conc Blk	Grey	0
Interior Building 17 Maintenance							
92	D	Wall	U Ctr	Poor	Conc Blk	Grey	0.2
93	C	Wall	U Ctr	Poor	Conc Blk	Grey	0.1
94	B	Wall	U Ctr	Poor	Conc Blk	Grey	0.2
Interior Building 17 North Break Room							
95	D	Floor		Poor	Concrete	Grey	0.2
Interior Building 17 Men's Restroom							
96	A	Floor		Poor	Concrete	Grey	0.3
Interior Building 17 Hallwy							
97	B	Wall	L Rgt	Poor	Conc Blk	Tan	0.3
Interior Building 18 Paint Room							

98	A	Floor			Poor	Concrete	White	0.1
Interior Building 11 Stairway								
99	A	Stairs	Ctr	Treads	Poor	Concrete	Grey	0.3
Interior Building 14 Warehouse								
100	D	Wall	U Lft		Poor	Conc Blk	Grey	0.2
101	A	Floor			Poor	Concrete	Yellow	0.2
Interior Building 14 Office Warehouse								
102	C	Floor			Poor	Concrete	Grey	0.2
Interior Building 14 New Warehouse								
105	D	Wall	U Ctr		Poor	Concrete	Grey	0.1
106	A	Ceiling			Poor	Concrete	Grey	0.1
Interior Building 7 Maintenance								
107	A	Wall	L Ctr		Poor	Concrete	Tan	0.1
108	B	Wall	L Ctr		Poor	Concrete	Tan	0.1
109	A	Floor			Poor	Concrete	Grey	0.2
Interior Building 7 West Parts Room								
110	A	Floor			Poor	Concrete	Grey	0.2
Interior Building 7 East Parts Room								
111	A	Floor			Poor	Concrete	Grey	0.3
Interior Building 7 Southeast Office								
112	A	Floor			Poor	Concrete	Grey	0.1
Interior Building 7 East Office								
113	A	Floor			Poor	Concrete	Grey	0.3
Interior Building 7 Maintenance Shop								
114	A	Floor			Poor	Concrete	Grey	0.1
Interior Building 7 Maintenance Garage								
115	A	Floor			Poor	Concrete	Grey	0.2
116	D	Wall	U Ctr		Poor	Conc Blk	Grey	0.4
117	D	Wall	U Ctr		Poor	Concrete	Grey	0.1
Interior Building 8 Break Room								
118	C	Floor			Poor	Concrete	Grey	0.3
Interior Building 8 Men's Restroom								
119	C	Floor			Poor	Concrete	Grey	0.2
Interior Building 8 Laundry Room								
120	C	Floor			Poor	Concrete	Grey	0.3
Post-Calibration								
136								**1.1**
137								**1**
138								**0.9**
139								0.1

Abbreviations:	**U = Upper**	**L = Lower**	**Rgt = Right**	**Lft = Left**	**Ctr = Center**	**Bsmt = Basement**

Note:

- Wall A (West) is the road/street side (Depot Street) of the building. Walls B/C/D are determined clockwise from Wall A.
- The XRF analyzer was calibrated before and after testing by taking three readings from a source known to contain 1.02 mg/cm^2 lead (NIST Standard Reference Material). The three positive calibration readings were followed by a sample on bare wood containing no lead-based paint.
- The State of Wisconsin defines lead-bearing paint as that which is equal to or greater than 1.0 mg/cm^2.
- Readings with a negative value (i.e. -0.1) are equivalent to 0.0.

Appendix C RESTRICTED WASTE REPORT

Price County United

Former Lionite Wood Products
115 Depot Road
Phillips, WI 54555

October 2023

October 19, 2023

Price County United
c/o Lyn Ludwig
N9751 Bass Lake Lane
Phillips, WI 54555

Project:	Pre-Demolition: Restricted Waste Inventory
Site:	Former Lionite Wood Products 115 Depot Road Phillips, WI 54555
Work Area:	Throughout
Site Date:	October 2 - 5, 2023
NorthStar No.:	230-1101

NorthStar Environmental Testing LLC (NorthStar) was authorized by Lyn Ludwig on behalf of Price County United to perform a restricted waste material inventory within applicable building spaces prior to demolition.

INSPECTION SUMMARY:

Site Address:	115 Depot Road Phillips, WI 545556
County:	Price
Structure Type:	Commercial Building (Former Former Lionite Wood Products)
Building Age:	1940's to 1990's
Size:	Production Facilities: 130,000 sf (approx. footprint) Storage Facilities: 20,000 sf (approx. footprint) Office Building: 4,000 sf (approx. footprint)
Floors	2
# of Structures:	26 (production facilities, storage facilities and office building)
Inspector:	Andrew Schilling & Larry Pawlus
Survey Date:	October 2 - 13, 2023

PROJECT DISCUSSION:

In preparation for the upcoming structure demolition, a restricted waste material inventory was performed within applicable areas of the buildings. The restricted waste material inventory provides an overview of materials likely to be categorized as restricted waste per the Wisconsin Department of Natural Resources (WDNR) guidance document WA-651. The WDNR requires proper handling of restricted waste materials, including safe removal, recycling (if applicable) and/or proper disposal.

The restricted waste material inventory was limited to currently accessible materials within an occupied facility. Typical areas that may be inaccessible during an investigation include but are not limited to: wall or ceiling cavities; locked or operable electrical panels, operating equipment interiors; and spaces requiring confined space entry procedures. No material testing was performed and certain presumptions may have been made due to absence of labeling. Quantities given are approximate as noted during the site survey. These quantities should be verified by a qualified remediation contractor prior to planning a specific response action. Personal items and movable items expected to be retained by the building owner were not inventoried.

The list below may not be all inclusive and makes assumptions due to the lack of or inaccessible labeling. Tools, Vehicles, Equipment, Production Machines and other contents remained inside the building and are assumed to be moved prior to demo. Any electrical or chemical containing materials should be assumed to contain restricted waste until proven otherwise. No material testing was performed.

RESTRICTED WASTE SUMMARY:

Material Description	Quantity	Units	Comments
Building 4			
Compact Fluorescent Bulbs	2	Each	
Fluorescent Bulbs	50	Each	
Ballasts	18	Each	
Halogen Lights	8	Each	
Mercury Thermostat/Switches	3	Each	
Electrical Panels	36	Each	
Chemical Containers (miscellaneous)	26	Each	
Air Conditioners	1	Each	
Chemical Vessels	3	Each	
Emergency Lights	6	Each	
Pressure Gauges	48	Each	
Fire Extinguishers	3	Each	
Emergency Lights	5	Each	
Electronics	24	Each	
Transformers	1	Each	
Chemical Barrels	9	Each	
Chemical Vessels	3	Each	
Chemical Ground Contamination	600	Sf	Exterior – Around Chemical Barrels

Material Description	Quantity	Units	Comments
Building 5			
Fluorescent Bulbs	40	Each	
Ballasts	25	Each	
Transformers	1	Each	
Mercury Thermostat/Switches	1	Each	
Electrical Panels	51	Each	
Air Conditioners	1	Each	
Chemical Vessels	7	Each	
Pressure Gauges	2	Each	
Fire Extinguishers	2	Each	
Emergency Lights	2	Each	
Chemical Ground Contamination	400	SF	
Exit Signs	4	Each	
Electronics	2	Each	

Material Description	Quantity	Units	Comments
Building 6			
Compact Fluorescent Bulbs	2	Each	
Fire Suppression Tank	7	Each	
Fluorescent Bulbs	236	Each	
Ballasts	118	Each	
Halogen Lights	12	Each	
Mercury Thermostat/Switches	2	Each	
Electrical Panels	94	Each	
Chemical Containers (miscellaneous)	21	Each	
Hydraulic Pumps	8	Each	
Chemical Vessels	15	Each	
Pressure Gauges	82	Each	
Fire Extinguishers	13	Each	
Fire Alarms	2	Each	
Emergency Lights	6	Each	
Electronics	25	Each	
Motors/Oil	2	Each	
Oil Reservoirs	45	Each	
Gas Cylinders	1	Each	
Chemical Ground Contamination	600	SF	Basement
Compressors	3	Each	
Transformers	2	Each	
Bubblers	1	Each	
Refrigerators	1	Each	
Exit Signs	5	Each	
Fire Sprinkler Heads	102	Each	
Fuel Tanks	2	Each	
Chemical Barrels	13	Each	
Radioactive Sensor/Device	**1**	**Each**	**Located in SE area on processing equipment.**

Material Description	Quantity	Units	Comments
Building 8			
Fluorescent Bulbs	82	Each	
Ballasts	22	Each	
Mercury Thermostat/Switches	1	Each	
Chemical Containers (miscellaneous)	20	Each	
Air Conditioners	1	Each	
Batteries	10	Each	
Fire Sprinkler Heads	16	Each	
Transformers	1	Each	
Fire Extinguishers	1	Each	
Refrigerator	1	Each	
Exit Sign	1	Each	
Appliances	10	Each	
Electronics	12	Each	

Material Description	Quantity	Units	Comments
Building 7			
Compact Fluorescent Bulbs	6	Each	
Fluorescent Bulbs	440	Each	
Ballasts	130	Each	
Halogen Lights	9	Each	
Mercury Thermostat	2	Each	
Non-Mercury Thermostat	1	Each	
Electrical Panels	43	Each	
Chemical Containers (miscellaneous)	110	Each	
Air Conditioners/HVAC	2	Each	
ire Extinguishers	19	Each	
Emergency Lights	3	Each	
Electronics	78	Each	
Chemical Barrels	1	Each	
Door Closures	2	Each	
Exit Signs	7	Each	
Fire Sprinkler Heads	79	Each	
Batteries	60	Each	
Transformers	2	Each	
Compressors	1	Each	
Generators	1	Each	
Oil Reservoirs	6	Each	

Material Description	Quantity	Units	Comments
Building 11			
Compact Fluorescent Bulbs	2	Each	
Fluorescent Bulbs	154	Each	
Ballasts	40	Each	
Halogen Lights	4	Each	
Electrical Panels	26	Each	
Chemical Containers (miscellaneous)	6	Each	
Air Conditioners/HVAC	2	Each	
Exit Signs	3	Each	
Pressure Gauges	23	Each	
Fire Extinguishers	7	Each	
Emergency Lights	2	Each	
Tank Cylinders	7	Each	
Hydraulic Pumps	3	Each	
Chemical Barrels	1	Each	
Motor/Oil	4	Each	
Electronics	10	Each	
Transformers	2	Each	
Oil Reservoirs	28	Each	
Compressors	1	Each	
Fire Sprinkler Heads	171	Each	

Material Description	Quantity	Units	Comments
Building 13			
Fluorescent Bulbs	60	Each	
Ballasts	15	Each	
Refrigerators	1	Each	
Chemical Containers (miscellaneous)	10	Each	
Emergency Lights	1	Each	
Pressure Gauges	1	Each	
Fire Extinguishers	1	Each	
Oil Reservoirs	1	Each	
Door Closures	1	Each	

Material Description	Quantity	Units	Comments
Building 14			
Fluorescent Bulbs	386	Each	
Ballasts	87	Each	
Halogen Lights	18	Each	
Non-Mercury Thermostat	3	Each	
Electrical Panels	88	Each	
Chemical Containers (miscellaneous)	110	Each	
Air Conditioners	1	Each	
Pressure Gauges	36	Each	
Fire Extinguishers	12	Each	
Oil Reservoirs	20	Each	
Exit Signs	3	Each	
Fire Sprinkler Heads	304	Each	
Electronics	10	Each	
Mercury Switches	5	Each	
Hydraulics	1	Each	
Chemical Vessels	2	Each	
Chemical Barrels	8	Each	
Gas Cylinders	1	Each	
Emergency Lights	3	Each	
Air Compressors	1	Each	
Mercury Switches	5	Each	
Batteries	10	Each	

Material Description	Quantity	Units	Comments
Building 14 Warehouse			
Fluorescent Bulbs	96	Each	
Ballasts	24	Each	
Mercury Thermostat	1	Each	
Electrical Panels	8	Each	
Chemical Containers (miscellaneous)	6	Each	
Air Conditioners	1	Each	
Pressure Gauges	1	Each	
Fire Extinguishers	7	Each	
Fire Sprinkler Heads	256	Each	
Electronics	10	Each	
Oil Container	1	Each	
Chemical Barrell	1	Each	
Emergency Lights	2	Each	
Batteries	3	Each	
Transformer	1	Each	

Material Description	Quantity	Units	Comments
Building 17			
Compact Fluorescent Bulbs	8	Each	
Fluorescent Bulbs	56	Each	
Ballasts	23	Each	
Halogen Lights	1	Each	
Non-Mercury Thermostat	1	Each	
Electrical Panels	4	Each	
Chemical Containers (miscellaneous)	31	Each	
Air Conditioners	1	Each	
Pressure Gauges	1	Each	
Fire Extinguishers	2	Each	
Appliances	2	Each	
Bubblers	1	Each	
Chemical Barrels	4	Each	
Oil Reservoirs	1	Each	
Door Closures	1	Each	
Exit Signs	3	Each	
Fire Sprinkler Heads	15	Each	

Material Description	Quantity	Units	Comments
Building 18			
Fluorescent Bulbs	8	Each	
Ballasts	4	Each	
Halogen Lights	5	Each	
Non-Mercury Thermostat	1	Each	
Electrical Panels	3	Each	
Chemical Containers (miscellaneous)	14	Each	
Pressure Gauges	4	Each	
Fire Extinguishers	3	Each	
Exit Signs	1	Each	
Fire Sprinkler Heads	13	Each	
Chemical Vessels	2	Each	
Chemical Barrells	2	Each	
Transformer	1	Each	
Oil Reservoirs	4	Each	

Material Description	Quantity	Units	Comments
Building 19			
Compact Fluorescent Bulbs	2	Each	
Chemical Vessels	2	Each	
Non-Mercury Thermostat	1	Each	
Electrical Panels	5	Each	
Pressure Gauges	1	Each	
Fire Extinguishers	1	Each	
Oil Reservoirs	1	Each	

Material Description	Quantity	Units	Comments
Building 20			
Compact Fluorescent Bulbs	2	Each	
Chemical Vessels	2	Each	
Non-Mercury Thermostat	1	Each	
Electrical Panels	5	Each	
Halogen Lights	2	Each	
Fire Extinguishers	1	Each	

Material Description	Quantity	Units	Comments
Building 23			
Fluorescent Bulbs	64	Each	
Ballasts	16	Each	
Halogen Lights	3	Each	
Non-Mercury Thermostat	1	Each	
Electrical Panels	5	Each	
Chemical Containers (miscellaneous)	25	Each	
Bubblers	1	Each	
Chemical Barrels	13	Each	
Oil Reservoirs	2	Each	
Chemical Barrells	15	Each	
Chemical Vessels	10	Each	
Tires	8	Each	
Transformers	1	Each	
Air Compressors	2	Each	
Batteries	2	Each	

Material Description	Quantity	Units	Comments
Building 26 Silo and Electrical			
Halogen Lights	1	Each	
Mercury Thermostat	1	Each	
Electrical Panels	29	Each	
Fire Extinguishers	1	Each	
Emergency Lights	1	Each	
Exit Signs	3	Each	

Material Description	Quantity	Units	Comments
Building 26			
Halogen Lights	1	Each	
Electrical Panels	3	Each	
Fire Extinguishers	1	Each	
Exit Signs	1	Each	
Compact Fluorescent Lights	7		

Material Description	Quantity	Units	Comments
Building 28			
Chemical Containers	10	Each	
Fluorescent Bulbs	12	Each	
Ballasts	6	Each	
Fire Extinguishers	3	Each	
Pressure Gauges	8	Each	
Exit Signs	1	Each	
Air Compressors	1	Each	

Material Description	Quantity	Units	Comments
Building 29			
Halogen Lights	1	Each	
Electrical Panels	1	Each	
Fluorescent Bulbs	8	Each	
Ballasts	4	Each	
Fire Extinguishers	1	Each	
Pressure Gauges	1	Each	

Material Description	Quantity	Units	Comments
Building 30			
Fluorescent Bulbs	10	Each	
Ballasts	5	Each	
Halogen Lights	8	Each	
Mercury Thermostat	1	Each	
Electrical Panels	30	Each	
Chemical Containers (miscellaneous)	1	Each	
Pressure Gauges	2	Each	
Fire Extinguishers	2	Each	
Motor/Oil	9	Each	
Oil Reservoirs	1	Each	
Exit Signs	2	Each	
Fire Alarms	2	Each	
Emergency Lights	2	Each	
Transformers	2	Each	
Air Compressors	1	Each	

Material Description	Quantity	Units	Comments
Truck Lift			
Electrical Panels	2	Each	
Hydraulic Pumps	2	Each	

Material Description	Quantity	Units	Comments
Silos (3)			
Electrical Panels	8	Each	
Motor/Oil	4	Each	

Material Description	Quantity	Units	Comments
New Warehouse			
Compact Fluorescent Bulbs	N/A	Each	Assumed
Fluorescent Bulbs	N/A	Each	Assumed
Ballasts	N/A	Each	Assumed
Halogen Lights	5	Each	
Non-Mercury Thermostat	N/A	Each	Assumed
Electrical Panels	N/A	Each	Assumed
Chemical Containers (miscellaneous)	N/A	Each	Assumed
Air Conditioners	N/A	Each	Assumed
Exit Signs	N/A	Each	Assumed
Fire Sprinkler Heads	N/A	Each	Assumed
Chemical Vessels	1	Each	
Restricted Wate Items	N/A		Assumed Throughout – Building was Inaccessible Due to the Collapsed Structure

Material Description	Quantity	Units	Comments
North Storage			
Gas Cylinder	1	Each	
Halogen Lights	1	Each	
Fire Extinguishers	1	Each	

Material Description	Quantity	Units	Comments
Weigh Station			
Electronics	3	Each	
Fluorescent Bulbs	2	Each	
Ballasts	1	Each	
Electrical Panels	1	Each	
Fire Extinguishers	1	Each	

Material Description	Quantity	Units	Comments
Exterior Fuel Tank			
Fuel Tank	1	Each	
Fire Extinguishers	1	Each	

Material Description	Quantity	Units	Comments
Exterior Blue Vessels (Round & Square)			
Fire Suppression Tanks	8	Each	

Material Description	Quantity	Units	Comments
Thermal Oxidizer			
Hydraulic Pump	1	Each	
HVAC	2	Each	
Halogen Lights	6	Each	
Pressure Gauges	7	Each	

Material Description	Quantity	Units	Comments
Electrical Building			
Fluorescent Bulbs	16	Each	
Ballasts	4	Each	
Halogen Lights	2	Each	
Non-Mercury Thermostat	1	Each	
Electrical Panels	8	Each	
Air Conditioners	1	Each	
Fire Extinguishers	1	Each	
Exit Signs	2	Each	
Electronics	6	Each	
Door Closures	3	Each	
Fire Alarms	3	Each	
Emergency Lights	2	Each	
Transformers	1	Each	

Material Description	Quantity	Units	Comments
Office Building			
Door Closures	2	Each	
Exit Signs	2	Each	
Non-Mercury Thermostat	3	Each	
Electrical Panels	2	Each	
Chemical Containers (miscellaneous)	40	Each	
Fire Extinguishers	1	Each	
Exit Signs	2	Each	
Emergency Lights	1	Each	
Electronics	30	Each	
Refrigerators	1	Each	
Restricted Waste Items	N/A	N/A	Basement Inaccessible – Restricted Water Items Present

The above list may not be all inclusive and makes assumptions due to the lack of or inaccessible labeling. Tools, Vehicles, Equipment, Production Machines and other contents remained inside the building and are assumed to be moved prior to demo. Any electrical or chemical containing materials should be assumed to contain restricted waste until proven otherwise. No material testing was performed.

REMARKS:

This document is intended to provide guidance only and should not be considered a comprehensive report of any and all environmental hazards contained within the facility. Additional hazardous materials may relate to unknown past events or current production processes requiring specific environmental testing.

Information provided to us by the building owner/occupant, client or other interested party that may have been utilized in the performance and reporting of the survey was accepted in good faith and can only be assumed to be accurate. The findings and recommendations made are representative of our professional opinion based on currently available information; no other warranty is implied or intended.

Please contact us if you have any questions regarding the presented information or the project in general.

Sincerely,

NorthStar Environmental Testing, LLC.

David Barrett
Senior Project Manager

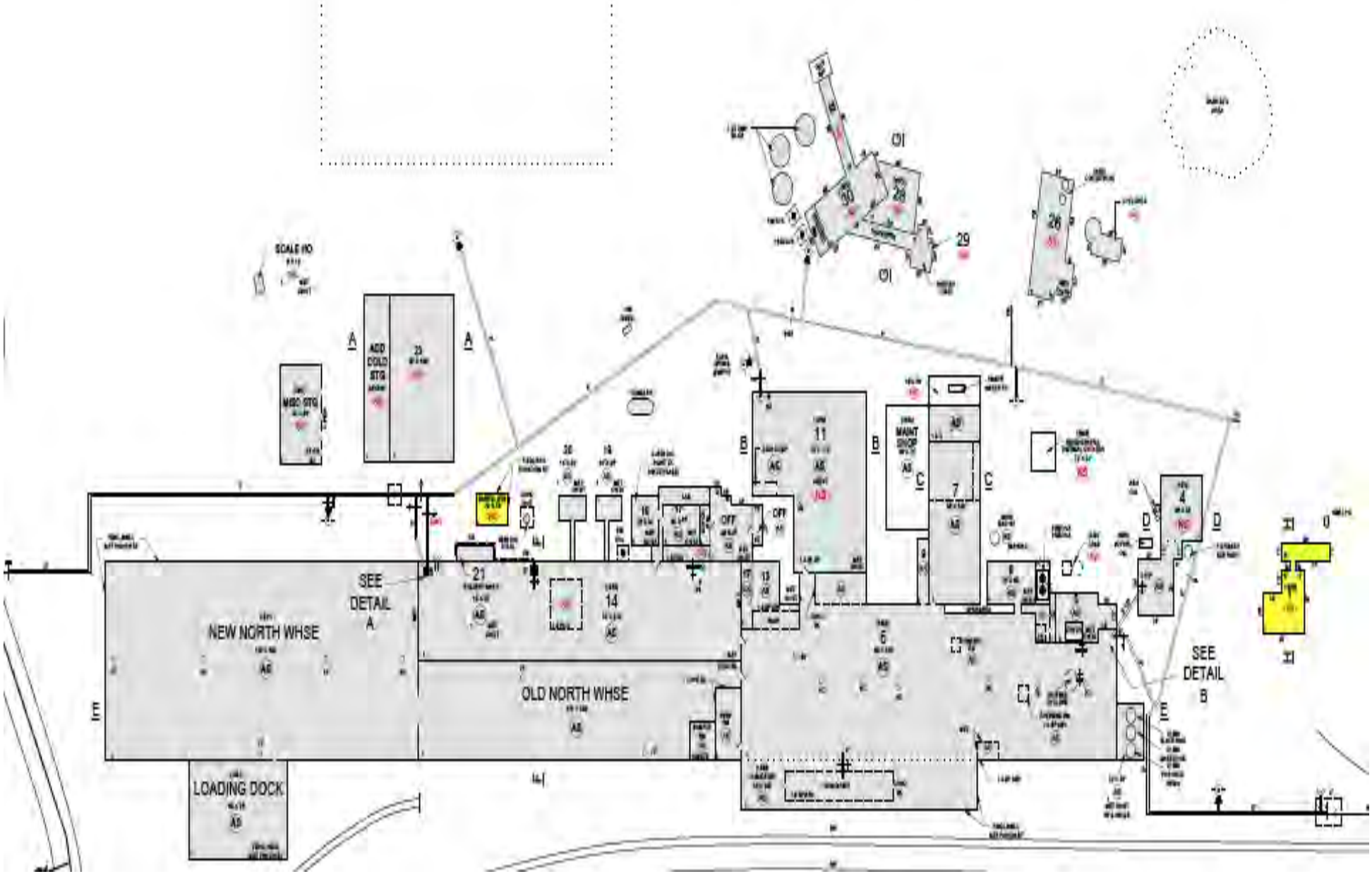
Andrew Schilling
Project Technician

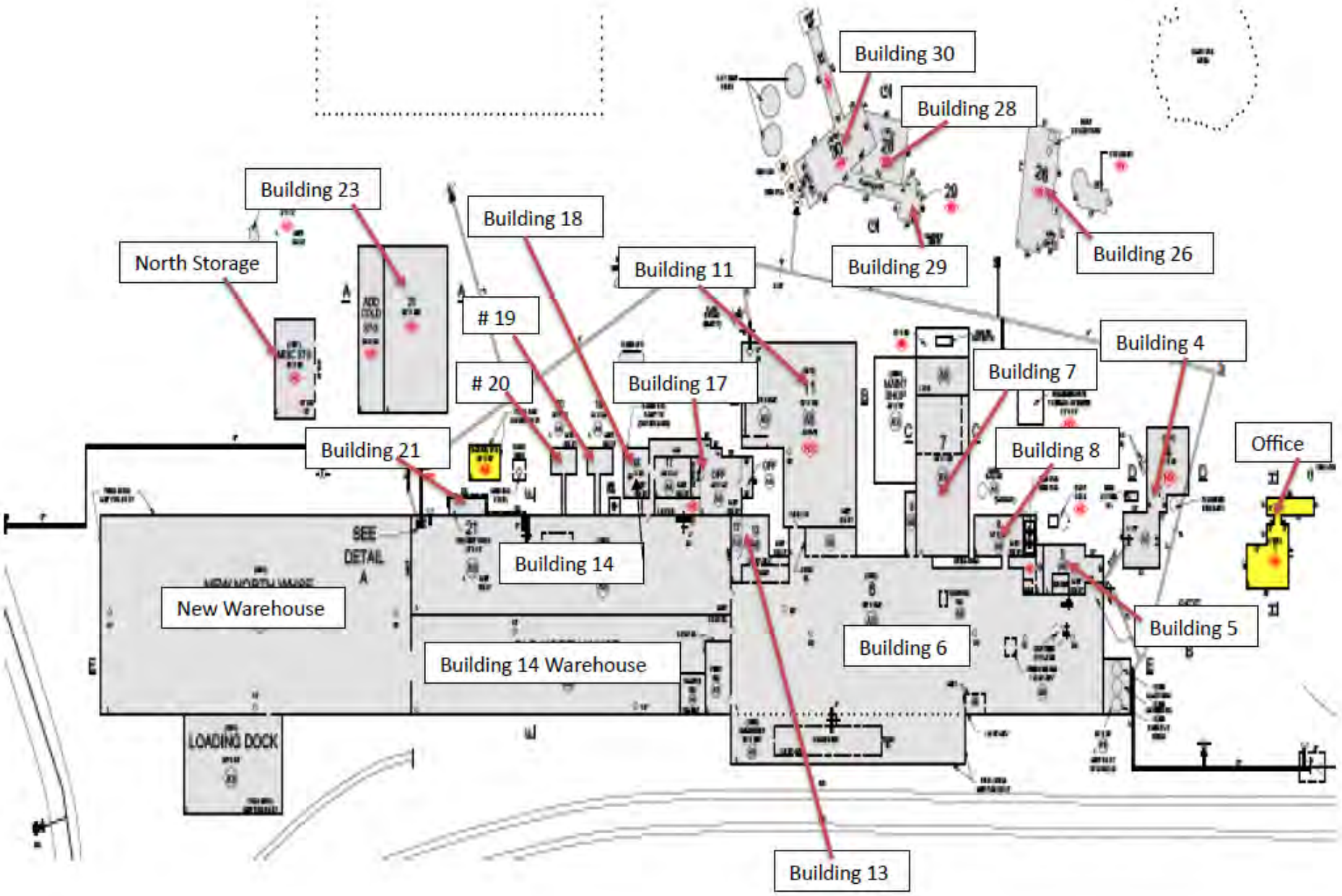
Appendix D SITE DIAGRAMS

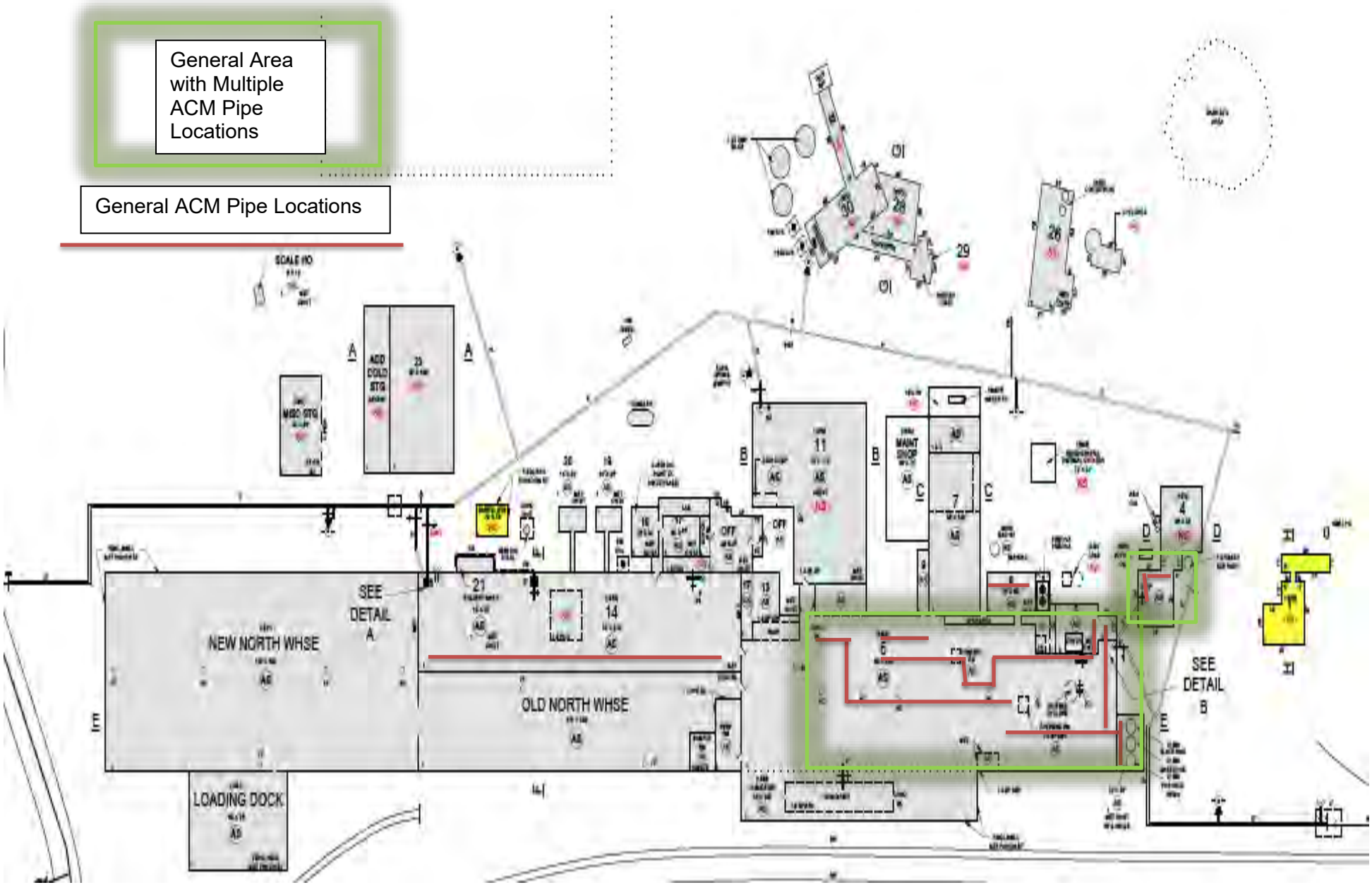
Price County United

Former Lionite Wood Products
115 Depot Road
Phillips, WI 54555

October 2023


NEW NORTH WHSE
OLD NORTH WHSE
LOADING DOCK
SEE DETAIL A
SEE DETAIL B
MISC STG
ADD COLD STG
MAINT SHOP
OFF
OFF


Building 30
Building 28
Building 23
Building 18
Building 26
North Storage
Building 11
Building 29
19
Building 4
Building 7
20
Building 17
Building 21
Building 8
Office
SEE DETAIL A
Building 14
New Warehouse
Building 5
Building 6
Building 14 Warehouse
LOADING DOCK
Building 13


General Area with Multiple ACM Pipe Locations
General ACM Pipe Locations
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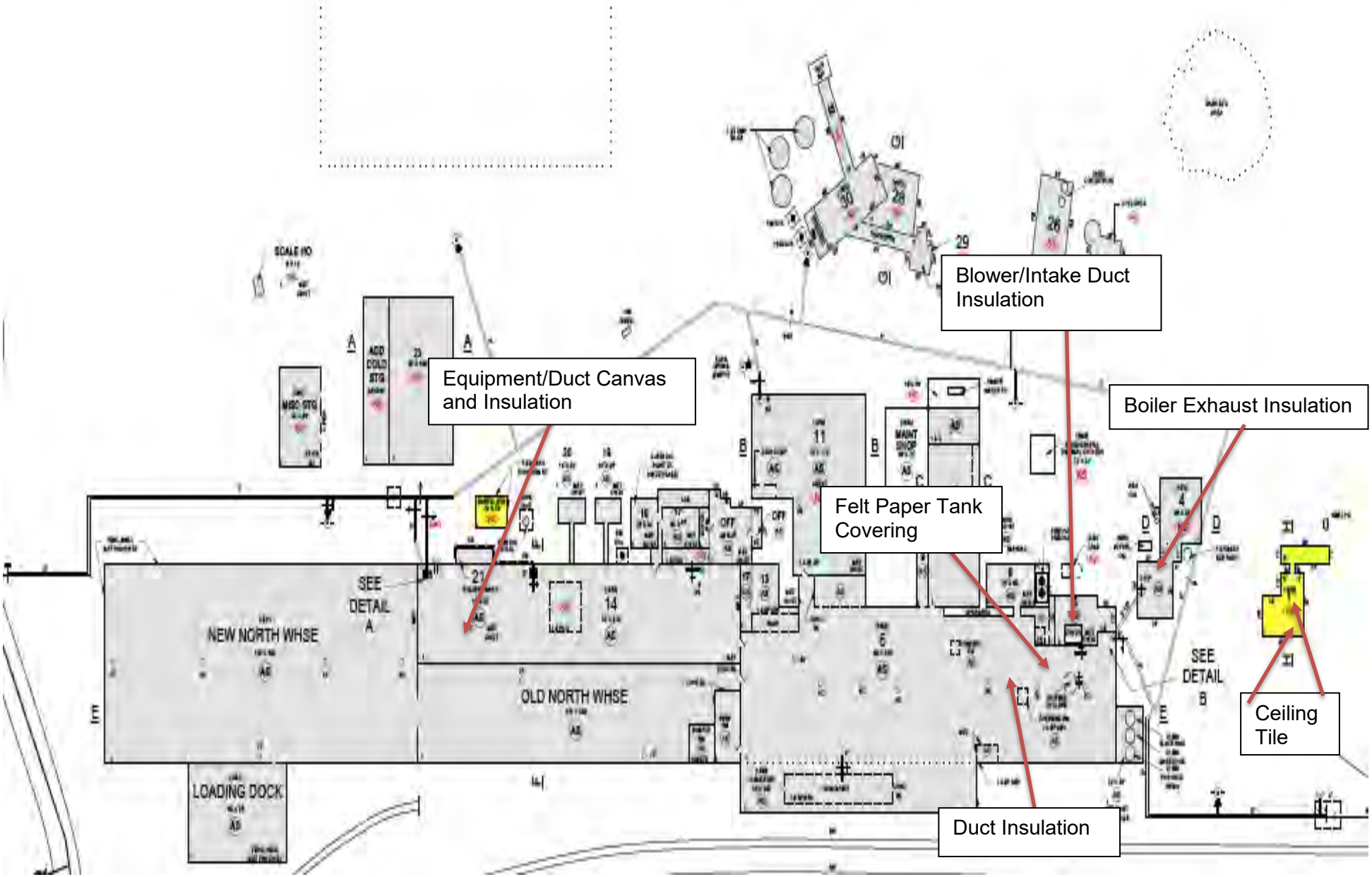
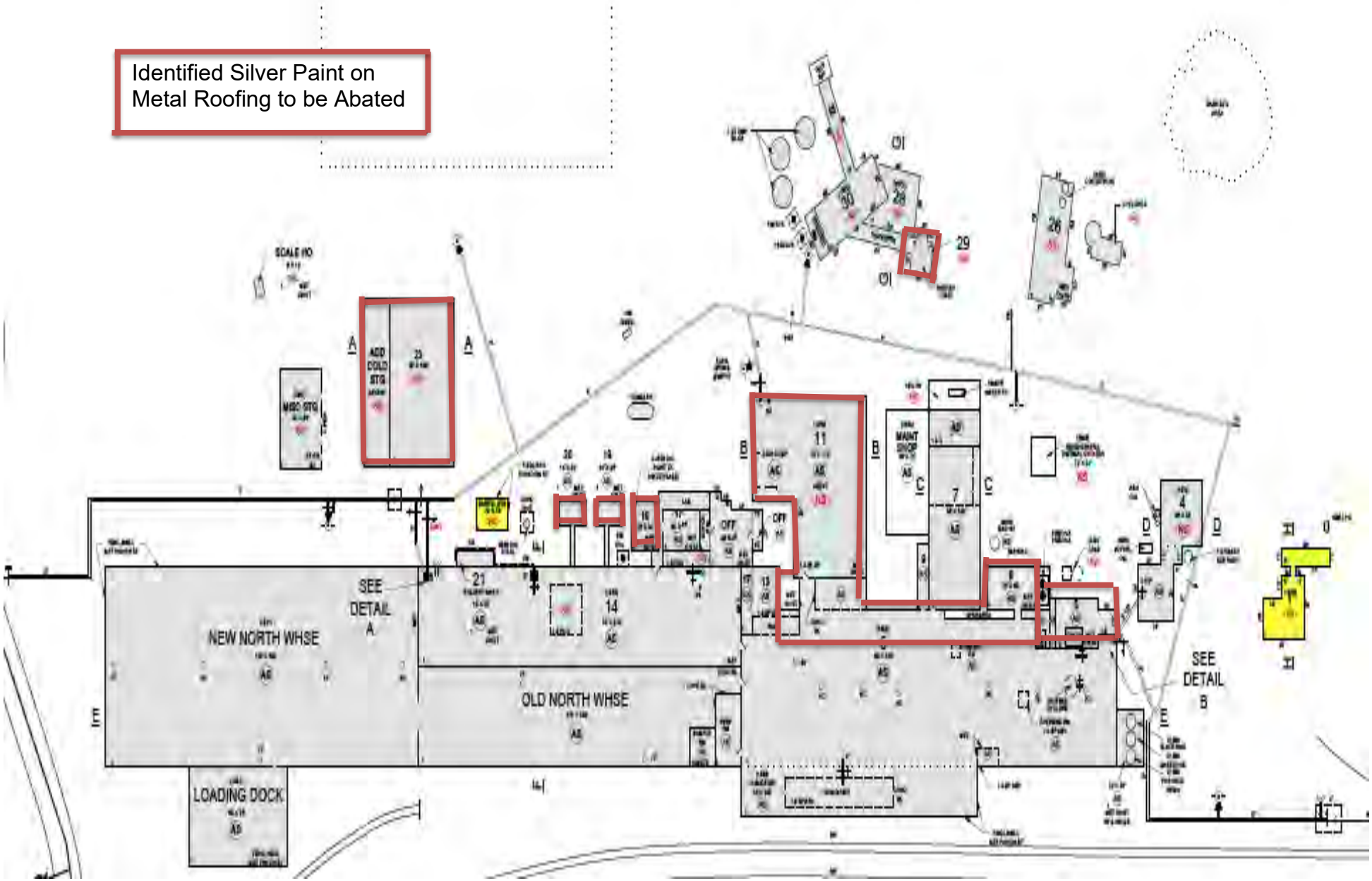
OLD NORTH WHSE
LOADING DOCK
SEE DETAIL A
SEE DETAIL B
MAINT SHOP
ADD COLD STG
MISC STG


Blower/Intake Duct Insulation
Equipment/Duct Canvas and Insulation
Boiler Exhaust Insulation
Felt Paper Tank Covering
Ceiling Tile
Duct Insulation
NEW NORTH WHSE
OLD NORTH WHSE
LOADING DOCK
SEE DETAIL A
SEE DETAIL B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Appendix E CERTIFICATIONS

NorthStar Environmental Testing, LLC.

NORTHSTAR ENVIRONMENTAL TESTING LLC

1006 WESTERN AVE, MOSINEE, WI 54455-1530 | (715) 693-6112

is a

Certified Asbestos Company
DHS ID 925800

under Wisconsin Admin. Code ch. DHS 159.

Issued Date: May 30, 2023
Expiration Date: August 1, 2025

COPY

Miriam Hasan
Supervisor, Lead & Asbestos Certification Unit

Wisconsin Department of Health Services
1 W Wilson Street
Madison, WI 53701
608-261-6876 | dhsasbestoslead@dhs.wisconsin.gov

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Appendix F WDNR GUIDANCE

WISCONSIN DEPT. OF NATURAL RESOURCES

WA-651 (Revised 2013)

PLANNING YOUR DEMOLITION OR RENOVATION PROJECT:

A Guide to Hazard Evaluation, Recycling and Waste Disposal

(Formerly called Pre-Demolition Environmental Checklist)

INFORMATION ON IDENTIFYING, HANDLING AND PROPERLY DISPOSING OF HAZARDOUS MATERIALS

PLANNING YOUR PROJECT

1

- ☑ Conduct a walk-through of the project building(s) and grounds to **identify items that contain harmful materials** and other site-related concerns.

2

- ☑ **Identify and quantify harmful materials at your job site** with specialized inspectors or contractors, if necessary

3

- ☑ **Notify the DNR of** demolition or renovation activities prior to starting any demolition or renovation work.

4

- ☑ **Hire specialized consultants, contractors or transporters** to remove and properly manage harmful materials prior to starting your project.

5

- ☑ **Request and file all receipts** for the disposal of harmful and non-harmful materials related to the project to avoid potential enforcement action.

Before beginning any demolition or renovation project, it is important to know about harmful materials that may be present on your project site.

This guide walks contractors and building owners through the steps to identify harmful materials commonly found at project sites and to handle and dispose of them safely. It also offers proper ways to manage recyclable and reusable materials and other wastes that are common in demolition and renovation projects.

The Resources section on the last page has links to websites with more information.

Note: This document is not intended as a substitute for reading the rules, regulations, and statues related to handling demolition and renovation debris. It is simply a guide to assist you in determining how they apply to your demolition or renovation project.

COMMON HARMFUL MATERIALS

Buildings can contain a number of harmful materials that may expose workers and the public to serious health risks and pollute the air, land and water if handled or disposed of in an unsafe way. Five of these harmful materials are common on project sites and need special care in identification and handling:

- **Asbestos**
- **CFCs (chlorofluorocarbons) and halons**
- **Lead**
- **Mercury**
- **PCBs (polychlorinated biphenyls)**

FIVE STEPS TO A SUCCESSFUL DEMOLITION OR RENOVATION PROJECT

1 STEP 1. Conduct a walk-through of the project building(s) and grounds to identify items that contain harmful materials and other site-related concerns.

Identifying hazardous materials before starting work on a project site protects worker health and safety, building occupants, and the financial viability of the project. Doing this up front can help you choose the appropriate inspectors, consultants and contractors and avoid costly change orders or project delays.

Before you begin any demolition or renovation project, thoroughly inspect and inventory the project site for the following items:

- **Appliances:** Appliances may contain CFCs, mercury or PCBs. Appliances that contain CFCs or PCBs must be processed by an appliance de-manufacturer registered with the DNR.
- **Building materials and fixtures that may contain asbestos:** All layers of materials, behind walls, ceiling spaces, etc., should be inspected and sampled unless they are assumed to contain asbestos. The following building components may contain asbestos, but this list is by no means all-inclusive:
  - **Caulking:** Used around windows, doors, corrugated roofing and other places where two materials are joined. PCBs have also been found in caulking materials. Schools and industrial buildings constructed or renovated between 1950 and 1979 are suspected to contain PCB-containing caulk.
  - **Ceilings:** Including acoustical tiles and adhesives, and the materials listed under "Interior and exterior walls" below. All ceiling layers and any spaces above the ceiling where drop ceilings are present should be checked. Insulation debris may also be lying on top of ceiling tiles.
  - **Electrical systems:** Insulators; spark arrestors and transite panels in electrical boxes; wiring insulation; ducts/conduits (transite pipe); and light fixtures.
  - **Flooring:** All sizes of vinyl floor tile, sheet flooring, and linoleum, and felt paper used under hardwood floors.
  - **HVAC systems:** Duct, pipe, and joint insulation because elbows/joints are often coated with asbestos; fiberglass insulation on the straight runs; forced air dampers; wall, floor and chimney penetrations; lining and mortar; fire brick; fire-proofing materials such as transite sheets or heavy paper; boiler insulation; flexible fabric connectors; packing/gaskets and adhesives; paper backing; mastic/adhesives (floor tile, carpet, etc.); and grout and felt paper under hardwood floors.
  - **Insulation in ceilings and walls:** Blown-in, spray-applied, and block.
  - **Interior and exterior walls:** Wall plaster; joint compound; patches; transite wallboard and siding; fire doors; window putty/glazing/caulking; mortar; asphalt shingles/siding; felt under siding, stucco, textured paint, and other spray-applied materials. Paint containing asbestos is rare except in commercial applications, where it was usually applied as a very thick, often silver-colored coating or added to textured paints.
  - **Miscellaneous:** Appliances with a heating element, especially older models; fire curtains and blankets; laboratory tabletops; fume hood linings; blackboards; and fire-resistant clothing like gloves, hoods, aprons, etc.
  - **Plumbing:** Pipe wrap, pipe joints, transite counter tops in bathrooms, faucets, packing gaskets, and adhesives.
  - **Roofing:** Asphalt shingles; tar-type coatings which are often around vents, chimneys, etc.; transite shingles; roofing felts that are often under a layer of other material; flashings; and mag-block type material found under other material. Check all roof areas and roofing layers.
- **Lighting fixtures/ballasts and bulbs/lamps:** Switches for lighting may use mercury relays. Look for any control associated with exterior or automated lighting systems, such as "silent" wall switches. Several types of light bulbs or lamps contain mercury and must be properly legitimately recycled or disposed of as hazardous waste. These include:
  - **Fluorescent lights:** Even the newer lamps with green-colored ends contain mercury.
  - **High intensity discharge:** metal halide, high pressure sodium, mercury vapor.
  - **Neon**
- **Meters and switches:** Mercury may be found in thermometers, barometers, thermostats, blood-pressure devices, and fluorescent and other types of light bulbs. Any equipment used for measurement of vacuum, pressure, fluid level, temperature, or flow rate could contain mercury. These devices are

most commonly associated with commercial and industrial equipment systems, including tanks, boilers, furnaces, heaters, electrical systems, water cleaning systems, and systems for the movement or pumping of gas (air) or liquids (water). In addition, mercury containing devices are also common in certain agricultural operations such as dairy, and may be present in older model consumer appliances and residential properties, especially larger multi-unit properties.

- **Oil:** Used oil in containers or tanks, hydraulic oils in machinery, electrical transformers and capacitors, and elevator shafts. These oils may contain PCBs and may need to be tested to determine if the oil can be recycled or must be properly disposed of.
- **Paint:** Residential and industrial paints may contain lead, solvents or asbestos. Some industrial paints may contain PCBs.

In addition to the items listed above, be aware of these other site-related concerns:

- **Abandoned wells:** Unused and improperly abandoned wells are a significant threat to groundwater quality. If not properly filled, abandoned wells can directly channel contaminated surface water into the groundwater. State law requires that all wells and drill holes be properly filled prior to any demolition or construction work on the property.
- **Batteries (non-lead-containing):** Batteries may be found in smoke detectors, emergency lighting systems, elevator control panels, exit signs, security systems and alarms. Batteries should be separated from other wastes and taken to a recycling facility or a business that accepts batteries for recycling.
- **Computers and other electronics:** Most electronics are banned from Wisconsin landfills and must be recycled. These can contain hazardous materials such as lead, cadmium, chromium, and mercury and, if not recycled, may be regulated as hazardous waste.
- **Exit signs:** Many self-luminous exit signs contain tritium, a radioactive material. All self-luminous exit signs must have a permanent label that identifies it as containing radioactive material. The label will also include the name of the manufacturer, the product model number, the serial number, and the quantity of tritium contained. It is illegal to abandon or dispose of these signs except by sending them to the manufacturer or to others licensed by the U.S. Nuclear Regulatory Commission.

▶ HAZARDOUS AND UNIVERSAL WASTES

Some wastes, such as used or unused solvents, sanitizers, paint wastes, chemical wastes, pharmaceuticals, gas cylinders, aerosol cans and pesticides, may be hazardous waste and regulated by the EPA and DNR. Hazardous wastes must be removed from a project site prior to demolition or renovation and be disposed of according to specific rules. Read the DNR publication "Is Your Waste Hazardous?" (WA-1152) at http://dnr.wi.gov/files/pdf/pubs/wa/wa1152.pdf to determine if a waste is hazardous. *See Handling and Disposal Choices on page 7 for information on how to dispose of hazardous wastes on a project site.*

Universal wastes are hazardous wastes that can be collected and transported with fewer regulations. Universal wastes include hazardous waste batteries, certain pesticides, mercury thermostats and other mercury-containing equipment and some lamps (light bulbs). In Wisconsin, antifreeze can also be managed as a universal waste if it is recycled. See chapter NR 673 of Wisconsin Administrative Code for more details on recycling and reusing universal waste.

- **Painted concrete:** Walls and foundations often contain painted concrete. With prior DNR approval, contractors can grind the concrete and use it on-site or nearby under a new building or road.
- **Smoke detectors:** The smoke detectors that contain a small amount of radioactive material will be labeled and should be returned to the manufacturer for disposal. Otherwise, smoke detectors may go in the trash.
- **Soil contamination:** A qualified environmental consultant can conduct environmental property assessments including identification of contaminated soil.
- **Spills:** In Wisconsin, all spills of hazardous substances that negatively affect or threaten to negatively affect public health, welfare or the

▶ REUSE AND RECYCLING OF MATERIALS

Many materials, fixtures and components can be donated or sold for reuse or recycled prior to demolition. As you inventory the project site for harmful materials, take note of materials that can be reused or recycled and remove them from the project site before demolition work begins.

- The Wisconsin Business Materials Exchange is a web service that facilitates the reuse of surplus or unwanted items or materials among businesses, institutions, and organizations. You can use this tool to post items that are available and request an item you may need.
- Consider holding an auction as a way to reuse building materials, fixtures and components once all the harmful materials have been removed.
- Clean brick, building stone, concrete and asphalt can be stockpiled for crushing and reusing in future building projects.
- Clean, untreated wood can be recycled or chipped for mulch or ground cover.
- Many items such as appliances, electronics, paper and cardboard, glass containers and vehicle items are banned from Wisconsin landfills and must be recycled. For a complete list of these items, go to dnr.wi.gov and search "what to recycle."
- The online Wisconsin Recycling Markets Directory contains a list of self-identifying businesses accepting recyclable materials. Make sure your chosen recycler meets local, state and federal regulatory requirements.
- Demolition debris may be taken to a construction and demolition recycling facility if all harmful materials, including all types of asbestos, are removed prior to demolition or renovation.

▶ OPEN BURNING

It is illegal to burn painted, treated or unclean wood, asphalt, plastics of any kind, oily substances, tires and other rubber products, garbage, recyclables, wet rubbish, and other materials. Demolition materials that cannot be burned include: roofing materials, all kinds of flooring materials, insulation, plywood and other composition board, electrical wiring, cabinetry and countertops, and plastic plumbing.

Burning of clean, unpainted and untreated wood is allowed with a DNR burning permit using DNR-approved methods. When burning this type of wood from demolition waste, you must separate out all of the illegal materials, including painted or treated wood, before any burning occurs. The DNR encourages chipping clean, untreated wood for mulch or ground cover.

If you do decide to burn clean, unpainted and untreated wood, it is your responsibility to know what restrictions apply in the area where you are burning. Remember, you must also follow local burning ordinances that may be more restrictive than state law. Contact your local fire department, town chairperson, or local municipal official for more information on local burning rules.

It is illegal to burn unwanted buildings in Wisconsin. The only exception is for a fire department training exercise. For more information on how to prepare a building for a fire department training exercise, contact the DNR asbestos program coordinator at (608) 266-3658.

environment *must* be immediately reported to the DNR via the Spills Hotline, 800-934-0003.

- **Tanks:** Chemical tanks (underground and aboveground) and septic tanks should be assessed, emptied and decommissioned.
- **Tires:**Tires should be reused or recycled. Your local landfill may collect them for recycling or you can check WisconsinRecyclingDirectory.com and search for "motor vehicle items" and then "tires."

2 STEP 2. Identify and quantify harmful materials at your job site with specialized inspectors or contractors, if necessary

Asbestos and lead have specific requirements from the Department of Natural Resources and the Department of Health Services for their identification and testing on a project site. See the sections on asbestos and lead in this step for those requirements.

You can identify other harmful materials on a project site, such as CFCs and halons, mercury, and PCBs, by doing an inventory of the building systems and fixtures for the items listed here and in Step 1. You may need some testing to confirm the presence of these materials. The DNR recommends hiring an inspector or consultant who has sufficient experience identifying these materials and can collect samples, if necessary, that will help in identification.

If you have a large or complex project, it may make sense to hire a consultant to oversee the coordination of all waste identification and disposal activities.

▶ Asbestos

Health risks: Asbestos is a known human carcinogen that can cause serious health problems when disturbed and inhaled. Historically, asbestos was commonly used in industrial, commercial, and residential structures. Asbestos is still used today but to a lesser extent.

Location and/or materials: Asbestos is used in more than 3,000 building materials. Asbestos is commonly found in HVAC systems, electrical systems, interior and exterior walls, roofing materials, ceilings, plumbing, and flooring insulation. It is also found in appliances with a heating element, fire curtains and blankets, laboratory tabletops, fume hood lining, blackboards and fire resistant clothing. Refer to Step 1 for a detailed list of building materials and locations that may contain asbestos.

Identification and testing: The Department of Health Services requires licensed inspectors to identify asbestos. Inspectors can assume asbestos to be present, or they can identify it through testing. The DNR requires an asbestos inspection for certain projects and recommends it for others.

Required projects:

- Two or more contiguous single family homes
- Homes that are part of a larger demolition project
- Multi-family housing with five or more units
- Industrial, manufacturing or commercial buildings including bridges, farm buildings, and churches
- Any structure being prepped for a fire training exercise

Recommended projects:

- Single family homes
- Multi-family housing with 2–4 units

Inspection must be completed and asbestos materials must be removed before beginning any demolition or renovation activities.

▶ CFCs (chlorofluorocarbons) and halons

Health risks: CFCs and halons damage the earth's protective ozone layer high in the atmosphere, allowing greater exposure to the sun's dangerous ultraviolet rays. Some of the harmful effects of increased UV exposure include increased risk of skin cancer, eye cataracts, immune system deficiencies, and crop damage.

Location and/or materials: CFCs can be found in refrigerants in rooftop, room and central air conditioners, refrigerators, freezers, and chillers, dehumidifiers, heat pumps, water fountains and drinking coolers, walk-in coolers (refrigeration or cold storage areas), vending machines and food display cases. Halons are found in fire extinguishers and other fire control equipment.

▶ Lead

Health risks: Inhaling or swallowing lead dust can cause serious health effects, including kidney disease, neuropathy, infertility, heart and cardiovascular disease, stroke, memory problems, and Alzheimer's disease.

Location and/or materials: Lead plumbing and lead-based paint are commonly found in many older buildings. Lead may be found in paint on woodwork and metal equipment, leaded glass, lead window-sash weights, lead flashing molds, roof vents, lead pipes and solder. Lead is found in both indoor and outdoor applications. Lead is also found in lead-acid batteries associated with older lighting, exit signs, and security systems.

Identification and testing: The Department of Health Services requires licensed inspectors and risk assessors to identify lead paint. When building surfaces or components are being renovated in any residential and child-occupied buildings built before 1978 (such as private homes, rental units, day care centers, and schools), lead paint must be assumed to be present or identified through testing.

Lead paint sampling is recommended on commercial and industrial projects. The US discontinued manufacturing lead paint for residential use by 1978, but lead is still used in specialty paints in commercial and industrial applications. Most buildings have multiple layers of paint, and all layers should be considered.

▶ Mercury

Health risks: Liquid mercury evaporates slowly at room temperature and gives off harmful vapors that are invisible and odorless. Breathing these vapors causes the most harm to people, but mercury can also be harmful when it comes in contact with broken skin or when it is swallowed. Women and children are most at risk from mercury poisoning, which can cause brain and nerve damage, resulting in impaired coordination, blurred vision, tremors, irritability and memory loss. Mercury poisoning also causes birth defects.

Location and/or materials: Mercury may be found in thermometers, barometers, thermostats, dental offices, blood-pressure devices, and fluorescent and other types of light bulbs. Any equipment used for measurement of pressure, fluid level, temperature, or flow rate could contain mercury. These devices are most commonly associated with commercial and industrial equipment systems, including tanks, boilers, furnaces, heaters, electrical systems, water cleaning systems, and systems for the movement or pumping of gas (air) or liquid (water). In addition, mercury containing devices are common in certain agricultural operations such as dairy, and may be present in older model consumer appliances, vehicle light switches and residential properties, especially larger multi-unit properties. Dental offices use mercury-containing amalgam that may be found in sink drain traps. Mercury can also be found as part of older wastewater treatment plant trickling filters.

▶ PCBs (polychlorinated biphenyls)

Health risks: PCBs may cause cancer in humans and can disrupt hormone and nervous system function. PCBs are persistent in the environment and stay in animals' and humans' systems. PCBs are a source of contamination in fish and have caused fish consumption advisories for humans.

Location and/or materials: PCBs can be found in electrical oils (e.g. transformers and capacitors in appliances) electronic equipment, heat transfer equipment, hydraulic fluids, light ballasts, industrial paints, specialty paints (e.g. swimming pools) and caulking materials. Sumps, oil traps and concrete flooring in facilities that used or manufactured PCBs may be contaminated with PCBs as well. Electrical devices manufactured prior to 1978 should be assumed to contain PCBs.

Identification and testing: You may be able to determine PCB concentrations in electrical equipment oil using identification labels, documents from the manufacturer indicating the PCB concentration at the time of manufacture, or service records showing the PCB concentration measured when the equipment was serviced. If a manufactured date and PCB content label are not found on a transformer or capacitor, the oil should be tested to determine the PCB content prior to dismantling and disposal. Oil-filled electrical equipment labeled "No PCBs" may still contain PCBs, but at a concentration lower than what the EPA regulates. The oils in this equipment should still be tested to see if they contain PCBs and then handled appropriately.

Testing of specialty paint, epoxies and caulks in buildings built or renovated between 1950 and 1979 is recommended. High levels of PCBs are being found in these materials across the country. Once testing is complete, boldly label all surfaces and items that were found to contain PCBs so they are handled appropriately during renovation or demolition.

STEP 3. Notify the DNR of demolition or renovation activities prior to starting any demolition or renovation work.

Notification to the DNR is required for all demolition projects meeting any of these categories:.

- Two or more contiguous single-family homes
- Homes that are part of a larger demolition project
- Multi-family housing with five or more units
- Industrial, manufacturing or commercial buildings including bridges, farm buildings, and churches
- Any structure being prepped for a fire training exercise

DNR notification is also required for renovation projects meeting any of these criteria, if asbestos removal is involved.

For demolition projects
All demolition projects meeting the previously listed criteria require DNR notification 10 working days before the project work begins.

For renovation projects involving asbestos
All renovation projects meeting the previously listed criteria that involve asbestos require DNR notification 10 working days before the project begins.

Note: While plans to demolish or renovate a single-family home do NOT require DNR notification, it is recommended you take the precautionary steps outlined in this publication.

▶ HANDLING AND DISPOSAL CHOICES

You have a few options for handling and disposing of lead, mercury, PCBs and other wastes from your project site that qualify as hazardous waste. Identifying these options prior to beginning the project can help you schedule transportation and disposal and maintain the overall project schedule.

- **Hire a waste management contractor** to pick up and dispose of hazardous wastes. This takes the guess work out of handling these types of wastes. Contractors have properly trained personnel that will determine appropriate packaging, shipping and vehicle licensing and have established relationships with disposal facilities.

Other choices provide you with reduced regulation and may change depending on the amount of hazardous waste generated in a month. As a contractor, you may manage hazardous wastes you generate at temporary job sites only according to the following options. For more details on these options, see the DNR publication "Pilot Project for Management of Contractor Generated Hazardous Waste" (WA-654) at http://dnr.wi.gov/files/pdf/pubs/wa/wa654.pdf.

- **Hire a licensed hazardous waste transporter** to transport the hazardous waste to a licensed or permitted hazardous waste treatment, storage and disposal facility. In this case, you must follow the applicable generator requirements in chapters NR 660-679 of Wisconsin Administrative Code.
- **Leave containerized hazardous waste for the site owner to properly manage.** In this case, the site owner must follow the applicable generator requirements in chapters NR 660-679 of Wisconsin Administrative Code. If you choose this option, be sure to include this in your contract with the site owner.
- **Transport the containerized hazardous waste yourself** directly from the temporary job site to a Household and Very Small Quantity Generator (VSQG) Hazardous Waste Collection Facility. This includes county or municipal Clean Sweep locations. If the total quantity of hazardous waste generated by your company in one month is less than 220 lbs. (about half of a 55-gallon drum), you would be a VSQG and your hazardous waste may be taken to a Clean Sweep location for handling and disposal. Contact your local Clean Sweep coordinator for information on possible fees, accepted materials, and other details.
- **Transport the containerized hazardous waste yourself to your central business location.** This option is currently available under a pilot project. Waste handled in this manner is subject to the pilot project conditions. See the publication referenced above for more information.

STEP 4. Hire specialized consultants, contractors or transporters to remove and properly manage harmful materials prior to starting your project.

Hiring the right consultant, contractor or transporter is important to ensure safe handling practices and disposal options. This section will help you determine who to hire. Links to lists of licensed consultants, contractors and transporters are on the last page under Resources.

▶ Asbestos

Handling practices: Asbestos professionals trained and certified by DHS are required to perform asbestos removal in most multi-unit residential and all commercial, industrial, manufacturing and government buildings. Most types of asbestos-containing materials must be removed from the building prior to demolition or renovation.

Disposal: The asbestos removal contractor is responsible for disposing of the asbestos materials at a licensed landfill approved to accept asbestos waste. Not all landfills accept asbestos materials, so contractors should call the landfill to find out what materials are accepted and the hours of operation.

In some situations, non-friable asbestos materials (materials that are resistant to crushing), such as floor tile and roofing, may remain in place during the demolition activities. When this is done, the debris must be taken to a municipal or construction and demolition landfill. Debris containing non-friable asbestos materials may not be taken to a construction and demolition recycling facility.

▶ CFCs (chlorofluorocarbons) and halons

Handling practices: Keep units that contain refrigerants in place for a certified transporter to remove them. Moving them may cause an accidental release of refrigerants. Certified transporters include waste haulers, community recycling programs, and appliance salvage businesses. State law requires that anyone transporting salvaged refrigeration units must certify to the DNR that they will transport items in a way that prevents refrigerant releases. Technicians who remove refrigerants from units must be registered with the DNR and use approved equipment.

Check both portable and installed fire suppression systems for labels indicating halons. Trained technicians are also needed to remove halons. Contact local fire suppression equipment companies or the Halon Recovery Corporation for more information. Do not discharge halon fire extinguishers; intentionally releasing these substances is prohibited under federal regulations.

Disposal: Once the refrigerants are recovered, the unit may be taken to a metal scrap recycling facility. If you send halon-containing equipment offsite for disposal, it must be sent to a manufacturer, fire equipment dealer or recycler operating in accordance with National Fire Protection Association standards.

▶ Lead

Handling practices: DHS-certified lead-safe contractors are required for any renovations, repairs, painting or other paint-disturbing services on or in the regulated buildings that contain lead paint. These contractors must use lead-safe practices at these properties.

State law prohibits the sale or transfer of any fixture or other object that contains lead-bearing paint if children would have ready access to the fixture or object in its new location.

Disposal: Dispose of in a landfill any painted wood or building components that contain lead paint. Do not burn or chip wood that contains lead paint or use it for landscaping.

Lead paint waste, such as lead paint chips or lead paint removed from commercial or industrial buildings, must be tested to determine if it is a hazardous waste for disposal purposes.

See Handling and Disposal Choices on page 7 for handling and disposal options.

▶ Mercury

Handling practices: You may collect intact mercury-containing devices and bring them back to your primary business location or bring them directly to an off-site mercury recovery facility. Do not remove mercury ampoules or free liquids from the device. Store devices in a covered plastic container to prevent them from breaking. Label the container to assist proper handling and disposal.

If any mercury is spilled or released during handling, report the spill immediately by calling the DNR 24-hour Spills Hotline: (800) 934-0003. Mercury spreads quickly, and even a small spill can cause big cleanup costs in a short period of time.

Disposal: Trained professionals and specific equipment are needed for safe removal of mercury from ampoules and devices. Mercury must be transported by a licensed hazardous waste transporter to a mercury facility to be recycled or reclaimed.

See Handling and Disposal Choices on page 7 for handling and disposal options.

▶ PCBs (polychlorinated biphenyls)

Handling practices: The EPA recommends that caulk containing PCBs be removed during planned renovations and repairs (when replacing windows, doors, roofs, ventilation, etc.). It is important to ensure that PCBs are not released into the air during renovation or repair of affected buildings.

Oils with PCB content greater than 50 ppm are prohibited from being mixed with other materials to reduce the PCB content.

Disposal: PCBs must be transported either by your company, a licensed hazardous waste transporter or a full-service contractor. PCBs and PCB-containing wastes must be taken to a licensed disposal facility or directly to a licensed incineration facility. Arrangements for accepting PCBs must be made with these facilities ahead of time.

See Handling and Disposal Choices on page 7 for handling and disposal options.

STEP 5. Request and file all receipts for the disposal of harmful and non-harmful materials related to the project to avoid potential enforcement action.

As materials are removed from the project site, ask your contractors for disposal receipts to document the disposal or recycling of your wastes. This is an important step in protecting your company. If materials are illegally dumped, the DNR will investigate to determine where the materials came from. Part of the investigation process would be to identify projects in the area that may have been the source of the illegally dumped materials. Receipts show that your project wastes were disposed of appropriately and protect you from liability issues and fines and/or forfeitures.

▶ DEMOLITION AND RENOVATION WASTE

Disposal options for demolition and renovation wastes depend on the type of waste and, in some cases, the amount generated. Solid wastes such as trash, painted wood, and fiberglass insulation can be disposed of at solid waste transfer stations and landfills, including construction and demolition landfills.

If demolition wastes are going to a construction and demolition landfill, all non-building components, such as books, furniture and trash must be removed before you begin demolition (note that most of these non-building components can be reused or recycled). Non-building components may stay in the building if the demolition waste is going to a municipal solid waste landfill. Check with local landfills prior to demolition to determine how to manage your wastes.

Demolition debris may be taken to a construction and demolition recycling facility if all asbestos materials and other harmful materials have been removed prior to demolition or renovation.

To find a list of these facilities licensed in Wisconsin, go to dnr.wi.gov and search "licensed waste haulers and facilities."

Once the harmful materials have been removed from the project site and the notification to DNR is submitted with the appropriate dates of demolition, demolition may begin. This includes first removing materials for reuse or recycling. If all harmful materials, including all types of asbestos, have been removed from the building or structure before demolition, the resulting debris may be taken to a construction and demolition recycling facility.

RESOURCES

Asbestos

- DNR asbestos program requirements: dnr.wi.gov, search "asbestos"
- DHS Wisconsin Asbestos Program: www.dhs.wi.gov/asbestos/
- DHS-certified asbestos companies: at the link above, look for "certified company" in the left-hand margin

Brownfields

- DNR brownfields redevelopment: dnr.wi.gov, search "brownfield"

CFCs and halons

- DNR refrigerant recovery program: dnr.wi.gov, search "refrigerants"

Demolition debris, waste, transporters, landfills and other licensed facilities

- DNR demolition, construction & renovation information: dnr.wi.gov, search "demolition"
- DNR waste and materials management: dnr.wi.gov, search "waste"
- DNR list of licensed haulers and facilities: dnr.wi.gov, search "licensed waste haulers and facilities"
- Contact the DNR: 608-266-2111 or DNRWasteMaterials@wisconsin.gov

Hazardous and universal wastes

- DNR hazardous waste information: dnr.wi.gov, search "hazardous waste"
- "Is Your Waste Hazardous?" (DNR publication WA-1152): http://dnr.wi.gov/files/pdf/pubs/wa/wa1152.pdf
- Handling and disposal of hazardous wastes – "Pilot Project for Management of Contractor Generated Hazardous Waste" (DNR publication WA-654): http://dnr.wi.gov/files/pdf/pubs/wa/wa654.pdf.
- Wisconsin Administrative Code chapter NR 673 – Universal Waste Management Standards: http://docs.legis.wisconsin.gov/code/admin_code/nr/600/673/

Lead

- DHS Lead-Safe Wisconsin: www.dhs.wi.gov/lead/
- DHS-certified lead companies: at the link above, look for "certified company" in the left-hand margin
- DNR Application for Low Hazard Waste Exemption for Reuse of Concrete Coated with Lead-Bearing Paint -- Form 4400-274 (R 2/12) http://dnr.wi.gov/files/pdf/forms/4400/4400-274.pdf

Mercury

- EPA information on mercury: www.epa.gov/hg/consumer.htm

PCBs

- EPA information on PCBs: www.epa.gov/wastes/hazard/tsd/pcbs/
- Wisconsin Administrative Code chapter NR 157 – Management of PCBs and Products containing PCBs: docs.legis.wisconsin.gov/code/admin_code/nr/100/157/

Reuse & recycling

- DNR recycling program: dnr.wi.gov, search "recycling"
- WasteCapDIRECT – a centralized, online directory of construction and demolition recycling processors, haulers and end markets: www.wastecap.org
- Wisconsin Recycling Markets Directory: www.wisconsinrecyclingdirectory.com

Storage tanks

- Department of Safety and Professional Services storage tank database: http://dsps.wi.gov/online-services/storage-tanks

Wisconsin Administrative Code

- Wisconsin Legislative Documents: http://docs.legis.wisconsin.gov

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