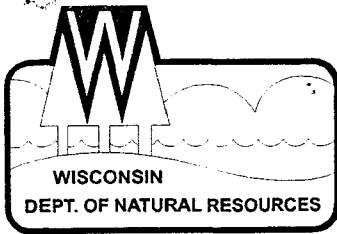


Grundl - Amey



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary
Gloria L. McCutcheon, Regional Director

Southeast Regional Headquarters
2300 N. Dr. ML King Drive, PO Box 12436
Milwaukee, Wisconsin 53212-0436
Telephone 414-263-8500
FAX 414-263-8483
TDD 414-263-8713

May 9, 2000

Mr. Richard Meinburg, Registered Agent
Key Products, Inc.
10600 W. Glenbrook Court
Milwaukee, WI 53224

FID# 241437790

NOTICE OF VIOLATION

The Department of Natural Resources has reason to believe that Key Products, Inc. is in violation of s. 292.11(3), Wis. Stats., which requires that a person who possesses or controls a hazardous substance which is released take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of the state.

Key Products, Inc. operated a manufacturing facility on the site located at 8627-8633 W. Lynx Street in Milwaukee from 1974 -1994.

A spill was reported to the Department by Key Products in January, 1996. This spill was reported to have come from leaking containers of waste paint and solvent which had been placed in a dumpster on site. Subsequent investigation indicated that contaminants in the groundwater at monitoring well #1 exceeded the enforcement standard for tetrachloroethene, trichloroethene, vinyl chloride and cis-2,3-dischloroethene.

A closure request by Key Products was denied in a November 17, 1998, letter from the Department because the degree and extent of groundwater and soil contamination has not been defined.

Recent work was done on site from June-September, 1999, although this work was not submitted to the Department until March, 2000. We believe that, even with the additional groundwater monitoring, the degree and extent of contamination has not been defined. At least 2 additional wells will be needed to complete this definition. In addition, we do not agree with the conclusions you have drawn regarding groundwater flow direction. Groundwater flow direction needs to be better documented.

In order to discuss this matter, the following enforcement conference has been scheduled:

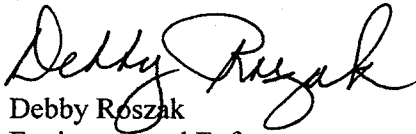
- Conference Date: May 23, 2000
Conference Time: 9:00 a.m.
Location: DNR Richards Street Annex
4041 N. Richards Street
Milwaukee, WI 53212

The Department is authorized to seek forfeitures of up to \$5,000 for each day of violation.



If you have any questions, contact me at (414) 263-8671 or Barb Grundl at (414) 229-0870.

Sincerely,

A handwritten signature in cursive script that reads "Debby Roszak". The signature is written in black ink and is positioned above the printed name and title.

Debby Roszak
Environmental Enforcement

C: ERR/3
Barb Grundl
Karen Shapiro Frazer Schapiro & Rich