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May 12, 2000

Ms. Debby Roszak
Wisconsin Department of Natural Resources
Southeast Regional Headquarters
2300 North Martin Luther King Drive
Milwaukee, Wisconsin 53212

**RE: Key Products (Lynx Street Property)
FID #241437790**

Dear Ms. Roszak:

My client, Key Products, received a Notice of Violation dated May 9, 2000 regarding the above-referenced cleanup. We were quite surprised because there appears to be no legal basis to assert that Key Products is in violation of the Spill Statute, Wis. Stats. § 292.11(3).

Maybe you didn't receive or have misinterpreted our correspondence to you dated March 14, 2000. In any event, in that correspondence we specifically stated that Key Products was taking steps to define the extent of contamination associated with releases on the Lynx Street Property.

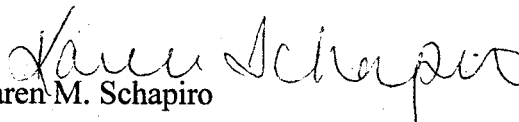
Since submitting you that correspondence and the results of soil sampling and groundwater monitoring performed in late 1999, Key has been working with its consultant, Key Engineering, and has authorized work for additional site investigation activities in accordance with Wis. Adm. Code § NR 716. Moreover, efforts are underway to seek permission to enter the properties of adjacent sites.

We will appear at the enforcement conference scheduled for May 23 and will present more details of the ongoing investigation. We reiterate, however, our position that there is no justification for issuance of the NOV.

If you have any questions before the 23rd, please do not hesitate to contact me.

Very truly yours,

FRAZER SCHAPIRO & RICH, S.C.


Karen M. Schapiro

KMS/kb

cc: Mr. Richard Meinburg