

GIS REGISTRY

Cover Sheet

August 2011
(RR-5367)

Source Property Information

BRRTS #:

ACTIVITY NAME:

PROPERTY ADDRESS:

MUNICIPALITY:

PARCEL ID #:

CLOSURE DATE:

FID #:

DATCP #:

PECFA#:

*WTM COORDINATES:

X: Y:

** Coordinates are in
WTM83, NAD83 (1991)*

WTM COORDINATES REPRESENT:

Approximate Center Of Contaminant Source

Approximate Source Parcel Center

Please check as appropriate: (BRRTS Action Code)

Contaminated Media:

Groundwater Contamination > ES (236)

Contamination in ROW

Off-Source Contamination

*(note: for list of off-source properties
see "Impacted Off-Source Property" form)*

Soil Contamination > *RCL or **SSRCL (232)

Contamination in ROW

Off-Source Contamination

*(note: for list of off-source properties
see "Impacted Off-Source Property" form)*

Land Use Controls:

N/A (Not Applicable)

Soil: maintain industrial zoning (220)

*(note: soil contamination concentrations
between non-industrial and industrial levels)*

Structural Impediment (224)

Site Specific Condition (228)

Cover or Barrier (222)

*(note: maintenance plan for
groundwater or direct contact)*

Vapor Mitigation (226)

Maintain Liability Exemption (230)

*(note: local government unit or economic
development corporation was directed to
take a response action)*

Monitoring Wells:

Are all monitoring wells properly abandoned per NR 141? (234)

Yes No N/A

** Residual Contaminant Level*

***Site Specific Residual Contaminant Level*

This Adobe Fillable form is intended to provide a list of information that is required for evaluation for case closure. It is to be used in conjunction with Form 4400-202, Case Closure Request. The closure of a case means that the Department has determined that no further response is required at that time based on the information that has been submitted to the Department.

NOTICE: Completion of this form is mandatory for applications for case closure pursuant to ch. 292, Wis. Stats. and ch. NR 726, Wis. Adm. Code, including cases closed under ch. NR 746 and ch. NR 726. The Department will not consider, or act upon your application, unless all applicable sections are completed on this form and the closure fee and any other applicable fees, required under ch. NR 749, Wis. Adm. Code, Table 1 are included. It is not the Department's intention to use any personally identifiable information from this form for any purpose other than reviewing closure requests and determining the need for additional response action. The Department may provide this information to requesters as required by Wisconsin's Open Records law [ss. 19.31 - 19.39, Wis. Stats.].

BRRTS #:	<input type="text" value="03-36-170638"/> (No Dashes)	PARCEL ID #:	<input type="text" value="052-809-401-010.00"/>
ACTIVITY NAME:	<input type="text" value="Mirro CO PLT 5"/>	WTM COORDINATES:	X: <input type="text" value="708735"/> Y: <input type="text" value="408798"/>

CLOSURE DOCUMENTS (the Department adds these items to the final GIS packet for posting on the Registry)

- Closure Letter**
- Maintenance Plan** (if activity is closed with a land use limitation or condition (land use control) under s. 292.12, Wis. Stats.)
- Continuing Obligation Cover Letter** (for property owners affected by residual contamination and/or continuing obligations)
- Conditional Closure Letter**
- Certificate of Completion (COC)** (for VPLE sites)

SOURCE LEGAL DOCUMENTS

- Deed:** The most recent deed as well as legal descriptions, for the **Source Property** (where the contamination originated). Deeds for other, off-source (off-site) properties are located in the **Notification** section.
Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.
- Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. (lots on subdivided or platted property (e.g. lot 2 of xyz subdivision)).
Figure #: **Title:**
- Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description accurately describes the correct contaminated property.

MAPS (meeting the visual aid requirements of s. NR 716.15(2)(h))

- Maps must be no larger than 11 x 17 inches unless the map is submitted electronically.
- Location Map:** A map outlining all properties within the contaminated site boundaries on a U.S.G.S. topographic map or plat map in sufficient detail to permit easy location of all parcels. If groundwater standards are exceeded, include the location of all potable wells within 1200 feet of the site.
Note: Due to security reasons municipal wells are not identified on GIS Packet maps. However, the locations of these municipal wells must be identified on Case Closure Request maps.
Figure #: **Title:**
 - Detailed Site Map:** A map that shows all relevant features (buildings, roads, individual property boundaries, contaminant sources, utility lines, monitoring wells and potable wells) within the contaminated area. This map is to show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding a ch. NR 140 Enforcement Standard (ES), and/or in relation to the boundaries of soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Levels (SSRCL) as determined under s. NR 720.09, 720.11 and 720.19.
Figure #: 2 **Title: Site Layout And Soil Sample Locations**
 - Soil Contamination Contour Map:** For sites closing with residual soil contamination, this map is to show the location of all contaminated soil and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeds a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL) as determined under s. NR 720.09, 720.11 and 720.19.
Figure #: **Title:**

BRRTS #: 03-36-170638

ACTIVITY NAME: Mirro CO PLT 5

MAPS (continued)

- Geologic Cross-Section Map:** A map showing the source location and vertical extent of residual soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL). If groundwater contamination exceeds a ch. NR 140 Enforcement Standard (ES) when closure is requested, show the source location and vertical extent, water table and piezometric elevations, and locations and elevations of geologic units, bedrock and confining units, if any.

Figure #: **Title:**

Figure #: **Title:**

- Groundwater Isoconcentration Map:** For sites closing with residual groundwater contamination, this map shows the horizontal extent of all groundwater contamination exceeding a ch. NR140 Preventive Action Limit (PAL) and an Enforcement Standard (ES). Indicate the direction and date of groundwater flow, based on the most recent sampling data.

Note: This is intended to show the total area of contaminated groundwater.

Figure #: **Title:**

- Groundwater Flow Direction Map:** A map that represents groundwater movement at the site. If the flow direction varies by more than 20° over the history of the site, submit 2 groundwater flow maps showing the maximum variation in flow direction.

Figure #: **Title:**

Figure #: **Title:**

TABLES (meeting the requirements of s. NR 716.15(2)(h)(3))

Tables must be no larger than 11 x 17 inches unless the table is submitted electronically. Tables must not contain shading and/or cross-hatching. The use of **BOLD** or *ITALICS* is acceptable.

- Soil Analytical Table:** A table showing remaining soil contamination with analytical results and collection dates.
Note: This is one table of results for the contaminants of concern. Contaminants of concern are those that were found during the site investigation, that remain after remediation. It may be necessary to create a new table to meet this requirement.

Table #: 1-3 **Title:** **Summary of UST System Information, ...Inspection, ..Soil Sample Field Screening**

- Groundwater Analytical Table:** Table(s) that show the most recent analytical results and collection dates, for all monitoring wells and any potable wells for which samples have been collected.

Table #: **Title:**

- Water Level Elevations:** Table(s) that show the previous four (at minimum) water level elevation measurements/dates from all monitoring wells. If present, free product is to be noted on the table.

Table #: **Title:**

IMPROPERLY ABANDONED MONITORING WELLS

For each monitoring well not properly abandoned according to requirements of s. NR 141.25 include the following documents.

Note: If the site is being listed on the GIS Registry for only an improperly abandoned monitoring well you will only need to submit the documents in this section for the GIS Registry Packet.

- Not Applicable**

- Site Location Map:** A map showing all surveyed monitoring wells with specific identification of the monitoring wells which have not been properly abandoned.

Note: If the applicable monitoring wells are distinctly identified on the Detailed Site Map this Site Location Map is not needed.

Figure #: **Title:**

- Well Construction Report:** Form 4440-113A for the applicable monitoring wells.

- Deed:** The most recent deed as well as legal descriptions for each property where a monitoring well was not properly abandoned.

- Notification Letter:** Copy of the notification letter to the affected property owner(s).

BRRTS #: 03-36-170638

ACTIVITY NAME: Mirro CO PLT 5

NOTIFICATIONS

Source Property

Not Applicable

Letter To Current Source Property Owner: If the source property is owned by someone other than the person who is applying for case closure, include a copy of the letter notifying the current owner of the source property that case closure has been requested.

Return Receipt/Signature Confirmation: Written proof of date on which confirmation was received for notifying current source property owner.

Off-Source Property

Group the following information per individual property and label each group according to alphabetic listing on the "Impacted Off-Source Property" attachment.

Not Applicable

Letter To "Off-Source" Property Owners: Copies of all letters sent by the Responsible Party (RP) to owners of properties with groundwater exceeding an Enforcement Standard (ES), and to owners of properties that will be affected by a land use control under s. 292.12, Wis. Stats.

Note: Letters sent to off-source properties regarding residual contamination must contain standard provisions in Appendix A of ch. NR 726.

Number of "Off-Source" Letters:

Return Receipt/Signature Confirmation: Written proof of date on which confirmation was received for notifying any off-source property owner.

Deed of "Off-Source" Property: The most recent deed(s) as well as legal descriptions, for all affected deeded **off-source property(ies)**. This does not apply to right-of-ways.

Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.

Certified Survey Map: A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. (lots on subdivided or platted property (e.g. lot 2 of xyz subdivision)).

Figure #:

Title:

Letter To "Governmental Unit/Right-Of-Way" Owners: Copies of all letters sent by the Responsible Party (RP) to a city, village, municipality, state agency or any other entity responsible for maintenance of a public street, highway, or railroad right-of-way, within or partially within the contaminated area, for contamination exceeding a groundwater Enforcement Standard (ES) and/or soil exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL).

Number of "Governmental Unit/Right-Of-Way Owner" Letters:



January 27, 2003

Mr. Thomas Reed
Mirro Corporation
PO Box 1330
Manitowoc, WI 54221-1330

RE: **Final Closure**

Commerce # 54220-6717-15 **WDNR BRRTS # 03-36-170638**
Mirro Corporation Plant 5, 2015 Mirro Drive, Manitowoc

Dear Mr. Reed:

The Wisconsin Department of Commerce (Commerce) has received all items required for closure of the site referenced above. This site is now listed as "closed" on the Commerce database and will be included on the Wisconsin Department of Natural Resources (WDNR) Geographic Information System (GIS) Registry of Closed Remediation Sites to address residual soil contamination.

It is in your best interest to keep all documentation related to the environmental activities at your site. If residual contamination is encountered in the future, appropriate measures must be implemented to assure that it is managed following all applicable regulations. If future site conditions indicate that any remaining contamination poses a threat, and subsequent information indicates a need to reopen this case, any original claim under the PECFA fund would also reopen and you may apply for assistance to the extent of remaining eligibility.

Thank you for your efforts to protect Wisconsin's environment. If you have any questions, please contact me in writing at the letterhead address or by telephone at (920) 424-0046.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert H. Klauk', written in a cursive style.

Robert H. Klauk, PG
Hydrogeologist
Site Review Section

cc: **Marty Koopman – Northern Environmental
Case File**

926152



Document Number

DEED RESTRICTION

In re: All that part of the Southeast one quarter (SE1/4) of Section nine (9), Township nineteen (19) North of Range twenty-four (24) east, lying north of the Chicago and Northwestern Railway Company right of way, containing approximately one hundred and four (104) acres.

RCPT* 556. STN

\$33.00 MISC

STATE OF WISCONSIN
MANITOWOC COUNTY
PRESTON JONES
REGISTER OF DEEDS
RECEIVED FOR RECORD

15 JAN 2003 1:45:13 PM

Recording Area

Name and Return Address

Charles Hauck
Newell Operating Company (Mirro)
2015 Mirro Drive
Manitowoc, Wisconsin 54221

Declaration of Restrictions

STATE OF WISCONSIN)
) ss
COUNTY OF MANITOWOC)

Parcel Identification Number (PIN)

WHEREAS, Newell Operating Company (formerly known as the Aluminum Goods Manufacturing Company, a New Jersey Corporation) is the owner of the above-described property.

WHEREAS, one or more discharges have occurred on this property. Contaminated soils exist on this property at or near the locations as shown in Exhibit A, Figure 1 Site Layout, Mirro Company

Specific types, concentrations, and locations of contaminated soil are listed below with corresponding attached drawings:

- Exhibit B: Figures 2 and 3: Diesel range organics (DRO), gasoline range organics, (GRO), petroleum volatile organic compounds (PVOC) at the northeast corner of Plant 01 [formerly known as Plant #7] (BRRTS #03-36-001476), in the location of the soil excavation and water supply line.
- Exhibit C, Figure 4: DRO and polychlorinated byphenols (PCBs) on the north side of Plant 02 (BRRTS #02-36-220607), approximately 40 feet northeast of overhead door #23
- Exhibit D, Figure 5: DRO on the North side of Plant 50 [formerly known as plant #5](Commerce #54220-6717-15), on the north side of the plant at the wall, 15 feet south of the concrete access manhole.



NOW THEREFORE, the owner hereby declares that specific portions of the property described above as specifically described below, are held and shall be held, conveyed or encumbered, leased, rented, used, occupied and improved subject to the following limitation and restrictions:

1. Northeast corner of Plant 01 [formerly known as Plant #7] (BRRTS #03-36-001476), in the location of the soil excavation and water supply line [Exhibit B: Figures 2 and 3]

One or more petroleum discharges have occurred at this location on the property. Structural impediments existing at the time of clean-up made complete remediation of the soil contamination impracticable. Petroleum contaminated soil may remain on this property at the following locations: near the northeast corner of Plant 01 and in the location of the soil excavation and water supply line as specifically identified in Exhibit B (Figures 2 and 3). Pursuant to the requirements of s. 292.11, Stats, if the structural impediments that currently exist on this property are removed, the property owner shall conduct an investigation of the degree and extent of petroleum contamination. To the extent that contamination is found at that time, the Wisconsin Department of Natural Resources shall be immediately notified and the contamination shall be properly treated or disposed of in accordance with applicable laws.

2. North side of Plant 02 (BRRTS #02-36-220607) [Exhibit C, Figure 4]

The following activities are prohibited on that portion of the property shown in Exhibit C, Figure 4 where a soil cover has been placed (in the vicinity of soil sample S-2) unless prior written approval has been obtained from the Wisconsin Department of Natural Resources or its successor or assign: (1) Excavating or grading of the land surface; (2) Filling on the capped area; (3) Plowing for agricultural cultivation; and (4) Construction or installation of a building or other structure with a foundation that would sit on or be placed within the cap or cover. In addition, the soil cover shall be maintained in compliance with a Plan dated June 11, 2002, prepared and submitted to the Wisconsin Department of Natural Resources by Mirro Co, as required by section NR 724.13(2), Wis. Adm. Code (1999).

3. North side of Plant 50 [formerly known as plant #5](Commerce #54220-6717-15) [Exhibit D, Figure 5]

This affidavit is being recorded for the purpose of notifying prospective purchasers and other interested parties that soil contaminated with Diesel Range Organics from an underground storage tank remains on this property as shown on Exhibit D, Figure 5. If this contaminated soil is excavated in the future, it may be considered solid waste and will need to be disposed in accordance with applicable statutes and rules.

WHEREAS, it is the desire and intention of the property owner to impose on the property restrictions which will make it unnecessary to conduct further soil remediation activities on the property at the present time.

This restriction is hereby declared to be a covenant running with the land and shall be fully binding upon all persons acquiring the above-described property whether by descent, devise, purchase or otherwise. This restriction benefits and is enforceable by, the Wisconsin Department of Natural Resources, its successors and assigns. The Department, its successors or assigns, may initiate proceedings at law or in equity against any person or persons who violate or are proposing to violate this covenant, to prevent the proposed violation or to recover damages for such violation.



Any person who is or becomes owner of the property described above may request that the Wisconsin Department of Natural Resources or its successor issue a determination that the restrictions set forth in this covenant are no longer required. Upon receipt of such a request, the Wisconsin Department of Natural Resources shall determine whether or not the restrictions contained herein can be extinguished. If the Department determines that the restrictions can be extinguished, an affidavit, with a copy of the Department's written determination, may be recorded to give notice that this deed restriction, or portions of this deed restriction are no longer binding.

By signing this document, Douglas L. Martin acknowledges that he is duly authorized to sign this document on behalf of Newell Operating Company.

Signature: 

Printed Name: Douglas L. Martin

Title: Vice President – Treasurer of Newell Operating Company

Subscribed and sworn to before me

this 20 day of December, 2002

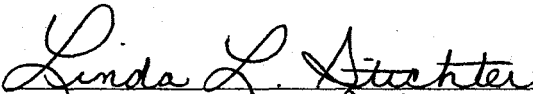

Notary Public, State of Illinois
My commission expires March 26, 2005





EXHIBIT A
SITE LAYOUT



60 Acre
Parcel - Leased for
farming

35

30

25

20

15

10

5

0

Site Location -
BRRTs #02-36-220607

Mirro Company
Plant 567
Manitowoc, WI

104 Acres
Main Site

0 500'



Site Location -
BRRTS#03-36-001476

Site Location -
BRRTS #03-36-170638/
Commerce #54220-6717-15

Scale: one unit=100 feet

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z AA AB AC

Rail Road Track

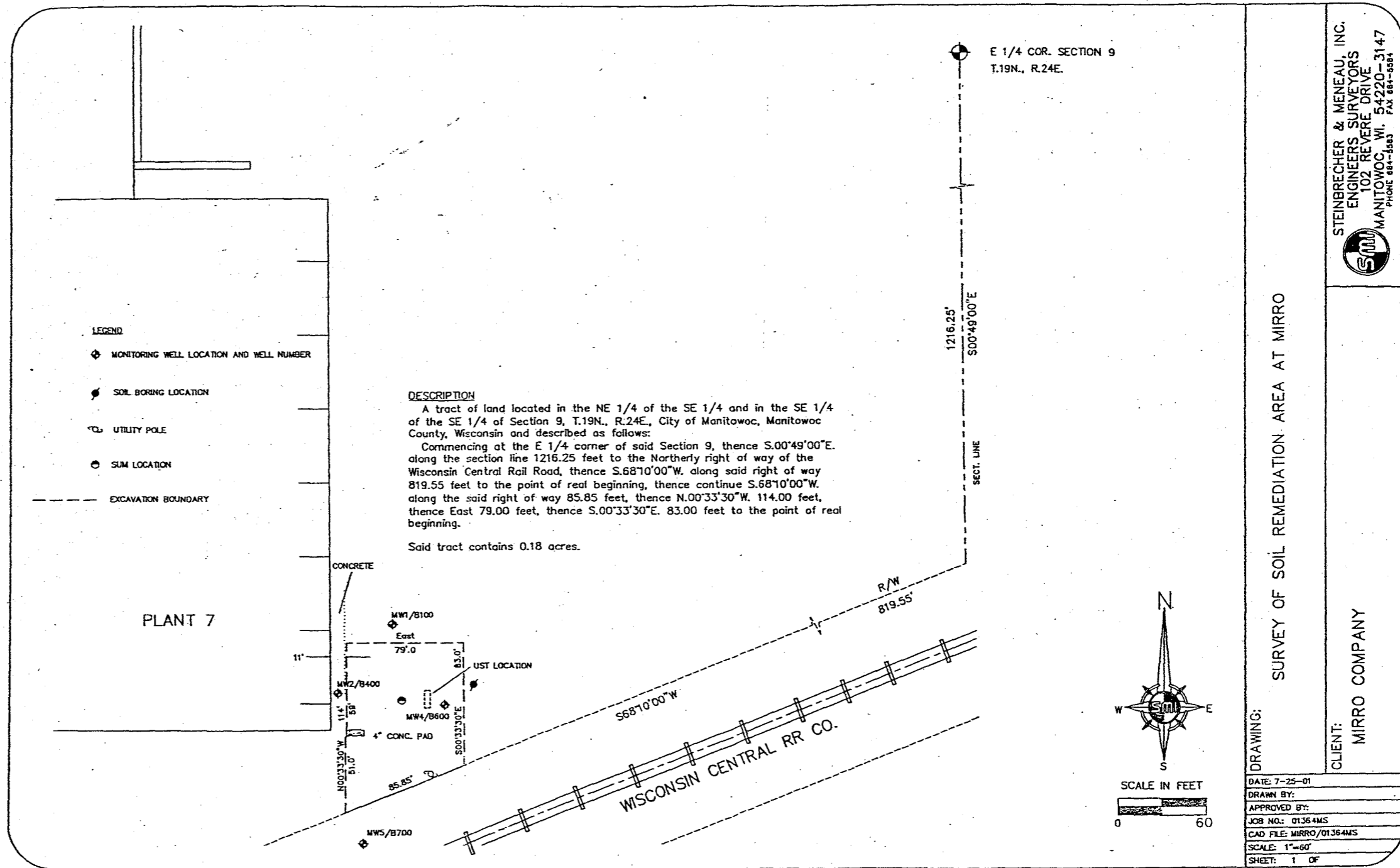
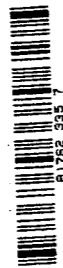
FIGURE 1: SITE LAYOUT, MIRRO COMPANY



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EXHIBIT B
LOCATION OF REMAINING SOIL CONTAMINATION
PLANT #01

Vol 1762 PG 335



LEGEND

- ◆ MONITORING WELL LOCATION AND WELL NUMBER
- SOIL BORING LOCATION
- UTILITY POLE
- SUM LOCATION
- - - EXCAVATION BOUNDARY

DESCRIPTION

A tract of land located in the NE 1/4 of the SE 1/4 and in the SE 1/4 of the SE 1/4 of Section 9, T.19N., R.24E., City of Manitowoc, Manitowoc County, Wisconsin and described as follows:
 Commencing at the E 1/4 corner of said Section 9, thence S.00°49'00"E. along the section line 1216.25 feet to the Northerly right of way of the Wisconsin Central Rail Road, thence S.68°10'00"W. along said right of way 819.55 feet to the point of real beginning, thence continue S.68°10'00"W. along the said right of way 85.85 feet, thence N.00°33'30"W. 114.00 feet, thence East 79.00 feet, thence S.00°33'30"E. 83.00 feet to the point of real beginning.

Said tract contains 0.18 acres.



DRAWING: SURVEY OF SOIL REMEDIATION AREA AT MIRRO

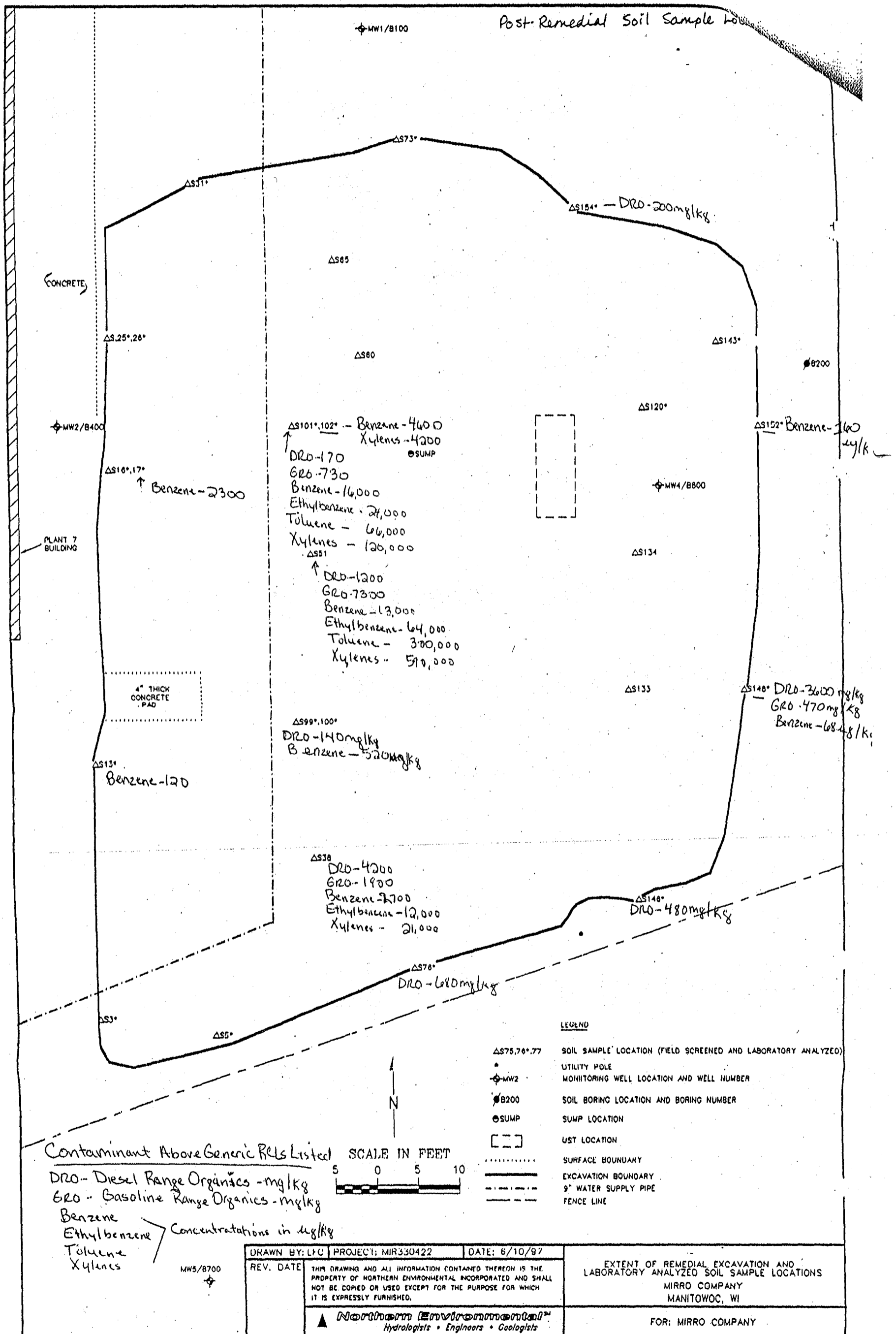
STEINBRECHER & MENEAU, INC.
 ENGINEERS SURVEYORS
 102 REVERE DRIVE
 MANITOWOC, WI. 54220-3147
 PHONE 921-5583 FAX 921-5584

CLIENT: MIRRO COMPANY

DATE: 7-25-01
DRAWN BY:
APPROVED BY:
JOB NO.: 01364MS
CAD FILE: MIRRO/01364MS
SCALE: 1"=60'
SHEET: 1 OF

FIGURE 2

PLANT 01



S:\PROJ\MM\330422\EXCSAMP

PLANT FIGURE 3

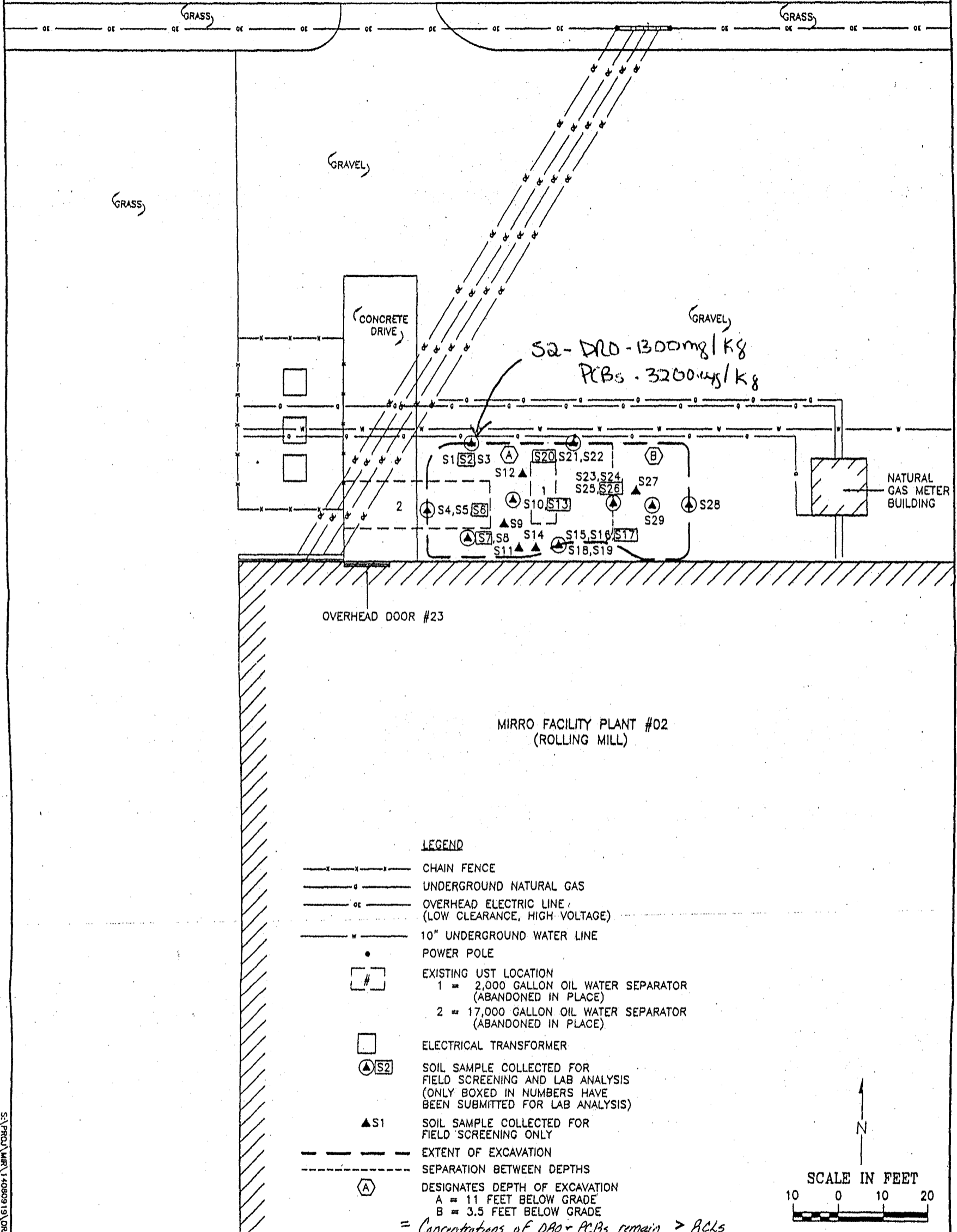


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EXHIBIT C
LOCATION OF REMAINING SOIL CONTAMINATION
PLANT #02



SERVICE ROAD

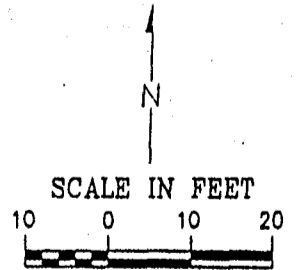


MIRRO FACILITY PLANT #02 (ROLLING MILL)

LEGEND

- x-x-x- CHAIN FENCE
- o-o- UNDERGROUND NATURAL GAS
- oe- OVERHEAD ELECTRIC LINE (LOW CLEARANCE, HIGH VOLTAGE)
- w- 10" UNDERGROUND WATER LINE
- POWER POLE
- # EXISTING UST LOCATION
 - 1 = 2,000 GALLON OIL WATER SEPARATOR (ABANDONED IN PLACE)
 - 2 = 17,000 GALLON OIL WATER SEPARATOR (ABANDONED IN PLACE)
- ELECTRICAL TRANSFORMER
- ▲S2 SOIL SAMPLE COLLECTED FOR FIELD SCREENING AND LAB ANALYSIS (ONLY BOXED IN NUMBERS HAVE BEEN SUBMITTED FOR LAB ANALYSIS)
- ▲S1 SOIL SAMPLE COLLECTED FOR FIELD SCREENING ONLY
- - - - - EXTENT OF EXCAVATION
- - - - - SEPARATION BETWEEN DEPTHS
- (A) DESIGNATES DEPTH OF EXCAVATION
 - A = 11 FEET BELOW GRADE
 - B = 3.5 FEET BELOW GRADE

= Concentrations of DDO + PCBs remain > ACLs



S:\PROJ\MIR\14080919\DRAWINGS\072099-3.DWG

DRAWN BY: SXM PROJECT: MIR-0919 DATE: 7/20/99

REV. DATE 02/05/01

THIS DRAWING AND ALL INFORMATION CONTAINED THEREON IS THE PROPERTY OF NORTHERN ENVIRONMENTAL INCORPORATED AND SHALL NOT BE COPIED OR USED EXCEPT FOR THE PURPOSE FOR WHICH IT IS EXPRESSLY FURNISHED.

EXTENT OF EXCAVATION WITH SOIL SAMPLE LOCATIONS
MIRRO PLANT #02
MANITOWOC, WISCONSIN

Northern Environmental
Hydrologists • Engineers • Geologists

FOR: MIRRO COMPANY

FIGURE 4

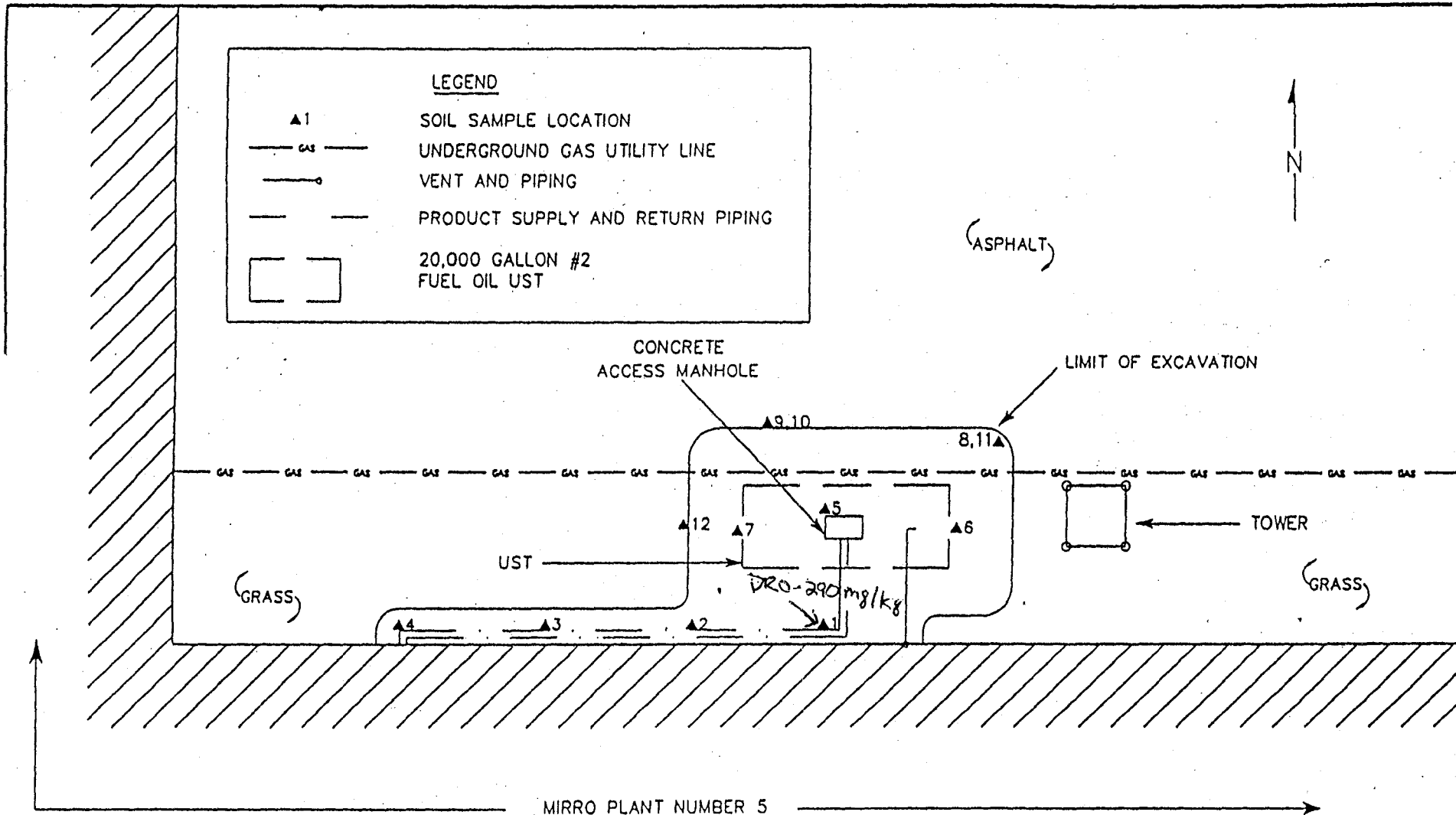
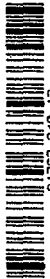
PLANT 02



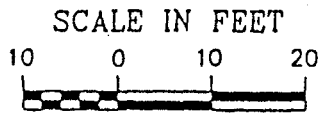
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EXHIBIT D

**LOCATION OF REMAINING SOIL CONTAMINATION
PLANT #50**



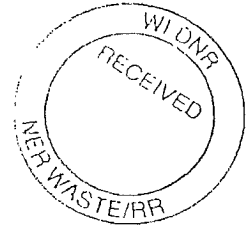
MIRRO PLANT NUMBER 5



DRAWN BY: DAM	PROJECT: USP820163	DATE: 9/5/1997	SITE LAYOUT AND SOIL SAMPLE LOCATIONS MIRRO PLANT #5 MANITOWOC, WISCONSIN
REV. DATE	THIS DRAWING AND ALL INFORMATION CONTAINED THEREON IS THE PROPERTY OF NORTHERN ENVIRONMENTAL INCORPORATED AND SHALL NOT BE COPIED OR USED EXCEPT FOR THE PURPOSE FOR WHICH IT IS EXPRESSLY FURNISHED.		
▲ Northern Environmental SM Hydrologists • Engineers • Geologists			FOR: US PETROLEUM EQUIPMENT

FIGURE 5 PLANT 5

June 11, 2002
(MIR03-1408-0919)



Ms. Annette Weissbach
Wisconsin Department of Natural Resources
Post Office Box 10448
Green Bay, Wisconsin 54307-0448

Re: Performance Standard Cap, Mirro Company Plant #02, 2401 Memorial Drive, Manitowoc,
Wisconsin; BRRTS #02-36-220607

Dear Ms. Weissbach:

On behalf of the Mirro Company, Northern Environmental Technologies, Incorporated (Northern Environmental) is providing information regarding the performance standard cap that was required as part of the conditional case closure letter for the Mirro Company Plant #02, 2401 Mirro Drive, Manitowoc, Wisconsin (the Site). As part of the conditional case closure of the Site, the WDNR is requiring that a surface barrier be maintained over the soil contamination near soil sample S2. Given the low permeability of the native soil at the Site, Northern Environmental is recommending that the top three feet of soil near soil sample S2 serve as a performance standard cap.

Maintenance Plan

The surface area near S1 will be inspected on a yearly basis by the Site owner to ensure that the cap is being maintained. The area will be examined for evidence of settling, potholes, erosion, and other damage. Damaged areas will be repaired within 30 days of discovery. A report describing the nature and extent of any damage to the barrier and subsequent repairs will be submitted to the Wisconsin Department of Natural Resources upon completion of these activities. Completed copies of written inspections will be maintained on-site. An example of the inspection form is enclosed.

We trust this information meets your needs. Please contact us at 920-592-8400 if you have any questions.

Sincerely,
**Northern Environmental
Technologies, Incorporated**

A handwritten signature in black ink, appearing to read "Lynelle P. Caine".

Lynelle P. Caine
Project Manager

LPC/jmv
Mr. Doug Deaton, Mirro Company

©2002 Northern Environmental Technologies, Inc.

S:\proj\MIR\14080919\LETTERS\maintenance plan.doc

WISCONSIN • Milwaukee • Green Bay • Waupun • Park Falls
MINNESOTA • St. Paul • Brainerd • Rochester

CANADA • Calgary

Annual Surface Barrier Inspection Report
Plant #02, 2401 Mirro Drive
Manitowoc, Wisconsin

Date: _____ Weather _____

Inspected By: _____

Observations of paved areas: _____

Signature: _____



BRRTS: 03-36-170638

October 13, 2000

Mirro Corporation
Attn: Mr. Thomas Reed
P.O. Box 1330
Manitowoc, WI 54221-1330

RE: CONDITIONAL CLOSURE
Mirro Corporation Plant No. 5, 2015 Mirro Drive, Manitowoc, WI
Commerce #54220-6717-15

Dear Mr. Reed:

On October 13, 2000, the closure request for the above-referenced site was reviewed by the Site Review staff of the Petroleum Environmental Cleanup Fund Bureau. The site was transferred from the WDNR to the Department of Commerce for regulatory authority on September 11, 2000. Using guidance established in NR 700, COMM 47 and COMM 46, the Department has determined that the site meets environmental standards and no further action is necessary.

The Department, in making this determination, reviewed the following document prepared by Northern Environmental, as well as other correspondence in the case file:

- *UST Site Assessment*, October 28, 1997

The following documentation is necessary to satisfy the conditions of closure:

1. A notification must be placed on the property deed addressing residual soil impacts. For case closure, we will need a copy of the deed notification that contains the County Register of Deeds' recording information. Enclosed an example of a "Notice of Contamination to Property" for your use. If you wish to modify the language, submit a copy to this office for approval before filing.

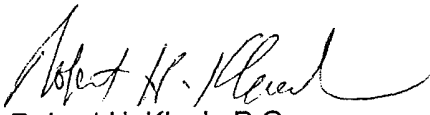
IMPORTANT: Before this case can be officially listed as "closed" on the Wisconsin Department of Commerce/Natural Resources computer database, you or your consultant must submit the requested information.

Mr. Thomas Reed
Mirro Corporation

If, in the future, site conditions indicate that the contamination that remains poses a threat the need for further remediation would be determined and required if necessary. If subsequent information indicates a need to reopen this case, any original claim under the PECFA fund would also reopen and you may apply for assistance to the extent of remaining eligibility.

Thank you for your efforts in the protection of the environment. If you have any questions you may contact me at 920-424-0046.

Sincerely,



Robert H. Klauk, P.G.
Hydrogeologist
PECFA Site Review Section

Encl.:

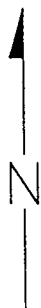
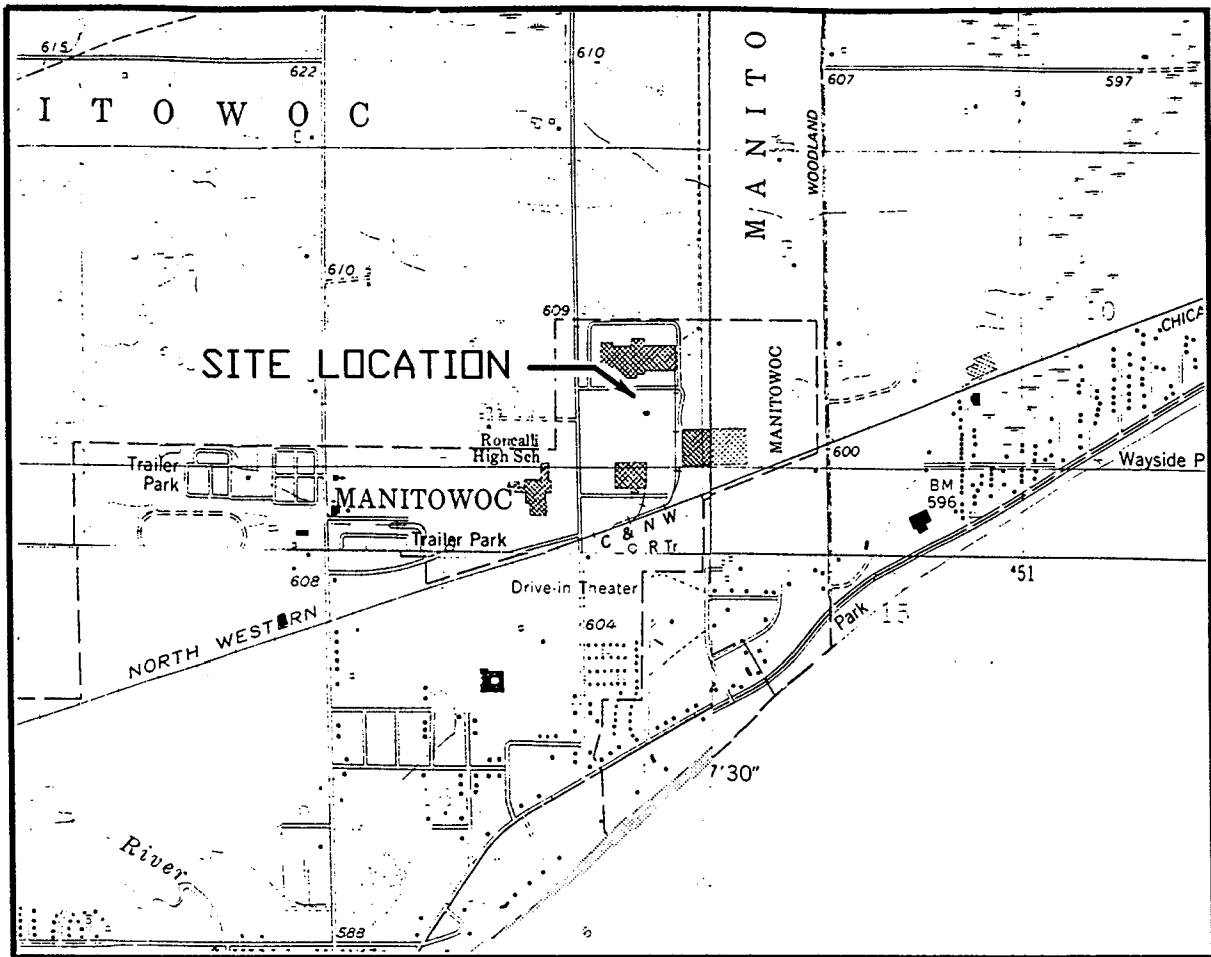
Cc: Clint W. Wendt – Northern Environmental
Pf\pecfa\542\54220\671715\Close-Conditional.doc

BRRTS #: 03-36-170638
FID #: 436106110
SITE NAME: MIRRO CORP PLT #5

Associated VPLE Site

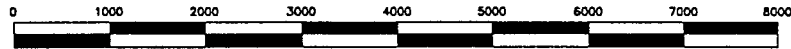
To view the Certificate of Completion (COC) for this site click on the link below:

BRRTS #	SITE NAME
06-36-556282	<u>SKANA ALUMINUM CO (VPLE)</u>



SCALE IN FEET

1" = 2000'



CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929



BASE MAP SOURCE: USGS MANITOWOC, MISHICOT, TWO RIVERS WISCONSIN 7.5 MINUTE QUADRANGLES, 1954, 1978, 1978 QUADRANGLE LOCATION

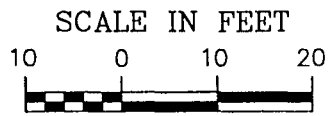
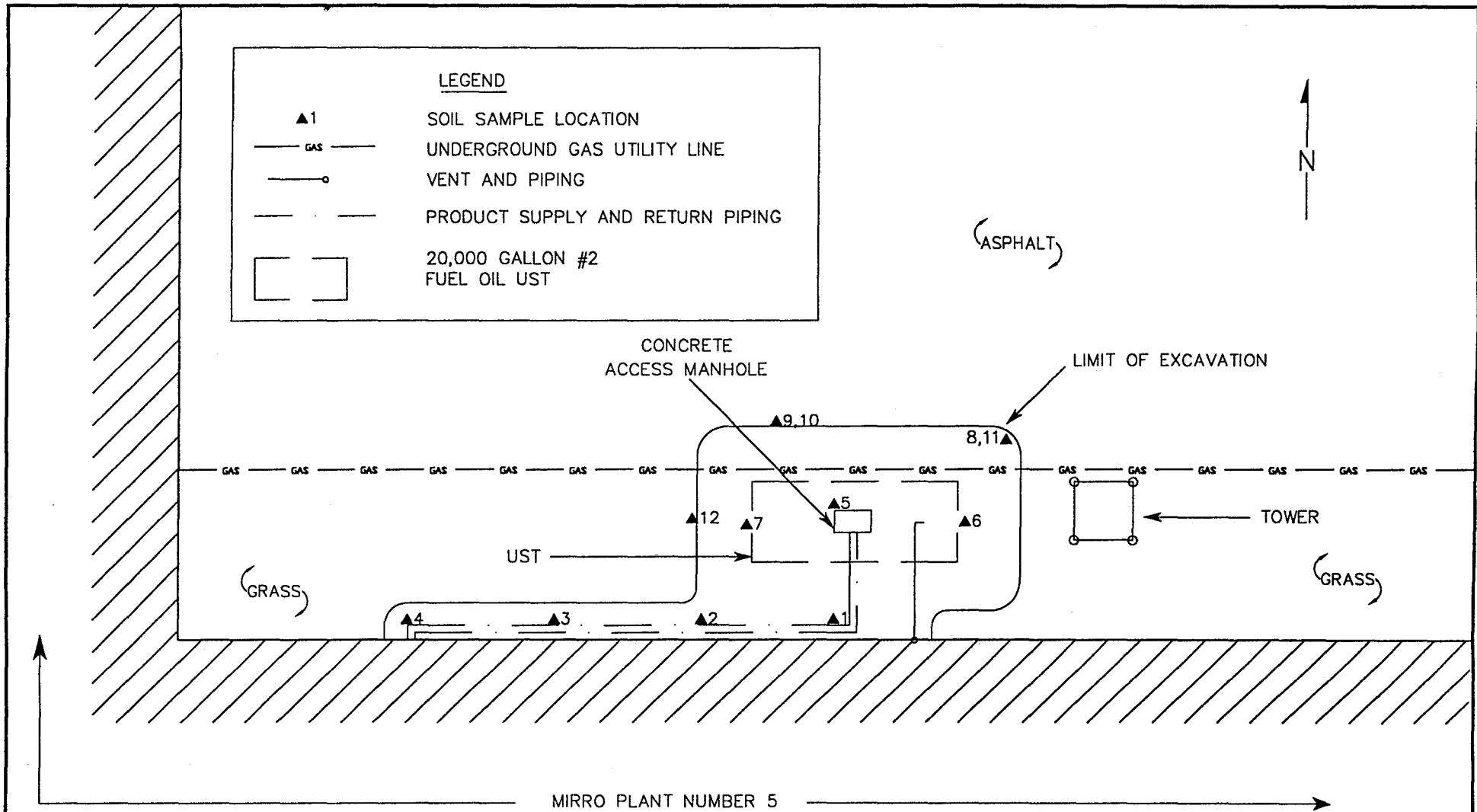
DRAWN BY: DAM PROJECT: USP820163 DATE: 9/5/1997

FIGURE 1
SITE LOCATION AND LOCAL TOPOGRAPHY
MIRRO PLANT #5
MANITOWOC, WISCONSIN

REV. DATE THIS DRAWING AND ALL INFORMATION CONTAINED THEREON IS THE PROPERTY OF NORTHERN ENVIRONMENTAL INCORPORATED AND SHALL NOT BE COPIED OR USED EXCEPT FOR THE PURPOSE FOR WHICH IT IS EXPRESSLY FURNISHED.

▲ Northern EnvironmentalSM
Hydrologists • Engineers • Geologists

FOR: US PERTROLEUM



DRAWN BY: DAM	PROJECT: USP820163	DATE: 9/5/1997
REV. DATE	THIS DRAWING AND ALL INFORMATION CONTAINED THEREON IS THE PROPERTY OF NORTHERN ENVIRONMENTAL INCORPORATED AND SHALL NOT BE COPIED OR USED EXCEPT FOR THE PURPOSE FOR WHICH IT IS EXPRESSLY FURNISHED.	
▲ Northern Environmental SM Hydrologists • Engineers • Geologists		

FIGURE 2 SITE LAYOUT AND SOIL SAMPLE LOCATIONS MIRRO PLANT #5 MANITOWOC, WISCONSIN
FOR: US PETROLEUM EQUIPMENT

Table 1 Summary of UST System Information, Mirro Corporation, Manitowoc, Wisconsin

UST Number	Registration Number	UST Construction	Volume (gallons)	Contents	Status	Date Installed	Type of Delivery System	Piping Construction	Location of Check Valves
1	360700199	Coated Steel	20,000	#2 Fuel Oil	Removed 08/13/97	01/01/50	Unknown	Bare Steel	Unknown

Table 2 Summary of UST System Inspection

UST Number	UST Condition	Piping Condition	Piping Joint Integrity	Dispenser Condition	Apparent Releases
1	Little Rust	Rusted	Fair	Not Applicable	No

Table 3 Summary of Soil Sample Field Screening and Laboratory Analysis

Sample Number	Associated UST System	Location	Depth (fbg)	Date Collected	Time	PID Response (iui)	Odor	Soil Description	Soil Type (USCS)	Laboratory Analytical Results (mg/kg) DRO
1	1	Beneath Piping	4	08/13/97	11:20	27	None	Sand	SW	290
2	1	Beneath Piping	4	08/13/97	11:20	1.5	None	Sand	SW	<10
3	1	Beneath Piping	4	08/13/97	11:21	2.0	None	Sand	SW	<10
4	1	Piping	3	08/13/97	11:22	1.0	None	Silty Clay	CL	<10
5	1	Beneath Center of UST	15	08/13/97	12:07	1.0	None	Gravelly Sand	SW	<10
6	1	Beneath East End of UST	15	08/13/97	12:08	66	Trace Petroleum	Gravelly Sand	SW	<10
7	1	Beneath West End of UST	15	08/13/97	12:09	19	None	Gravelly Sand	SW	<10
8	1	Excavation Wall	6	08/13/97	12:25	6.0	None	Gravelly Sand	SW	<10
9	1	Excavation Wall	6	08/13/97	12:26	4.0	None	Gravelly Sand	SW	<10
10	1	Excavation Wall	14	08/13/97	13:06	10.0	None	Gravelly Sand	SW	32
11	1	Excavation Wall	14	08/13/97	13:06	2.0	None	Gravelly Sand	SW	<10
12	1	Excavation Wall	15	08/13/97	13:07	1.0	None	Silty Clay	CL	<10

Note:

UST = underground storage tank
 fbg = feet below grade
 iui = instrument units as isobutylene
 USCS = United Soil Classification System
 mg/kg = milligram per kilogram
 <x = not detected above laboratory reporting limit of x





January 27, 2003

Mr. Thomas Reed
Mirro Corporation
PO Box 1330
Manitowoc, WI 54221-1330

RE: **Final Closure**

Commerce # 54220-6717-15 **WDNR BRRTS # 03-36-170638**
Mirro Corporation Plant 5, 2015 Mirro Drive, Manitowoc

Dear Mr. Reed:

The Wisconsin Department of Commerce (Commerce) has received all items required for closure of the site referenced above. This site is now listed as "closed" on the Commerce database and will be included on the Wisconsin Department of Natural Resources (WDNR) Geographic Information System (GIS) Registry of Closed Remediation Sites to address residual soil contamination.

It is in your best interest to keep all documentation related to the environmental activities at your site. If residual contamination is encountered in the future, appropriate measures must be implemented to assure that it is managed following all applicable regulations. If future site conditions indicate that any remaining contamination poses a threat, and subsequent information indicates a need to reopen this case, any original claim under the PECFA fund would also reopen and you may apply for assistance to the extent of remaining eligibility.

Thank you for your efforts to protect Wisconsin's environment. If you have any questions, please contact me in writing at the letterhead address or by telephone at (920) 424-0046.

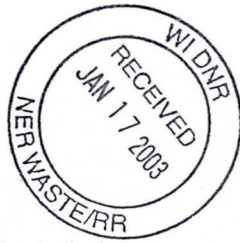
Sincerely,

A handwritten signature in black ink, appearing to read 'Robert H. Klauk', written in a cursive style.

Robert H. Klauk, PG
Hydrogeologist
Site Review Section

cc: **Marty Koopman – Northern Environmental
Case File**

Memo



MIRRO
A Division of
Newell Rubbermaid

To: Annette Weissbach
Location: WDNR Hydrogeologist
Remediation and
Redevelopment Program

From: Charles Hauck
Phone: 920-684-4421 x7158

Fax: **920-492-5859**
Phone: 920-492-5916

Fax: 920-684-0837

Date: 1/15/03

Re: Deed Restriction Filed

Concerning:

Mirro Company Plant #2, 2401 Mirro Drive, Manitowoc, Wisconsin
WDNR BRRTS #02-36-220607, WDNR #03-36-001476
Commerce #54220-6717-15

RECEIVED

JAN 27 2002

ERS DIVISION
OSHKOSH

Dear Ms. Weissbach,

Please find attached the deed restriction and the legal description change for our property at 2015 Mirro Drive.

Please note that we have updated the legal company name and had a parent company Officer sign the restriction. This added to the time to file this.

This was filled with the Manitowoc Register of Deeds on Wednesday, 1/15/03.

Please contact me with any questions.

Sincerely,

Charles Hauck

July 27, 2002

To Whom It May Concern:

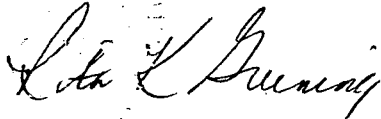
RE: Legal Description for GIS Registry, Mirro Company, Plant #01, 2211 Mirro Drive,
Manitowoc, Wisconsin, BRRTS # 03-36-001476

The legal description attached to this letter for the Mirro Company Plant #01 (formerly
Plant #7) located at 2211 Mirro Drive, Manitowoc, Wisconsin is complete and accurate.

Sincerely,



Mr. Richard Adams
Mirro Company



NOTARY PUBLIC

MY COMMISSION EXPIRES 6/15/06

926152



Document Number

DEED RESTRICTION

In re: All that part of the Southeast one quarter (SE1/4) of Section nine (9), Township nineteen (19) North of Range twenty-four (24) east, lying north of the Chicago and Northwestern Railway Company right of way, containing approximately one hundred and four (104) acres.

RCPT* 556. STN

\$33.00 MISC

STATE OF WISCONSIN
MANITOWOC COUNTY
PRESTON JONES
REGISTER OF DEEDS
RECEIVED FOR RECORD

15 JAN 2003 1:45:13 PM

Recording Area

Name and Return Address

Charles Hauck
Newell Operating Company (Mirro)
2015 Mirro Drive
Manitowoc, Wisconsin 54221

Declaration of Restrictions

STATE OF WISCONSIN)
) ss
COUNTY OF MANITOWOC)

Parcel Identification Number (PIN)

WHEREAS, Newell Operating Company (formerly known as the Aluminum Goods Manufacturing Company, a New Jersey Corporation) is the owner of the above-described property.

WHEREAS, one or more discharges have occurred on this property. Contaminated soils exist on this property at or near the locations as shown in Exhibit A, Figure 1 Site Layout, Mirro Company

Specific types, concentrations, and locations of contaminated soil are listed below with corresponding attached drawings:

- Exhibit B: Figures 2 and 3: Diesel range organics (DRO), gasoline range organics, (GRO), petroleum volatile organic compounds (PVOC) at the northeast corner of Plant 01 [formerly known as Plant #7] (BRRTS #03-36-001476), in the location of the soil excavation and water supply line.
- Exhibit C, Figure 4: DRO and polychlorinated byphenols (PCBs) on the north side of Plant 02 (BRRTS #02-36-220607), approximately 40 feet northeast of overhead door #23
- Exhibit D, Figure 5: DRO on the North side of Plant 50 [formerly known as plant #5](Commerce #54220-6717-15), on the north side of the plant at the wall, 15 feet south of the concrete access manhole.



NOW THEREFORE, the owner hereby declares that specific portions of the property described above as specifically described below, are held and shall be held, conveyed or encumbered, leased, rented, used, occupied and improved subject to the following limitation and restrictions:

1. Northeast corner of Plant 01 [formerly known as Plant #7] (BRRTS #03-36-001476), in the location of the soil excavation and water supply line [Exhibit B: Figures 2 and 3]

One or more petroleum discharges have occurred at this location on the property. Structural impediments existing at the time of clean-up made complete remediation of the soil contamination impracticable. Petroleum contaminated soil may remain on this property at the following locations: near the northeast corner of Plant 01 and in the location of the soil excavation and water supply line as specifically identified in Exhibit B (Figures 2 and 3). Pursuant to the requirements of s. 292.11, Stats, if the structural impediments that currently exist on this property are removed, the property owner shall conduct an investigation of the degree and extent of petroleum contamination. To the extent that contamination is found at that time, the Wisconsin Department of Natural Resources shall be immediately notified and the contamination shall be properly treated or disposed of in accordance with applicable laws.

2. North side of Plant 02 (BRRTS #02-36-220607) [Exhibit C, Figure 4]

The following activities are prohibited on that portion of the property shown in Exhibit C, Figure 4 where a soil cover has been placed (in the vicinity of soil sample S-2) unless prior written approval has been obtained from the Wisconsin Department of Natural Resources or its successor or assign: (1) Excavating or grading of the land surface; (2) Filling on the capped area; (3) Plowing for agricultural cultivation; and (4) Construction or installation of a building or other structure with a foundation that would sit on or be placed within the cap or cover. In addition, the soil cover shall be maintained in compliance with a Plan dated June 11, 2002, prepared and submitted to the Wisconsin Department of Natural Resources by Mirro Co, as required by section NR 724.13(2), Wis. Adm. Code (1999).

3. North side of Plant 50 [formerly known as plant #5](Commerce #54220-6717-15) [Exhibit D, Figure 5]

This affidavit is being recorded for the purpose of notifying prospective purchasers and other interested parties that soil contaminated with Diesel Range Organics from an underground storage tank remains on this property as shown on Exhibit D, Figure 5. If this contaminated soil is excavated in the future, it may be considered solid waste and will need to be disposed in accordance with applicable statutes and rules.

WHEREAS, it is the desire and intention of the property owner to impose on the property restrictions which will make it unnecessary to conduct further soil remediation activities on the property at the present time.

This restriction is hereby declared to be a covenant running with the land and shall be fully binding upon all persons acquiring the above-described property whether by descent, devise, purchase or otherwise. This restriction benefits and is enforceable by, the Wisconsin Department of Natural Resources, its successors and assigns. The Department, its successors or assigns, may initiate proceedings at law or in equity against any person or persons who violate or are proposing to violate this covenant, to prevent the proposed violation or to recover damages for such violation.



Any person who is or becomes owner of the property described above may request that the Wisconsin Department of Natural Resources or its successor issue a determination that the restrictions set forth in this covenant are no longer required. Upon receipt of such a request, the Wisconsin Department of Natural Resources shall determine whether or not the restrictions contained herein can be extinguished. If the Department determines that the restrictions can be extinguished, an affidavit, with a copy of the Department's written determination, may be recorded to give notice that this deed restriction, or portions of this deed restriction are no longer binding.

By signing this document, Douglas L. Martin acknowledges that he is duly authorized to sign this document on behalf of Newell Operating Company.

Signature: *[Handwritten Signature]*

Printed Name: Douglas L. Martin

Title: Vice President – Treasurer of Newell Operating Company

Subscribed and sworn to before me

this 20 day of December, 2002

Linda L. Stichter
Notary Public, State of Illinois
My commission expires March 26, 2005





EXHIBIT A
SITE LAYOUT



60 Acre
Parcel - Leased for
farming

35

30

25

20

15

10

5

0

Site Location -
BRRTs #02-36-220607

Mirro Company
Plant 567
Manitowoc, WI

104 Acres
Main Site

0 500'



Site Location -
BRRTS#03-36-001476

Site Location -
BRRTS #03-36-170638/
Commerce #54220-6717-15

Scale: one unit=100 feet

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z AA AB AC

Rail Road Track

FIGURE 1: SITE LAYOUT, MIRRO COMPANY



VOL 1762 PG 334

EXHIBIT B
LOCATION OF REMAINING SOIL CONTAMINATION
PLANT #01

Vol 1762 PG 335

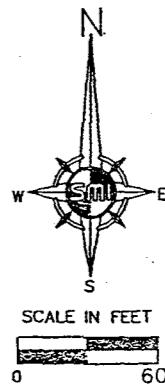
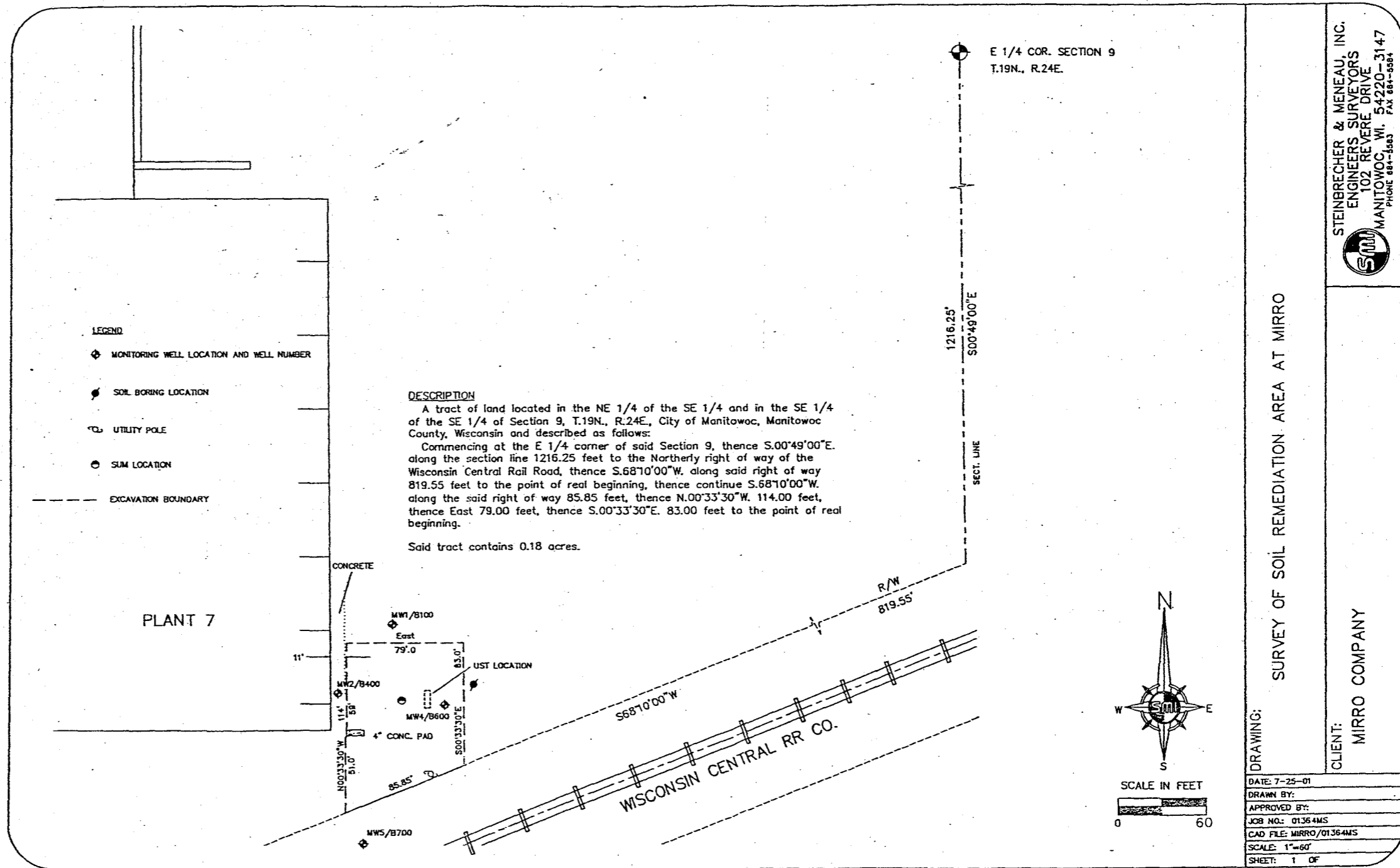


FIGURE 2

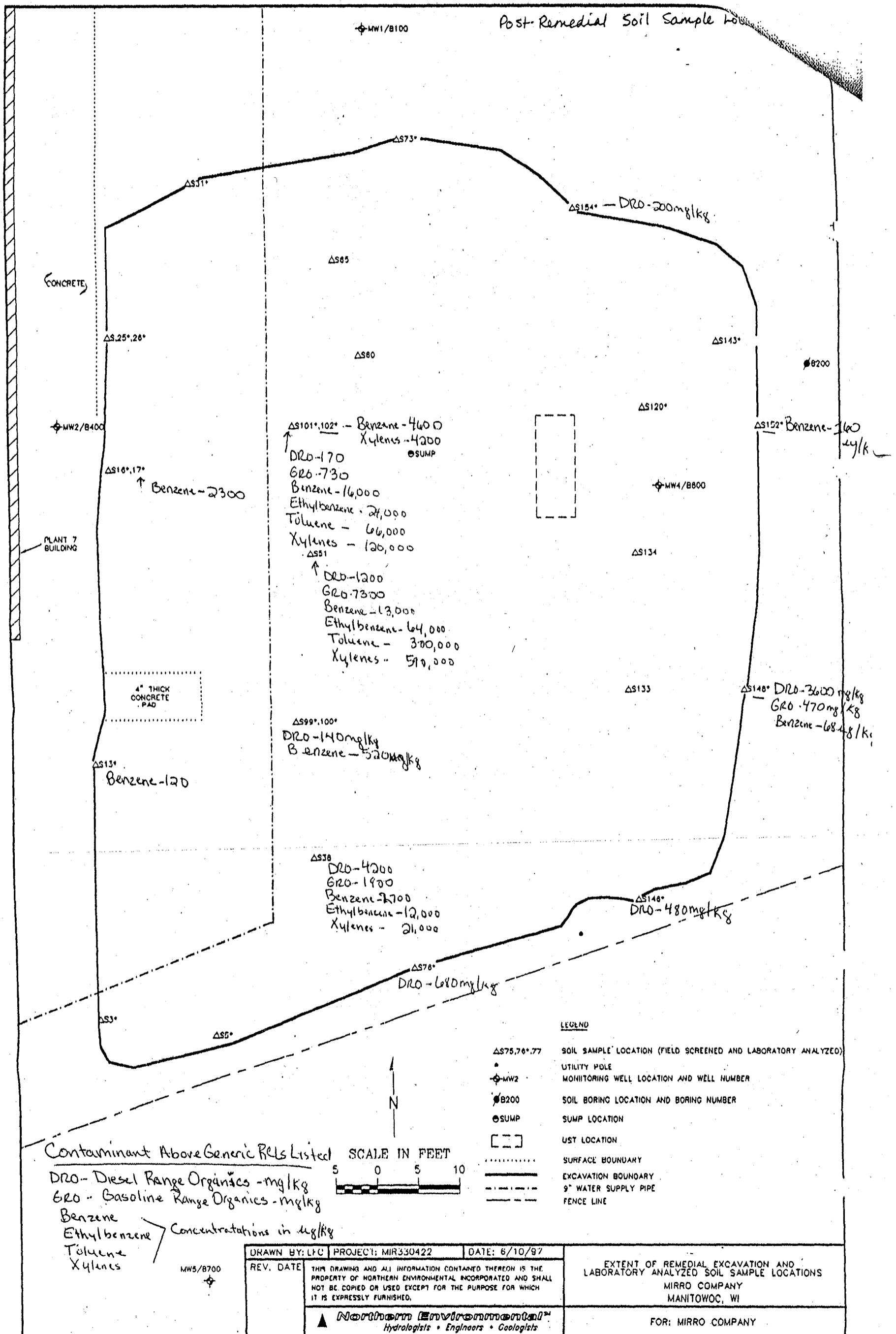
PLANT 01

DRAWING: SURVEY OF SOIL REMEDIATION AREA AT MIRRO

STEINBRECHER & MENEAU, INC.
 ENGINEERS SURVEYORS
 102 REVERE DRIVE
 MANITOWOC, WI. 54220-3147
 PHONE 881-5583 FAX 881-5884

CLIENT:
 MIRRO COMPANY

DATE: 7-25-01
DRAWN BY:
APPROVED BY:
JOB NO.: 01364MS
CAD FILE: MIRRO/01364MS
SCALE: 1"=60'
SHEET: 1 OF



S:\PROJ\MM\330422\EXCSAMP

PLANT FIGURE 3

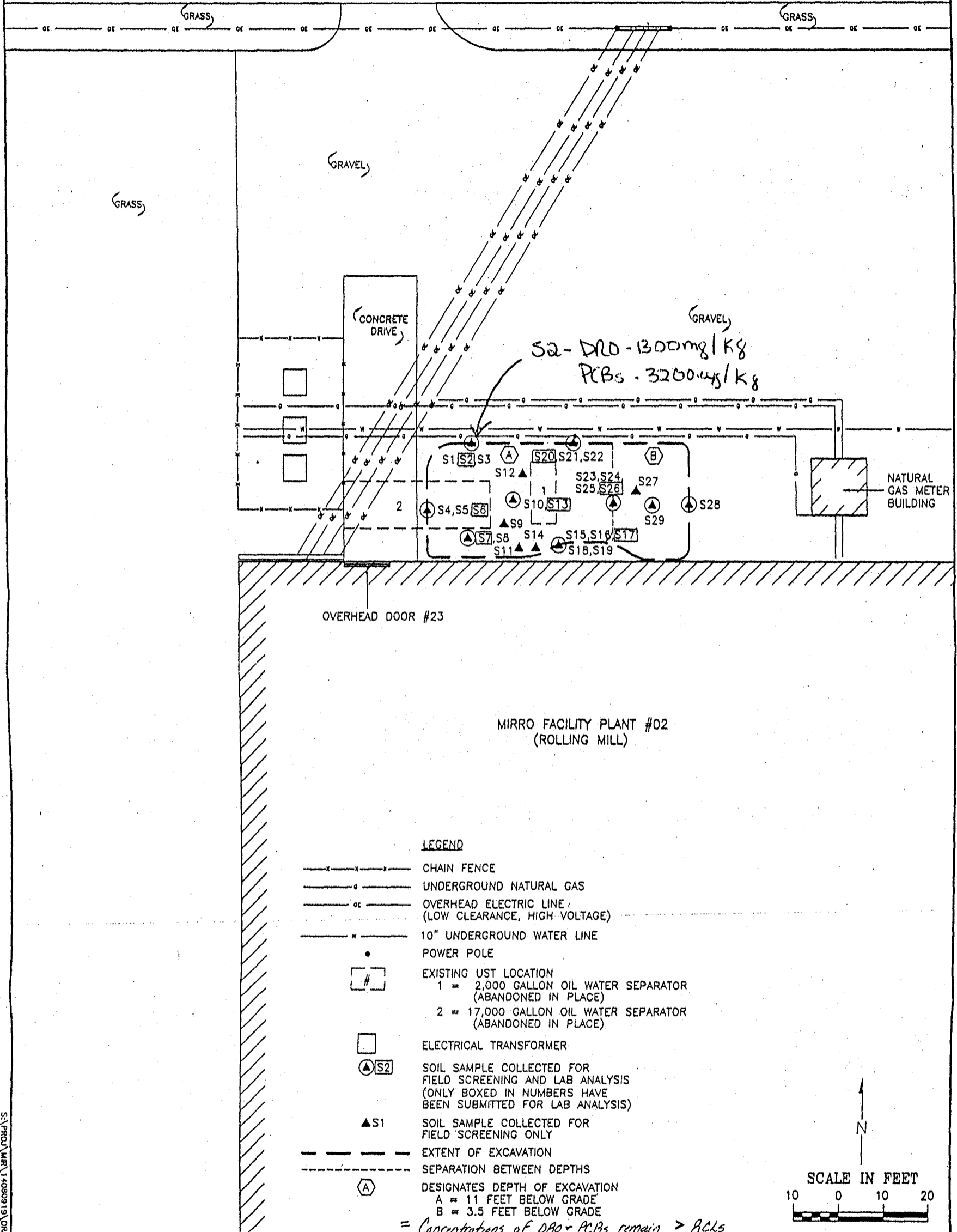


VOL 1762 PG 337

EXHIBIT C
LOCATION OF REMAINING SOIL CONTAMINATION
PLANT #02



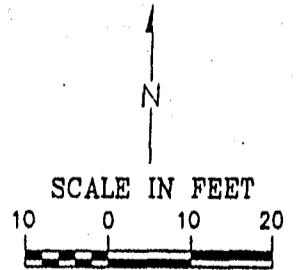
SERVICE ROAD



MIRRO FACILITY PLANT #02 (ROLLING MILL)

LEGEND

- x-x-x- CHAIN FENCE
- o-o- UNDERGROUND NATURAL GAS
- oe- OVERHEAD ELECTRIC LINE (LOW CLEARANCE, HIGH VOLTAGE)
- w- 10" UNDERGROUND WATER LINE
- POWER POLE
- # EXISTING UST LOCATION
 - 1 = 2,000 GALLON OIL WATER SEPARATOR (ABANDONED IN PLACE)
 - 2 = 17,000 GALLON OIL WATER SEPARATOR (ABANDONED IN PLACE)
- ELECTRICAL TRANSFORMER
- ▲ S2 SOIL SAMPLE COLLECTED FOR FIELD SCREENING AND LAB ANALYSIS (ONLY BOXED IN NUMBERS HAVE BEEN SUBMITTED FOR LAB ANALYSIS)
- ▲ S1 SOIL SAMPLE COLLECTED FOR FIELD SCREENING ONLY
- - - - - EXTENT OF EXCAVATION
- - - - - SEPARATION BETWEEN DEPTHS
- (A) DESIGNATES DEPTH OF EXCAVATION
 - A = 11 FEET BELOW GRADE
 - B = 3.5 FEET BELOW GRADE



Concentrations of DDO & PCBs remain > ACLs

DRAWN BY: SXM PROJECT: MIR-0919 DATE: 7/20/99 REV. DATE: 02/05/01	THIS DRAWING AND ALL INFORMATION CONTAINED THEREON IS THE PROPERTY OF NORTHERN ENVIRONMENTAL INCORPORATED AND SHALL NOT BE COPIED OR USED EXCEPT FOR THE PURPOSE FOR WHICH IT IS EXPRESSLY FURNISHED.	EXTENT OF EXCAVATION WITH SOIL SAMPLE LOCATIONS MIRRO PLANT #02 MANITOWOC, WISCONSIN FOR: MIRRO COMPANY
Northern Environmental Hydrologists • Engineers • Geologists		

S:\PROJ\MIR\14080919\DRAWINGS\072099-3.DWG

FIGURE 4

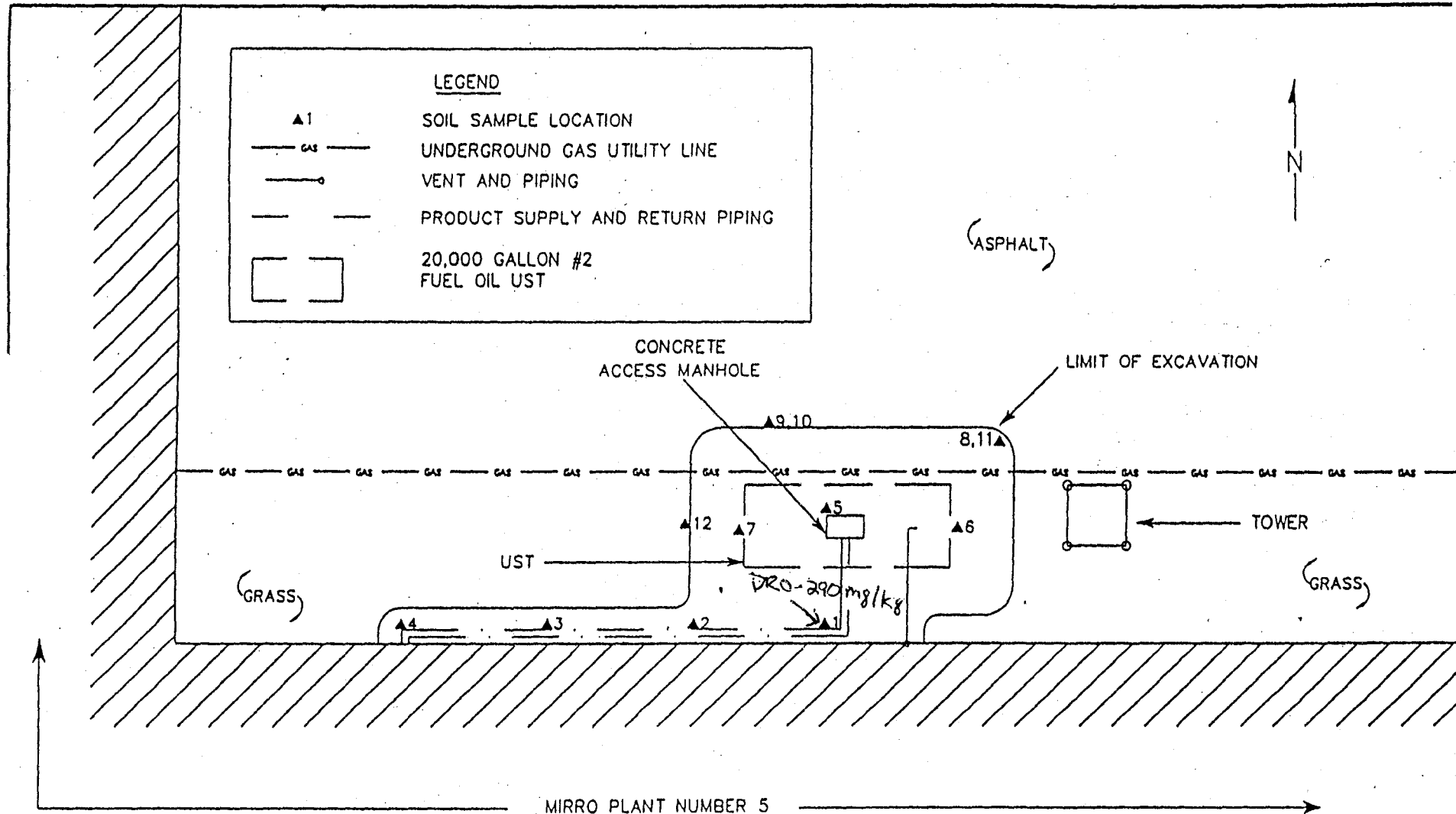
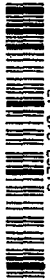
PLANT 02



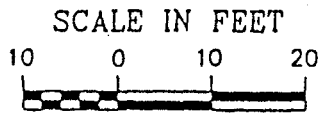
VOL 1762 PG 339

EXHIBIT D

**LOCATION OF REMAINING SOIL CONTAMINATION
PLANT #50**



MIRRO PLANT NUMBER 5



DRAWN BY: DAM	PROJECT: USP820163	DATE: 9/5/1997	SITE LAYOUT AND SOIL SAMPLE LOCATIONS MIRRO PLANT #5 MANITOWOC, WISCONSIN
REV. DATE	THIS DRAWING AND ALL INFORMATION CONTAINED THEREON IS THE PROPERTY OF NORTHERN ENVIRONMENTAL INCORPORATED AND SHALL NOT BE COPIED OR USED EXCEPT FOR THE PURPOSE FOR WHICH IT IS EXPRESSLY FURNISHED.		
▲ Northern Environmental SM Hydrologists • Engineers • Geologists			FOR: US PETROLEUM EQUIPMENT

FIGURE 5 PLANT 5

Klauk, Robert

From: Klauk, Robert
Sent: Friday, May 24, 2002 9:53 AM
To: Weissbach, Annette E
Subject: RE: Mirro deed restriction

This looks fine to me.

Bob

-----Original Message-----

From: Weissbach, Annette E
Sent: Friday, May 24, 2002 9:46 AM
To: Klauk, Robert; 'Caine, Lynelle P.'
Subject: Mirro deed restriction

For your review, here's a draft of the deed restriction. It's currently under review by our Atty. in Madison.

<< File: 03-36-001476 Mirro deed restriction.doc >>

Thanks,
Annette~

*Annette Weissbach
Hydrogeologist/ Project Manager
Remediation & Redevelopment Program - Northeast Region
Department of Natural Resources
PO Box 19448 1125 N. Military Avenue
Green Bay WI 54307-0448
tel. 920.492.5865 fax. 920-492.5859
weissa@dnr.state.wi.us*

Document Number

DEED RESTRICTION

In re: All that part of the Southeast one quarter (SE1/4) of Section nine (9), Township nineteen (19) North of Range twenty-four (24) east, lying north of the Chicago and Northwestern Railway Company right of way, containing approximately one hundred and four (104) acres.

Recording Area

Name and Return Address

Douglas Deaton
Mirro Company
Post Office Box 1330
Manitowoc, Wisconsin 54221-1330

Declaration of Restrictions

Parcel Identification Number (PIN)

STATE OF WISCONSIN)
) ss
COUNTY OF MANITOWOC)

WHEREAS, Mirro Company is the owner of the above-described property.

WHEREAS, one or more discharges have occurred on this property. Contaminated soils exist on this property at or near the locations as shown in Exhibit A, Figure 1 Site Layout, Mirro Company

Specific types, concentrations, and locations of contaminated soil are listed below with corresponding attached drawings:

- Exhibit B: Figures 2 and 3: Diesel range organics (DRO), gasoline range organics, (GRO), petroleum volatile organic compounds (PVOC) at the northeast corner of Plant 01 [formerly known as Plant #7] (BRRTS #03-36-001476), in the location of the soil excavation and water supply line.
- Exhibit C, Figure 4: DRO and polychlorinated byphenols (PCBs) on the north side of Plant 02 (BRRTS #02-36-220607), approximately 40 feet northeast of overhead door #23
- Exhibit D, Figure 5: DRO on the North side of Plant 50 [formerly known as plant #5](Commerce #54220-6717-15), on the north side of the plant at the wall, 15 feet south of the concrete access manhole.

NOW THEREFORE, the owner hereby declares that specific portions of the property as described above are held and shall be held, conveyed or encumbered, leased, rented, used, occupied and improved subject to the following limitation and restrictions:

1. Northeast corner of Plant 01 [formerly known as Plant #7] (BRRTS #03-36-001476), in the location of the soil excavation and water supply line [Exhibit B: Figures 2 and 3]

One or more petroleum discharges have occurred at this location on the property. Structural impediments existing at the time of clean-up made complete remediation of the soil contamination impracticable. Petroleum contaminated soil may remain on this property at the following locations: near the northeast corner of Plant 01 and in the location of the soil excavation and water supply line as specifically identified in Exhibit B (Figures 2 and 3). Pursuant to the requirements of s. 292.11, Stats, if the structural impediments that currently exist on this property are removed, the property owner shall conduct an investigation of the degree and extent of petroleum contamination. To the extent that contamination is found at that time, the Wisconsin Department of Natural Resources shall be immediately notified and the contamination shall be properly treated or disposed of in accordance with applicable laws.

2. North side of Plant 02 (BRRTS #02-36-220607) [Exhibit C, Figure 4]

The following activities are prohibited on that portion of the property shown in Exhibit C, Figure 4 above where a soil cover has been placed (in the vicinity of soil sample S-2) unless prior written approval has been obtained from the Wisconsin Department of Natural Resources or its successor or assign: (1) Excavating or grading of the land surface; (2) Filling on the capped area; (3) Plowing for agricultural cultivation; and (4) Construction or installation of a building or other structure with a foundation that would sit on or be placed within the cap or cover. In addition, the soil cover shall be maintained in compliance with a Plan dated () prepared and submitted to the Wisconsin Department of Natural Resources by Mirro Co, as required by section NR 724.13(2), Wis. Adm. Code (1997).

3. North side of Plant 50 [formerly known as plant #5](Commerce #54220-6717-15) [Exhibit D, Figure 5]

This affidavit is being recorded for the purpose of notifying prospective purchasers and other interested parties that soil contaminated with Diesel Range Organics from an underground storage tank remains on this property as shown on Exhibit D, Figure 5. If this contaminated soil is excavated in the future, it may be considered solid waste and will need to be disposed in accordance with applicable statutes and rules.

WHEREAS, it is the desire and intention of the property owner to impose on the property restrictions which will make it unnecessary to conduct further soil remediation activities on the property at the present time.

This restriction is hereby declared to be a covenant running with the land and shall be fully binding upon all persons acquiring the above-described property whether by descent, devise, purchase or otherwise. This restriction benefits and is enforceable by, the Wisconsin Department of Natural Resources, its successors and assigns. The Department, its successors or assigns, may initiate proceedings at law or in equity against any person or persons who violate or are proposing to violate this covenant, to prevent the proposed violation or to recover damages for such violation.

Any person who is or becomes owner of the property described above may request that the Wisconsin Department of Natural Resources or its successor issue a determination that the restrictions set forth in this covenant are no longer required. Upon receipt of such a request, the Wisconsin Department of Natural Resources shall determine whether or not the restrictions contained herein can be extinguished. If the Department determines that the restrictions can be extinguished, an affidavit, with a copy of the Department's written determination, may be recorded to give notice that this deed restriction, or portions of this deed restriction are no longer binding.

By signing this document, Richard Adams acknowledges that he is duly authorized to sign this document on behalf of Mirro Company.

Signature: _____

Printed Name: Richard Adams

Title: Vice President of Operations

Subscribed and sworn to before me

this _____ day of _____, 20____.

Notary Public, State of _____
My commission _____

This document was drafted by Mirro Company and the Wisconsin Department of Natural Resources based on documents from Northern Environmental.

EXHIBIT A
SITE LAYOUT

EXHIBIT B

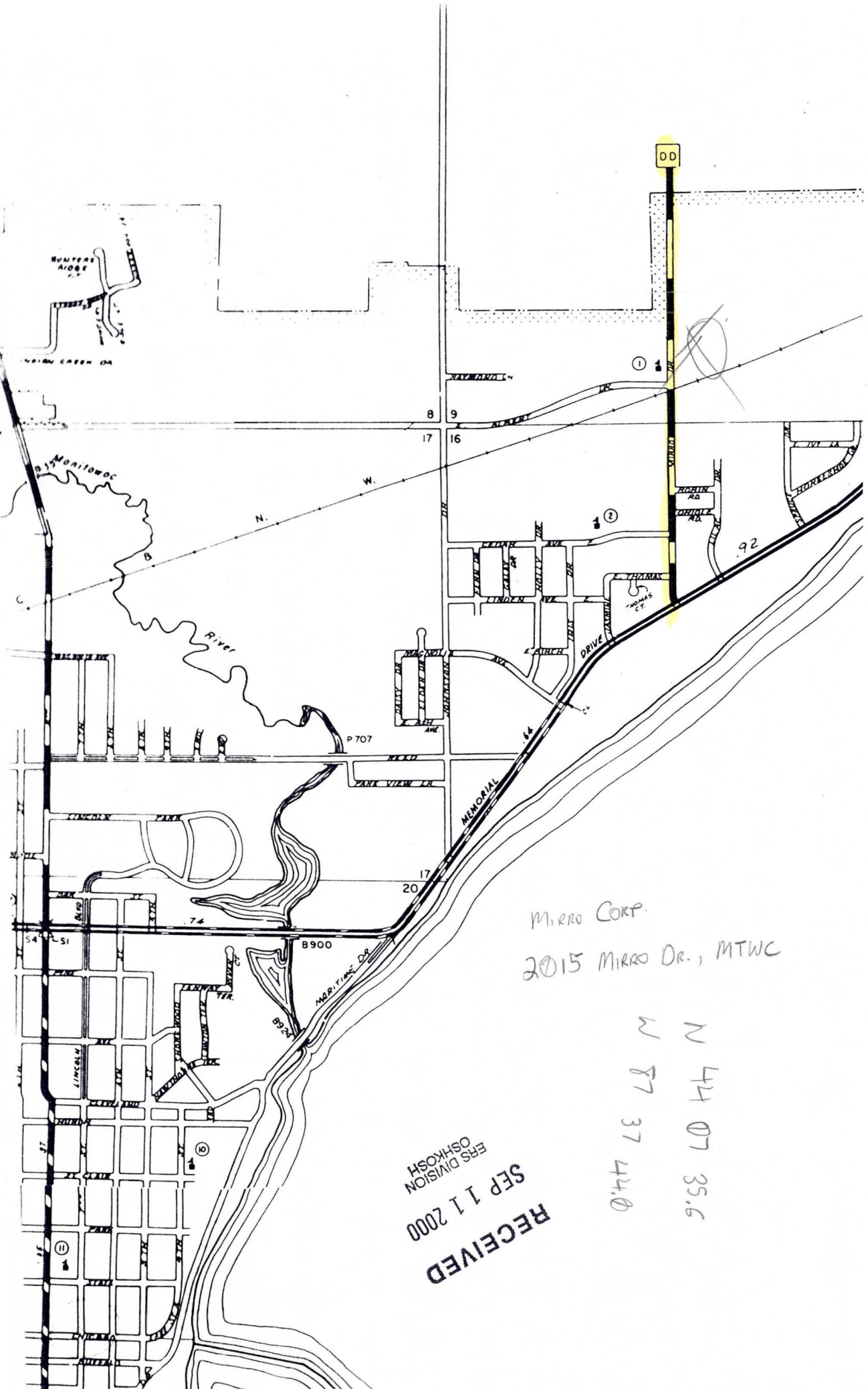
**LOCATION OF REMAINING SOIL CONTAMINATION
PLANT #01**

EXHIBIT C
LOCATION OF REMAINING SOIL CONTAMINATION
PLANT #02

EXHIBIT D

**LOCATION OF REMAINING SOIL CONTAMINATION
PLANT #50**

TY MAPS OF MANITOWOC COUNTY



Mirro Corp.
2015 Mirro Dr., MTWC

N 44 07 35.6
W 87 37 44.0

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SEP 11 2000
ERS DIVISION
OSHKOSH



BRRTS: 03-36-170638

October 13, 2000

Mirro Corporation
Attn: Mr. Thomas Reed
P.O. Box 1330
Manitowoc, WI 54221-1330

RE: CONDITIONAL CLOSURE
Mirro Corporation Plant No. 5, 2015 Mirro Drive, Manitowoc, WI
Commerce #54220-6717-15

Dear Mr. Reed:

On October 13, 2000, the closure request for the above-referenced site was reviewed by the Site Review staff of the Petroleum Environmental Cleanup Fund Bureau. The site was transferred from the WDNR to the Department of Commerce for regulatory authority on September 11, 2000. Using guidance established in NR 700, COMM 47 and COMM 46, the Department has determined that the site meets environmental standards and no further action is necessary.

The Department, in making this determination, reviewed the following document prepared by Northern Environmental, as well as other correspondence in the case file:

- *UST Site Assessment, October 28, 1997*

The following documentation is necessary to satisfy the conditions of closure:

1. A notification must be placed on the property deed addressing residual soil impacts. For case closure, we will need a copy of the deed notification that contains the County Register of Deeds' recording information. Enclosed an example of a "Notice of Contamination to Property" for your use. If you wish to modify the language, submit a copy to this office for approval before filing.

IMPORTANT: Before this case can be officially listed as "closed" on the Wisconsin Department of Commerce/Natural Resources computer database, you or your consultant must submit the requested information.

Mr. Thomas Reed
Mirro Corporation

If, in the future, site conditions indicate that the contamination that remains poses a threat the need for further remediation would be determined and required if necessary. If subsequent information indicates a need to reopen this case, any original claim under the PECFA fund would also reopen and you may apply for assistance to the extent of remaining eligibility.

Thank you for your efforts in the protection of the environment. If you have any questions you may contact me at 920-424-0046.

Sincerely,



Robert H. Klauk, P.G.
Hydrogeologist
PECFA Site Review Section

Encl.:

Cc: Clint W. Wendt – Northern Environmental
Pf\pecfa\542\54220\671715\Close-Conditional.doc

Document Number

**NOTICE OF CONTAMINATION TO
PROPERTY**

Legal Description of the Property: In re:

(as it appears on the most recent deed)

Recording Area

Name and Return Address

STATE OF WISCONSIN)
) ss
COUNTY OF)

Parcel Identification Number (PIN)

Section 1. _____ is the owner of the above-described property.

Section 2. One or more petroleum discharges have occurred at this property. Diesel range organic soil contamination above NR 720 residual contaminant levels of the Wisconsin Administrative Code exist on this property.

Section 3. The owner hereby declares that all of the property described above is held and shall be held, conveyed or encumbered, leased, rented, used, occupied and improved subject to the following limitations and/or restrictions:

Residual petroleum contaminated soil remains on this site. It has been shown that these levels are protective of health and the environment. If this contaminated soil is excavated in the future, it may be considered a solid waste and will need to be disposed in accordance with all applicable laws.

Any person who is or becomes owner of the property described above may request that the Wisconsin Department of Commerce, or its successor, issue a determination that the restrictions set forth in this covenant are no longer required. That property owner shall provide any and all necessary information to the Department in order for the Department to be able to make a determination. Upon receipt of such a request, the Department shall determine whether or not the restrictions contained herein can be extinguished. Conditions under which a restriction may be extinguished will be determined in accordance with the site specific standards, rules and laws for this property. If the Department determines that the restrictions can be extinguished, an affidavit, with a copy of the Department's written determination, may be recorded to give notice that this restriction, or portions of this restriction are no longer binding. Any restriction placed upon this property shall not be extinguished without the Department's written determination.

IN WITNESS WHEREOF, the owner of the property has executed this document, this _____ day of _____, 20____.

[When appropriate use the following clause]:

By signing this document, [he/she] acknowledges that [he/she] is duly authorized to sign this document on behalf of _____.

Signature: _____

Printed Name: _____

Title: _____

Subscribed and sworn to before me
this _____ day of _____, 20__.

Notary Public, State of _____

My commission _____

This document was drafted by the Wisconsin Department of Commerce.



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary
Ronald Kazmierczak, Regional Director

Northeast Region Headquarters
Bureau for Redevelopment & Remediation
PO Box 10448, 1125 N. Military Avenue
Green Bay, Wisconsin 54307-0448
Telephone 920-492-5916
FAX 920-492-5859

September 7, 2000

Mirro Corporation
Attn: Thomas Reed
1512 Washington St
PO Box 1330
Manitowoc, WI 54221-1330

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SEP 11 2000

ERS DIVISION
OSHKOSH

Subject: Transfer of File
Mirro Corporation Plant #5
2015 Mirro Dr
Manitowoc, WI
WDNR BRRTS ID # 03-36-170638

Dear Mr Reed:

The currently enacted Biennial Budget contains language that modifies the way the State classifies sites impacted by petroleum contamination. Under this same language, oversight for sites falling under the definition of "low or medium risk" become the responsibility of the Wisconsin Department of Commerce rather than our agency. This site falls under this new definition, and as such, further reviews of submittals and technical assistance will need to be provided by staff at Commerce.

Due to the changes in statutory language, we are transferring all file documents for this site to the Department of Commerce at the following address:

Wisconsin Department of Commerce
Attn: Bob Klauk (920) 424-0046
2129 Jackson Street
Oshkosh, WI 54901

If you have questions or concerns regarding this site, or would like to review any of the pertinent file documents, you should direct them to the Commerce contact person listed above.

Thank you for your understanding as we implement the language contained within the Biennial Budget.

Sincerely,

Sheila Neuman
Program Assistant, Bureau for Remediation and Redevelopment

cc: Lori Huntoon, WI Dept. of Commerce, PO Box 8044, Madison, WI 53708-8044
Bob Klauk, WI Dept. of Commerce, 2129 Jackson Street, Oshkosh, WI 54901
Clint Wendt, Northern Environmental Technologies Inc, 1203 Storbeck Dr,
Waupun, WI 53963

Quality Natural Resources Management
Through Excellent Customer Service



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Recycled
Paper



MIRRO COMPANY

WEAREVER

1512 WASHINGTON STREET
P.O. BOX 1330,
MANITOWOC, WI 54221-1330

PHONE (800) 518-6245
Extension 6255
FAX (920) 684-1743

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SEP 11 2000
ERS DIVISION
OSHKOSH

October 30, 1997

Wisconsin Department of Natural Resources
Attn: James Reyburn
PO Box 10448
Green Bay, WI 54307-0448

RECEIVED
NOV 03 1997
LMD SOLID WASTE

SUBJECT: WDNR LUST ID #03-36-170638

Dear Mr. Reyburn:

Enclosed please find a copy of the UST Site Assessment report dated October 28, 1997, prepared during the closure of a number 2 fuel oil storage tank located at our Plant 5 Mirro Drive facility. We believe no significant release occurred at this site and request site closure as recommended in the UST Site Assessment report prepared by Northern Environmental. Enclosed please find a report prepared by S.M.I. documenting the limited area available for excavation in support of the Northern Environmental conclusions.

We request the Department of Natural Resources to review the site assessment report and make a decision on the need for additional study before we proceed further as stated in our letter to dated October 8, 1997.

Thank you for your consideration. Please call if you have any questions or comments.

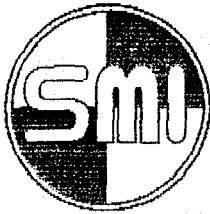
Sincerely,

EXT 6255

Thomas E. Reed
Chief Environmental Engineer

6322 Doug Pla

cc: Gordy Norlin, Harry Welhouse



S.M.I.

STEINBRECHER & MENEAU, INC.
CONSULTING ENGINEERS & LAND SURVEYORS
MANITOWOC, WISCONSIN

FAX

102 REVERE DRIVE
MANITOWOC, WISCONSIN 54220-3147
PHONE 414-684-5583 FAX 414-684-5584

Date June 9, 1997

Number of pages including cover sheet 3

To: **MIRRO COMPANY**

Tom Reed

From: **S.M.I.**

Jeff Gordon

Phone 684-4421 ext 6255

Fax Phone 684-1743

CC. _____

Phone 414-684-5583

Fax Phone 414-684-5584

REMARKS

Urgent For your review Reply ASAP Please comment

Tom -

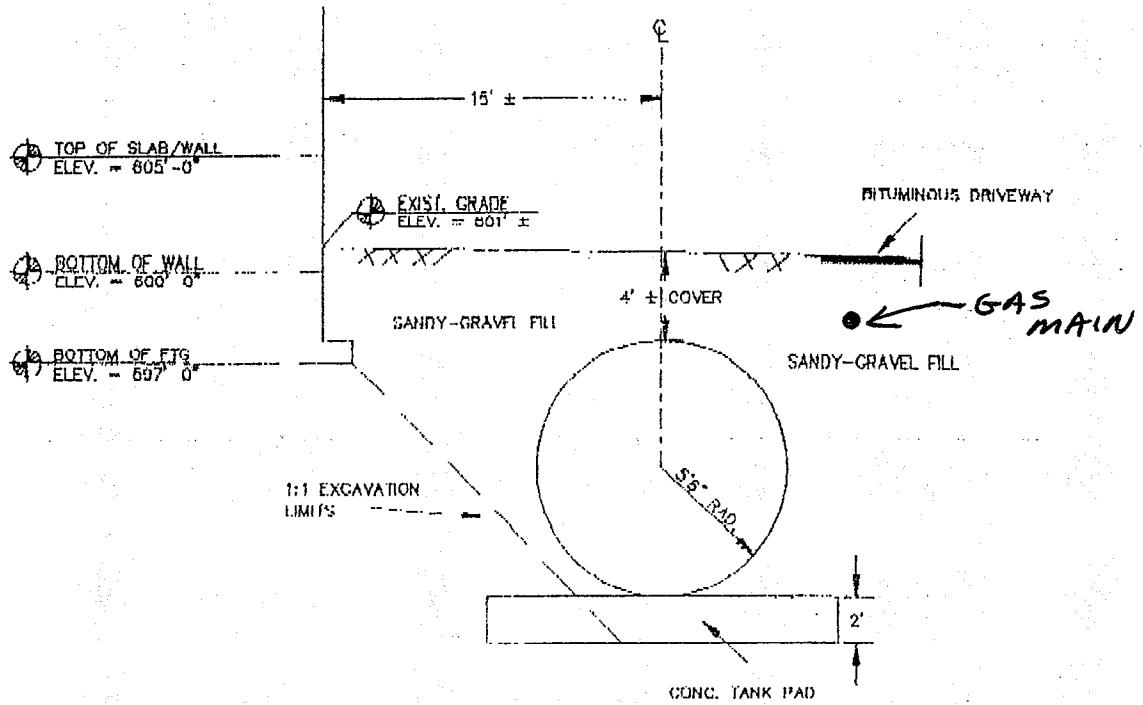
Following are the sketches of the tank location along the north wall of Plant 5C.

As is shown on section B-B, the concrete north wall is not continuously supported with a wall footing. Because it supports almost no load other than its self weight, the wall essentially spans from column pier to column pier (approx. 30'). Please note that the column footing is 3 feet lower than the bottom of the wall. With this configuration, it is more crucial that the soil supporting the column footing not be disturbed, as it will effect a large portion of the wall.

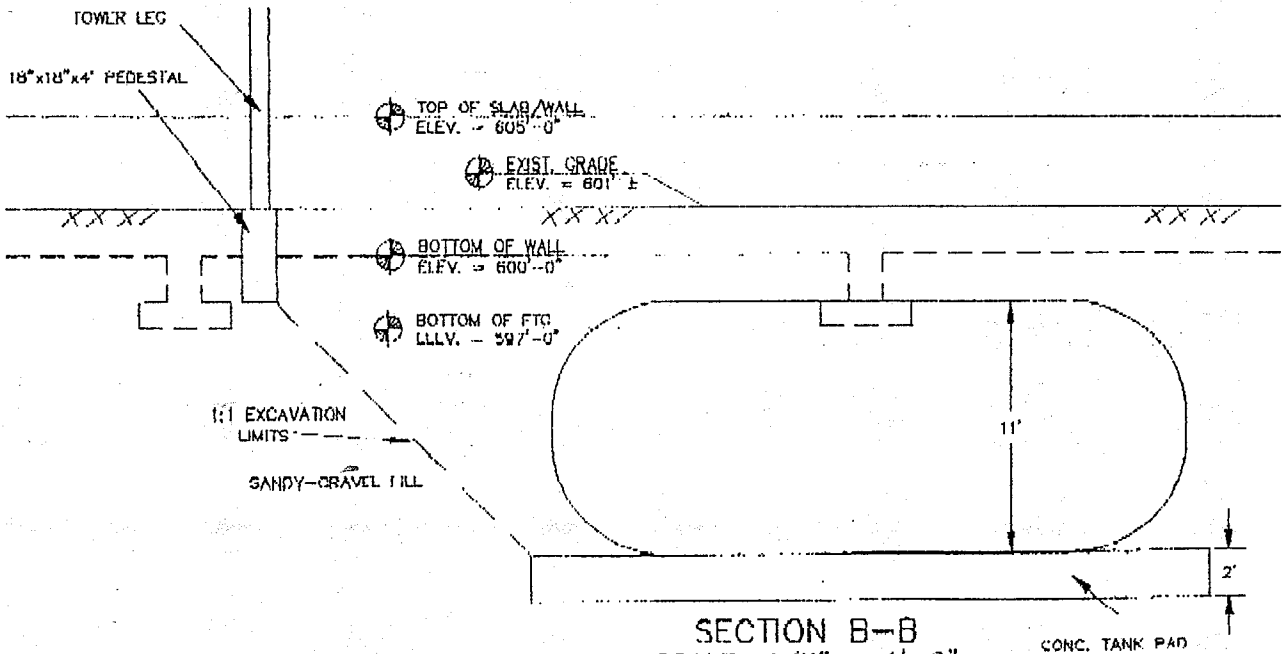
It is recommended not to exceed a 1:1 excavation slope. The limit is shown on the drawing and depicts that the removal of the tank will not disturb the supporting soil. However, some sort of sheet piling would be required if you wish to remove the tank slab.

If you have any questions, comments, or concerns, please call. Thank you.

Jeffrey T. Gordon, M.S.



SECTION A-A
SCALE: 1/8" = 1'-0"



SECTION B-B
SCALE: 1/8" = 1'-0"

SHEET 2 OF 2

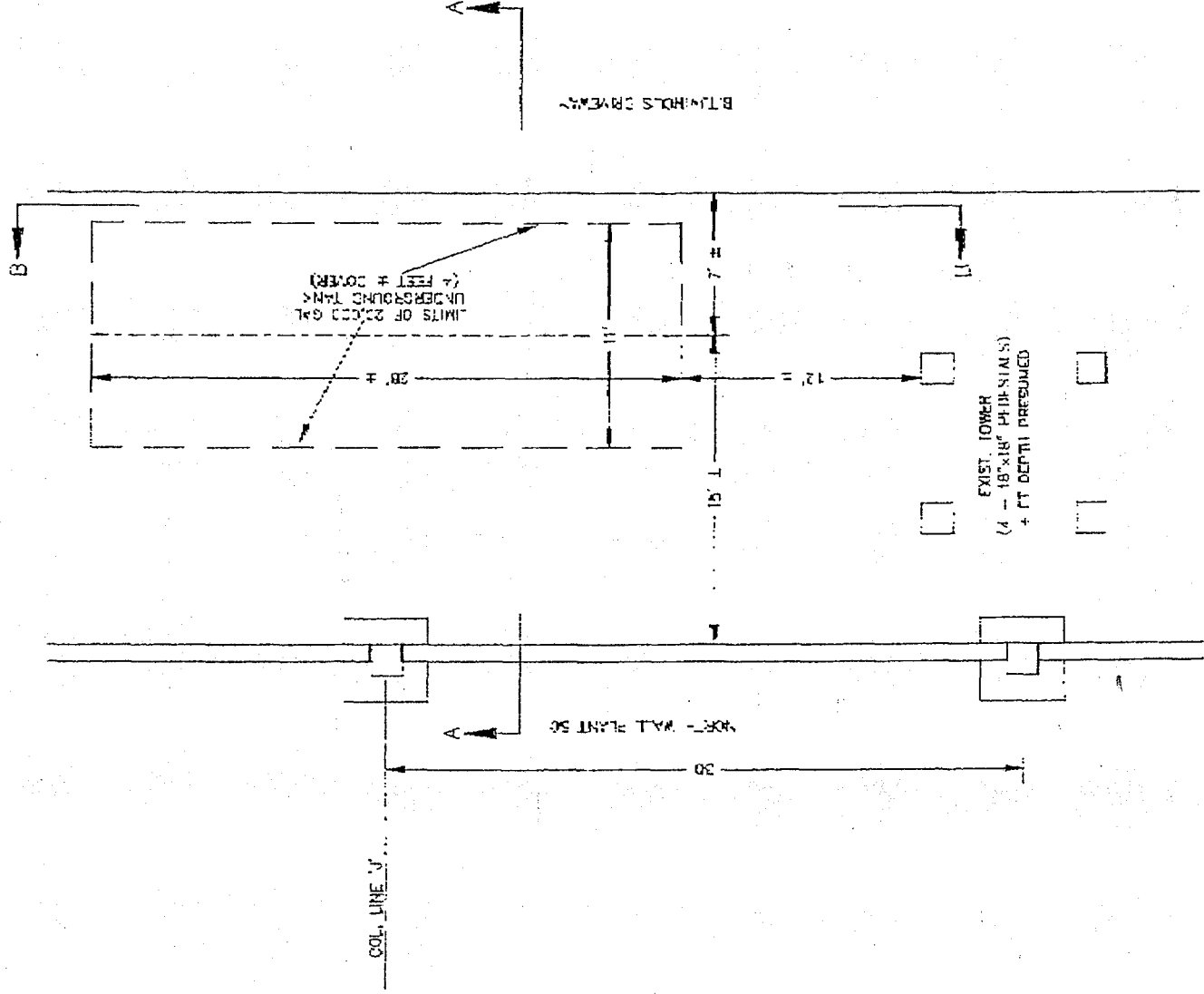
CLIENT MIRRO CO. (TOM REED)

DATE JUNE 9, 1997

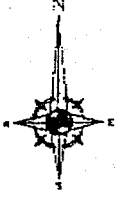
CAD FILE STRUCTUR\97368MB JOB NO 97-368-MB



STEINBRECHER & MENEAU, INC.
ENGINEERS & SURVEYORS
102 REVERE DRIVE
MANITOWOC, WISCONSIN 54220-3147
PHONE 884-5583 FAX 884-5584



PLAN VIEW
 SCALE: 1/8" = 1' 0"



SHEET 1 OF 2

CLIENT MIRRO CO. (TOM REED)

DATE JUNE 9, 1997

CAD FILE STRUCTUR\97368ME

JOB NO. 97-368-MB



STEINBRECHER & MENEAU, INC.
 ENGINEERS & SURVEYORS
 102 REVERE DRIVE
 MANITOWOC, WISCONSIN 54220-3147
 PHONE 884-0983 FAX 884-2504



CARBONLESS FORM 3801

NO CARBON REQUIRED

RAPID LETTER

NOTE: Send White and Pink copies. Sender retains Canary copy. TRIPLICATE

TO ~~Maintain to~~
Micro Corp file

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OSHKOSH

SUBJECT 03-38-170638

MESSAGE Upon review I believe A full 7/16 SITE DATE
investigation is not needed and this is a low priority
case based on.
1) only 1 soil sample in pipe run had DRO - 290 ug/kg
2) no other sample had detect.
3) Samples at dept in bottom tank - no detect DRO
4) limited access - close to building.
SIGNED

5)
REPLY Recommend transfer to O&M for closer review DATE
SIGNED



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SEP 11 2000

ERS DIVISION
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RECEIVED

NOV 03 1997

LMD SOLID WASTE

UST SITE ASSESSMENT

**MIRRO CORPORATION
2015 MIRRO DRIVE
MANITOWOC, WISCONSIN**

October 28, 1997

 **Northern Environmental**SM
Hydrologists • Engineers • Geologists

Below pp 10
Community
Groundwater

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NOV 03 1997

LMD SOLID WASTE

UST SITE ASSESSMENT

**MIRRO CORPORATION
2015 MIRRO DRIVE
MANITOWOC, WISCONSIN**

October 28, 1997

*Depth Contaminant
Groundwater below ppj
sample -*

October 28, 1997
(USP820136)

Mr. Jesse Rose
U.S. Petroleum Equipment
and Environmental Services
558 Carter Court
Kimberly, Wisconsin 54136

RE: Underground Storage Tank Site Assessment, Mirro Corporation, 2015 Mirro Drive,
Manitowoc, Wisconsin, 54220-6717

Dear Mr. Rose:

Northern Environmental Technologies, Incorporated (Northern Environmental) completed a underground storage tank (UST) site assessment on August 13, 1997 for U.S. Petroleum Equipment and Environmental Services. A 20,000 gallon fuel oil UST was removed from 2015 Mirro Drive, Manitowoc, Wisconsin on August 13, 1997. The site is located in the northeast quarter of the southeast quarter of Section 9, Township 19 North, Range 24 East in Manitowoc, Wisconsin as shown in Figure 1 (USGS, 1954, 1978). This UST site assessment conforms with Chapter ILHR 10, Wisconsin Administrative Code and the Wisconsin Department of Natural Resources (WDNR) site assessment guidelines (WDNR, 1993).

This report has been distributed to the parties listed in Attachment A. Specific information regarding the site, UST system, UST removal, and site assessment is contained in the following attachments.

- ▲ Background information is summarized in Attachment B.
- ▲ Tank excavation and removal are described in Attachment C.
- ▲ Tank cleaning and disposal are summarized in Attachment D.
- ▲ Surplus product and tank sludge management are described in Attachment E.
- ▲ Visual inspection data are summarized in Attachment F.
- ▲ Copies of the updated Underground Petroleum Product Tank Inventory Form and the Closure Checklist which were sent to the Wisconsin Department of Commerce (WDCOMM) are included in Attachment G.
- ▲ Soil sample field screening and sample preparation methods are described in Attachment H.



- ▲ Copies of the laboratory reports and chain-of-custody record are included in Attachment I.

Information obtained from the Wisconsin Department of Workforce Development (DWD, September 11, 1997), tank owner (Reed, 1997), and/or tank removal contractor (Van Pey, 1997) about the UST system are listed in Tables 1 and 2. The UST system layout is illustrated in Figure 2.

Seven soil samples were collected during the UST site assessment in accordance with the WDNR guidance (WDNR, 1993). Five additional soil samples were collected along excavation limits to assess the soil sample locations shown on Figure 2. Each sample was described and field screened using a photoionization detector (PID). Field screening results indicated that released petroleum was present in the soil samples. Twelve soil samples were laboratory analyzed for diesel range organics (DRO) and/or petroleum volatile organic compounds (PVOCs) to confirm the release. Field screening and laboratory results are summarized in Table 3.

Laboratory analysis detected up to 290 milligram per kilogram (mg/kg) DRO in soil. The WDNR currently uses a concentration of 10 mg/kg DRO to require additional investigation (WDNR, 1995). Based on information collected during the UST site assessment, DRO was released to the environment at the site.

For discharges of hazardous substances into the environment from UST systems, NR 706, Wisconsin Administration Code requires that the owner or operator of the UST system immediately notify the WDNR of the release. If required or necessary, the responsible party shall complete interim actions to halt, contain, and/or stabilize the discharged hazardous substance (NR 708, Wis. Adm. Code); complete a site investigation to define the nature, degree, and extent of the contamination (NR 716, Wis. Adm. Code); and remediate the released substance to restore the environment.

In accordance with WDNR requirements, the following actions have been taken:

- ▲ The released petroleum was reported to the WDNR (Wendt, 1997).
- ▲ The suspected source of the released petroleum was removed.
- ▲ Soil sample laboratory analysis confirmed that petroleum was released.

Northern Environmental recommends that the Mirro Corporation not be required to conduct a site investigation. The following items support this recommendation.

- ▲ DRO was only identified above state cleanup standards in one soil sample beneath product piping.
- ▲ Remaining soil samples collected as part of the closure assessment did not contain detectable DRO.

- ▲ Additional soil samples collected along excavation walls did not contain DRO above cleanup standards or any detectable PVOCs.
- ▲ Contaminated soils are inaccessible due to their close proximity to the building foundation.

The findings and results of the UST site assessment are based upon interpretation of the information available to Northern Environmental given the time and budget constraints of this project. Northern Environmental does not warrant that this report represents an exhaustive study of all possible environmental concerns at the Property. The items investigated as part of this study represent likely sources of environmental concern associated with the described UST system, and are consequently believed to adequately address the needs of the responsible party at the present time.

We trust this information meets your needs. Please feel free to contact Northern Environmental at (920) 324-8600 if you have any questions.

Sincerely,

**Northern Environmental
Technologies, Incorporated**



Clint W. Wendt
Environmental Scientist



Marty L. Koopman
District Manager

scs
Attachments

REFERENCES

Reed, Thomas (Mirro Corporation) conversation with Clint W. Wendt (Northern Environmental Technologies, Incorporated), August 13, 1997.

Van Pey, Brian (U.S. Petroleum Equipment and Environmental Services) conversation with Clint Wendt (Northern Environmental Technologies, Incorporated), August 13, 1997.

Wendt, Clint (Northern Environmental Technologies, Incorporated) facsimile transmission to Janis DeBrock (Wisconsin Department of Natural Resources), September 11, 1997.

United States Geological Survey, Manitowoc Mishicat, and Two Rivers, *Wisconsin 7.5 Minutes Quadrangles*, 1954, 1978.

Wisconsin Department of Industry, Labor, and Human Relations, "Flammable and Combustible Liquids," *Wisconsin Administrative Code*, Chapter ILHR 10, October 1996.

Wisconsin Department of Natural Resources, "Site Assessments for Underground Storage Tanks Technical Guidance," June 1993.

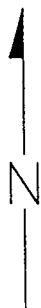
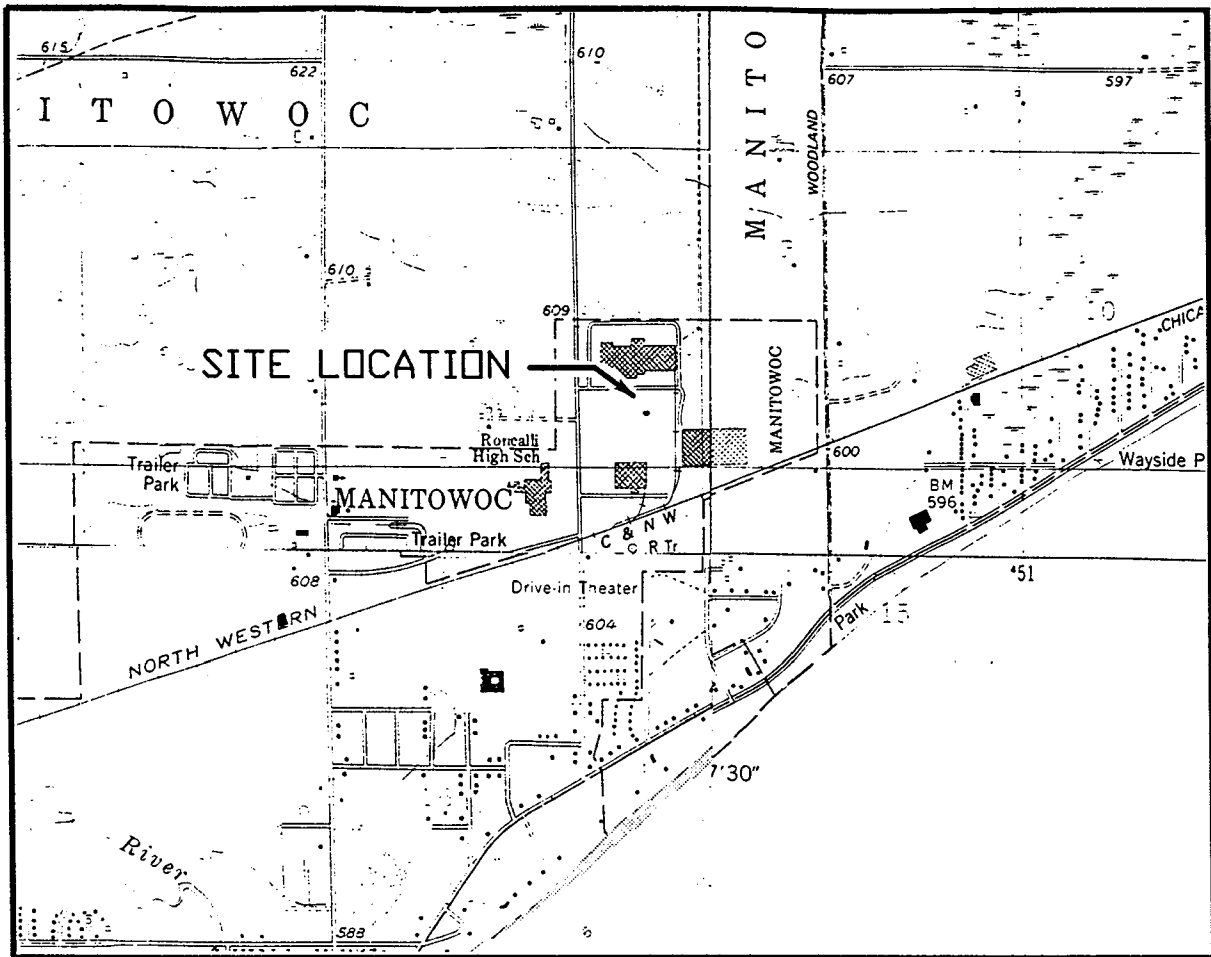
Wisconsin Department of Natural Resources, *Release News*, Volume 5, Number 1, January 1995.

Wisconsin Department of Natural Resources, "Hazardous Substance Discharge Notification and Source Confirmation Requirements," *Wisconsin Administrative Code*, Chapter NR 706, February 1997.

Wisconsin Department of Natural Resources, "Immediate and Interim Actions," *Wisconsin Administrative Code*, Chapter NR 708, February 1997.

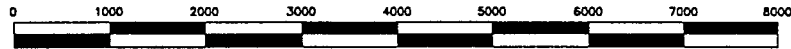
Wisconsin Department of Natural Resources, "Site Investigations," *Wisconsin Administrative Code*, Chapter NR 716, February 1997.

Wisconsin Department of Workforce Development, *DWD On-Line Tanks Data Base*, September 11, 1997.



SCALE IN FEET

1" = 2000'



CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929



BASE MAP SOURCE: USGS MANITOWOC, MISHICOT, TWO RIVERS WISCONSIN 7.5 MINUTE QUADRANGLES, 1954, 1978, 1978

QUADRANGLE LOCATION

DRAWN BY: DAM PROJECT: USP820163 DATE: 9/5/1997

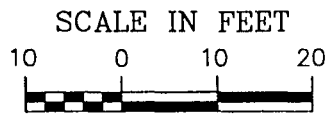
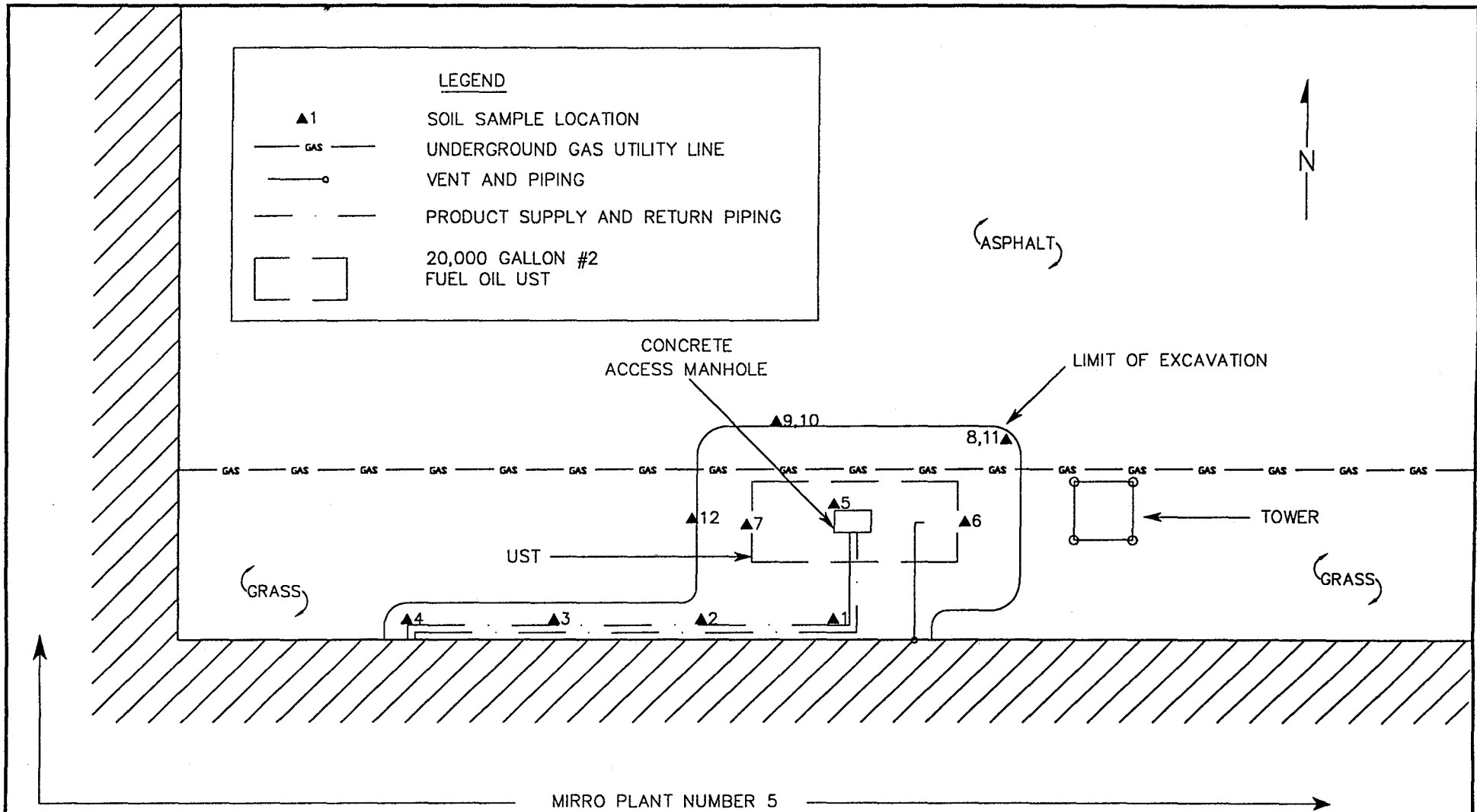
FIGURE 1

SITE LOCATION AND LOCAL TOPOGRAPHY
MIRRO PLANT #5
MANITOWOC, WISCONSIN

REV. DATE THIS DRAWING AND ALL INFORMATION CONTAINED THEREON IS THE PROPERTY OF NORTHERN ENVIRONMENTAL INCORPORATED AND SHALL NOT BE COPIED OR USED EXCEPT FOR THE PURPOSE FOR WHICH IT IS EXPRESSLY FURNISHED.

▲ Northern EnvironmentalSM
Hydrologists • Engineers • Geologists

FOR: US PERTROLEUM



DRAWN BY: DAM	PROJECT: USP820163	DATE: 9/5/1997
REV. DATE	THIS DRAWING AND ALL INFORMATION CONTAINED THEREON IS THE PROPERTY OF NORTHERN ENVIRONMENTAL INCORPORATED AND SHALL NOT BE COPIED OR USED EXCEPT FOR THE PURPOSE FOR WHICH IT IS EXPRESSLY FURNISHED.	
▲ Northern Environmental SM Hydrologists • Engineers • Geologists		

FIGURE 2 SITE LAYOUT AND SOIL SAMPLE LOCATIONS MIRRO PLANT #5 MANITOWOC, WISCONSIN
FOR: US PETROLEUM EQUIPMENT

Table 1 Summary of UST System Information, Mirro Corporation, Manitowoc, Wisconsin

UST Number	Registration Number	UST Construction	Volume (gallons)	Contents	Status	Date Installed	Type of Delivery System	Piping Construction	Location of Check Valves
1	360700199	Coated Steel	20,000	#2 Fuel Oil	Removed 08/13/97	01/01/50	Unknown	Bare Steel	Unknown

Table 2 Summary of UST System Inspection

UST Number	UST Condition	Piping Condition	Piping Joint Integrity	Dispenser Condition	Apparent Releases
1	Little Rust	Rusted	Fair	Not Applicable	No

Table 3 Summary of Soil Sample Field Screening and Laboratory Analysis

Sample Number	Associated UST System	Location	Depth (fbg)	Date Collected	Time	PID Response (iui)	Odor	Soil Description	Soil Type (USCS)	Laboratory Analytical Results (mg/kg) DRO
1	1	Beneath Piping	4	08/13/97	11:20	27	None	Sand	SW	290
2	1	Beneath Piping	4	08/13/97	11:20	1.5	None	Sand	SW	<10
3	1	Beneath Piping	4	08/13/97	11:21	2.0	None	Sand	SW	<10
4	1	Piping	3	08/13/97	11:22	1.0	None	Silty Clay	CL	<10
5	1	Beneath Center of UST	15	08/13/97	12:07	1.0	None	Gravelly Sand	SW	<10
6	1	Beneath East End of UST	15	08/13/97	12:08	66	Trace Petroleum	Gravelly Sand	SW	<10
7	1	Beneath West End of UST	15	08/13/97	12:09	19	None	Gravelly Sand	SW	<10
8	1	Excavation Wall	6	08/13/97	12:25	6.0	None	Gravelly Sand	SW	<10
9	1	Excavation Wall	6	08/13/97	12:26	4.0	None	Gravelly Sand	SW	<10
10	1	Excavation Wall	14	08/13/97	13:06	10.0	None	Gravelly Sand	SW	32
11	1	Excavation Wall	14	08/13/97	13:06	2.0	None	Gravelly Sand	SW	<10
12	1	Excavation Wall	15	08/13/97	13:07	1.0	None	Silty Clay	CL	<10

Note:

UST = underground storage tank
 fbg = feet below grade
 iui = instrument units as isobutylene
 USCS = United Soil Classification System
 mg/kg = milligram per kilogram
 <x = not detected above laboratory reporting limit of x



ATTACHMENT A
REPORT DISTRIBUTION

REPORT DISTRIBUTION

Mr. Jesse Rose
U.S. Petroleum Equipment
and Environmental Services
558 Carter Court
Kimberly, Wisconsin 54136

Mr. Thomas E. Reed
Mirro Corporation
1512 Washington Street
Post Office Box 1330
Manitowoc, Wisconsin 54221-1330

Wisconsin Department of Natural Resources
Northeast Region LUST Section
1125 North Military Avenue
Post Office Box 10448
Green Bay, Wisconsin 54307

Mr. Tim Krowiorz
Manitowoc Fire Department
911 Franklin Street
Manitowoc, Wisconsin 54220



ATTACHMENT B
BACKGROUND INFORMATION

BACKGROUND INFORMATION

UST System Owner:

Name: Mirro Corporation
Address: 1512 Washington Street, Manitowoc, Wisconsin, 54220
Telephone Number: (920) 684-4421

Site Owner:

Name: Mirro Corporation
Address: 1512 Washington Street, Manitowoc, Wisconsin, 54220
Telephone Number: (920) 684-4421

Site Address: 2015 Mirro Drive, Manitowoc, Wisconsin 54220-6717

Legal Description: NE 1/4, SE 1/4, Section 9, Township 19 North, Range 24 East

Summary of past and present property use:

Present property use is industrial, past property uses are unknown but were likely agricultural.

Description of any USTs previously removed from the site:

According to the Wisconsin Department of Work Force Development, On-Line Tanks Data Base, there are no records of any underground storage tanks (USTs) previously removed from this address (Mirro Plant #5).

Have tanks or piping been previously integrity tested?

Yes

Most current date: 09/26/96 Were results satisfactory? Yes

Has the current system ever leaked or had a breach repaired?

Yes _____
No _____
Unknown _____✓

If yes, When? Describe:

Has the current system ever been lined?

Yes _____
No _____
Unknown ✓ _____

Are other USTs or LUSTs present on adjacent properties?

Yes ✓ _____
No _____
Unknown _____

Describe: Numerous USTs are present at adjacent Mirro Plants.

Are any of the UST systems described in this UST site assessment believed to have released product?

Yes ✓ _____
No _____
Unknown _____

If so, describe UST and method of determining release:

A petroleum release was determined through field screening and laboratory analysis of soil samples.

Has the party responsible for the UST system been notified of the release of their responsibilities under Chapter NR 158, Wisconsin Administrative Code?

Yes ✓ _____
No _____

ATTACHMENT C
TANK EXCAVATION AND REMOVAL

TANK EXCAVATION AND REMOVAL

UST Closed By:

Removal: _____
Closure In-Place: _____
WDILHR Order: _____

Date of Closure: August 13, 1997

Site Assessor

Company Name: Northern Environmental Technologies, Incorporated
Company Address: 1203 Storbeck Drive, Waupun, Wisconsin, 53963
Company Telephone Number: (920) 324-8600
Certified Individual: Clint W. Wendt
Certification Number: 06301

UST Removal Contractor

Company Name: U.S. Petroleum Equipment and Environmental Services
Company Address: 558 Carter Court, Kimberly, Wisconsin, 54136
Company Telephone Number: (920) 735-8232
Project Manager: Jesse Rose
Certified Individual: Brian Van Pey, Field Representative
Certification Number: 00816

Excavator Contractor

Company Name: Gene Frederickson Trucking and Excavating
Company Address: W1732 County Road KK, Kaukauna, Wisconsin, 54130
Company Telephone Number: (920) 766-1100

Descriptions of tank system(s) removed from and known tanks remaining on the site are provided in Tables 1 and 2.

Certified Remover

Company Name: U.S. Petroleum Equipment and Environmental Services
Company Address: 558 Carter Court, Kimberly, Wisconsin, 54136
Company Telephone Number: (920) 735-8232
Certified Individual: Jesse Rose, Project Manager

ATTACHMENT D
TANK CLEANING AND DISPOSAL DOCUMENTATION

TANK CLEANING AND DISPOSAL DOCUMENTATION

Location of Cleaning

On-Site _____
Off-Site _____
Other _____

Method Used to Clean the Tank

The underground storage tank (UST) was rendered vapor free prior to removal. After removal, a hole was cut in the UST end. Sludge in the UST bottom was scraped with a squeegee. Sludge was removed by buckets and placed into steel 55 gallon drums.

Final Disposal (Disposal Documentation is Attached)

Recycled _____
Scrapped _____
Disposed _____

Handling of Cleaning Waste Water (Disposal Documentation Attached) Not Applicable

Drummed _____
Taken Off-Site _____
Volume _____ (gallons)
Number of Drums _____

Method of Tank Transport

The UST was secured to a flat bed trailer and transported for disposal with a semi-tractor.

Documentation of Emergency Waiver to Transport Tank

Not Applicable

Contractor Cleaning Tank

Company Name: Schroeder Environmental Cleaning Services, Incorporated
Company Address: Post Office Box 045, DePere, Wisconsin, 54115-0045
Company Telephone Number: (920) 339-9970

Contractor Dismantling Tank

Company Name: Custom Welding and Fabrication, Incorporated
Company Address: N6431 County Trunk Road H, Luxenberg, Wisconsin, 54217
Company Telephone Number: (920) 845-2815

Contractor Transporting Tank

Company Name: Custom Welding and Fabrication, Incorporated
Company Address: N6431 County Trunk Road H, Luxenberg, Wisconsin, 54217
Company Telephone Number: (920) 845-2815

Contractor Disposing of Tank

Company Name: Custom Welding and Fabrication, Incorporated
Company Address: N6431 County Trunk Road H, Luxenberg, Wisconsin, 54217
Company Telephone Number: (920) 845-2815

SECSI

Schroeder Environmental Cleaning Services, Inc.

August 13, 1997

U.S. Petroleum Equipment
558 Carter Court
Kimberly, WI 54136
Attn: Jesse Rose

RE: SECSI Invoice #97217

Dear Jesse:

On August 12, 1997, Schroeder Environmental Cleaning Services, Inc. cleaned and rendered "VAPOR-FREE" one (1) 20,000 gallon #2 fuel oil underground storage tank located at Mirro Plant #5, Manitowoc, WI.

The tank was cleaned and tested "vapor-free" thereby rendering it useless for all but scrap. I understand that you arranged for tank disposal.

The contents of the tank were pumped into one drum. I understand that you are handling waste disposal.

Thank you for the opportunity to be of service. We look forward to working with you again.

Sincerely,



Nancy Schroeder
Business Manager

ATTACHMENT E

SURPLUS PRODUCT AND TANK SLUDGE MANAGEMENT

SURPLUS PRODUCT AND TANK SLUDGE MANAGEMENT

Approximately 150 gallons of fuel oil sludge were recycled at U.S. Oils Waste Oil To Energy Facility.

Contractor Transporting Liquids/Sludges

Company Name: U.S. Petroleum Equipment
Company Address: 558 Carter Court, Kimberly, Wisconsin, 54136
Company Telephone Number: (920) 735-8237

Copies of waste characterization data, Hazardous Waste Manifests, and USEPA Hazardous Waste Generator I.D. Numbers are attached if available.

Contractor Disposing or Recycling Liquids/Sludges

Company Name: U.S. Oil Waste Oil to Energy
Company Address: U.S. Oil, 558 Carter Court, Kimberly, Wisconsin, 54136
Company Telephone Number: (920) 735-8237



THIS SHIPPING ORDER

must be legibly filled, in ink, in Indelible Pencil, or in Carbon, and retained by the Agent

U.S. Oil Co. Inc.

(Name of Carrier)

RECEIVE. subject to the classifications and tariffs in effect on the date of issue of this Shipping Order.

4188

Shipper's No. _____

Carrier's No. _____

At

Mirio Feley
2015 Mirio Dr.

From

Manitowoc, WI 54220

19__

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is, mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address of consignee - For purposes of notification only.)

Consigned to U.S. Waste Oil to Energy

Destination SSZ Carter A. Kimberly State WI Zip Code 54126 Delivery Address *

(* To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Route _____

Delivering Carrier _____ Car or Vehicle Initials _____ No. _____

NO. PACKAGES	HAZARDOUS MATERIALS	Kind of Package, Description of Articles, Special Marks, and Exceptions	*WEIGHT (SUBJECT TO CORR.)	CLASS OR RATE	CHECK COLUMN	Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. Per _____ (Signature of Consignor.) If charges are to be prepaid, write or stamp here, "To be Prepaid." Received \$ _____ to apply in prepayment of the charges on the property described hereon. Agent or Cashier. Per _____ (The signature here acknowledges only the amounts prepaid.) Charges Advanced: _____ \$ _____ † Shipper's imprint in lieu of stamp; not a part of Bill of Lading approved by the Interstate Commerce Commission.
3x55		Fuel oil sludge non-regulated flash 2141°				
		AB1437				
TOTAL PIECES						

SHIPPER'S CERTIFICATION This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

SIGNATURE: [Signature]

TITLE: Bus Dev Mgr

* If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

per

Waste Profile

Profile AB1437

Expiration Date: _____

 Check here if this is a recertificationLocation of Original U.S. Oil Co. Inc.Site Approved U.S. Oil NOTE

GENERAL INFORMATION

1. Generator Name Mingo Tolley Generator USEPA ID: Not recertified2. Generator Address 2115 Mingo Dr.
Manteno, WI 53120 Billing Address (same) USPE
Attn: Tessa Rose3. Technical Contact Phone Tom Reed 920-684-11424. Alternate Contact Phone _____ Billing Contact Phone 1-800-496-1915

PROPERTIES AND COMPOSITION

5. Process Generating Waste: Removal of storage tank6. Waste Name: fuel oil sludge7a. Is this a USEPA hazardous waste (40 CFR Part 261) Yes No

7b. Identify ALL USEPA listed and characteristic waste code numbers (D,F,P,U): _____

State waste codes: _____

8. Physical State @70°F: A. Solid () Liquid () Both () B. Single Layer () Multilayer () C. Free liquid range ___ to ___%9. A pH: range ___ to ___ or Not applicable () B. Strong Odor (); describe _____10. Liquid Flash Point: < 73°F () 73-99°F () 100-139°F () 140-199°F () ≥ 200°F () N.A. () Closed Up () Open Cup ()

11. CHEMICAL COMPOSITION: List ALL constituents (including halogenated organics) present in any concentration and forward available analysis.

Constituents	Range	Units	Constituents	Range	Units
product	95	%			
Water	0	%			
Solids	5	%			

TOTAL COMPOSITION MUST EQUAL OR EXCEED 100%

Benzene is yes, concentration ___ ppm. Shock Sensitive () Oxidizer () Carcinogen () Infectious () Other _____13. If the waste is subject to the land ban and meets the treatment standards, check here , and supply analytical results where applicable _____

SHIPPING INFORMATION:

14. Packaging: Bulk Solid () Bulk liquid () Drum () Type/Size 55 gallon Other _____15. ANTICIPATED ANNUAL VOLUME: 150 Units: gallons Shipping Frequency: one time

SAMPLE INFORMATION

16a. Sample source (drum, lagoon, pond, tank, vat, etc.) tankDate Sampled: Samplers Name/Company 2/12/97 - USPE16b. GENERATOR'S Agent Supervising Sampling: _____ 17. () No sample required (See Instructions)

GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40CFR 261-Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize U.S. Oil Co., Inc. to obtain a sample from any waste shipment for purposes of recertification

Thomas E. Reed
SignatureTHOMAS E. REED 9-10-97
Printed (or typed) name and title Date

U.S. Oil - TC RULE - CERTIFICATION / RECERTIFICATION FORM

Generator Name: Micro Foley Epa I.D. # Non-Regulated
 Location: Maine WI 5120 U.S. Oil Profile #: AB1437

CHARACTERISTICS OF HAZARDOUS WASTE: Indicate if this waste contains any of the following characteristics based on criteria mandated by 40 CFR 261.21, 261.22, 261.23 and 261.24.

	Constituent	Regulatory Threshold Level PPM.	Check One		Scientific Data	Generators Knowledge	Actual Value PPM/MGL
			Yes	No			
D004	Arsenic As	5.00		✓		✓	
D005	BARIUM Ba	100.00		✓		✓	
D006	CADMIUM Cd	1.00		✓		✓	
D007	CHROMIUM TOTAL Cr	5.00		✓		✓	
D008	LEAD Pb	5.00		✓		✓	
D009	MERCURY Hg	0.20		✓		✓	
D010	SELENIUM Se	1.00		✓		✓	
D011	SILVER Ag	5.00		✓		✓	
TCLP VOLATILES							
D018	BENZENE	0.50		✓		✓	
D019	CARBON TETRACHLORIDE	0.50		✓		✓	
D021	CHLOROBENZENE	100.00		✓		✓	
D022	CHLOROFORM	6.00		✓		✓	
D028	1,2-DICHLOROETHANE	0.50		✓		✓	
D028	1,2-DICHLOROETHALYNE	0.70		✓		✓	
D028	1,1-DICHLOROETHALYNE	0.70		✓		✓	
D035	METHYL ETHYL KETONE	200.00		✓		✓	
D039	TETRACHLOROETHYLENE	0.70		✓		✓	
D040	TICHLOROETHYLENE	0.50		✓		✓	
D043	VINYL CHLORIDE	0.20		✓		✓	
TCLP SEMI-VOLATILES							
D023	o-CRESOL	200.00		✓		✓	
D024	m-CRESOL	200.00		✓		✓	
D025	p-CRESOL	200.00		✓		✓	
D026	CRESOL	200.00		✓		✓	
D027	1,4 - DICHLOROBENZENE	7.50		✓		✓	
D030	2,4 - DINITROTOLUENE	0.13		✓		✓	
D028	HEXACHLOROENZENE	0.13		✓		✓	
D033	HEXACHLOROBUTADIENE	0.50		✓		✓	
D034	HEXACHLOROETHANE	3.00		✓		✓	
D036	NITROBENZENE	2.00		✓		✓	
D037	PENTACHLOROPHENOL	100.00		✓		✓	
D038	PYRIDINE	5.00		✓		✓	
D041	2,4,5-TRICHCHLOROPHENOL	400.00		✓		✓	
D041	2,4,6-TRICHCHLOROPHENOL	2.00		✓		✓	
HERBICIDES AND PESTICIDES							
D020	CHLORDANE	0.03		✓		✓	
D016	2, 4-DICHLOROPHENOZY ACETIC ACID	10.00		✓		✓	
D012	ENDRIN	0.02		✓		✓	
D031	HEPTACHLOR (AND ITS HYDROXIDE)	0.008		✓		✓	
D013	LINDANE	0.40		✓		✓	
D014	METHOXYCHLOR	10.00		✓		✓	
D015	TOXAPHENE	0.50		✓		✓	
D017	2,4, 5-TP SILVEX	1.00		✓		✓	

THE DATA PROVIDED ABOVE IS BASED ON THE ATTACHED LABORATORY ANALYSIS

THE DATA PROVIDED ABOVE IS BASED UPON MY KNOWLEDGE OF THE WASTE STREAM AND THE PRCESS GENERATING THE WASTE

SIGANTURE Tom Reed TITLE Environ. Eng. PRINTED NAME TOM REED DATE 9-10

ATTACHMENT F
VISUAL INSPECTION DATA

VISUAL INSPECTION DATA

Weather Conditions:

Temperature: 60°F
Precipitation: None

Site Conditions

Surface Staining: None
Stressed or Dead Vegetation: None
Previously Undiscovered or Unregistered Tanks: None Discovered
Describe:

Excavation

Depth of Excavation Beneath Tank (fbg): 15 feet
Depth of Excavation Beneath Piping (fbg): 4 feet
Free Product Present: No Obvious Odors: No Soil Discoloration: No
Oil Sheen on Water in Excavation: No

Soil Types: (USCS Classification)
Native: SW
Backfill: CL

Free Standing Water: Yes
Type (runoff, perched, ground water): Perched
Depth to Water (feet below grade): NA

Anticipated Depth to Ground-Water Level:

18 feet below grade

Local Ground-Water Use:

Unknown

Tank system components are described in Tables 1 and 2.

ATTACHMENT G
UNDERGROUND PETROLEUM PRODUCT
TANK INVENTORY FORMS
AND
CLOSURE CHECKLIST

UNDERGROUND
PETROLEUM PRODUCT
TANK INVENTORY

For Office Use Only:
Tank ID #

M5-1

Instructions

This form is to be completed pursuant to Section 101.142, Wis. Stats., to register all underground tanks in Wisconsin that have stored, currently store or will store petroleum or regulated substances. Please see the reverse side for additional information on this program. An underground storage tank is defined as any tank with at least 10 percent of its total volume (including piping) located below ground level. A separate form is needed for each tank. Send each completed form to the agency designated in the top right corner.

- This Individual Tank Registration Applies To (check one):
1. Tank still in active use
 2. Inoperative or abandoned tank with product still in tank
 3. Inoperative or abandoned tank with no known product in tank
 4. Location for which tank has been removed
 5. New tank to be installed (provide date): _____

A. IDENTIFICATION

1. Name of Installation Mirro Corp., Plant 5			2. Name for Mailing if Different Than #1		
Street Address of Installation 2001 Mirro Drive			Mailing Address if Different Than #1 P. O. Box 409		
<input checked="" type="checkbox"/> City	<input type="checkbox"/> Village	<input type="checkbox"/> Town of:	<input checked="" type="checkbox"/> City	<input type="checkbox"/> Village	<input type="checkbox"/> Town of:
Manitowoc			Manitowoc		
State Wisconsin	Zip Code 54220	County Manitowoc	State Wisconsin	Zip Code 54220	County Manitowoc
3. Name of Contact Person Thomas E. Reed			4. Name of Owner if Different from #3 Mirro Corporation		
Street Address P. O. Box 409			Street Address P. O. Box 409		
<input checked="" type="checkbox"/> City	<input type="checkbox"/> Village	<input type="checkbox"/> Town of:	<input checked="" type="checkbox"/> City	<input type="checkbox"/> Village	<input type="checkbox"/> Town of:
Manitowoc			Manitowoc		
State Wisconsin	Zip Code 54220	County Manitowoc	State Wisconsin	Zip Code 54220	County Manitowoc
Telephone Number (include area code) 414-684-4421, Ext. 2255			Telephone Number (include area code) 414-684-4421		
5. Fire Department Name and ID # Manitowoc Fire Dept. 36071		6. Tank Age (date installed, if known; or years old) 1956		7. If Tank Abandoned, Give Date (mo / day / yr)	
8. Tank Capacity (in gallons) 20,000		9. Tank Manufacturer's Name, if known: Not Known			

B. TANK CONSTRUCTION:

1. Bare Steel
2. Cathodically Protected Steel
3. Coated Steel
4. Fiberglass
5. Other (specify): _____

C. TANK CONTENTS:

1. Diesel
2. Leaded Gasoline
3. Unleaded Gasoline
4. Fuel Oil
5. Gasohol
6. Other (specify): _____

D. TYPE OF USER (check one):

1. Gas Station
2. Bulk Storage
3. Utility
4. Mercantile
5. Industrial
6. Government
7. School
8. Residential
9. Agricultural
10. Other (specify): _____

Signature of Person Completing Form:
Thomas E. Reed

Date Completed:
June 28, 1985

CHECKLIST FOR UNDERGROUND TANK CLOSURE

RETURN COMPLETED CHECKLIST TO: Safety & Buildings Division, Fire Prevention & Underground Storage Tank Section, P. O. Box 7969, Madison, WI 53707

Complete one form for each site closure.

The information you provide may be used by other government agency programs [Privacy Law, s. 15.04 (1)(m)].

A. IDENTIFICATION: (Please Print) Indicate whether closure is for: [X] Tank System [] Tank Only [] Piping Only

1. Site Name: MIRRO Foley - PLANT 5; 2. Owner Name: MIRRO Foley Corp.; Site Street Address: 2001 MIRRO DR; Owner Street Address: P.O. Box 409; City: MANITOWOC; State: WI; Zip Code: 54220; Telephone No.: (920) 684-4421

3. Closure Company Name (Print): U.S. Petroleum Equip.; Closure Company Street Address: 558 CARTER CT.; Closure Company Telephone No.: (920) 735-8287; Closure Company City, State, Zip Code: Kimberly, WI, 54136

4. Name of Company Performing Closure Assessment: W. J. ...; Assessment Company Street Address, City, State, Zip Code: ...; Telephone #: ...; Certified Assessor Name (Print): ...; Assessor Signature: ...; Assessor Certification No.: ...

Table with 7 columns: Tank ID #, Closure, Temp. Closure, Closure In Place, Tank Capacity, Contents *, Closure Assessment. Row 1: 360700199, [X], [], [], 20,000, 04, [X] Y [] N

Indicate which product by numeric code: 01-Diesel; 02-Leaded; 03-Unleaded; 04-Fuel Oil; 05-Gasohol; 06-Other; 09-Unknown; 10-Premix; 11-Waste oil; 13-Chemical (indicate the chemical name(s) or numbers(s)); 14-Kerosene; 15-Aviation.

Written notification was provided to the local agent 15 days in advance of closure date. [X] Y [] N [] NA; All local permits were obtained before beginning closure. [X] Y [] N [] NA

Check applicable box at right in response to all statements in Sections B - E.

B. TEMPORARILY OUT OF SERVICE. Written inspector approval of temporary closure obtained, which is effective until (provide date) ... 1. Product Removed: a. Product lines drained into tank ... b. All product removed to bottom of suction line ... c. All product removed to within 1" of bottom. 2. Fill pipe, gauge pipe, tank truck vapor recovery fittings, and vapor return lines capped. 3. All product lines at the islands or pumps located elsewhere are removed and capped, OR 4. Dispensers/pumps left in place but locked and power disconnected. 5. Vent lines left open. 6. Inventory form filed indicating temporary closure.

C. CLOSURE BY REMOVAL. 1. Product from piping drained into tank (or other container). 2. Piping disconnected from tank and removed. 3. All liquid and residue removed from tank using explosion proof pumps or hand pumps. 4. All pump motors and suction hoses bonded to tank or otherwise grounded. 5. Fill pipes, gauge pipes, vapor recovery connections, submersible pumps and other fixtures removed. NOTE: DROP TUBE SHOULD NOT BE REMOVED IF THE TANK IS TO BE PURGED THROUGH THE USE OF AN EDUCTOR. 6. Vent lines left connected until tanks purged. 7. Tank openings temporarily plugged so vapors exit through vent. 8. Tank atmosphere reduced to 10% of the lower flammable range (LEL) - see Section F. 9. Tank removed from excavation after PURGING/INERTING; placed on level ground and blocked to prevent movement. 10. Tank cleaned before being removed from site.

Remover Verified	Inspector Verified	NA
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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C. CLOSURE BY REMOVAL (continued)

- Tank labeled in 2" high letters after removal but before being moved from site.
NOTE: COMPLETE TANK LABELING SHOULD INCLUDE WARNING AGAINST REUSE; FORMER CONTENTS; VAPOR STATE; VAPOR FREEING TREATMENT; DATE.
- Tank vent hole (1/8 th " in uppermost part of tank) installed prior to moving the tank from site.
- Inventory form filed by owner with Safety and Buildings Division indicating closure by removal.
- Site security is provided while the excavation is open.

D. CLOSURE IN PLACE

NOTE: CLOSURES IN PLACE ARE ONLY ALLOWED WITH THE PRIOR WRITTEN APPROVAL OF THE DEPARTMENT OF INDUSTRY, LABOR AND HUMAN RELATIONS OR LOCAL AGENT.

- Product from piping drained into tank (or other container).
- Piping disconnected from tank and removed.
- All liquid and residue removed from tank using explosion proof pumps or hand pumps.
- All pump motors and suction hoses bonded to tank or otherwise grounded.
- Fill pipes, gauge pipes, vapor recovery connections, submersible pumps and other fixtures removed.
NOTE: DROP TUBE SHOULD NOT BE REMOVED IF THE TANK IS TO BE PURGED THROUGH THE USE OF AN EDUCTOR - EDUCTOR OUTPUT 12 FT ABOVE GRADE.
- Vent lines left connected until tanks purged.
- Tank openings temporarily plugged so vapors exit through vent.
- Tank atmosphere reduced to 10% of the lower flammable range (LEL) - see Section F.
- Tank properly cleaned to remove all sludge and residue.
- Solid inert material (sand, cyclone boiler slag, pea gravel recommended) introduced and tank filled.
- Vent line disconnected or removed.
- Inventory form filed by owner with Safety and Buildings Division indicating closure in place.

<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/>
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<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/>

CLOSURE ASSESSMENTS

NOTE: DETERMINE IF A CLOSURE ASSESSMENT IS REQUIRED BY REFERRING TO ILHR 10.

- Individual conducting the assessment has a closure assessment plan (written) which is used as the basis for their work on the site.
- Do points of obvious contamination exist?
- Are there strong odors in the soils?
- Was a field screening instrument used to pre-screen soil sample locations?
- Was a closure assessment omitted because of obvious contamination?
- Was the DNR notified of suspected or obvious contamination?
Agency, office and person contacted: _____
- Contamination suspected because of: Odor Soil Staining Free Product Sheen On Groundwater Field Instrument Test

<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/>
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<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/>

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JPK

METHOD OF ACHIEVING 10% LEVEL DESCRIPTION

- Educator Or Diffused Air Blower
Eductor driven by compressed air, bonded and drop tube left in place; vapors discharged minimum of 12 feet above ground. Diffused air blower bonded and drop tube removed. Air pressure not exceeding 5 psig
- Dry Ice
Dry ice introduced at 1.5 pounds per 100 gallons of tank capacity. Dry ice crushed and distributed over the greatest possible tank area. Dry ice evaporated before proceeding.
- Inert Gas (CO/2 or N/2) **NOTE: INERT GASSES PRODUCE AN OXYGEN DEFICIENT ATMOSPHERE. THE TANK MAY NOT BE ENTERED IN THIS STATE WITHOUT SPECIAL EQUIPMENT**
Gas introduced through a single opening at a point near the bottom of the tank at the end of the tank opposite the vent.
Gas introduced under low pressure not to exceed 5 psig to reduce static electricity. Gas introducing device grounded
- Tank atmosphere monitored for flammable or combustible vapor levels.
Calibrate combustible gas indicator. Drop tube removed prior to checking atmosphere. Tank space monitored at bottom, middle and upper portion of tank. Readings of 10% or less of the lower flammable range (LEL) obtained before removing tank from ground.

G. NOTE SPECIFIC PROBLEMS OR NONCOMPLIANCE ISSUES BELOW

NONE

H. REMOVER/CLEANER INFORMATION

BRIAN VAN PAY Brian Van Pay GD 816 8-13-97
Remover Name (print) Remover Signature Remover Certification No. Date Signed

INSPECTOR INFORMATION

JAMES P. KROWIORZ James P. Krowiorz 00081
Inspector Name (print) Inspector Signature Inspector Certification No.
36071 920-683-4557 8-13-97
FDID # For Location Where Inspection Performed Inspector Telephone Number Date Signed

REMOVER

ATTACHMENT H

**SOIL SAMPLE FIELD SCREENING AND
PREPARATION METHODS**

SOIL SAMPLE FIELD SCREENING AND PREPARATION METHODS

Soil samples were collected by or under the direction of a Wisconsin Department of Commerce (WDCOMM)-certified Northern Environmental Technologies, Incorporated site assessor in conformance with Wisconsin Department of Natural Resources (WDNR) guidelines (WDNR, 1993) and Chapter ILHR 10, Wisconsin Administrative Code.

Each sample was split into two representative portions: one for field screening, the other for laboratory analysis. Field screening consisted of classifying the soil according to the Unified Soil Classification System, identifying obvious odors and staining, and photoionization detector (PID) headspace analysis. The PID headspace analysis sample was sealed in a resealable type plastic jar. Care was taken to maintain a relatively constant soil volume-to-headspace volume ratio for all samples. The sealed headspace sample was agitated to break up soil clods before being left in a warm environment for at least 15 minutes to allow time for volatilization to occur. The plastic bag was then carefully punctured with the PID probe and the highest stable response occurring in 10 to 20 seconds was recorded as instrument units as isobutylene.

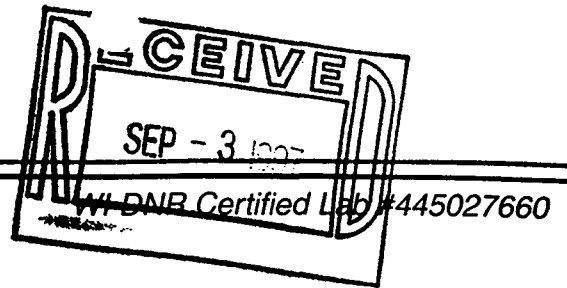
A portion of the sample designated for laboratory analysis was immediately transferred into a 2-ounce glass jar with no headspace for dry weight analysis. For samples collected for diesel range organics (DRO) analysis, 25 grams of the soil were immediately transferred into a 2-ounce glass jar and sealed with a Teflon-lined cap. Samples collected for petroleum volatile organic compound (PVOC) analysis, 25 grams of the soil were immediately transferred to a 2-ounce glass jar, preserved with methanol, and sealed with a Teflon-lined cap.

Soil samples collected for laboratory analysis were labeled and stored on ice in a cooler where they were maintained in a chilled condition for possible laboratory analysis. Soil samples selected for laboratory analysis were transported by courier under chain-of-custody to a WDNR-certified laboratory.

Wisconsin Department of Industry, Labor, and Human Relations, "Flammable and Combustible Liquids," *Wisconsin Administrative Code*, Chapter ILHR 10, October 1996.

Wisconsin Department of Natural Resources, "Site Assessments for Underground Storage Tanks Technical Guidance," June 1993.

ATTACHMENT I
LABORATORY ANALYSIS REPORTS
AND
CHAIN-OF-CUSTODY RECORDS



Analytical Laboratory
 1090 Kennedy Ave. Kimberly, WI 54136
 920-735-8295

CLINT WENDT
 NORTHERN ENVIRONMENTAL
 1203 STORBECK
 WAUPUN WI 53963

Project #: USP820163
 Project : MANITOWOC, WI
 Sample ID: 1-163
 Lab Code: 5018199A
 Sample Type: Soil
 Sample Date: NONE

Report Date: 25-Aug-97

Test	Result	LOD	LOQ	Unit	Dilution Factor	Date Analyzed:	Analyzed By:	QC Code
TOTAL SOLIDS	87.9			%		15-Aug-97	JLB	1
MODIFIED DRO WDNR SEP 95	290	1.7	5.5	MG/KG	1	18-Aug-97	DJM	1

LOD = Limit of Detection

"J" Flag: Analyte detected between LOD and LOQ.

LOQ = Limit of Quantitation

QC SUMMARY

CODE:

1

All laboratory QC requirements were met for this sample.

Authorized Signature

Analytical Laboratory

 1090 Kennedy Ave. Kimberly, WI 54136
 920-735-8295

WI DNR Certified Lab #445027660

 CLINT WENDT
 NORTHERN ENVIRONMENTAL
 1203 STORBECK
 WAUPUN WI 53963

 Project #: USP820163
 Project : MANITOWOC, WI
 Sample ID: 2-163
 Lab Code: 5018199B
 Sample Type: Soil
 Sample Date: NONE

Report Date: 25-Aug-97

Test	Result	LOD	LOQ	Unit	Dilution Factor	Date Analyzed:	Analyzed By:	QC Code
TOTAL SOLIDS	95.3			%		15-Aug-97	JLB	1
MODIFIED DRO WDNR SEP 95	< 10	1.7	5.5	MG/KG	1	18-Aug-97	DJM	1

LOD = Limit of Detection

"J" Flag: Analyte detected between LOD and LOQ.

LOQ = Limit of Quantitation

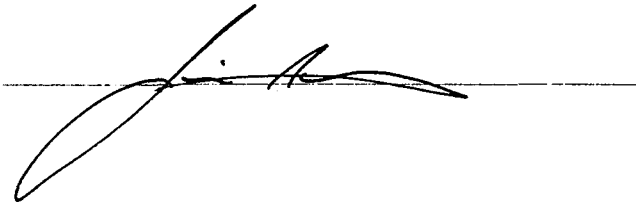
QC SUMMARY

CODE:

1

All laboratory QC requirements were met for this sample.

Authorized Signature



Analytical Laboratory
 1090 Kennedy Ave. Kimberly, WI 54136
 920-735-8295

WI DNR Certified Lab #445027660

CLINT WENDT
 NORTHERN ENVIRONMENTAL
 1203 STORBECK
 WAUPUN WI 53963

Project #: USP820163
 Project : MANITOWOC, WI
 Sample ID: 3-163
 Lab Code: 5018199C
 Sample Type: Soil
 Sample Date: NONE

Report Date: 25-Aug-97

Test	Result	LOD	LOQ	Unit	Dilution Factor	Date Analyzed:	Analyzed By:	QC Code
TOTAL SOLIDS	95.4			%		15-Aug-97	JLB	1
MODIFIED DRO WDNR SEP 95	< 10	1.7	5.5	MG/KG	1	18-Aug-97	DJM	1

LOD = Limit of Detection

"J" Flag: Analyte detected between LOD and LOQ.

LOQ = Limit of Quantitation

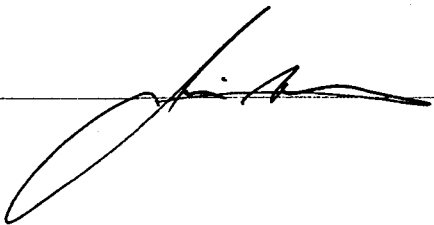
QC SUMMARY

CODE:

1

All laboratory QC requirements were met for this sample.

Authorized Signature



Analytical Laboratory

 1090 Kennedy Ave. Kimberly, WI 54136
 920-735-8295

WI DNR Certified Lab #445027660

 CLINT WENDT
 NORTHERN ENVIRONMENTAL
 1203 STORBECK
 WAUPUN WI 53963

 Project #: USP820163
 Project : MANITOWOC, WI
 Sample ID: 4-163
 Lab Code: 5018199D
 Sample Type: Soil
 Sample Date: NONE

Report Date: 25-Aug-97

Test	Result	LOD	LOQ	Unit	Dilution Factor	Date Analyzed:	Analyzed By:	QC Code
TOTAL SOLIDS	82.4			%		15-Aug-97	JLB	1
MODIFIED DRO WDNR SEP 95	< 10	1.7	5.5	MG/KG	1	18-Aug-97	DJM	1

LOD = Limit of Detection

"J" Flag: Analyte detected between LOD and LOQ.

LOQ = Limit of Quantitation

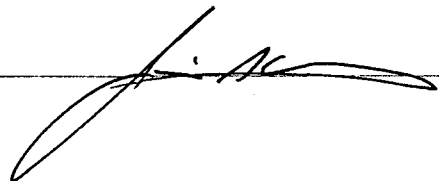
QC SUMMARY

CODE:

1

All laboratory QC requirements were met for this sample.

Authorized Signature



Analytical Laboratory
 1090 Kennedy Ave. Kimberly, WI 54136
 920-735-8295

WI DNR Certified Lab #445027660

CLINT WENDT
 NORTHERN ENVIRONMENTAL
 1203 STORBECK
 WAUPUN WI 53963

Project #: USP820163
 Project : MANITOWOC, WI
 Sample ID: 5-163
 Lab Code: 5018199E
 Sample Type: Soil
 Sample Date: NONE

Report Date: 25-Aug-97

Test	Result	LOD	LOQ	Unit	Dilution Factor	Date Analyzed:	Analyzed By:	QC Code
TOTAL SOLIDS	82.3			%		15-Aug-97	JLB	1
MODIFIED DRO WDNR SEP 95	< 10	1.7	5.5	MG/KG	1	18-Aug-97	DJM	1

LOD = Limit of Detection

"J" Flag: Analyte detected between LOD and LOQ.

LOQ = Limit of Quantitation

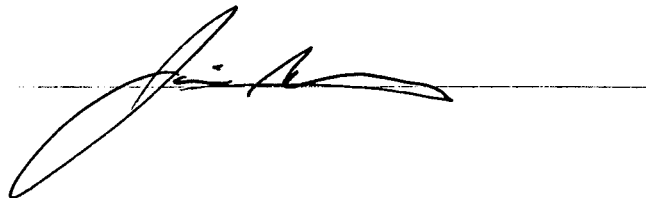
QC SUMMARY

CODE:

1

All laboratory QC requirements were met for this sample.

Authorized Signature



Analytical Laboratory
 1090 Kennedy Ave. Kimberly, WI 54136
 920-735-8295

WI DNR Certified Lab #445027660

CLINT WENDT
 NORTHERN ENVIRONMENTAL
 1203 STORBECK
 WAUPUN WI 53963

Project #: USP820163
 Project : MANITOWOC, WI
 Sample ID: 6-163
 Lab Code: 5018199F
 Sample Type: Soil
 Sample Date: NONE

Report Date: 25-Aug-97

Test	Result	LOD	LOQ	Unit	Dilution Factor	Date Analyzed:	Analyzed By:	QC Code
TOTAL SOLIDS	82.0			%		15-Aug-97	JLB	1
MODIFIED DRO WDNR SEP 95	< 10	1.7	5.5	MG/KG	1	18-Aug-97	DJM	1
PVOC SW846 8020 (Meth Pres.)						20-Aug-97	TJW	
Benzene	< 25	3.1	9.8	UG/KG	1			1
Ethylbenzene	< 25	2.5	7.8	UG/KG	1			1
MTBE	< 25	4.2	13	UG/KG	1			1
Toluene	< 25	3.9	13	UG/KG	1			1
1,2,4-Trimethylbenzene	26	2.5	7.9	UG/KG	1			1
1,3,5-Trimethylbenzene	< 25	3.6	11	UG/KG	1			1
Xylenes	< 50	8.2	26	UG/KG	1			1
Fluorobenzene Surrogate	100			% Rec.				

LOD = Limit of Detection

"J" Flag: Analyte detected between LOD and LOQ.

LOQ = Limit of Quantitation

PVOC analysis detected unidentified peaks.

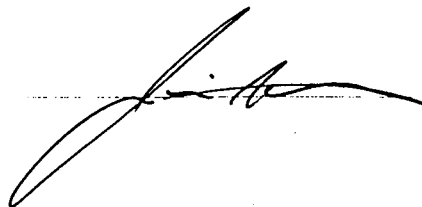
QC SUMMARY

CODE:

1

All laboratory QC requirements were met for this sample.

Authorized Signature



Analytical Laboratory
 1090 Kennedy Ave. Kimberly, WI 54136
 920-735-8295

WI DNR Certified Lab #445027660

CLINT WENDT
 NORTHERN ENVIRONMENTAL
 1203 STORBECK
 WAUPUN WI 53963

Project #: USP820163
 Project : MANITOWOC, WI
 Sample ID: 7-163
 Lab Code: 5018199G
 Sample Type: Soil
 Sample Date: NONE

Report Date: 25-Aug-97

Test	Result	LOD	LOQ	Unit	Dilution Factor	Date Analyzed:	Analyzed By:	QC Code
TOTAL SOLIDS	86.0			%		15-Aug-97	JLB	1
MODIFIED DRO WDNR SEP 95	< 10	1.7	5.5	MG/KG	1	18-Aug-97	DJM	1

LOD = Limit of Detection

"J" Flag: Analyte detected between LOD and LOQ.

LOQ = Limit of Quantitation

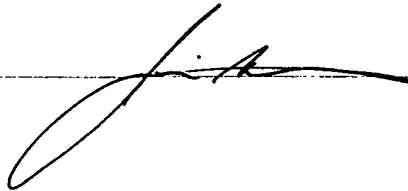
QC SUMMARY

CODE:

1

All laboratory QC requirements were met for this sample.

Authorized Signature



Analytical Laboratory

 1090 Kennedy Ave. Kimberly, WI 54136
 920-735-8295

WI DNR Certified Lab #445027660

 CLINT WENDT
 NORTHERN ENVIRONMENTAL
 1203 STORBECK
 WAUPUN WI 53963

 Project #: USP820163
 Project: MANITOWOC, WI
 Sample ID: 10-163
 Lab Code: 5018199H
 Sample Type: Soil
 Sample Date: NONE

Report Date: 25-Aug-97

Test	Result	LOD	LOQ	Unit	Dilution Factor	Date Analyzed:	Analyzed By:	QC Code
TOTAL SOLIDS	88.6			%		15-Aug-97	JLB	1
MODIFIED DRO WDNR SEP 95	32	1.7	5.5	MG/KG	1	20-Aug-97	TJW	1
PVOC SW846 8020 (Meth Pres.)						20-Aug-97	TJW	
Benzene	< 25	3.1	9.8	UG/KG	1			1
Ethylbenzene	< 25	2.5	7.8	UG/KG	1			1
MTBE	< 25	4.2	13	UG/KG	1			1
Toluene	< 25	3.9	13	UG/KG	1			1
1,2,4-Trimethylbenzene	< 25	2.5	7.9	UG/KG	1			1
1,3,5-Trimethylbenzene	< 25	3.6	11	UG/KG	1			1
Xylenes	< 50	8.2	26	UG/KG	1			1
Fluorobenzene Surrogate	101			% Rec.				

LOD = Limit of Detection

"J" Flag: Analyte detected between LOD and LOQ.

LOQ = Limit of Quantitation

PVOC analysis detected unidentified peaks.

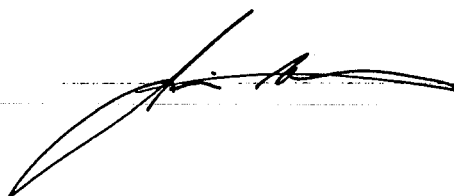
QC SUMMARY

CODE:

1

All laboratory QC requirements were met for this sample.

Authorized Signature



Analytical Laboratory

 1090 Kennedy Ave. Kimberly, WI 54136
 920-735-8295

WI DNR Certified Lab #445027660

 CLINT WENDT
 NORTHERN ENVIRONMENTAL
 1203 STORBECK
 WAUPUN WI 53963

 Project #: USP820163
 Project : MANITOWOC, WI
 Sample ID: 11-163
 Lab Code: 5018199I
 Sample Type: Soil
 Sample Date: NONE

Report Date: 25-Aug-97

Test	Result	LOD	LOQ	Unit	Dilution Factor	Date Analyzed:	Analyzed By:	QC Code
TOTAL SOLIDS	75.1			%		15-Aug-97	JLB	1
MODIFIED DRO WDNR SEP 95	< 10	1.7	5.5	MG/KG	1	20-Aug-97	TJW	1
PVOC SW846 8020 (Meth Pres.)						20-Aug-97	TJW	
Benzene	< 25	3.1	9.8	UG/KG	1			1
Ethylbenzene	< 25	2.5	7.8	UG/KG	1			1
MTBE	< 25	4.2	13	UG/KG	1			1
Toluene	< 25	3.9	13	UG/KG	1			1
1,2,4-Trimethylbenzene	< 25	2.5	7.9	UG/KG	1			1
1,3,5-Trimethylbenzene	< 25	3.6	11	UG/KG	1			1
Xylenes	< 50	8.2	26	UG/KG	1			1
Fluorobenzene Surrogate	104			% Rec.				

LOD = Limit of Detection

"J" Flag: Analyte detected between LOD and LOQ.

LOQ = Limit of Quantitation

PVOC analysis detected unidentified peaks.

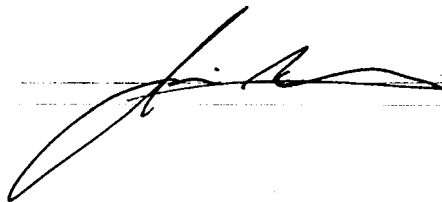
QC SUMMARY

CODE:

1

All laboratory QC requirements were met for this sample.

Authorized Signature



Analytical Laboratory
 1090 Kennedy Ave. Kimberly, WI 54136
 920-735-8295

WI DNR Certified Lab #445027660

CLINT WENDT
 NORTHERN ENVIRONMENTAL
 1203 STORBECK
 WAUPUN WI 53963

Project #: USP820163
 Project : MANITOWOC, WI
 Sample ID: 12-163
 Lab Code: 5018199J
 Sample Type: Soil
 Sample Date: NONE

Report Date: 25-Aug-97

Test	Result	LOD	LOQ	Unit	Dilution Factor	Date Analyzed:	Analyzed By:	QC Code
TOTAL SOLIDS	73.9			%		15-Aug-97	JLB	1
MODIFIED DRO WDNR SEP 95	< 10	1.7	5.5	MG/KG	1	20-Aug-97	TJW	1
PVOC SW846 8020 (Meth Pres.)						20-Aug-97	TJW	
Benzene	< 25	3.1	9.8	UG/KG	1			1
Ethylbenzene	< 25	2.5	7.8	UG/KG	1			1
MTBE	< 25	4.2	13	UG/KG	1			1
Toluene	< 25	3.9	13	UG/KG	1			1
1,2,4-Trimethylbenzene	< 25	2.5	7.9	UG/KG	1			1
1,3,5-Trimethylbenzene	< 25	3.6	11	UG/KG	1			1
Xylenes	< 50	8.2	26	UG/KG	1			1
Fluorobenzene Surrogate	106			% Rec.				

LOD = Limit of Detection

"J" Flag: Analyte detected between LOD and LOQ.

LOQ = Limit of Quantitation

PVOC analysis detected unidentified peaks.

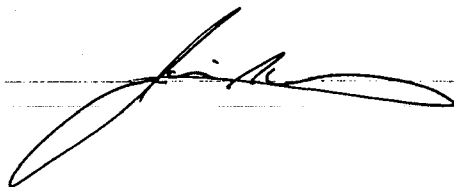
QC SUMMARY

CODE:

1

All laboratory QC requirements were met for this sample.

Authorized Signature



CHAIN OF CUSTODY RECO..J REQUEST FOR ANALYSIS



1214 W. Venture Ct.
Mequon, WI 53092
414-241-3133
FAX 414-241-8222

372 West County Road D
New Brighton, MN 55112
612-635-9100
FAX 612-635-0643

954 Circle Drive
Green Bay, WI 54304
414-592-8400
FAX 414-592-8444

330 South 4th Avenue
Park Falls, WI 54552
715-762-1544
FAX 715-762-1844

324 East Main Street
Waupun, WI 53963
414-324-8600
FAX 414-324-3023

749 Lakewood Lane
Marquette, MI 49855
906-249-4300
FAX 906-249-4311

No: 7836

1203 Starbuck Drive

Check office originating request

5018199

Project No: <u>25182013</u>		Task No:		Laboratory: <u>US Oil Analytical</u>			Sample Integrity - To be completed by receiving lab Seal intact upon receipt <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
Project Location: <u>Manitowoc, WI</u>				Wisconsin DNR Certification #: <u>448027060</u>			Method of Shipment: <u>Carrier</u> Contents Temperature: <u>On Ice</u> Refrigerator No: _____								
Project Manager: <u>Mary Koepfer</u>				Laboratory Contact:			ANALYSES REQUESTED								
Sampler: (name) <u>Clint Wendt</u>				Price Quote:			DRO (WI Modified Method)	GRO (WI Modified Method)	BETX (EPA Method 8020)	PVOC (EPA Method 8020)	VOC (EPA Method 8021)	PAH (EPA Method)	Pb (EPA Method)		
Sampler: (signature) <u>Clint Wendt</u>				TURNAROUND TIME REQUIRED											
Sampling Date(s): <u>8-13-97</u>				<input type="checkbox"/> Normal <input type="checkbox"/> Rush											
Reports to be Sent to: <u>Clint Wendt</u>				Date Needed _____											
Lab ID No.	Sample No.	Collection		No. of Containers, Size & Type	Description			Preservative	DRO (WI Modified Method)	GRO (WI Modified Method)	BETX (EPA Method 8020)	PVOC (EPA Method 8020)	VOC (EPA Method 8021)	PAH (EPA Method)	Pb (EPA Method)
		Date	Time		Water	Soil	Other								
<u>5018199 A</u>	<u>1-163</u>								<input checked="" type="checkbox"/>						
<u>B</u>	<u>2-163</u>														
<u>C</u>	<u>3-163</u>														
<u>D</u>	<u>4-163</u>														
<u>E</u>	<u>5-163</u>														
<u>F</u>	<u>6-163</u>											<input checked="" type="checkbox"/>			
<u>G</u>	<u>7-163</u>														
<u>H</u>	<u>10-163</u>								<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>			
<u>I</u>	<u>11-163</u>								<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>			
<u>J</u>	<u>12-163</u>								<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>			
Packed for Shipping by: <u>Clint Wendt</u>				Comments: <u>IF any of the above samples contain DRO above 10 mg/kg run 10-163, 11-163, 12-163 for DRO/PVOC and 6-163 for PAH. [Preserve ahead of time]</u>											
Shipment Date:				Disposal <u>7-163, 8-163</u>											
Relinquished By: <u>Clint Wendt</u>		Date: <u>8-14-97</u>		Relinquished By:				Date:				Relinquished By: <u>Deo Huss</u>		Date: <u>8-14-97</u>	
Company: <u>NE T. I.</u>		Time: <u>1:00</u>		Company:				Time:				Company: <u>US OIL</u>		Time: <u>2:45</u>	
Received By: <u>Deo Huss</u>		Date: <u>8-14</u>		Received By:				Date:				Received By: <u>Andy Charable</u>		Date: <u>8-14-97</u>	
Company: <u>US OIL</u>		Time: <u>1:00</u>		Company:				Time:				Company: <u>US Oil</u>		Time: <u>2:45</u>	

5018199 A ↓

38



MIRRO COMPANY

WEAREVER

1512 WASHINGTON STREET
P.O. BOX 1330,
MANITOWOC, WI 54221-1330

PHONE (800) 518-6245
Extension 6255
FAX (920) 684-1743

October 8, 1997

RECEIVED

OCT 09 1997

LMD SOLID WASTE

Wisconsin Department of Natural Resources
Attn: James Reyburn
PO Box 10448
Green Bay, WI 54307-0448

SUBJECT: WDNR LUST ID #03-36-170638

Dear Mr. Reyburn:

This letter is to request an extension of the October 25, 1997 deadline for the hiring of an environmental consultant and the November 25, 1997 deadline for the submission of a workplan as stated in a letter dated September 16, 1997 from Program Assistant, Janis DeBrock.

The reason for the extension is that we have not received a copy of the Tank Closure Site Assessment report and do not expect to receive it until October 20, 1997. It is our understanding that the report will discuss the results of the additional sampling completed during the closure and further investigation may not be justified or necessary. The Tank Closure Site Assessment report will request closure based on the results of the laboratory analysis and field observations made during the removal of the tank. We request the Department of Natural Resources to review the site assessment report and make a decision on the need for additional study before we proceed further.

We agree to hire an environmental consultant within 30 days of receipt of the DNR decision regarding Tank Closure Site Assessment report recommendations, and to submit a workplan within 60 days of receipt of the DNR decision.

Thank you for your consideration. Please call if you have any questions or comments.

Sincerely,

Thomas E. Reed
Chief Environmental Engineer

cc: Gordy Norlin, Harry Welhouse

H:\ENVIRON\TANKS\DNR extension for Plant 5 UST.doc



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary
William R. Selbig, Regional Director

Northeast Region
Remediation & Redevelopment Program
PO Box 10448, 1125 N. Military Avenue
Green Bay, WI 54307-0448
TELEPHONE 920-492-5916
TELEFAX 920-492-5859

September 16, 1997

Mirro Corporation
Attn: Thomas Reed
PO Box 1330
Manitowoc, WI 54221-1330

SUBJECT: Petroleum Contamination from Underground Storage Tank System
Mirro Corporation, 2015 Mirro Drive, Manitowoc
WDNR LUST ID #03-36-170638

Dear Mr. Reed:

On September 11, 1997, the Department of Natural Resources (DNR) received notification from Northern Environmental that petroleum contamination was discovered on August 13, 1997, while performing a tank closure assessment at the above-referenced location.

Based on the information received by the DNR, we believe that Mirro Corporation is responsible for restoring the environment at this site under Section 292.11, Wisconsin Statutes (hazardous substances spills law). This responsibility includes first investigating the extent of the contamination, then selecting and implementing the most appropriate remedial action. Enclosed is information to help you understand what you need to do to ensure your compliance with the spills law.

The purpose of this letter is threefold: (1) to describe your legal responsibilities; (2) to explain what you need to do to investigate and clean up the contamination; and (3) to provide you with information about cleanups, environmental consultants, and working cooperatively with the DNR.

Legal Responsibilities

Your legal responsibilities are defined both in statute and administrative code. The hazardous substances spill law, Section 292.11(3) Wisconsin Statutes, states:

RESPONSIBILITY. A person who possesses or controls a hazardous substance which is discharged or who causes the discharge of a hazardous substance shall 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.

Wisconsin Administrative Codes NR 700 through NR 728 establish requirements for emergency and interim actions, public information, site investigations, design and operation of remedial action systems, and case closure. Chapter NR 708 includes provisions for immediate actions in response to limited contamination. Wisconsin Administrative Code NR 140 establishes groundwater standards for contaminants that reach groundwater.



Steps to Take

The longer contamination is left in the environment, the farther it can spread and the more it may cost to clean up. Quick action may lessen damage to your property and to neighboring properties and reduce your costs in investigating and cleaning up the contamination. To ensure that your cleanup complies with Wisconsin's laws and administrative codes, you should hire a professional environmental consultant who understands what needs to be done. These are the first four steps to take:

1. **By October 25, 1997**, please submit written verification (such as a letter from the consultant) that you have hired an environmental consultant (we would like a contact name, mailing address and phone number). If you cannot meet this timeline, please send a request for an extension, in writing, to the name listed at the bottom of this page, indicating the reason why the timeline cannot be met and when you expect to be able to meet this requirement.
2. **By November 25, 1997**, your consultant must submit a workplan and a schedule for conducting the investigation. The consultant must follow the Department's administrative codes and our technical guidance documents. Please include with the workplan a copy of any previous information that has been completed for your site (such as an underground tank removal report or a preliminary soil excavation report).
3. Please keep us informed of what is being done at your site. You or your consultant must provide us with a brief report **at least every 90 days** starting after your workplan is submitted. These quarterly reports should summarize the work completed since the last report. Quarterly reports need only include one or two pages of text, plus any relevant maps and tables. Should conditions at your site warrant, you may receive a letter requiring more frequent contacts with the Department. You will also receive an annual site status report form in February.
4. When the site investigation is complete, your consultant must submit a full report on the extent and degree of soil and groundwater contamination and a proposal for cleaning up the contamination.

Due to the number of contaminated sites and our staffing levels, we will be unable to respond to each report. To maintain your compliance with the spills law and chapters NR 700 through NR 728, do not delay the investigation and cleanup by waiting for DNR responses. We have provided detailed technical guidance to environmental consultants. Your consultant is expected to be familiar with our technical procedures and administrative codes and should be able to answer your questions on meeting Wisconsin's cleanup requirements.

Though a WDNR project manager has not been assigned to this case, your correspondence and reports regarding this site should be sent to the Department at the following address:

Wisconsin Department of Natural Resources
Attn: James Reyburn (920-492-5864)
PO Box 10448
Green Bay, WI 54307-0448

If the contamination doesn't include groundwater contamination, the responsibility for governmental oversight of this site will be transferred to the Wisconsin Department of Commerce in accordance with Wisconsin Act 27.

Unless otherwise requested, please send only one duplexed copy of all plans and reports. Correspondence and reports should be identified with the assigned WDNR ID number and name of the site, which can be found on the first page of this letter.

Information for Site Owners

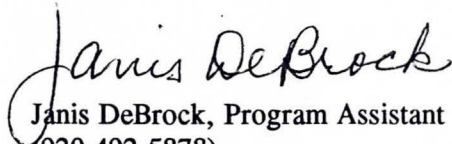
Enclosed is a list of environmental consultants and some important tips on selecting a consultant. If you are eligible for reimbursement of costs under Wisconsin's PECFA program (see last paragraph), you will need to compare at least three consultants' proposals before hiring a consultant. Consultants and laboratories working in the PECFA program are required to carry errors and omissions insurance to help protect you against unsuitable work. Also enclosed are materials on controlling costs, understanding the cleanup process, and choosing a site cleanup method. This information has been prepared to help you understand your responsibilities and what your environmental consultant needs to do. Please read this information carefully.

Financial Information

Reimbursement from the Petroleum Environmental Cleanup Fund (PECFA) is available for the costs of cleaning up contamination from eligible petroleum storage tanks. The fund is administered by the Wisconsin Department of Commerce (DCOM). Please contact DCOM at (608) 266-2424 for more information on eligibility and regulations for this program.

Thank you for your cooperation.

Sincerely,


Janis DeBrock, Program Assistant
(920-492-5878)

Enc: Selecting An Environmental Consultant; Consultant List
 Controlling UST Cleanup Costs Factsheets
 Quarterly Updates for Cleanup of Contaminated Properties
 Cleanup Process for Emergency & Remedial Response Program
 Cleanup Methods for Petroleum Contaminated Soil & Groundwater

cc: Northern Environmental, 1203 Storbeck Drive, Waupun, WI 53963

Wisconsin Department of Natural Resources

Notification of Petroleum Contamination from Underground / Aboveground Storage Tank Systems

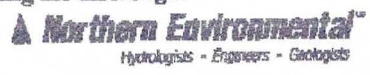
Please complete this form and FAX it to the appropriate WDNR contact person (see list on back page) immediately upon discovery of a release from an UST / AST system.

TO: WDNR, Attn: Janis DeBroek
FAX #: (920) 492 5859

03-36-170638

PLEASE PRINT

1. Name, company, mailing address and phone number of person reporting the discharge:



1203 Starbeck Drive
Waupun, WI 53083
920-324-8800
1-800-488-3821
Fax: 920-324-3023
E-Mail: nenvir@northern-env.com
Web Site: www.northern-env.com

Curt W. Wendt
Environmental Scientist
1203 Starbeck Dr.
Waupun
53083

2. Site Information

Name of site at which discharge occurred (local name of site/business -- not responsible party name, unless a residence): Mirco Corporation

Location (actual street address, not PO box; if no street address, describe as precisely as possible, i.e., 1/4 mile NW of CTHs 60 & 123 on E side of CTH 60):
2055 Mirco Drive

Municipality (city, village, township in which the site is located -- not mailing address):
Manitowoc

County:
Manitowoc

Legal Description: NE 1/4, SE 1/4, Section 9, Tn 19, Range 24 E W

3. Responsible Party (RP) and/or RP Representative Information

RP / Business Name: Mirco Corporation

Contact Person (if different): Thomas Reed

Mailing Address (with zip code):
1512 Washington Street, P.O. Box 1330
Manitowoc, WI 54221-1330

Telephone Number:
920 414-584-4421

4. Identity, physical state and quantity of the hazardous substance discharged (check all that apply):

- Unleaded gasoline
- Leaded gasoline
- Diesel
- Fuel oil Unknown quantity
- Waste oil
- Other

5. Impacts to the environment (enter "K" for known/confirmed or "P" for potential for all that apply):

- Fire/explosion threat
- Contaminated private wells (# of wells) _____
- Contaminated public wells
- Groundwater contamination
- Soil contamination
- Surface water impacts
- Floating product
- Other _____

6. Contamination was discovered as a result of:

- Tank closure assessment
- Site assessment
- (other) _____

On what date: August 13, 1997

Additional Comments:

One soil sample contained DRO at 290 mg/kg & another at 32 mg/kg.

FAX numbers to report leaking tank sites in DNR's five regions are as follows:

Northeast Region (920-492-5859)

Underground Tanks: Attention - Janis DeBrock

Aboveground Tanks: Attention - Roxanne Chronert

Brown, Calumet, Door, Fond du Lac (except City of Waupun), Green Lake, Kewaunee, Manitowoc, Marinette, Marquette, Menominee, Oconto, Outagamie, Shawano, Waupaca, Waushara, Winnebago Counties

Northern Region (715-365-8932); Attention - Janet Kazda:

Ashland, Barron, Bayfield, Burnett, Douglas, Forest, Florence, Iron, Langlade, Lincoln, Oneida, Polk, Price, Rusk, Sawyer, Taylor, Vilas, Washburn Counties

South Central Region (608-275-3388); Attention - Marilyn Jahake:

Columbia, Crawford, Dane, Dodge, Fond du Lac (City of Waupun only), Grant, Green, Iowa, Jefferson, Lafayette, Richland, Rock, Sauk Counties

Southeast Region (414-229-0810); Attention - Mike Farley:

Kenosha, Milwaukee, Ozaukee, Racine, Sheboygan, Walworth, Washington, Waukesha Counties

West Central Region (715-839-6076); Attention - John Grump:

Adams, Buffalo, Chippewa, Clark, Dunn, Eau Claire, Jackson, Juneau, LaCrosse, Marathon, Monroe, Pepin, Pierce, Portage, St. Croix, Trempealeau, Vernon, Wood Counties