

GIS REGISTRY INFORMATION

SITE NAME: MIRRO PLANT #9

BRRTS #: 03-36-274209 **FID # (if appropriate):**

COMMERCE # (if appropriate): 54220-5046-12

CLOSURE DATE: 11/26/2003

STREET ADDRESS: 1512 WASHINGTON STREET

CITY: MANITOWOC

SOURCE PROPERTY GPS COORDINATES (meters in WTM91 projection): X= 706682 Y= 404483

CONTAMINATED MEDIA: Groundwater Soil Both

OFF-SOURCE GW CONTAMINATION >ES: Yes No

IF YES, STREET ADDRESS 1: _____

GPS COORDINATES (meters in WTM91 projection): X= _____ Y= _____

OFF-SOURCE SOIL CONTAMINATION >Generic or Site-Specific RCL (SSRCL): Yes No

IF YES, STREET ADDRESS 1: _____

GPS COORDINATES (meters in WTM91 projection): X= _____ Y= _____

CONTAMINATION IN RIGHT OF WAY: Yes No

DOCUMENTS NEEDED:

Closure Letter, and any conditional closure letter issued	X
Copy of most recent deed, including legal description, for all affected properties	X
Certified survey map or relevant portion of the recorded plat map (if referenced in the legal description) for all affected properties	X
County Parcel ID number, if used for county, for all affected properties	NA
Location Map which outlines all properties within contaminated site boundaries on USGS topographic map or plat map in sufficient detail to permit the parcels to be located easily (8.5x14" if paper copy). If groundwater standards are exceeded, the map must also include the location of all municipal and potable wells within 1200' of the site.	X
Detailed Site Map(s) for all affected properties, showing buildings, roads, property boundaries, contaminant sources, utility lines, monitoring wells and potable wells. (8.5x14", if paper copy) This map shall also show the location of all contaminated public streets, highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding ch. NR 140 ESs and soil contamination exceeding ch. NR 720 generic or SSRCLs.	X
Tables of Latest Groundwater Analytical Results (no shading or cross-hatching)	NA
Tables of Latest Soil Analytical Results (no shading or cross-hatching)	X
Isoconcentration map(s), if required for site investigation (SI) (8.5x14" if paper copy). The isoconcentration map should have flow direction and extent of groundwater contamination defined. If not available, include the latest extent of contaminant plume map.	NA
GW: Table of water level elevations, with sampling dates, and free product noted if present	NA
GW: Latest groundwater flow direction/monitoring well location map (should be 2 maps if maximum variation in flow direction is greater than 20 degrees)	NA
SOIL: Latest horizontal extent of contamination exceeding generic or SSRCLs, with one contour	X
Geologic cross-sections, if required for SI. (8.5x14" if paper copy)	NA
RP certified statement that legal descriptions are complete and accurate	X
Copies of off-source notification letters (if applicable)	NA
Letter informing ROW owner of residual contamination (if applicable)(public, highway or railroad ROW)	NA
Copy of (soil or land use) deed restriction(s) or deed notice if any required as a condition of closure	NA



November 26, 2003

Mr. Lou Meschede
Newell Rubbermaid, Inc.
6833 Stalter Drive, Suite 101
Rockford, IL 61108

RE: **Final Closure**

Commerce # 54220-5046-12 **WDNR BRRS # 03-36-274209**
Mirro Plant #9, 1512 Washington Street, Manitowoc

Dear Mr. Meschede:

The Wisconsin Department of Commerce (Commerce) has received the item required as the condition for closure for the site referenced above. This case 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 that were conducted.

If residual contamination is encountered in the future, it must be managed in accordance with all applicable state and federal regulations. If it is determined that any remaining contamination poses a threat, the case may be reopened and further investigation or remediation may be required.

Thank you for your efforts to bring this case to closure. 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', with a long horizontal flourish extending to the right.

Robert H. Klauk, PG
Hydrogeologist
Site Review Section

cc: Lynelle P. Caine - Northern Environmental Technologies, Inc.
Case File



December 18, 2001

Dr. Peter J. Schultz
Environmental Affairs
6833 Stalter Drive, Suite 101
Rockford, IL 61108

RE: **Conditional Closure**

Commerce #54220-5046-12 WDNR BRRS #03-36-274209
Mirro Plant #9, 1512 Washington, Manitowoc

Four 4,406-gallon fuel oil USTs

Dear Dr. Schultz:

The closure request for Mirro Plant #9, 1512 Washington, Manitowoc has been reviewed by Wisconsin Department of Commerce (department) Bureau of PECFA Site Review Section staff. Using the standards established in the Wisconsin Administrative Code NR 700 series, the department has determined the site has been investigated to a level indicating residual soil contamination meets environmental standards and **no further action** is necessary. In making this determination, the following documents prepared by Northern Environmental was reviewed:

- *Underground Storage Tank Closure Assessment, November 2001*

The presence of residual soil contamination necessitates that the owner sign and record a soil notification for the property. **The department recommends that a figure showing the location of the soil contamination be attached.**

The following documentation is necessary to satisfy conditions for closure:

1. A notification must be placed on the property deed addressing residual soil impacts. For case closure, please submit a copy of the deed notification that contains the County Register of Deeds' recording information. Enclosed is 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 Departments of Commerce/Natural Resources computer data base, you or your consultant must submit the requested information.

Dr. Peter J. Schultz

Commerce #54220-5046-12 WDNr BRRTS #03-36-274209

Mirro Plant #9

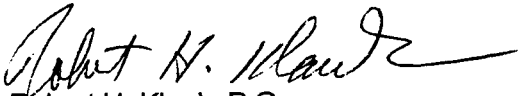
December 18, 2001

Page 2

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 to protect the environment. If you have questions, you may contact me at (920) 424-0046.

Sincerely,



Robert H. Klauk, P.G.

Hydrogeologist

Site Review Section

Enclosure

cc: Nicole L. LaPlant – Northern Environmental
Case File

Legal Description

RECORD LEGAL DESCRIPTION:

All of Block 246, Original Plat of the City of Manitowoc, Manitowoc County, Wisconsin.

NEW MEASURED LEGAL DESCRIPTION:

Lots 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 and 18, Block 246, Original Plat of Manitowoc, City of Manitowoc, Manitowoc County, Wisconsin being more particularly described as follows:

Beginning at the Southeast corner of said Lot 17; thence N89 degrees 37'15"W, 300.00 feet; thence N00 degrees 20'39"E, 540.00 feet; thence S89 degrees 37'15"E, 300.00 feet; thence S00 degrees 20'39"E, 540.00 feet to the point of beginning.

Contained within said bounds 162,000 square feet or 3.7190 acres.

This description describes all the land described in the title commitment identified as Chicago Title Insurance Company Commitment Number X124416 having an effective date of October 20, 2003.

Notes Corresponding to Schedule B

10

Revocable Occupancy Permit recorded September 27, 2001 in Volume 1557, Page 355 as Document Number 886656. This item is plotted hereon and does affect the subject property.

ALTA/ACSM Land Title Survey

rk
ys

WARRANTY DEED

No.

104958

This Indenture, Made this 3rd day of April in the year of our Lord, one thousand nine hundred and eleven between Michael L. Kleman and Dora Kleman his wife of Manitowish part 1st of the first part, and Aluminum Goods Mfg Company a corporation organized under the laws of New Jersey part 2^d of the second part

Witnesseth, That the said part 1st of the first part, for and in consideration of the sum of Four Thousand (4000⁰⁰) Dollars to them in hand paid by the said party of the second part, the receipt whereof is hereby confessed and acknowledged, have given, granted, bargained, sold remised, released, aliened, conveyed and confirmed, and by these presents do give, grant, bargain, sell, remise, release, alien, convey and confirm unto the said party of the second part its successors heirs and assigns forever, the following described real estate, situated in the county of Manitowish and State of Wisconsin, to-wit:

Lot No. Nine (9) in Block No two hundred forty - Six (246) in the city of Manitowish Wisconsin according to the recorded plat thereof

Together with all and singular the hereditaments and appurtenances thereunto belonging or in any wise appertaining, and all the estate, right, title, interest, claim or demand whatsoever, of the said part 1st of the first part, either in law or equity, either in possession or expectancy of, in and to the above bargained premises, and their hereditaments and appurtenances.

To Have and to Hold the said premises as above described, with the hereditaments, and appurtenances, unto the said party of the second part, and to its successors heirs and assigns FOREVER.

And the said Michael L. Kleman and Dora Kleman his wife for themselves their heirs, executors and administrators do covenant, grant, bargain and agree to and with the said party of the second part its successors heirs and assigns, that at the time of the encasing and delivery of these presents they are well seized of the premises above described, as of a good, sure, perfect, absolute and indefeasible estate of inheritance in the law, in fee simple, and that the same are free and clear from all encumbrances whatsoever.

and that the above bargained premises in the quiet and peaceful possession of the said party of the second part its successors heirs and assigns against all and every person or persons lawfully claiming the whole or any part thereof they will forever warrant and defend.

In Witness Whereof, the said party of the first part have hereunto set their hands and seals the day and year first above written.

Signed, Sealed and Delivered in Presence of
Allen Kleman
Frank Hoffmann

Michael L. Kleman [SEAL]
Dora Kleman [SEAL]
 _____ [SEAL]

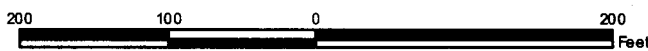
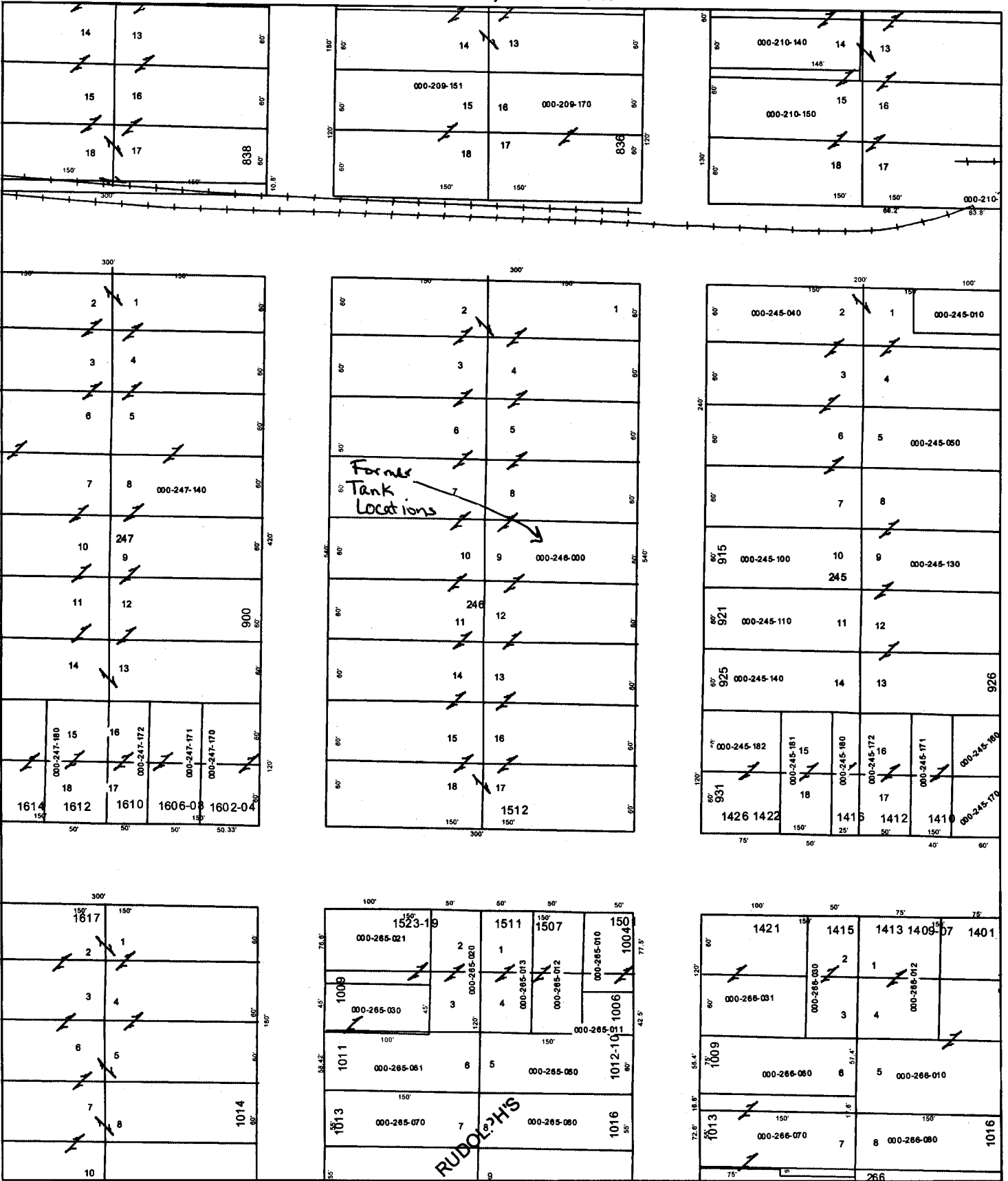
STATE OF WISCONSIN, }
 COUNTY OF Manitowish, ss.

BE IT REMEMBERED, That on the 3rd day of April

A. D. 1911, personally came before me the above named Michael L. Kleman and Dora Kleman his wife to me known to be the persons who executed the above Deed and acknowledged the same to be their free act and deed, for the uses and purposes therein mentioned.

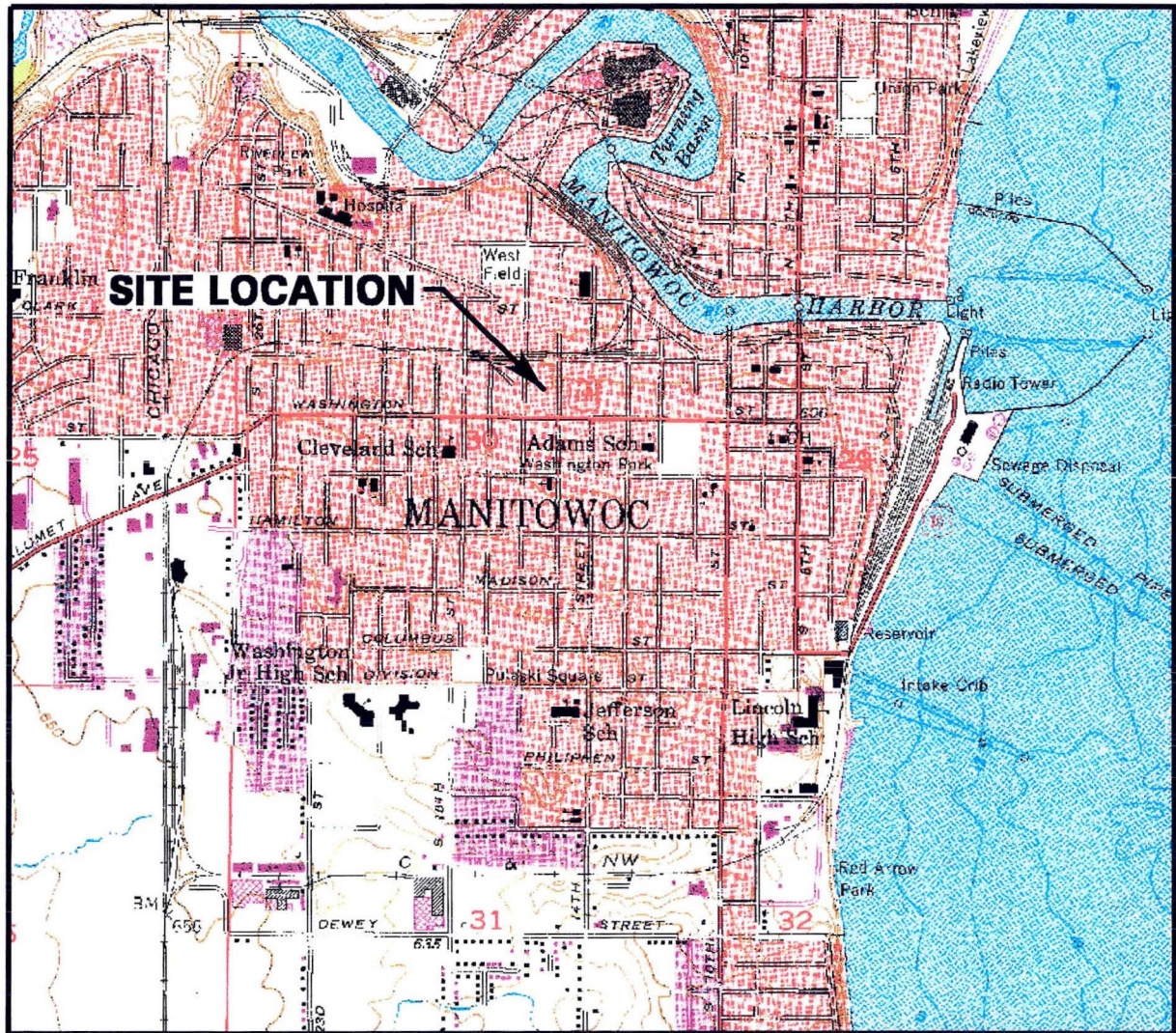
Received for record at 11³⁵ o'clock A. M. Mar 9th A. D. 1911
Notary Public
Frank Hoffmann

Manitowoc, Wisconsin



Tax parcel maps & data are believed to be accurate, but are not warranted.
This is not a legal document and is not intended for legal, survey, or related uses.





SCALE IN FEET

1" = 2000'




CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929



QUADRANGLE LOCATION



BASE MAP SOURCE: USGS MANITOWOC, WISCONSIN 7.5 MINUTE QUADRANGLE, 1954 (PHOTOREVISED 1973)

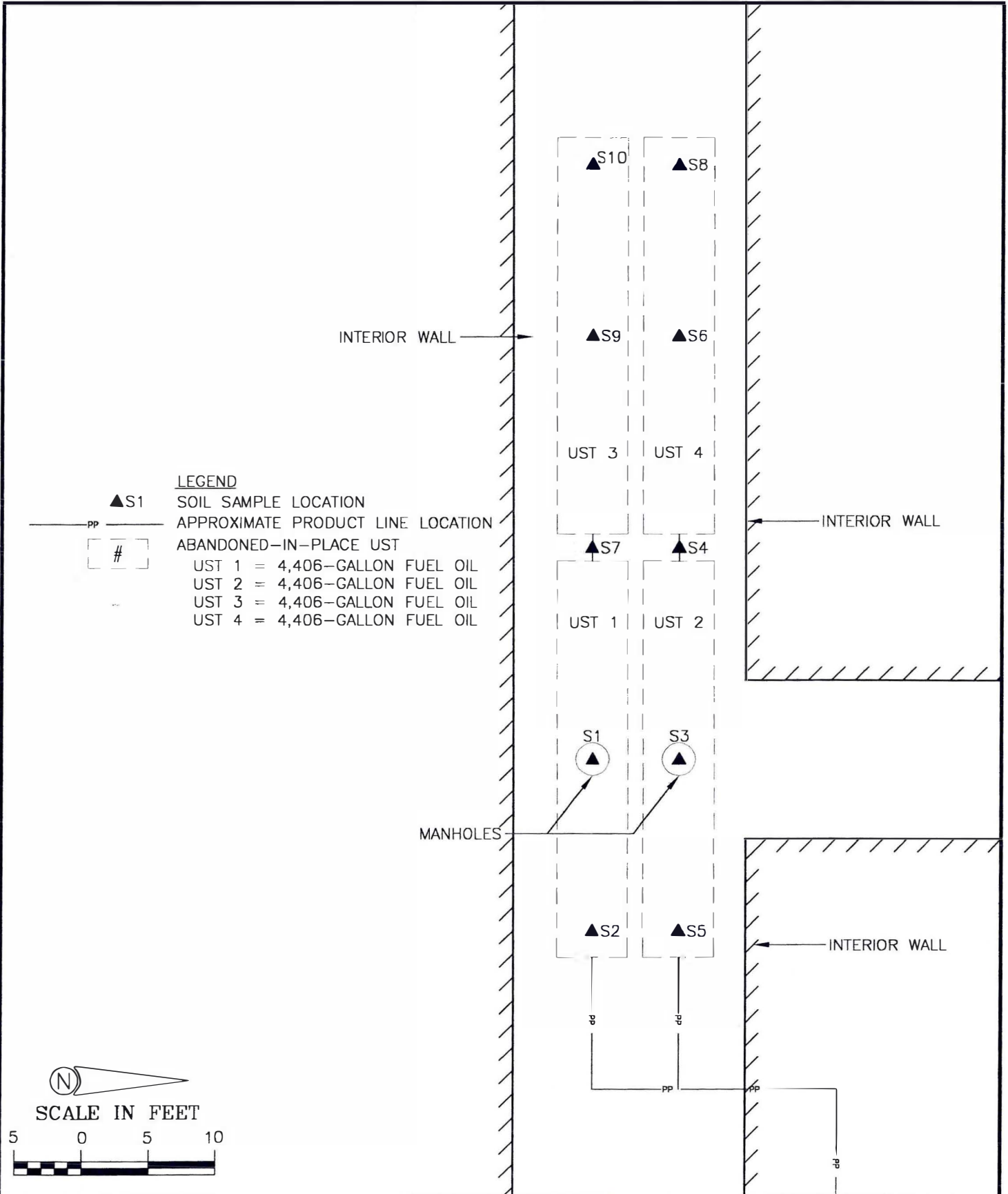
DRAWN BY: KRE	PROJECT: ESP-1241	DATE: 9/18/01
REV. DATE	THIS DRAWING AND ALL INFORMATION CONTAINED THEREON IS THE PROPERTY OF NORTHERN ENVIRONMENTAL INCORPORATED AND SHALL NOT BE COPIED OR USED EXCEPT FOR THE PURPOSE FOR WHICH IT IS EXPRESSLY FURNISHED.	
 Northern Environmental SM Hydrologists · Engineers · Geologists		

MIRRO COMPANY PLANT #9
MANITOWOC, WISCONSIN

SITE LOCATION AND
LOCAL TOPOGRAPHY

S:\PROJ\ESP\22001241\DRAWINGS\081801-1.DWG

FIGURE 1



LEGEND

- ▲ S1 SOIL SAMPLE LOCATION
- PP — APPROXIMATE PRODUCT LINE LOCATION
- [#] ABANDONED-IN-PLACE UST
- UST 1 = 4,406-GALLON FUEL OIL
- UST 2 = 4,406-GALLON FUEL OIL
- UST 3 = 4,406-GALLON FUEL OIL
- UST 4 = 4,406-GALLON FUEL OIL



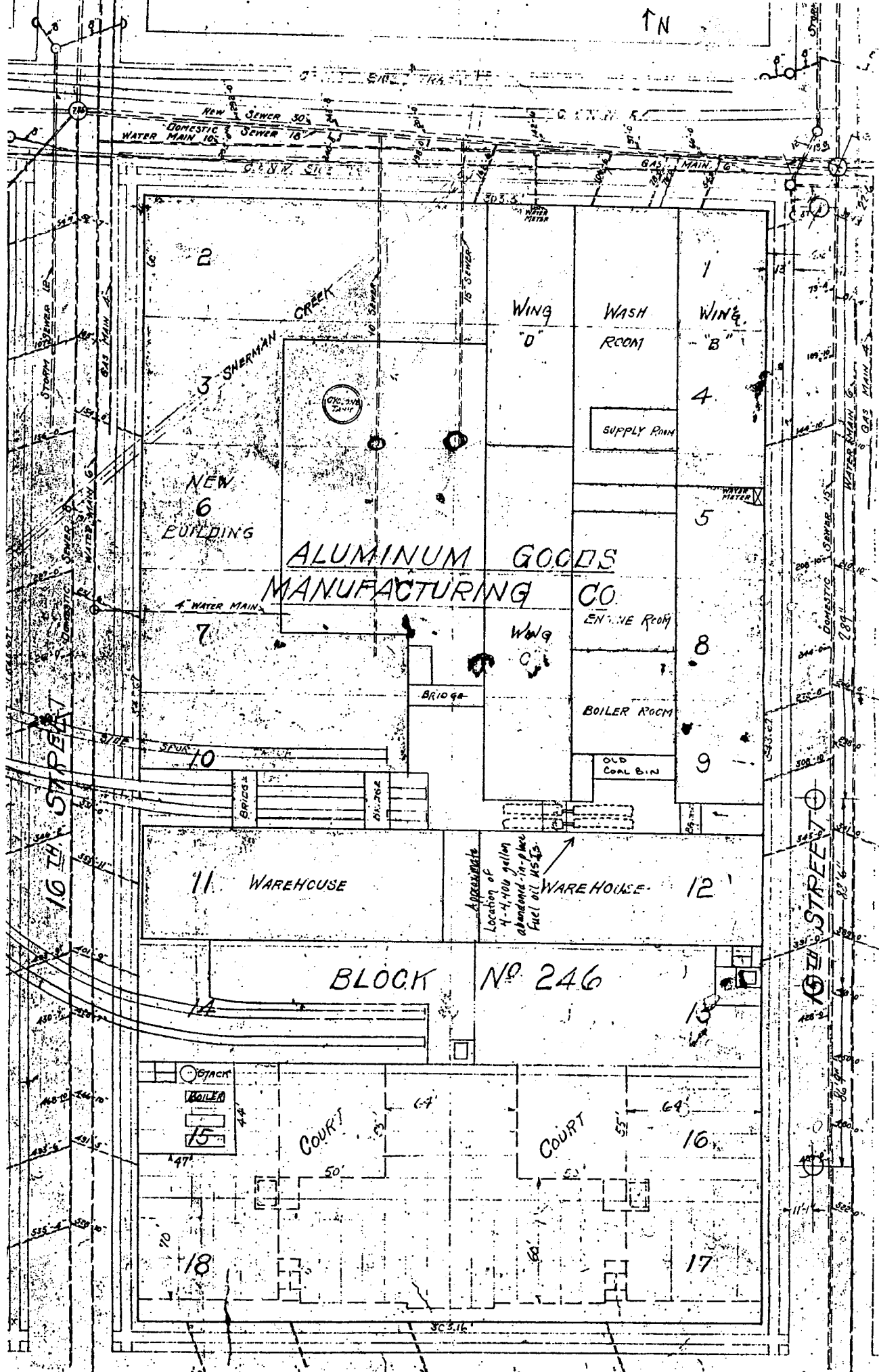
DRAWN BY: KRE	PROJECT: ESP-1241	DATE: 9/18/01
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Northern Environmental SM Hydrologists • Engineers • Geologists		

MIRRO COMPANY PLANT #9
MANITOWOC, WISCONSIN

SITE LAYOUT WITH
SOIL SAMPLE LOCATIONS

FIGURE 2

S:\PROJ\ESP_22001241\DRAWINGS\091801--2.DWG



MAP PROVIDED BY THE MIRRO COMPANY

FIGURE 1

↑ N

↑ N

ALUMINUM GOODS MANUFACTURING CO.

BLOCK NO. 246

2

1

NEW 6 BUILDING

Wing "D"

WASH ROOM

Wing "B"

SUPPLY ROOM

4

5

7

Wing "C"

ENGINE ROOM

8

BOILER ROOM

9

OLD COAL BIN

10

11 WAREHOUSE

WAREHOUSE 12

Approximate Location of 4-4,000 gallon abandoned-in-place fuel oil tanks

COURT

COURT

18

17

Stack BOILER 15

47'

44'

67'

69'

70'

60'

303.16'

50'

55'

44'

47'

44'

40'

40'

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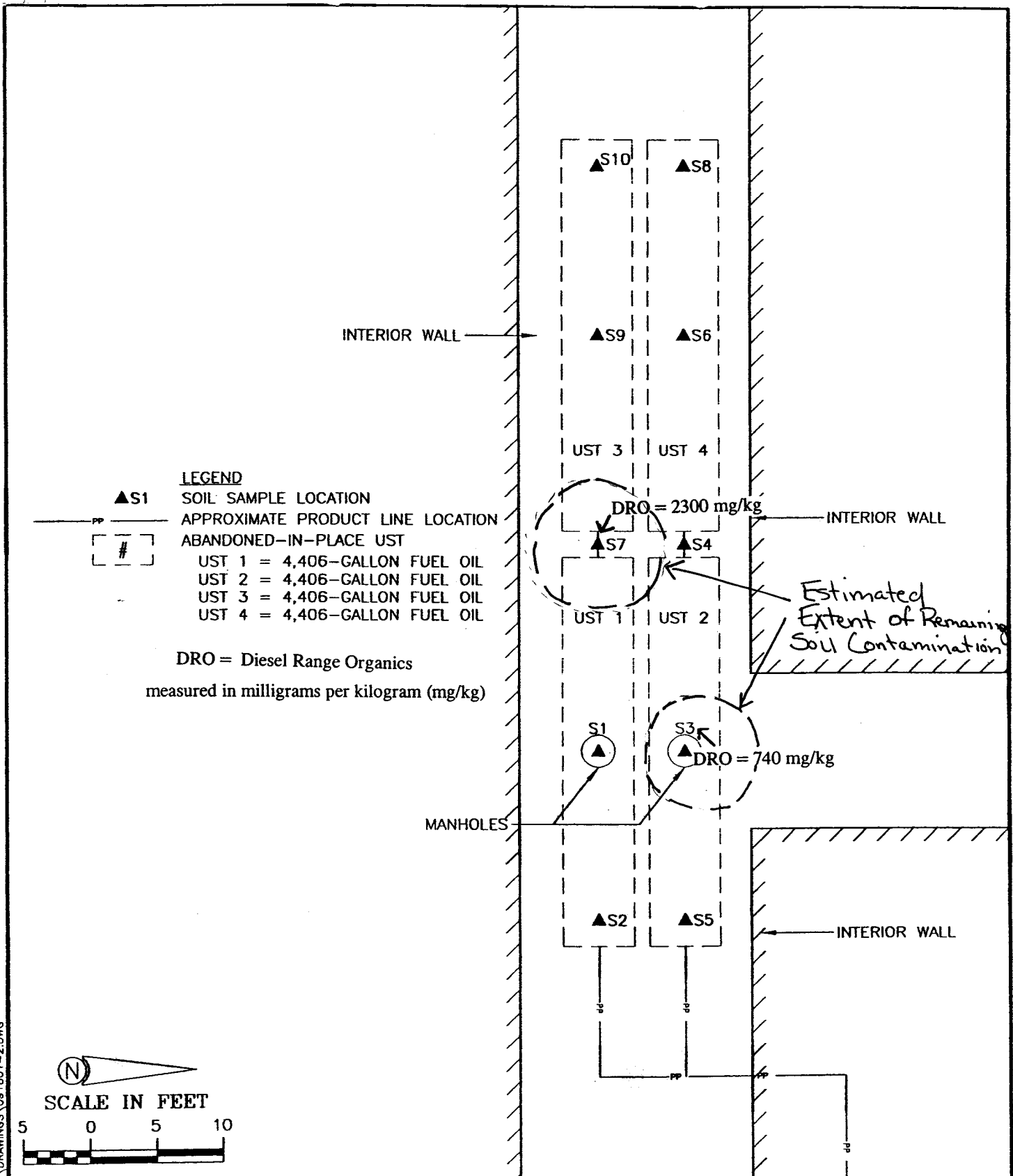
40'

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DRAWN BY: KRE PROJECT: ESP-1241 DATE: 9/18/01

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
Hydrologists • Engineers • Geologists

MIRRO COMPANY PLANT #9
MANITOWOC, WISCONSIN

SITE LAYOUT WITH
SOIL SAMPLE LOCATIONS

FIGURE 2

Table 4 Soil Analytical Results, Mirro Company Plant #09, Manitowoc, Wisconsin

Sample Number	Date Sampled	DRO (mg/kg)	Relevant and Significant Analytical Results (µg/kg)										
			Benzene	Ethylbenzene	MTBE	Toluene	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	Xylenes	1-Methyl Naphthalene	2-Methyl Naphthalene	Naphthalene	Pyrene
WAC Residual Contaminant Level		100	5.5	2900	NE	1500	NE	NE	4100	NE	NE	NE	NE
S1	06/20/01	< 10	---	---	---	---	---	---	---	---	---	---	---
S2	06/20/01	< 10	---	---	---	---	---	---	---	---	---	---	---
S3	06/20/01	740	---	---	---	---	---	---	---	---	---	---	---
S4	06/20/01	11	---	---	---	---	---	---	---	---	---	---	---
S5	06/20/01	< 10	---	---	---	---	---	---	---	---	---	---	---
S6	06/20/01	< 10	---	---	---	---	---	---	---	---	---	---	---
S7	06/20/01	2300	< 25	37	< 25	< 25	1100	430	200	390	540 "J"	140 "J"	410 "J"
S8	06/20/01	< 10	---	---	---	---	---	---	---	---	---	---	---
S9	06/20/01	< 10	---	---	---	---	---	---	---	---	---	---	---
S10	06/20/01	< 10	---	---	---	---	---	---	---	---	---	---	---

Key:

- DRO = Diesel Range Organics
- MTBE = Methyl-Tertiary-Butyl-Ether
- mg/kg = Milligrams per kilogram
- µg/kg = Micrograms per kilogram
-
- NE = Not Analyzed
- NE = Not Established by Wisconsin Administrative Code

Newell RubbermaidTM

November 19, 2003

Transmit via overnight delivery


To Whom It May Concern:

Subject: ***Former Mirro Plant #9, 1512 Washington Street, Manitowoc, WI***

This is to confirm that the legal description attached to this letter for the fuel oil release (BRRTS #03-36-274209) at Mirro Plant #9, 1512 Washington Street, Manitowoc, Wisconsin is complete and accurate.

If you have any questions, please feel free to call me at (815) 233-8059.

Sincerely,



Arthur C. Garcia, Jr.
Manager, Real Estate & Property

Enclosures



November 26, 2003

Mr. Lou Meschede
Newell Rubbermaid, Inc.
6833 Stalter Drive, Suite 101
Rockford, IL 61108

RE: **Final Closure**

Commerce # 54220-5046-12 **WDNR BRRTS # 03-36-274209**
Mirro Plant #9, 1512 Washington Street, Manitowoc

Dear Mr. Meschede:

The Wisconsin Department of Commerce (Commerce) has received the item required as the condition for closure for the site referenced above. This case 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 that were conducted.

If residual contamination is encountered in the future, it must be managed in accordance with all applicable state and federal regulations. If it is determined that any remaining contamination poses a threat, the case may be reopened and further investigation or remediation may be required.

Thank you for your efforts to bring this case to closure. 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', with a long horizontal line extending to the right.

Robert H. Klauk, PG
Hydrogeologist
Site Review Section

cc: Lynelle P. Caine - Northern Environmental Technologies, Inc.
Case File

RECEIVED

NOV 25 2003

LETTER OF TRANSMITTAL

ERS DIVISION
OSHKOSH

▲ Northern Environmental™
 Hydrologists • Engineers • Geologists
 954 Circle Drive 1-920-592-8400
 Green Bay, WI 54304-5537 Toll Free 1-800-854-0606
 Web Site: www.northern-env.com Fax 1-920-592-8444

Date: 11/24/03	Project No. ESP-1241
Attention: Mr. Bob Klauk	
RE: Soil GIS Packet	
Mirro Plant # 9, 1512 Washington Street	
Manitowoc, WI	
BRRTS #03-36-274209	
Commerce #54220-5046-12	

TO: Mr. Bob Klauk
WI. Department of Commerce
2129 Jackson Street
Oshkosh, WI 54901

WE ARE SENDING YOU:

- Attached Under Separate Cover
 Shop Drawings Specifications Plans
 Copy of Letter Samples Change Order

COPIES	DESCRIPTION
1	Soil GIS Packet

THESE ARE TRANSMITTED

- | | | |
|---|---|---|
| <input type="checkbox"/> For Approval | <input type="checkbox"/> No Exceptions Taken | <input type="checkbox"/> Resubmit _____ Copies for Review |
| <input type="checkbox"/> For Your Use | <input type="checkbox"/> Make Noted Corrections | <input type="checkbox"/> Submit _____ Copies for Distribution |
| <input type="checkbox"/> As Requested | <input type="checkbox"/> Amend and Resubmit | <input type="checkbox"/> Return _____ Corrected Prints |
| <input type="checkbox"/> For Review and Comment | <input type="checkbox"/> _____ | <input type="checkbox"/> Review, Sign and Return |
| <input type="checkbox"/> For Bids Due: _____ | | |

REMARKS: Bob,
 The above referenced site received conditional closure on December 18, 2001. As a condition to closure Newell Rubbermaid has opted to add the site to the soil GIS registry. The soil GIS packet is attached and the \$200 fee has been submitted to the WDNR.
 Newell Rubbermaid currently owns all of Block #246 – a copy of the legal description for the entire block is attached. According to the Manitowoc County Register is Deeds each lot within the block has a separate deed. The remaining soil contamination is located within Lot 9 of Block #246. The most recent deed for Lot 9 is attached. Please feel free to call with any questions.

COPY TO: Lou Meschede, Newell Rubbermaid

SIGNED: _____

Lynelle P. Caine

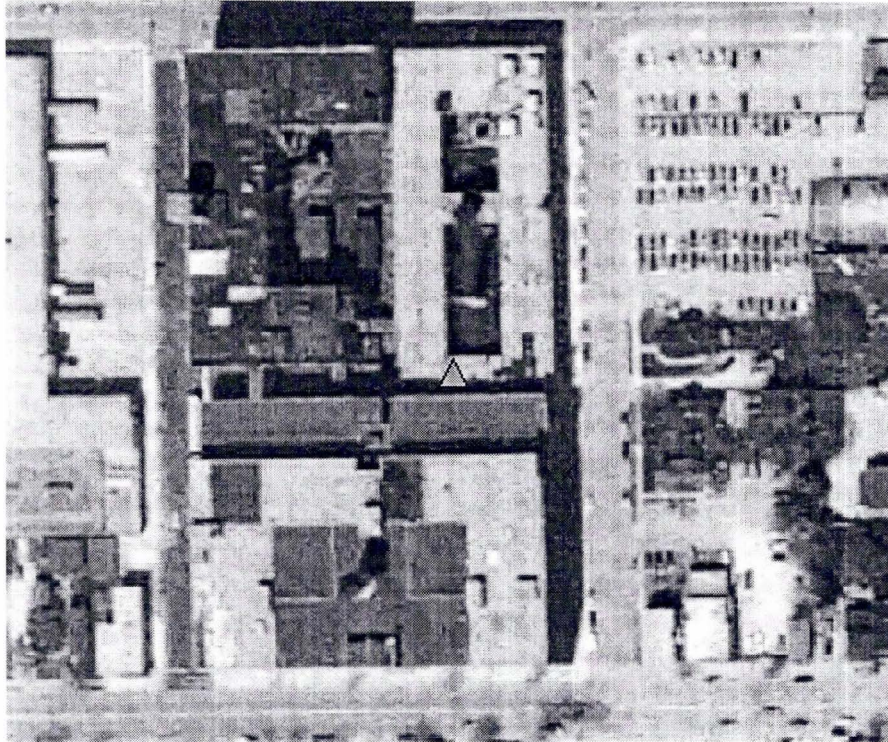
Checklist of Documents for GIS Registry Packet

WI DNR, Bureau for Remediation and Redevelopment, PUB-RR-688

(Include with closure request – please assemble in this order. *This checklist applies to closure requests for sites with groundwater exceeding ch. NR 140 standards and/or soil contamination exceeding ch. NR 720 generic or site specific residual contaminant levels (RCLs).*)

- N/A One-time fee of \$250.00 for groundwater, and/or
- \$200 for soil, for each case closed, for maintenance of the registry.
- Copies of the most recent deed including legal descriptions, for all properties within or partially within the contaminated site boundaries. (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.)
- A copy of the certified surveyed 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. lot2 of xyz subdivision))
- Parcel identification number for each property, if the county in which the property is located uses parcel identification numbers. Part of Parcel # 000246000
- Geographic position of all properties within or partially within the contaminated site boundaries. The coordinates need to be for a spot located at least 40 feet inside the property boundary. Refer to NR 716.15(2)(d)7, and (k). The coordinates must be in WTM91 projection. See the following WDNR website address for assistance: www.dnr.state.wi.us/org/at/et/geol/gwurl/index.htm.
- A location map which outlines all properties within the contaminated site boundaries on a U.S.G.S. topographic map or plat map in sufficient detail to permit the easy location of all parcels. If groundwater standards are exceeded, the map must also include the location of all municipal and potable wells within 1200 feet of the site. (If only one parcel, combine with next item.)
- A map of all contaminated properties within site boundaries, showing buildings, roads, property boundaries, contaminant sources, utility lines, monitoring wells and potable wells. This map shall also 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 ch. NR 140 enforcement standards, and/or in relation to the boundaries of soil contamination exceeding generic or site-specific residual contaminant levels as determined under s.. NR 720.09, 720.11 and 720.19.
- A table of the most recent analytical results, with sample collection dates: from all monitoring wells, and any potable wells for which samples have been collected for groundwater, and/or showing results for all contaminants found in pre-remedial sampling and in the most recent soil sampling event, for soils (without shading/crosshatching).
- N/A An isoconcentration map, if required as part of the site investigation (SI), of the contaminated properties within the site boundaries. The map should include the areal extent of groundwater contamination exceeding PALs and ESs, groundwater flow directions based on the most recent data, and sample collection dates. **If an isoconcentration map was not required as part of the SI, substitute a map showing the horizontal extent of contamination, based on the most recent data.**
- N/A A table of the previous 4 water level elevation measurements from all monitoring wells, at a minimum, with the date measurements were made, is to be included. If present, free product is to be noted on the table. In addition, a groundwater flow direction map, representative of groundwater movement at the site. If the flow direction varies by more than 20° over the history of the site, 2 groundwater flow maps showing the maximum variation in flow direction are to be submitted
- For sites closing with residual soil contamination, include a map showing the location of all soil samples and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeds generic or site specific residual contaminant levels.
- N/A A geologic cross section, if required as part of the SI, showing vertical extent and location of residual soil contamination exceeding generic or site specific RCLs and residual groundwater contamination, source extent and location; isoconcentrations for all groundwater contaminants that exceed PALs that remain when closure is requested; water table and piezometric elevations, and the location and elevation of geologic units, bedrock, and confining units, if any.
- A statement signed by the responsible party, which states that he or she believes that the legal descriptions attached to the statement are complete and accurate. (The point here is that the legal descriptions are describing the correct (i.e. contaminated) properties.)
- N/A A copy of the letters sent by the RP to all owners of properties with groundwater exceeding ESs (including the current source-property owner, if the RP is not the current source-property owner.) (Off source properties are listed separately with a link to the source property.)
- N/A A copy of all written notifications provided (to City/village/municipality/state agency or other responsible for maintenance) of a public street or highway or railroad right-of-way, within or partially within the boundaries of the contaminated site, for contamination exceeding groundwater ESs and/or soil exceeding generic or site specific RCLs.

Scale 1 : 1,537



more information.

Please read the documentation for

△WTM coordinates: 706682, 404483

Table 3, Soil Field Screening Results, Mirro Company, Plant #09, Manitowoc, WI

Sample Number	Sample Depth (feet)	Sample Petroleum Odor	Sample Description	Date Collected	PID Headspace Analysis		
					Time Collected	Time Analyzed	PID Response (IUI)
S1	7.5	Slight Fuel Oil	Sand Backfill	6/20/01	1150	1300	8
S2	7.5	Slight Fuel Oil	Sand Backfill	6/20/01	1200	1301	16
S3	7.5	Slight Fuel Oil	Sand Backfill	6/20/01	1205	1302	8
S4	-7.5	None	Sand Backfill	6/20/01	1210	1303	0
S5	7.5	Slight Fuel Oil	Sand Backfill	6/20/01	1215	1304	8
S6	7.5	None	Sand Backfill	6/20/01	1220	1305	0
S7	7.5	Old Fuel Oil	Fine Sand, Some Silt Petroleum Staining	6/20/01	1230	1306	40
S8	7.5	Slight Fuel Oil	Sand Backfill	6/20/01	1235	1307	4
S9	7.5	Slight Fuel Oil	Sand Backfill	6/20/01	1240	1308	4
S10	7.5	None	Sand Backfill	6/20/01	1245	1309	0

Key:

PID = Photoionization Detector

iui = Instrument units as isobutylene



December 18, 2001

Dr. Peter J. Schultz
Environmental Affairs
6833 Stalter Drive, Suite 101
Rockford, IL 61108

RE: **Conditional Closure**

Commerce #54220-5046-12 WDNR BRRTS #03-36-274209
Mirro Plant #9, 1512 Washington, Manitowoc

Four 4,406-gallon fuel oil USTs

Dear Dr. Schultz:

The closure request for Mirro Plant #9, 1512 Washington, Manitowoc has been reviewed by Wisconsin Department of Commerce (department) Bureau of PECFA Site Review Section staff. Using the standards established in the Wisconsin Administrative Code NR 700 series, the department has determined the site has been investigated to a level indicating residual soil contamination meets environmental standards and **no further action** is necessary. In making this determination, the following documents prepared by Northern Environmental was reviewed:

- *Underground Storage Tank Closure Assessment, November 2001*

The presence of residual soil contamination necessitates that the owner sign and record a soil notification for the property. **The department recommends that a figure showing the location of the soil contamination be attached.**

The following documentation is necessary to satisfy conditions for closure:

1. A notification must be placed on the property deed addressing residual soil impacts. For case closure, please submit a copy of the deed notification that contains the County Register of Deeds' recording information. Enclosed is 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 Departments of Commerce/Natural Resources computer data base, you or your consultant must submit the requested information.

Dr. Peter J. Schultz

Commerce #54220-5046-12 WDNr BRRTS #03-36-274209

Mirro Plant #9

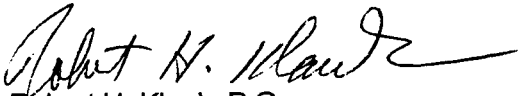
December 18, 2001

Page 2

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 to protect the environment. If you have questions, you may contact me at (920) 424-0046.

Sincerely,



Robert H. Klauk, P.G.

Hydrogeologist

Site Review Section

Enclosure

cc: Nicole L. LaPlant – Northern Environmental
Case File



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott McCallum, Governor
Darrell Bazzell, Secretary
Ronald W. Kazmierczak, Regional Director

Northeast Region Headquarters
1125 N. Military Ave., P.O. Box 10448
Green Bay, Wisconsin 54307-0448
Telephone 920-492-5800
FAX 920-492-5913
TTY 920-492-5912

November 16, 2001

Dr. Peter J. Schultz, Ph. D.
Environmental Affairs
Newell Rubbermaid, Inc.
6833 Stalter Drive Suite 101
Rockford, IL 61108

RECEIVED

NOV 19 2001

ERS DIVISION
OSHKOSH

SUBJECT: Transfer of Project Management to Department of Commerce
MIRRO PLT #9; 1512 WASHINGTON, MANITOWOC, WI;
WDNR BRRTS ID # 03-36-274209

Dear Dr. Schultz:

The State of Wisconsin divides the jurisdiction for sites contaminated by petroleum storage tank systems between the DNR and the Department of Commerce (Commerce), based on statutory definitions of high, medium and low risk sites. Under this statute, oversight of sites falling under the definition of "low or medium risk" is the responsibility of Commerce rather than the Wisconsin DNR.

Per the letter submitted on November 14, 2001 by Nicole LaPlant of Northern Environmental Technologies, Inc., this site falls under the definition of "low or medium risk". As such, staff at Commerce will provide further reviews of submittals and all technical assistance related to this case. Accordingly, DNR will transfer the above referenced file to Commerce at the following address:

ATTN: Bob Klauk
Wisconsin Department of Commerce
2129 Jackson St.
Oshkosh, WI 54901-1805
(920) 424-0046 FAX: (920) 424-0217

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

Sincerely,

Veronica Lorenz
Program Assistant
Bureau for Remediation and Redevelopment

cc: Bob Klauk, WI Dept. of Commerce, 2129 Jackson Street, Oshkosh, WI 54901
Karen Demcak, Mirro Company, P.O. Box 1330, Manitowoc, WI 54221-1330
Nicole LaPlant, Northern Environmental Technologies, Inc., 954 Circle Drive, Green Bay, WI 54304

November 13, 2001
(ESP03-2200-1241)

Mr. Keld Lauridsen
Wisconsin Department of Natural Resources
1125 North Military Avenue
Post Office Box 10448
Green Bay, Wisconsin 54307

RECEIVED

NOV 19 2001

ERS DIVISION
OSHKOSH

Re: Recommendation for Site Transfer to WDCOMM, Mirro Company Plant #09, 1512 Washington Street, Manitowoc, Wisconsin 54166; BRRTs ID #03-36-274209

Dear Mr. Lauridsen:

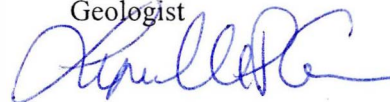
Northern Environmental Technologies, Incorporated has completed a closure assessment for four fuel oil underground storage tanks (USTs) abandoned-in-place inside the building at Mirro Plant #09, 1512 Washington Street, Manitowoc, Wisconsin (the Site). Results of the soil samples collected during the UST closure assessment indicate that a petroleum release has occurred from the USTs and has impacted a limited volume of soil. Based on data collected during the closure assessment, it appears that the extent of soil contamination has been defined. Ground water was not encountered during the UST closure assessment. Two site investigations (BRRTs #03-36-000085 and BRRTs #02-26-216391) have been previously conducted at the Site, and as part of these investigations, several monitoring wells were installed downgradient of this release. Closure of these sites was granted during 1999 and 2000 with Chapter NR 140, Wisconsin Administrative Code variances granting a Preventive Action Limit (PAL) exemption.

Based on the results of the soil samples collected during the UST closure assessment and the historical information available for the Site from the previous investigations, we believe that further investigation of this release is not necessary. Based on the available information, the Site meets the classification of a low risk site, and **we are requesting this Site be transferred from the WDNR to the WDCOMM.** If you have any questions regarding this submittal, please contact us at 920-592-8400.

Sincerely,
**Northern Environmental
Technologies, Incorporated**



Nicole L. LaPlant
Geologist



Lynelle P. Caine
Project Manager

LPC/hmo

c: Mr. Robert Klauk, WDCOMM
Dr. Peter Schultz, Newell Rubbermaid, Inc.
Mr. Doug Deaton, Mirro Company

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RECEIVED

NOV 14 2001

**ERS DIVISION
OSHKOSH**

**UNDERGROUND STORAGE
TANK CLOSURE ASSESSMENT**

**MIRRO COMPANY PLANT #09
1512 WASHINGTON STREET
MANITOWOC, WISCONSIN**

November 13, 2001

November 13, 2001
(ESP03-2200-1241)

954 Circle Drive
Green Bay, WI 54304
920-592-8400
1-800-854-0606
Fax • 920-592-8444
E-mail • netigb@admin.itol.com

Dr. Peter J. Schultz, Ph.D.
Newell Rubbermaid, Inc.
6833 Stalter Drive, Suite 101
Rockford, Illinois 61108

Re: Underground Storage Tank Closure Assessment and Recommendation for Case Closure,
Mirro Company Plant #09, 1512 Washington Street, Manitowoc, Wisconsin 54221;
BRRTs #03-36-274209

Dear Dr. Schultz:

Northern Environmental Technologies, Incorporated (Northern Environmental) was contacted by Environmental Services Plus, Ltd. (ESP) to complete an underground storage tank (UST) closure assessment for the Mirro Company Plant #09, 1512 Washington Street, Manitowoc, Wisconsin (the Site) (Figure 1). Four 4,406-gallon fuel oil USTs were abandoned-in-place at the Site on June 19, 2001. The UST site assessment conforms with Chapter COMM 10, Wisconsin Administrative Code (Wis. Adm. Code) and the Wisconsin Department of Natural Resources (WDNR) site assessment guidelines (WDNR, *Site Assessments for USTs Technical Guidance*, June 1993). This report has been distributed to yourself, Mr. Doug Deaton of the Mirro Company, Mr. Jesse Rose of ESP, and Mr. Robert Klauk of the Wisconsin Department of Commerce (WDCOMM).

Specific information regarding the Site, UST system, UST abandonment, and closure assessment are attached. Information about the UST system obtained from ESP (tank removal contractor) and Ms. Karen Demcak (a representative for the tank owner at the time of abandonment) is listed in Tables 1 and 2. The UST system layout is illustrated in Figure 2.

Ten soil samples were collected using a hand auger at the locations illustrated in Figure 2. Slight petroleum odors and photoionization detector (PID) readings were detected in soil samples collected from beneath the UST system. The soil samples were laboratory analyzed for diesel range organics (DRO). The soil sample exhibiting the highest field screening results was also analyzed for petroleum volatile organic compounds (PVOCs) and polynuclear aromatic hydrocarbons (PAHs). Laboratory analysis detected concentrations of 740, 11, and 2,300 milligrams per kilogram (mg/kg) DRO in soil samples S3, S4, and S7, respectively. Concentrations of several PVOCs were also detected in soil sample S7. Laboratory analysis did not detect concentrations of DRO in soil samples S1, S2, S5, S6, and S8 through S10. Field-screening and laboratory results are summarized in Tables 3 and 4, respectively. Copies of laboratory reports and chain-of-custody forms are attached.

The WDNR currently uses a concentration of 10 mg/kg DRO to require additional investigation (WDNR, *Release News*, Volume 5, Number 1, January 1995). Results of a site investigation are regulated by the soil cleanup standards presented in Chapter NR 720 Wis. Adm. Code. Residual contaminant levels (RCLs) that are protective of the ground-water quality in Wisconsin for DRO-contaminated soil have been established at 100 mg/kg for permeable soils by the WDNR (WDNR, *Wis. Adm. Code, Chapter NR720*, February 1997). Permeable soils are described as soils having a saturated hydraulic conductivity greater than 1×10^{-6} centimeters per second (cm/sec). The soil samples collected during the UST closure assessment, were predominantly sand. Based upon C. W. Fetter's *Applied Hydrology* text, the

hydraulic conductivity for sand ranges from 1×10^{-6} cm/sec to 1×10^{-1} cm/sec. In accordance with these published values, and our observations of the soil in the field, in our opinion, the sand found at the Site is a permeable soil in the context of NR 720, Wis. Adm. Code.

For discharges of hazardous substances into the environment from UST systems, NR 706, Wis. Adm. 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 suspected source of the released petroleum, the UST system, was abandoned-in-place.
- ▲ Soil sample laboratory analysis confirmed that petroleum was released.
- ▲ The released petroleum was reported to Ms. Cynthia Egtvedt of the WDNR on June 21, 2001 by Ms. Karen Demcak of the Mirro Company.

CONCLUSIONS AND RECOMMENDATIONS

Based on the results of the UST closure assessment, it appears that the petroleum release at the Site is minimal. Soil sampling results indicate that petroleum contaminated soil exists between the ends where UST 1 and 3 and UST 2 and 4 meet; and beneath the center of UST 2. Laboratory analysis detected concentrations of DRO in excess of the RCLs in soil samples S3 and S7 collected from beneath the center of UST 2 and between the ends of UST 1 and 3, respectively. Concentrations of DRO detected in soil sample S4, collected from between the ends of UST 2 and 4, were significantly below the RCLs. Concentrations of DRO, PVOCs, and PAHs in excess of the RCLs were not detected in any other soil samples.

Based on the results of soil sampling, it appears that the extent of soil contamination to the east and west of samples S3 and S7 has been adequately characterized and defined. Further definition of the extent of petroleum compounds in soil in the vicinity of the USTs to the north and south was prohibited by the building footings. The extent of the petroleum compounds to the north and south is expected to be similar to that defined to the east and west, which is minimal. In addition, an attempt was made to define the vertical extent of the soil contamination; however, a concrete slab was encountered beneath the USTs at approximately 7.5 feet below grade (fbg). The concrete slab appears to lie completely beneath the four USTs.

Soil types encountered at the Site consist predominantly of fine to medium grained sand to a maximum depth of 7.5 fbg. Based on the result of previous site investigations (BRRTs #03-36-000085 and #02-36-216391) completed at the Site, the sand encountered beneath the USTs appears to be fill. Native soil in the area of the Site typically consists of silty sand to silty clay.

Soil sample results indicate that petroleum compounds in soil have not migrated beyond the ends of the USTs to the east and west. Further contaminant migration is limited to the north and south due to the proximity of the building footings. The concrete slab beneath the USTs should limit vertical contaminant migration into the ground-water table. Based on this information and given that the soil contamination is limited to beneath the Site building and covered with concrete, we do not believe further action is necessary to address the remaining soil contamination at this time. Ground water was not encountered during the collection of soil samples. As part of the former site

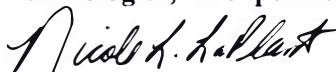
investigations completed at the Site, ground-water monitoring wells were placed at various locations around the perimeter of the Mirro Company Plant #09 building to monitor ground-water quality. Ground water level data collected from monitoring wells east of Mirro Company Plant #09 in the vicinity of the former UST system ranged from 7 to 8 fbg. Ground-water flow direction was predominantly to the north-northwest. Based on ground-water flow direction, several of the monitoring wells installed as part of the previous investigations appear to be downgradient of the release. According to the Bureau of Remediation & Redevelopment Tracking System (BRRTs), during 1999 and 2000 the WDNR granted the Mirro Company Plant #09 conditional case closures with Chapter NR 140, Wis. Adm. Code variances granting a preventive action limit (PAL) exemption on both of the previous releases. The monitoring well locations and data obtained from BRRTs is included in Attachment A.

Based on the low levels of PVOCs and PAHs, it is unlikely that ground water has been impacted above ground-water quality standards. Access to the area of the USTs is limited because of its location under the building; thus, making the installation of ground-water monitoring wells very difficult and costly. In addition, as indicated by the conditional case closure of the former site investigations and remedial actions completed at Mirro Company Plant #09, residual ground-water contamination is present at the Site downgradient of the release. As a result, it does not appear the fuel oil release will have any greater impact to the existing environmental conditions at the Site. **On behalf of Newell Rubbermaid, Northern Environmental is recommending no further action at the Site in accordance with NR 726, Wis. Adm. Code.**

The findings and results of the UST closure assessment, as well as the conclusions drawn and recommendations proposed, are based upon interpretation of the information available to Northern Environmental at the time of these activities. Northern Environmental does not warrant that this report represents an exhaustive study of all possible environmental concerns at the Site. 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 contact Northern Environmental at 920-592-8400 if you have any questions.

Sincerely,
**Northern Environmental
Technologies, Incorporated**



Nicole L. LaPlant

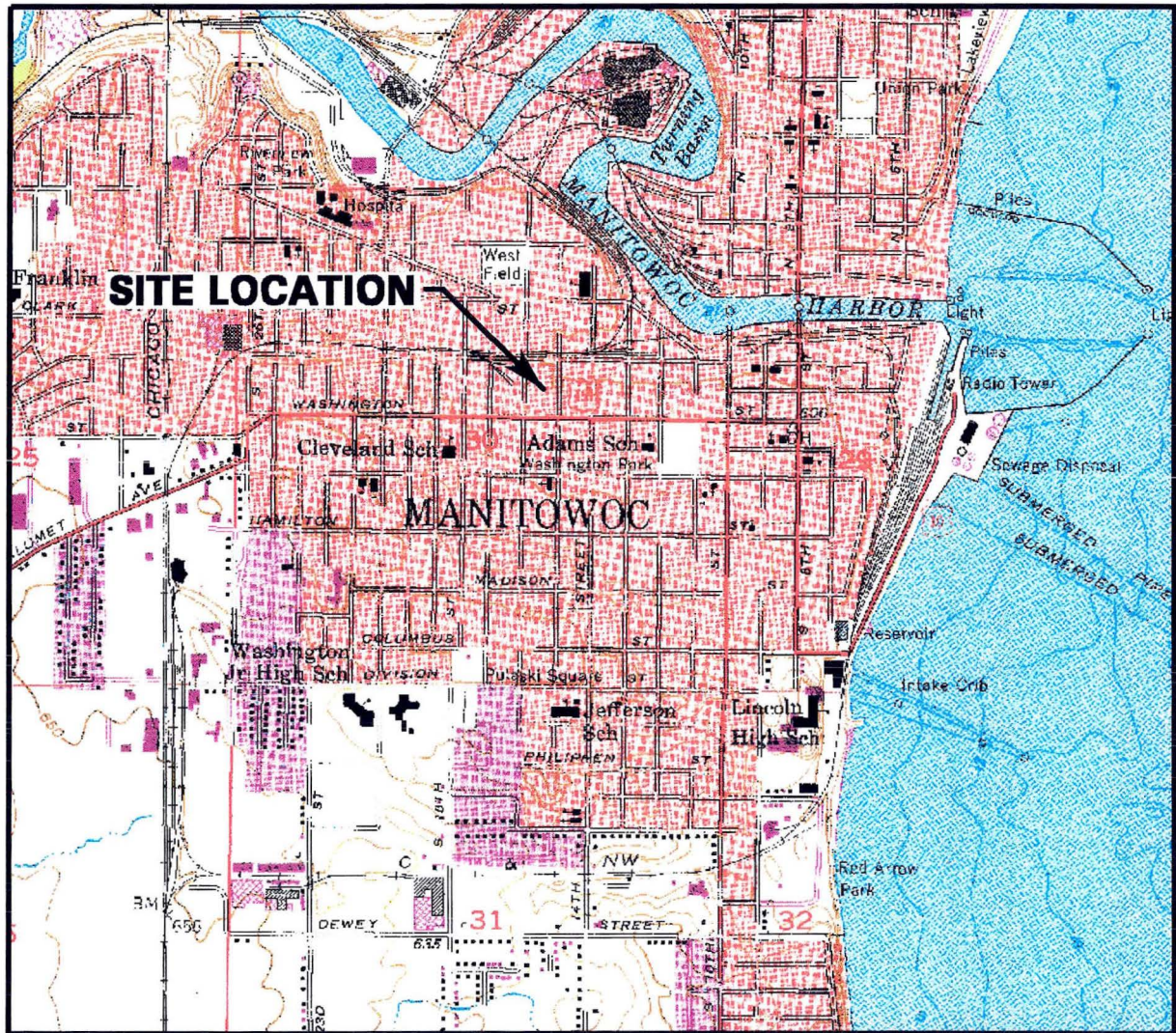
Geologist



Lynelle P. Caine
Project Manager

NLL/hmo
Attachments

c: Mr. Doug Deaton, Mirro Company
Mr. Robert Klauk, WDCOMM
Mr. Jesse Rose, ESP



SCALE IN FEET

1" = 2000'




CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929



QUADRANGLE LOCATION



BASE MAP SOURCE: USGS MANITOWOC, WISCONSIN 7.5 MINUTE QUADRANGLE, 1954 (PHOTOREVISED 1973)

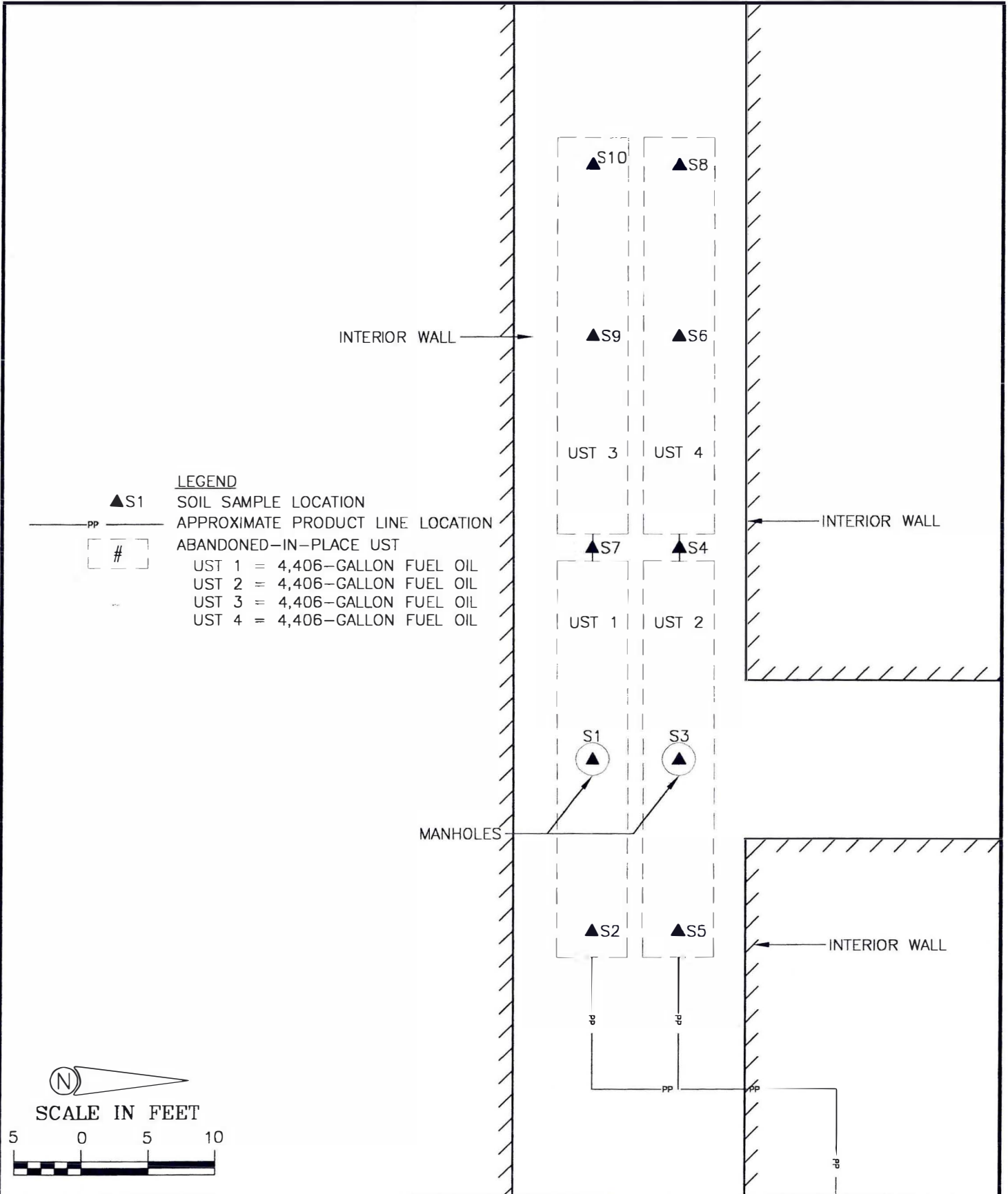
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 Northern Environmental SM Hydrologists · Engineers · Geologists		

MIRRO COMPANY PLANT #9
MANITOWOC, WISCONSIN

SITE LOCATION AND
LOCAL TOPOGRAPHY

S:\PROJ\ESP\22001241\DRAWINGS\081801-1.DWG


FIGURE 1



LEGEND

- ▲ S1 SOIL SAMPLE LOCATION
- PP — APPROXIMATE PRODUCT LINE LOCATION
- [#] ABANDONED-IN-PLACE UST
- UST 1 = 4,406-GALLON FUEL OIL
- UST 2 = 4,406-GALLON FUEL OIL
- UST 3 = 4,406-GALLON FUEL OIL
- UST 4 = 4,406-GALLON FUEL OIL



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 Northern Environmental SM Hydrologists • Engineers • Geologists		

MIRRO COMPANY PLANT #9
MANITOWOC, WISCONSIN

SITE LAYOUT WITH
SOIL SAMPLE LOCATIONS

FIGURE 2

S:\PROJ\ESP_22001241\DRAWINGS\091801--2.DWG

Table 1 Summary of UST System Information, Mirro Company #09, Manitowoc, Wisconsin

UST Number	Registration Number	UST Construction	Volume (gallons)	Contents	Status	Date Installed	Type of Delivery System	Piping Construction	Location of Check Valves
UST 1	414569	Bare Steel	4,406	Fuel Oil	Abandoned-in-place	1963	Suction Lift	Bare Steel	pump
UST 2	141570	Bare Steel	4,406	Fuel Oil	Abandoned-in-place	1963	Suction Lift	Bare Steel	pump
UST 3	414571	Bare Steel	4,406	Fuel Oil	Abandoned-in-place	1963	Suction Lift	Bare Steel	pump
UST 4	414688	Bare Steel	4,406	Fuel Oil	Abandoned-in-place	1963	Suction Lift	Bare Steel	pump

Table 2 Summary of UST System Inspection, Mirro Company #09, Manitowoc, Wisconsin

UST Number	UST Condition	Piping Condition	Piping Joint Integrity	Dispenser Condition	Apparent Releases
UST 1	Good	Good - Fair	Good - Fair	Not Applicable	Product piping between USTs
UST 2	Good	Good - Fair	Good - Fair	Not Applicable	Center of UST
UST 3	Good	Good - Fair	Good - Fair	Not Applicable	Product piping between USTs
UST 4	Good	Good - Fair	Good - Fair	Not Applicable	Product piping between USTs

Key:

UST = underground storage tank

fbg = feet below grade

--- = not analyzed

iui = instrument units as isobutylene

USCS = Unified Soil Classification System

mg/kg = milligram per kilogram

GRO = gasoline range organics

Table 3, Soil Field Screening Results, Mirro Company, Plant #09, Manitowoc, WI

Sample Number	Sample Depth (feet)	Sample Petroleum Odor	Sample Description	Date Collected	PID Headspace Analysis		
					Time Collected	Time Analyzed	PID Response (IUI)
S1	7.5	Slight Fuel Oil	Sand Backfill	6/20/01	1150	1300	8
S2	7.5	Slight Fuel Oil	Sand Backfill	6/20/01	1200	1301	16
S3	7.5	Slight Fuel Oil	Sand Backfill	6/20/01	1205	1302	8
S4	7.5	None	Sand Backfill	6/20/01	1210	1303	0
S5	7.5	Slight Fuel Oil	Sand Backfill	6/20/01	1215	1304	8
S6	7.5	None	Sand Backfill	6/20/01	1220	1305	0
S7	7.5	Old Fuel Oil	Fine Sand, Some Silt Petroleum Staining	6/20/01	1230	1306	40
S8	7.5	Slight Fuel Oil	Sand Backfill	6/20/01	1235	1307	4
S9	7.5	Slight Fuel Oil	Sand Backfill	6/20/01	1240	1308	4
S10	7.5	None	Sand Backfill	6/20/01	1245	1309	0

Key:

- PID = Photoionization Detector
- iui = Instrument units as isobutylene

Table 4 Soil Analytical Results, Mirro Company Plant #09, Manitowoc, Wisconsin

Sample Number	Date Sampled	DRO (mg/kg)	Relevant and Significant Analytical Results (µg/kg)										
			Benzene	Ethylbenzene	MTBE	Toluene	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	Xylenes	1-Methyl Naphthalene	2-Methyl Naphthalene	Naphthalene	Pyrene
WAC Residual Contaminant Level		100	5.5	2900	NE	1500	NE	NE	4100	NE	NE	NE	NE
S1	06/20/01	< 10	---	---	---	---	---	---	---	---	---	---	---
S2	06/20/01	< 10	---	---	---	---	---	---	---	---	---	---	---
S3	06/20/01	740	---	---	---	---	---	---	---	---	---	---	---
S4	06/20/01	11	---	---	---	---	---	---	---	---	---	---	---
S5	06/20/01	< 10	---	---	---	---	---	---	---	---	---	---	---
S6	06/20/01	< 10	---	---	---	---	---	---	---	---	---	---	---
S7	06/20/01	2300	< 25	37	< 25	< 25	1100	430	200	390	540 "J"	140 "J"	410 "J"
S8	06/20/01	< 10	---	---	---	---	---	---	---	---	---	---	---
S9	06/20/01	< 10	---	---	---	---	---	---	---	---	---	---	---
S10	06/20/01	< 10	---	---	---	---	---	---	---	---	---	---	---

Key:

- DRO = Diesel Range Organics
- MTBE = Methyl-Tertiary-Butyl-Ether
- mg/kg = Milligrams per kilogram
- µg/kg = Micrograms per kilogram
-
- NE = Not Analyzed
- NE = Not Established by Wisconsin Administrative Code

ATTACHMENT A

**CLOSURE ASSESSMENT QUESTIONNAIRE
AND TANK/WASTE DISPOSAL DOCUMENTATION**

BACKGROUND INFORMATION

Site Address

1512 Washington Street
Manitowoc, Wisconsin 54221

Site Legal Description

SW 1/4, NE 1/4, Section 30, Township 19N, Range 24E

County: Manitowoc

UST System and Site Owner

Name: Newell Rubbermaid
Address: 6833 Stalter Drive, Rockford, IL 61108
Telephone Number: 815-381-8121

Past and Present Property/Site Use

The Site is currently the location of Mirro Company Plant #09 (Plant #09). Plant #09 consists of five additions that were built between 1911 and 1926, which were used for a combination of manufacturing, warehousing, and distribution of cookware. Manufacturing at the plant ceased during the 1980s. Presently, Plant #09 consists of seven floors, with the top two functioning as offices and the remaining are used for distribution and warehousing. A layout of the Mirro Company Plant #09 is attached.

Describe Any USTs or ASTs Previously Removed From the Property

According to information gathered from the WDCOMM tank data base, ten USTs were previously closed/removed from the Site. The tank list is attached.

Has the Current System Ever Been Lined or Repaired?

Yes _____ No _____ Unknown X

Are Other USTs or LUSTs Present on Adjacent Properties?

Yes X No _____ Unknown _____

According the Bureau of Remediation and Redevelopment Tracking System, currently there are three active LUST sites located on Washington Street and one active Environmental Repair Program (ERP) site located on 15th Street in Manitowoc; however, none of the Sites appear to be located on adjacent properties to the Site. It is unknown whether or not there are active USTs located on properties adjacent to the Site.

Are Any of the UST Systems Described in This UST Site Assessment Believed to Have Released Product?

Yes X No Unknown

If so, describe UST and method of determining release:

Soil samples collected from beneath the UST system exhibited slight petroleum odors and photoionization detector readings. Petroleum contamination in the soil was verified by laboratory analysis.

Has the Party Responsible for the UST System Been Notified of the Release and of Their Responsibilities Under Chapter NR 158, Wisconsin Administrative Code?

Yes X No



Office of the Governor | Department Organization | Mail | Links | Index | News & Statistics | Search

Options

Topics

About Commerce | Business | Community | International | Petroleum Programs | Safety & Buildings | Employment

Petroleum Programs Home	Search Instructions	Search by Tank ID	Search by Site, Owner, or Tank Characteristics
---	-------------------------------------	-----------------------------------	--

Tank List

Searching for:

County Code = 36
 Street address = 1512 Washington St
 Municipality = MANITOWOC
 Tank type = UST

Number of matching records:14

Type	ID	Site ID	Address	Status	Contents	Size (gals)	Cust ID	Owner
County: MANITOWOC, FDID: 3607 - Manitowoc, Municipality: CITY OF MANITOWOC								
1. UST	414932	112098	1512 WASHINGTON ST	Closed/Removed	Other	1500	372375	THOMAS E REED
2. UST	414933	112098	1512 WASHINGTON ST	Closed/Removed	Diesel	250	372375	THOMAS E REED
3. UST	415036	112098	1512 WASHINGTON ST	Closed/Removed	Diesel	10000	580672	MIRRO ALUMINUM
4. UST	415037	112098	1512 WASHINGTON ST	Closed/Removed	Diesel	10000	580672	MIRRO ALUMINUM
5. UST	415038	112098	1512 WASHINGTON ST	Closed/Removed	Unleaded Gasoline	1000	580672	MIRRO ALUMINUM
6. UST	414566	112099	1512 WASHINGTON ST	Closed/Removed	Other	250	580672	MIRRO ALUMINUM
7. UST	414567	112099	1512 WASHINGTON ST	Closed/Removed	Diesel	1000	580672	MIRRO ALUMINUM
8. UST	414568	112099	1512 WASHINGTON ST	Closed/Removed	Other	2000	580672	MIRRO ALUMINUM
9.			1512					MIRRO

9.	UST	414569	112099	1512 WASHINGTON ST	In Use	Fuel Oil	4406	580672	MIRRO ALUMINUM
10.	UST	414570	112099	1512 WASHINGTON ST	In Use	Fuel Oil	4406	580672	MIRRO ALUMINUM
11.	UST	414571	112099	1512 WASHINGTON ST	In Use	Fuel Oil	4406	580672	MIRRO ALUMINUM
12.	UST	414687	112099	1512 WASHINGTON ST	Closed/Removed	Other	2000	580672	MIRRO ALUMINUM
13.	UST	414688	112099	1512 WASHINGTON ST	In Use	Fuel Oil	4406	580672	MIRRO ALUMINUM
14.	UST	414689	112099	1512 WASHINGTON ST	Closed/Removed	Other	250	580672	MIRRO ALUMINUM

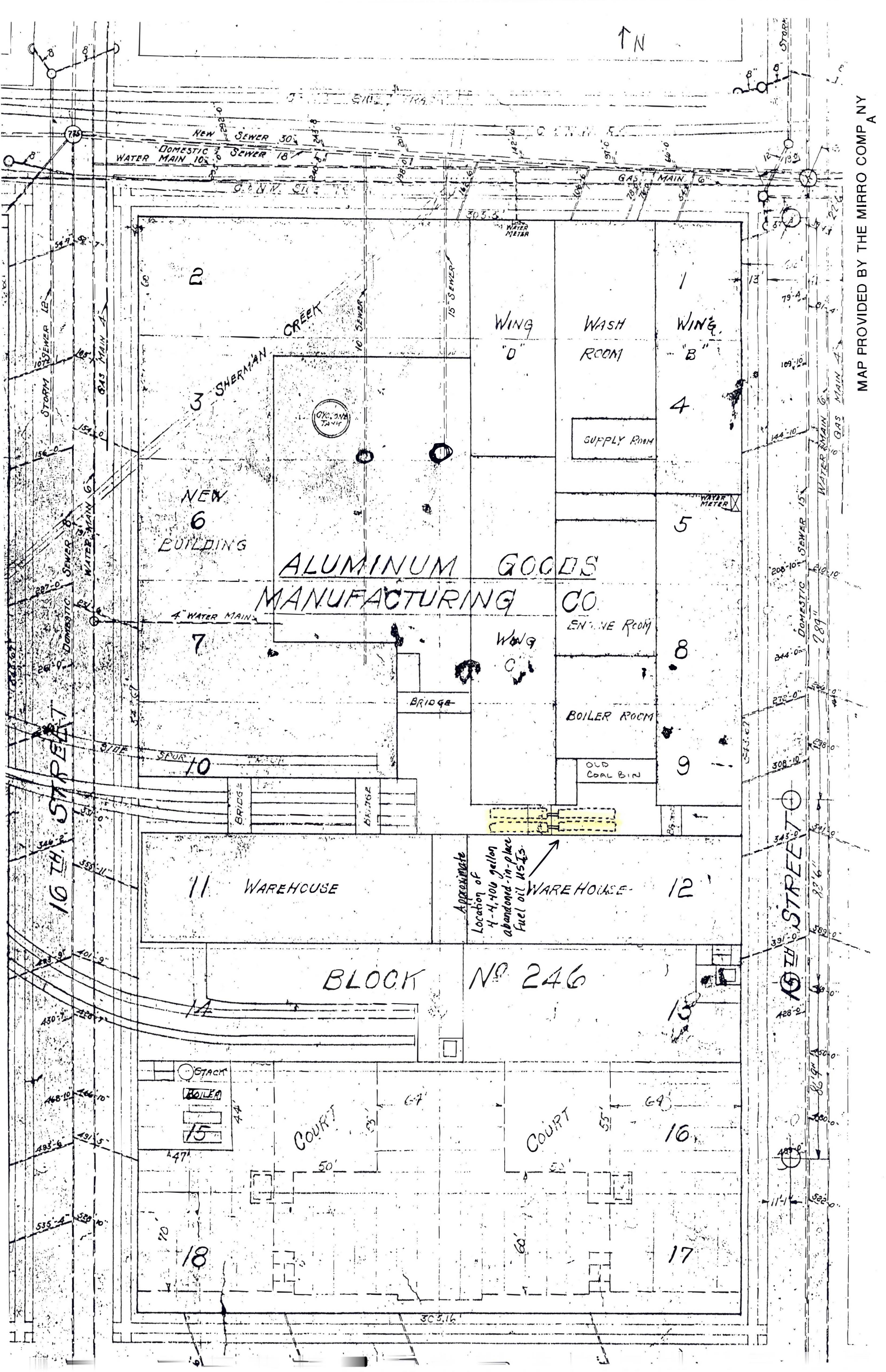
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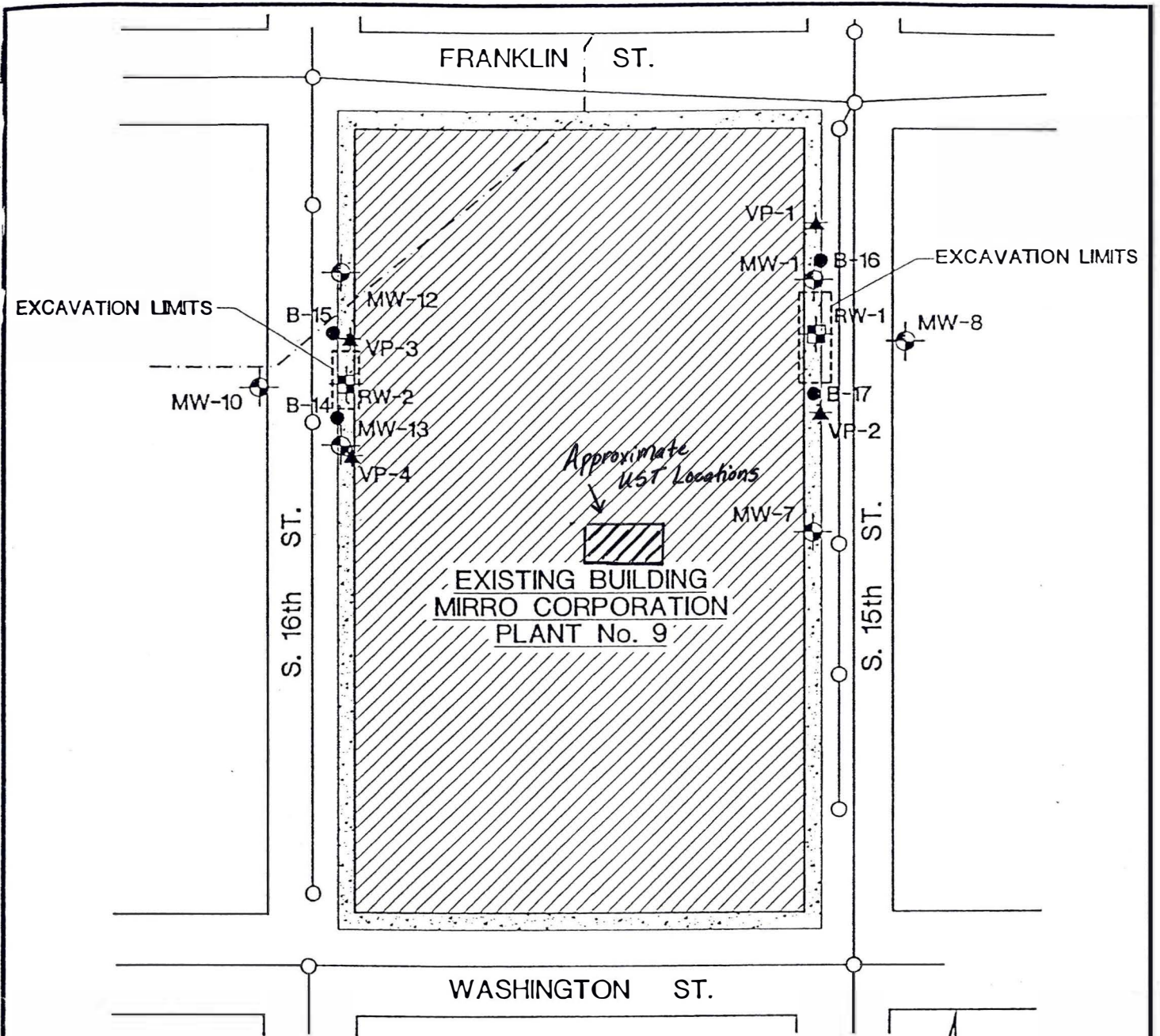
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This document was last revised: 15 Feb 2001

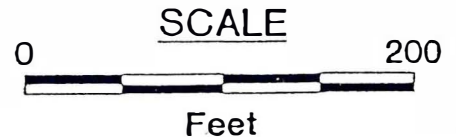
Wisconsin Department of Commerce





EXPLANATION

- EXISTING STORM SEWER
- EXISTING SANITARY SEWER
- MANHOLE
- MW-13 MONITOR WELL LOCATION AND DESIGNATION
- B-16 SOIL BOREHOLE LOCATION AND DESIGNATION
- VP-1 VAPOR PROBE LOCATION AND DESIGNATION
- RW-1 RECOVERY WELL LOCATION AND DESIGNATION



Hydro-Search, Inc.
A Tetra Tech Company

HYDROLOGISTS-GEOLOGISTS-ENGINEERS
Reno • Denver • Milwaukee • Huntington Beach
Sacramento • Houston • Phoenix

MIRRO COMPANY
MANITOWOC, WISCONSIN

RECOVERY WELL, MONITOR WELL
VAPOR PROBE, SOIL BOREHOLE
LOCATION MAP

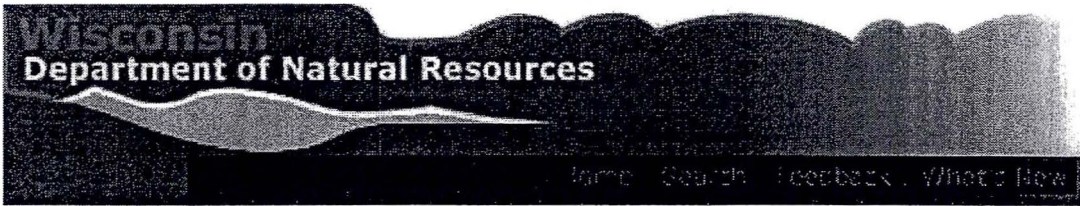
Dsgn. by: *PLS* Chk. by: *J3* Apprv. by: *J3*

PROJECT: 306693170 DATE: 06/27/94

DRAWING: 3170-a1

FIGURE: 1

ESP 03-2200-1241



WI DNR Activities at Discharge Sites

BRRTS data comes from many sources inside and outside of DNR. There may be gaps and errors in the data, or delays in updating new information. Please see our [disclaimers page](#) for more information.

DNR Activity Number: 03-36-000085
Activity Type: LUST
Activity Name: MIRRO PLT #9
Start Date: 12/15/1988
End Date: 03/02/1999
Site Name: MIRRO PLT #9
Address: 1512 WASHINGTON
Municipality: MANITOWOC
County: Manitowoc
DNR Region: Northeast Region
Quarter Quarter Section: SW
Quarter Section: NE
Survey Section: 30
Survey Township: 19
Survey Range: 23E
Jurisdiction: DNR
Co-Contamination at Site: Y
Priority: High
Risk: High

Persons or Companies associated with this DNR Activity

Person or Company	Role	Address	Address 2	PO Box	Municipality	State	Zip
LAURIDSEN, KELD	Project Manager			PO BOX 10448	GREEN BAY	WI	543070448
MIRRO FOLEY	Responsible Party			PO BOX 1330	MANITOWOC	WI	54221

Records 1 to 2 of 2

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Actions performed during this DNR Activity

Action Name	Action Description	Comment	Date Action Occurred
Notification	Date the DNR is notified of the discovery of the contamination.		12/15/1988
SI Report Received (w/out Fee)	Date the DNR receives the Site Investigation Report. Provides information regarding activities performed to determine degree & extent of contamination and forming a basis for choosing the appropriate remedial action.		04/06/1989
Remedial Action Options Report received (w/out Fee)	Date the DNR receives the Remedial Action Options Report (workplan). Includes actions to prevent, minimize, stabilize, eliminate threat of discharged hazardous substances, restore the environment to the extent practicable. Identify and evaluate options consistent with DNR standards.		09/21/1990
Site Investigation Workplan Go Ahead (notice to proceed)	Date the DNR allows the RP to proceed without approval of the SIWP. Either written or by phone call.		04/05/1993
Status Report Received	Date updates on progress are received. Can be 30, 60, 90 days or other interval.		05/28/1993
Status Report Received/2	Date updates on progress are received. Can be 30, 60, 90 days or other interval.		08/25/1993
Status Report Received/3	Date updates on progress are received. Can be 30, 60, 90 days or other interval.		11/15/1993
Status Report Received/4	Date updates on progress are received. Can be 30, 60, 90 days or other interval.		02/01/1994
Status Report Received/5	Date updates on progress are received. Can be 30, 60, 90 days or other interval.		04/27/1994
Status Report Received/6	Date updates on progress are received. Can be 30, 60, 90 days or other interval.	SAMPLING UPDATE	11/29/1994
Status Report Received/7	Date updates on progress are received. Can be 30, 60, 90 days or other interval.	MONTHLY UPDATE	01/17/1995
Status Report Received/8	Date updates on progress are received. Can be 30, 60, 90 days or other interval.	GW RESULTS	01/24/1995

Status Report Received/9	Date updates on progress are received. Can be 30, 60, 90 days or other interval.	CHANGE IN MONITORING SCHEDULE	04/11/1995
Status Report Received/10	Date updates on progress are received. Can be 30, 60, 90 days or other interval.	QUARTERLY VAPOR EXTRACTION RESULTS	04/24/1995
Status Report Received/11	Date updates on progress are received. Can be 30, 60, 90 days or other interval.	SVE UPDATE	07/11/1995
Status Report Received/12	Date updates on progress are received. Can be 30, 60, 90 days or other interval.	SVE UPDATE	10/18/1995
Status Report Received/13	Date updates on progress are received. Can be 30, 60, 90 days or other interval.	SVE UPDATE	01/16/1996
Status Report Received/14	Date updates on progress are received. Can be 30, 60, 90 days or other interval.	SVE UPDATE	03/19/1996
Status Report Received/15	Date updates on progress are received. Can be 30, 60, 90 days or other interval.		10/18/1996
Closure Review Request Received with Fee	Date the closure review request is received and a fee paid for DNR review.		09/20/1998
NR 140 Exemption at Closure	Variance granted under NR 140 to close the site with groundwater contamination above the preventive action limit (PAL).		03/02/1999
Activity Closed	Date the Closure Letter or No Further Action letter is sent. NOTE: This is the ONLY action code that will close an activity.		03/02/1999

Records 1 to 22 of 22

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Impacts

Impact Description	Comment
Co-contamination	
Groundwater Contamination	
Soil Contamination	

Records 1 to 3 of 3

Substance

No Records returned

Spiller Action

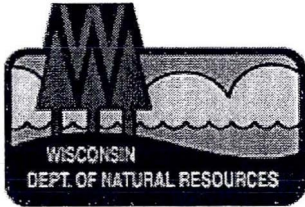
No Records returned

- [Person or Company](#)
- [Distance](#)
- [PLSS](#)
- [Lat/Long](#)

- **Return Links**

- [BRRTS on the Web](#)

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WI DNR Activities at Discharge Sites



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DNR Activity Number: 02-36-216391
Activity Type: ERP
Activity Name: MIRRO PLANT #9 - WEST SIDE
Start Date: 12/15/1988
End Date: 09/22/2000
Site Name: MIRRO PLT #9
Address: 1512 WASHINGTON
Municipality: MANITOWOC
County: Manitowoc
DNR Region: Northeast Region
Quarter Quarter Section: SW
Quarter Section: NE
Survey Section: 30
Survey Township: 19
Survey Range: 23E
Jurisdiction: DNR
Priority: Unknown
Risk: High

Persons or Companies associated with this DNR Activity

Person or Company	Role	Address	Address 2	PO Box	Municipality	State	Zip
MIRRO CORP	Responsible Party	1512 WASHINGTON ST		PO BOX 1330	MANITOWOC	WI	542211330
WEISSBACH, ANNETTE	Project Manager	1125 N MILITARY AVE		PO BOX 10448	GREEN BAY	WI	543070448

Records 1 to 2 of 2

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Actions performed during this DNR Activity

Action Name	Action Description	Comment	Date Action Occurred
Notification	Date the DNR is notified of the discovery of the contamination.	LUST CASE DIVIDED INTO ERP AND LUST 1999	12/15/1988
SI Report Received (w/out Fee)	Date the DNR receives the Site Investigation Report. Provides information regarding activities performed to determine degree & extent of contamination and forming a basis for choosing the appropriate remedial action.		04/12/1989
Remedial Action Options Report received (w/out Fee)	Date the DNR receives the Remedial Action Options Report (workplan). Includes actions to prevent, minimize, stabilize, eliminate threat of discharged hazardous substances, restore the environment to the extent practicable. Identify and evaluate options consistent with DNR standards.		10/01/1991
Status Report Received	Date updates on progress are received. Can be 30, 60, 90 days or other interval.		02/11/1992
Status Report Received/2	Date updates on progress are received. Can be 30, 60, 90 days or other interval.		04/13/1992
Status Report Received/3	Date updates on progress are received. Can be 30, 60, 90 days or other interval.		05/28/1993
Closure Review Req Received (w/out Fee)	Date the closure review request is received for DNR review and no fee was paid.		07/13/1994
Status Report Received/4	Date updates on progress are received. Can be 30, 60, 90 days or other interval.		08/03/1994
Closure Not Approved	Date closure not approved letter is sent.		11/21/1994
Status Report Received/5	Date updates on progress are received. Can be 30, 60, 90 days or other interval.		11/29/1994
Status Report Received/6	Date updates on progress are received. Can be 30, 60, 90 days or other interval.		01/16/1995
Status Report Received/7	Date updates on progress are received. Can be 30, 60, 90 days or other interval.		04/24/1995
Status Report	Date updates on progress are		06/30/1995

Received/8	received. Can be 30, 60, 90 days or other interval.		
Status Report Received/9	Date updates on progress are received. Can be 30, 60, 90 days or other interval.		10/20/1995
Status Report Received/10	Date updates on progress are received. Can be 30, 60, 90 days or other interval.		01/18/1996
Status Report Received/11	Date updates on progress are received. Can be 30, 60, 90 days or other interval.		03/22/1996
Status Report Received/12	Date updates on progress are received. Can be 30, 60, 90 days or other interval.		10/18/1996
Closure Review Request Received with Fee	Date the closure review request is received and a fee paid for DNR review.		06/26/2000
Conditional Closure	Date the site closure was approved, but the site will not be formally closed until receipt of documentation of abandonment of wells, disposal of soil, recording of deed instruments , etc.	NR 140 (PAL) EXEMPTION CLOSURE	09/11/2000
NR 140 Exemption at Closure	Variance granted under NR 140 to close the site with groundwater contamination above the preventive action limit (PAL).		09/22/2000
Activity Closed	Date the Closure Letter or No Further Action letter is sent. NOTE: This is the ONLY action code that will close an activity.		09/22/2000

Records 1 to 21 of 21

[Download](#)

Impacts

Impact Description	Comment
Groundwater Contamination	
Soil Contamination	

Records 1 to 2 of 2

Substance

Substance Description	Substance Name	Amount Released	Units
Other			

Record 1 of 1

Spiller Action

No Records returned

- [Person or Company](#)
- [Distance](#)
- [PLSS](#)
- [Lat/Long](#)

- **Return Links**

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Last Revised: 09/16/2001

TANK EXCAVATION AND REMOVAL

UST Closed By

Removal _____ Abandonment In-Place X

Date of Closure

The UST system was abandoned-in-place on June 19, 2001 and UST closure soil samples were collected on June 20, 2001.

Site Assessor

Company Name: Northern Environmental Technologies, Inc.
Company Address: 954 Circle Drive, Green Bay, Wisconsin 54304
Telephone Number: 920-592-8400
Certified Individual: Nicole L. LaPlant
Certification Number: 46836

UST Removal/Dismantling Contractor

Company Name: Environmental Services Plus, Ltd.
Company Address: W1732 County Road KK, Kaukauna, Wisconsin 54130
Telephone Number: 920-766-6756
Certified Individual: Jesse Rose
Certification Number: 41240

Excavator Contractor

The USTs were abandoned-in-place, therefore excavation was not necessary.

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

TANK CLEANING AND DISPOSAL DOCUMENTATION

Location of Cleaning

On Site X Off Site Other

Method Used to Clean the Tank

A hole was cut in the USTs to provide entry. The tank walls were scraped and wiped to remove any remaining product or sludge. Documentation of the tank cleaning is attached.

Final Disposal

Not Applicable. USTs were abandoned-in-place with fly ash and concrete mixture.

Handling of Cleaning Waste Water

Not Applicable. Water was not used to clean the tanks.

Method of Tank and Product Piping Transport

The USTs were abandoned-in-place with fly ash and concrete mixture. Product piping was placed on a trailer to be transported and disposed as scrap.

Documentation of Emergency Waiver to Transport Tank

Not Applicable.

Contractor Cleaning Tank

Company Name: Schroeder Environmental Cleaning Services, Inc.
Company Address: Post Office Box 45, De Pere, Wisconsin
Telephone Number: 920-339-9970

Contractor Disposing of Product Piping

Company Name: Environmental Services Plus, Inc.
Company Address: W1732 County Road KK, Kaukauna, Wisconsin
Telephone Number: 920-766-6756

SECSI

Schroeder Environmental Cleaning Services, Inc.

June 25, 2001

Environmental Services Plus
W1732 County Road KK
Kaukauna, WI 54130
Attn: Mr. Jesse Rose

RE: Invoice #21078

Dear Jesse:

On June 19-20, 2001, Schroeder Environmental Cleaning Services, Inc., cleaned and rendered "VAPOR-FREE" four (4) 4,000 gallon #2 fuel oil tank located at Mirro, Manitowoc, WI.

The tanks were cleaned and tested "vapor-free". I understand that you arranged for tank removal.

There were three (3) drums of waste tank bottoms left on site. I will contact you regarding waste disposal.

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

Sincerely,



Nancy Schroeder
Business Manager

SURPLUS PRODUCT AND TANK SLUDGE MANAGEMENT

Approximately 20 gallons of fuel oil/sludge were removed from the USTs during cleaning. The fuel oil sludge was stored in a 55-gallon steel drum and was transported and recycled at U.S. Oil Co., Inc. Waste to Energy facility in Kimberly, Wisconsin. Documentation of sludge disposal is attached.

Contractor Transporting and Disposing Liquids

Company Name:	Environmental Services Plus, Ltd.
Company Address:	W1732 County Road KK, Kaukauna, Wisconsin 54130
Telephone Number:	920-766-6756

THIS SHIPPING ORDER must be legibly filled in, in Ink, in Indelible Pen, or in Carbon, and retained by the Agent.

Shipper's No. _____

Name of Carrier) Environmental Services Plus SCAC. _____ Carrier's No. _____

Received, subject to the classifications and tariffs in effect on the date of this Bill of Lading:

WPNR 14401

at _____ date _____ from _____
 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 company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to the usual place of delivery at said destination, if on its own road or its own water line, 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 conditions not prohibited by law, whether printed or written, herein contained, (as specified in Appendix B to Part 1035) which are hereby agreed to by the shipper and accepted for himself and his assigns.

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

U.S. Oil - Waste Oil to Energy
 Destination Kimberly State WI County Outagamie Zip 54134 Delivery Address* 552 Carter Ct.
 Route _____ (*To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier _____ Car or Vehicle Initials _____ No. _____

Number of Packages	Description of articles, special marks, and exceptions	*Weight (Sub. to correction)	Class or rate	Check column	Subject to Section 7 of conditions, 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. (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 amount prepaid.) Charges Advanced: \$ _____
<u>1 x 55</u>	<u>Fuel oil sludge</u>				
	<u>flash >140°, halogens <1000 ppmv</u>				
	<u>AB1661</u>				
	<u>DELIVERED 8/15/01 JSLR</u>				

Collect On Delivery and remit to _____ C.O.D. Charge to be paid by Shipper Consignee

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 _____

HM EMERGENCY RESPONSE TELEPHONE NUMBER (517.2604)

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. Per _____

Shipper: Mirco Foley Agent: [Signature] Date: 8 13 01
 By: [Signature] Per: [Signature] Date: 8 13 01

Permanent post-office address of shipper
 FORM NO. 1 BLS (Rev. 8/95)

2

Agent must detach and retain this Shipping Order and must sign the Original Bill of Lading.

Waste Profile

Profile AB1601

Expiration Date: _____

Check here if this is a recertification

Location of Original U.S. Oil Co. Inc.

Site Approved U.S. WOTE

GENERAL INFORMATION

1. Generator Name Mirro Taley Plant 2 Generator USEPA ID: Non-regulated

2. Generator Address 2401 MIRRO DRIVE Billing Address (same) _____

MANITOWOC WI ESP
Attn: Jesse Rose

3. Technical Contact Phone 920-684-4421

4. Alternate Contact Phone _____ Billing Contact Phone 920-766-6756

PROPERTIES AND COMPOSITION

5. Process Generating Waste: tank cleaning

6. Waste Name: Fuel oil sludge

7a. 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° () 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
<u>Fuel</u>	<u>10</u>	<u>%</u>			
<u>Solids</u>	<u>90</u>	<u>%</u>			

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 gal Other _____

15. ANTICIPATED ANNUAL VOLUME: 200 Units: gal Shipping Frequency: one time

SAMPLE INFORMATION

16a. Sample source (drum, lagoon, pond, tank, vat, etc.) drum

Date Sampled: Samplers Name/Company ESP - 2/15/00

16b. 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

[Signature]

Scott Smetser 8-13-01
Printed (or typed) name and title Date

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

Generator Name: Mirro Foley EPA I.D. # Non-regulated

Location: _____ U.S. Oil Profile #: AB1001

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

	CIBSTITIUANT	REGULATORY THRESHODL LEVEL PPM	CHECK ONE		SCIENTIFIC DATA	GENERATORS KNOWLEDGE	ACTUAL VALUE PPM/MG/L
			YES	NO			
D004	ARSENIC As	5.00		✓		✓	
D005	BARIUM Ba	100.00		✓		✓	
D006	CADMIUM Cd	1.00		✓		✓	
D007	CHROMIUM Cr	5.00		✓		✓	
D008	LEAD Pb	5.00		✓		✓	
D009	MERCURY Hg	0.20		✓		✓	
D010	SELENIUM Se	1.00		✓		✓	
D011	SILV R 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-DICHLOROETHAL NE	0.70		✓		✓	
D028	1,1-DICHLOROETHAL NE	0.70		✓		✓	
D035	METHYL ETHYL KETONE	200.00		✓		✓	
D039	TETRACHLOROETHYLENE	0.70		✓		✓	
D040	TRICHLOROETHYLENE	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	HEXACHLOROBENZENE	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-TRICHLOROPHENOL	400.00		✓		✓	
D041	2,4,6-TRICHLOROPHENOL	2.00		✓		✓	
HERBICIDES AND PESTICIDES							
D020	CHLORDANE	0.03		✓		✓	
D016	2,4-DICHLOROPHENOZ ACETIC ACID	10.00		✓		✓	
D012	ENDRIN	0.02		✓		✓	
D031	HEPTACHLOR (AND ITS H DROXIDE)	0.008		✓		✓	
D013	LINDANE	0.40		✓		✓	
D014	METHOXYCHLOR	10.00		✓		✓	
D015	TOXAPHENE	0.50		✓		✓	
D017	2,4,5-T (SILVEX)	1.00		✓		✓	

() THE DATA PROVIDED ABOVE IS BASED ON THE ATTACHED LABORATORY ANALYSIS.

(X) THE DATA PROVIDED ABOVE IS BASED UPON MY KNOWLEDGE OF THE WASTE STREAM AND THE PROCESS GENERATING THE WASTE.

SIGNATURE

Mirro Foley

TITLE

Env. Eng

PRINTED NAME

Scott M. PSA

DATE

Customer Name Mirro. Tokey Plant 2
Location 2401 Mirro Dr.
Manitowoc, WI

EPA ID No. Non-regulated
Manifest Doc. No. -
Approved Facility US WOTE

Drum No.	Profile No.	Lab Code ID No.	Shipping Date	Received By	Process Type	Process Date	Batch No.	Processed By
1	AB1001	1733709	8/15/01	JM	CANT VAL SLUDGE DRAIN	8-15-01		R. Q.

Manager Approved [Signature]

Sample ID
Sample Type
Report Date

MR-21500 MIRRO FOLEY-ESP
Burner Fuel
2/23/00

U.S. Oil Chek Fuel Oil Report



797412-21500

Labcode	Sample Date	Receipt Date	Oil Type	Vis @ 40C cSt	Degrees F		Percent		Particulate Halogens	Microbe Stability	Color AF	API Lb/gal	Distillation Data Degrees F											BTU/gal			
					Flash	Cloud	Water	Sulfur					Pour	Solids	Ash	IBP	5%	10%	20%	30%	40%	50%	60%		70%	80%	90%
1733709	2/15/00	2/21/00			176				<30																		

Sample Date	Wear Metals (ppm)										Contaminant Metals (ppm)					Additive Metals (ppm)				
	Iron	Aluminum	Chrome	Copper	Lead	Tin	Cadmium	Silver	Nickel	Titanium	Silicon	Sodium	Boron	Potassium	Barium	Calcium	Magnesium	Molybdenum	Phosphorus	Zinc
2/15/00																				

Comment:

Reference sample only.

Report To:

SUE GAU
WASTE ENERGY
SUE GAU
COMBINED LOCKS, WI 54113

U.S. Oil Chek
1090 Kennedy Ave.
Kimberly, Wi. 54136

Phone 920-735-8295 / 800-490-4902 Fax 920-739-1738

WEATHER, SOIL, AND GROUND-WATER CONDITIONS

Weather Conditions

Temperature: 75 degrees F, sunny
Precipitation: None

Surface Conditions

Material UST area overlain by (e.g., concrete) Concrete

Is the area around the fill pipe, pump, etc. visibly stained? Not applicable

Is stressed or dead vegetation evident? No vegetation present

Are there previously undiscovered or unregistered tanks? No

Excavation and Soil

Depth of Tank: 7 feet below grade

Depth of Piping: Approximately 2 feet below grade

Free Product Present: No Obvious Odors: Yes Soil Discoloration: No

Oil Sheen on Water in Excavation: Not applicable

Soil Description:

Native: Unknown

Backfill: Sand

Freestanding Water in Excavation: No

Anticipated Depth to Ground-Water

Based on ground-water level data collected from former monitoring wells installed at the Site for previous site investigations, ground water is between 7 and 8 feet below grade.

Local Ground-Water Use

Drinking water for the Site is supplied by the city of Manitowoc's municipal distribution system.

ATTACHMENT B

**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 COMM 10, Wisconsin Administrative Code.

Each sample was split into two representative portions, one for field screening and 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 1-quart Ziploc resealable plastic bag. 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 4-ounce glass jar with no headspace for dry weight and polynuclear aromatic hydrocarbon analysis. For samples collected for diesel range organics and petroleum volatile organic compound analysis, a syringe was placed into a Powerstop Handle device and pushed into the soil until the soil column inside the syringe forced the plunger to the end plate. The syringe was removed from the Powerstop Handle and inserted into an open pre-tared 40 ml vial. The soil sample was ejected into the vial by pushing on the syringe plunger. The vial was then 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 Commerce, "Flammable and Combustible Liquids," *Wisconsin Administrative Code*, Chapter COMM 10, February 1999.

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

ATTACHMENT C

**UPDATED TANK INVENTORY FORMS
AND CLOSURE CHECKLIST**

Reg Obj #: 414688

UNDERGROUND FLAMMABLE/COMBUSTIBLE LIQUID STORAGE TANK INVENTORY

Send Completed Form To:
Department of Commerce
Bureau of Storage Tank Regulation
P.O. Box 7837
Madison, WI 53707-7837

Information Required By Section 101.142, Wis. Stats.

Underground tanks in Wisconsin that have stored or currently store petroleum or regulated substances must be registered. A separate form is needed for each tank. Send each completed form to the agency designated in the top right corner. Have you previously registered this tank by submitting a form? Yes No If yes, are you correcting/updating information only? Yes No Personal information you provide may be used for secondary purposes. [Privacy Law, s. 15.04 (1)(m)]

This registration applies to a tank that is (check one):			Fire Department providing tire coverage where tank is located: <input checked="" type="checkbox"/> City <input type="checkbox"/> Village <input type="checkbox"/> Town of _____
<input type="checkbox"/> In Use	<input type="checkbox"/> Closed - Tank Removed	<input type="checkbox"/> Ownership Change (Indicate new owner name in block 2)	
<input type="checkbox"/> Newly Installed	<input checked="" type="checkbox"/> Closed - Filled with Inert Materials		
<input type="checkbox"/> Abandoned with Product	<input type="checkbox"/> Temporary Out of Service - Provide Date: _____		
<input type="checkbox"/> Abandoned without Product (empty)	<input type="checkbox"/> Abandon with Water		

A. IDENTIFICATION (Please Print)

1. Tank Site Name: MILRO COMPANY INC
 City Village Town of: MANITOWOC
 Site Address: 1512 WASHINGTON STREET
 State: WISCONSIN Zip Code: 54221-1330
 Site Telephone Number: (920) 684-4421
 County: MANITOWOC

2. Tank Owner Name: NEWELL RUBBERMAID INC
 City Village Town of: ROCKFORD
 Mailing Address: 6833 STALTER DRIVE
 State: IL Zip Code: 61108
 Telephone Number: (815) 381-8121
 County: _____

3. Previous Name: _____
 Previous site address if different than #1: _____

B. Site ID #: 112099 Facility ID #: _____ Customer ID #: 580672

C. 4. Tank Age (age or date installed): 1963 5. Tank Capacity (gallons): 4406

D. LAND OWNER TYPE (check one)

County Federal Leased Federal Owned Municipal Other Government
 Private State Tribal Nation

E. OCCUPANCY TYPE (check one)

Gas/Retail Sales Bulk Storage Utility Mercantile/Commercial Industrial School Residential
 Agricultural Backup or Emergency Generator Other (Specify): _____

F. Tank Construction:

Bare Steel Coated Steel Unknown
 Fiberglass Steel - Fiberglass Reinforced Plastic Composite
 Lined (Date): _____ Other (specify): _____
 Cathodic Protection: Sacrificial Anodes Impressed Current N/A
 Overfill Protection? Yes No
 Spill Containment? Yes No
 Tank Double Walled? Yes No

G. Primary Tank leak detection method:

Inventory control and tightness testing Automatic tank gauging Groundwater monitoring
 Manual tank gauging (only for tanks of 1,000 gallons or less) Interstitial monitoring Vapor monitoring
 Statistical Inventory Reconciliation (SIR) Unknown

H. Piping Construction:

Bare Steel Coated Steel Unknown
 Fiberglass Flexible N/A
 Other (specify): _____
 Cathodic Protection: Sacrificial Anodes Impressed Current N/A
 Pipe Double Walled? Yes No

I. Primary Piping System Type: Pressurized piping with auto shutoff; alarm or flow restrictor Unknown
 Suction piping with check valve at tank Suction piping with check valve at pump and inspectable Not needed if waste oil

J. Piping Leak Detection Method: (used if pressurized or check valve at tank): SIR Tightness testing Electronic line leak monitor
 Groundwater monitoring Vapor monitoring Interstitial monitoring Not required Unknown

K. Vapor Recovery/Stage II CARB #: _____
 Fiberglass Other (specify): _____ Flexible Operational - Provide Date (mo/day/yr): _____

L. TANK CONTENTS (Current, or previous product if tank now empty)

Diesel Leaded Unleaded Fuel Oil Gasohol
 Other (Specify): _____ Empty Sand/Gravel/Slurry* Unknown* Premix
 Waste/Used Motor Oil Chemical _____ Kerosene Aviation Hazardous Waste*
 (Indicate chemical name and number)

If chosen, this tank is NOT PECFA eligible.

M. If Tank Closed, Abandoned or Out of Service, give date (mo/day/yr): JUNE 19 2001
 Geo Latitude: _____ Geo Longitude: _____
 Has a site assessment been completed (see reverse side for details): Yes No

Owner or Operator Name (please print): RICHARD M. ADAMS
Owner or Operator Signature: [Signature]
 Indicate whether: Owner or Operator
 Date Signed: 6/19/01

Reg Obj #: 414571

UNDERGROUND FLAMMABLE/COMBUSTIBLE LIQUID STORAGE TANK INVENTORY

Send Completed Form To: Department of Commerce Bureau of Storage Tank Regulation P.O. Box 7837 Madison, WI 53707-7837

Information Required By Section 101.142, Wis. Stats.

Underground tanks in Wisconsin that have stored or currently store petroleum or regulated substances must be registered. A separate form is needed for each tank. Send each completed form to the agency designated in the top right corner. Have you previously registered this tank by submitting a form? [X] Yes [] No If yes, are you correcting/updating information only? [X] Yes [] No Personal information you provide may be used for secondary purposes. [Privacy Law, s. 15.04 (1)(m)]

This registration applies to a tank that is (check one): [] In Use [] Closed - Tank Removed [] Ownership Change (Indicate new owner name in block 2) [X] Closed - Filled with Inert Materials [] Temporary Out of Service - Provide Date: [] Abandon with Water [] Abandoned with Product [] Abandoned without Product (empty) Fire Department providing fire coverage where tank is located: [X] City [] Village [] Town of

A. IDENTIFICATION (Please Print) 1. Tank Site Name: MIRRO COMPANY INC, MANITOWOC, WI, 54221-1330, (920)684-4421 2. Tank Owner Name: NEWELL-RUBBERMAID, ROCKFORD, IL, 61108, (815)381-8121 3. Previous Name: (blank), Previous site address if different than #1: (blank)

B. Site ID #: 112099 Facility ID #: (blank) Customer ID #: 580672

C. 4. Tank Age (age or date installed): 1963 5. Tank Capacity (gallons): 4406

D. AND OWNER TYPE (check one) [X] Private [] County [] Federal Leased [] Federal Owned [] Municipal [] Other Government [] State [] Tribal Nation

E. OCCUPANCY TYPE (check one) [X] Industrial [] Gas/Retail Sales [] Bulk Storage [] Utility [] Mercantile/Commercial [] School [] Residential [] Agricultural [] Backup or Emergency Generator [] Other (Specify):

F. Tank Construction: [X] Bare Steel [] Coated Steel [] Unknown [] Fiberglass [] Steel - Fiberglass Reinforced Plastic Composite [] Lined (Date): [] Other (specify): Cathodic Protection: [] Sacrificial Anodes [] Impressed Current [X] N/A Overfill Protection? [] Yes [X] No Spill Containment? [] Yes [X] No Tank Double Walled? [] Yes [X] No

G. Primary Tank leak detection method: [X] Inventory control and tightness testing [] Automatic tank gauging [] Groundwater monitoring [] Manual tank gauging (only for tanks of 1,000 gallons or less) [] Interstitial monitoring [] Vapor monitoring [] Statistical Inventory Reconciliation (SIR) [] Unknown

H. Piping Construction: [X] Bare Steel [] Coated Steel [] Unknown [] Fiberglass [] Flexible [] N/A Cathodic Protection: [] Sacrificial Anodes [] Impressed Current [X] N/A Pipe Double Walled? [] Yes [X] No

I. Primary Piping System Type: [] Pressurized piping with auto shutoff, alarm or flow restrictor [] Unknown [] Suction piping with check valve at tank [X] Suction piping with check valve at pump and inspectable [] Not needed if waste oil

J. Piping Leak Detection Method: (used if pressurized or check valve at tank): [] SIR [X] Tightness testing [] Electronic line leak monitor [] Groundwater monitoring [] Vapor monitoring [] Interstitial monitoring [] Not required [] Unknown

K. Vapor Recovery/Stage II CARB #: [] Fiberglass [] Other (specify): [] Flexible [] Operational - Provide Date (mo/day/yr):

L. TANK CONTENTS (Current, or previous product if tank now empty) [] Diesel [] Leaded [] Unleaded [X] Fuel Oil [] Gasohol [] Other (Specify): [] Empty [] Sand/Gravel/Slurry* [] Unknown* [] Premix [] Waste/Used Motor Oil [] Chemical [] Kerosene [] Aviation [] Hazardous Waste* (Indicate chemical name and number)

M. If chosen, this tank is NOT PECFA eligible. Geo Latitude: Geo Longitude: N. If Tank Closed, Abandoned or Out of Service, give date (mo/day/yr): JUNE 19 2001 Has a site assessment been completed (see reverse side for details) [X] Yes [] No

N. Owner or Operator Name (please print): RICHARD M. ADAMS Indicate whether: [] Owner or [X] Operator Owner or Operator Signature: R. M. Adams Date Signed: 6/19/01

Note: Refer to comments on reverse side of form. S-7437 (R. 04/98)

Reg Obj #: 44370

UNDERGROUND FLAMMABLE/COMBUSTIBLE LIQUID STORAGE TANK INVENTORY

Send Completed Form To:
Department of Commerce
Bureau of Storage Tank Regulation
P O. Box 7837
Madison, WI 53707-7837

Information Required By Section 101.142, Wis. Stats.

Underground tanks in Wisconsin that have stored or currently store petroleum or regulated substances must be registered. A separate form is needed for each tank. Send each completed form to the agency designated in the top right corner. Have you previously registered this tank by submitting a form? Yes No If yes, are you correcting/updating information only? Yes No Personal information you provide may be used for secondary purposes. [Privacy Law, s. 15.04 (1)(m)]

This registration applies to a tank that is (check one):		Fire Department providing fire coverage where tank is located:
<input type="checkbox"/> In Use	<input type="checkbox"/> Closed - Tank Removed	<input checked="" type="checkbox"/> City <input type="checkbox"/> Village
<input type="checkbox"/> Newly Installed	<input checked="" type="checkbox"/> Closed - Filled with Inert Materials	<input type="checkbox"/> Town of _____
<input type="checkbox"/> Abandoned with Product	<input type="checkbox"/> Temporary Out of Service - Provide Date: _____	
<input type="checkbox"/> Abandoned without Product (empty)	<input type="checkbox"/> Abandon with Water	

A. IDENTIFICATION (Please Print)

1. Tank Site Name <u>MIRRO COMPANY</u>	Site Address <u>1512 WASHINGTON ST</u>	Site Telephone Number <u>(920) 684-4421</u>
<input checked="" type="checkbox"/> City <input type="checkbox"/> Village <input type="checkbox"/> Town of:	State <u>WISCONSIN</u>	County <u>MANITOWOC</u>
2. Tank Owner Name <u>NEWELL RUBBERMAID</u>	Mailing Address <u>6833 STATER DRIVE</u>	Telephone Number <u>(815) 381-8121</u>
<input checked="" type="checkbox"/> City <input type="checkbox"/> Village <input type="checkbox"/> Town of:	State <u>IL</u>	County <u>61108</u>
3. Previous Name <u>ROCKFORD</u>	Previous site address if different than #1	

B. Site ID #: 112099 **Facility ID #:** _____ **Customer ID #:** 580672

C. 4. Tank Age (age or date installed): 1963 **5. Tank Capacity (gallons):** 4406

D. LAND OWNER TYPE (check one)

County Federal Leased Federal Owned Municipal Other Government

Private State Tribal Nation

E. OCCUPANCY TYPE (check one)

Gas/Retail Sales Bulk Storage Utility Mercantile/Commercial Industrial School Residential

Agricultural Backup or Emergency Generator Other (Specify): _____

F. Tank Construction:

<input checked="" type="checkbox"/> Bare Steel	<input type="checkbox"/> Coated Steel	<input type="checkbox"/> Unknown	Cathodic Protection	Overfill Protection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input type="checkbox"/> Fiberglass	<input type="checkbox"/> Steel - Fiberglass Reinforced Plastic Composite		<input type="checkbox"/> Sacrificial Anodes	Spill Containment? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input type="checkbox"/> Lined (Date): _____	<input type="checkbox"/> Other (specify): _____		<input type="checkbox"/> Impressed Current	Tank Double Walled? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
			<input checked="" type="checkbox"/> N/A	

G. Primary Tank leak detection method:

Inventory control and tightness testing Automatic tank gauging Groundwater monitoring

Manual tank gauging (only for tanks of 1,000 gallons or less) Interstitial monitoring Vapor monitoring

Statistical Inventory Reconciliation (SIR) Unknown

H. Piping Construction:

<input checked="" type="checkbox"/> Bare Steel	<input type="checkbox"/> Coated Steel	<input type="checkbox"/> Unknown	Cathodic Protection	Pipe Double Walled? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input type="checkbox"/> Fiberglass	<input type="checkbox"/> Flexible	<input type="checkbox"/> N/A	<input type="checkbox"/> Sacrificial Anodes	
<input type="checkbox"/> Other (specify): _____			<input type="checkbox"/> Impressed Current	
			<input checked="" type="checkbox"/> N/A	

I. Primary Piping System Type: Pressurized piping with _____ A. auto shutoff; B. alarm or C. flow restrictor Unknown

Suction piping with check valve at tank Suction piping with check valve at pump and inspectable Not needed if waste oil

J. Piping Leak Detection Method: (used if pressurized or check valve at tank): SIR Tightness testing Electronic line leak monitor

Groundwater monitoring Vapor monitoring Interstitial monitoring Not required Unknown

K. Vapor Recovery/Stage II CARB #: _____

Fiberglass Other (specify): _____ Flexible Operational - Provide Date (mo/day/yr): _____

L. TANK CONTENTS (Current, or previous product if tank now empty)

<input type="checkbox"/> Diesel	<input type="checkbox"/> Leaded	<input type="checkbox"/> Unleaded	<input checked="" type="checkbox"/> Fuel Oil	<input type="checkbox"/> Gasohol
<input type="checkbox"/> Other (Specify): _____	<input type="checkbox"/> Empty	<input type="checkbox"/> Sand/Gravel/Slurry*	<input type="checkbox"/> Unknown*	<input type="checkbox"/> Premix
<input type="checkbox"/> Waste/Used Motor Oil	<input type="checkbox"/> Chemical _____	<input type="checkbox"/> Kerosene	<input type="checkbox"/> Aviation	<input type="checkbox"/> Hazardous Waste*

(Indicate chemical name and number)

If chosen, this tank is NOT PECFA eligible.

M. If Tank Closed, Abandoned or Out of Service, give date (mo/day/yr): JUNE 19 2001

Geo Latitude: _____ **Geo Longitude:** _____

Has a site assessment been completed (see reverse side for details): Yes No

Owner or Operator Name (please print): RICHARD M. ADAMS

Owner or Operator Signature: _____

Indicate whether: Owner or Operator

Date Signed: 6/19/01

Note: Refer to comments on reverse side of form.
IS-7437 (R. 04/98)

Reg Obj #: 44369

UNDERGROUND FLAMMABLE/COMBUSTIBLE LIQUID STORAGE TANK INVENTORY

Send Completed Form To: Department of Commerce Bureau of Storage Tank Regulation P.O. Box 7837 Madison, WI 53707-7837

Information Required By Section 101.142, Wis. Stats.

Underground tanks in Wisconsin that have stored or currently store petroleum or regulated substances must be registered. A separate form is needed for each tank. Send each completed form to the agency designated in the top right corner. Have you previously registered this tank by submitting a form? [X] Yes [] No. If yes, are you correcting/updating information only? [X] Yes [] No

This registration applies to a tank that is (check one): [] In Use [X] Closed - Tank Removed [] Ownership Change (Indicate new owner name in block 2) [X] Closed - Filled with Inert Materials [] Temporary Out of Service - Provide Date: [] Abandoned with Product [] Abandoned without Product (empty) [] Abandon with Water

A. IDENTIFICATION (Please Print) 1. Tank Site Name: MIRRO COMPANY, Site Address: 1512 WASHINGTON ST, Site Telephone Number: (920) 684-4421. 2. Tank Owner Name: NEWELL RUBBERMAID INC, Mailing Address: 6833 STALTER DRIVE, Telephone Number: (815) 381-8121. 3. Previous Name: ROCKFORD

B. Site ID #: 112099, Facility ID #: , Customer ID #: 580672

C. 4. Tank Age (age or date installed): 1963, 5. Tank Capacity (gallons): 4406

D. LAND OWNER TYPE (check one) [X] Private [] County [] Federal Leased [] Federal Owned [] Municipal [] Other Government [] State [] Tribal Nation

E. OCCUPANCY TYPE (check one) [X] Industrial [] Gas/Retail Sales [] Bulk Storage [] Utility [] Mercantile/Commercial [] School [] Residential [] Agricultural [] Backup or Emergency Generator [] Other (Specify):

F. Tank Construction: [X] Bare Steel [] Coated Steel [] Unknown [] Fiberglass [] Steel - Fiberglass Reinforced Plastic Composite [] Lined (Date): [] Other (specify): [] Cathodic Protection [] Sacrificial Anodes [] Impressed Current [X] N/A [] Overfill Protection? [] Yes [X] No [] Spill Containment? [] Yes [X] No [] Tank Double Walled? [] Yes [X] No

G. Primary Tank leak detection method: [X] Inventory control and tightness testing [] Automatic tank gauging [] Groundwater monitoring [] Manual tank gauging (only for tanks of 1,000 gallons or less) [] Interstitial monitoring [] Vapor monitoring [] Statistical Inventory Reconciliation (SIR) [] Unknown

H. Piping Construction: [X] Bare Steel [] Coated Steel [] Unknown [] Fiberglass [] Flexible [] N/A [] Cathodic Protection [] Sacrificial Anodes [] Impressed Current [X] N/A [] Pipe Double Walled? [] Yes [X] No

I. Primary Piping System Type: [] Pressurized piping with A. [] auto shutoff; B. [] alarm or C. [] flow restrictor [] Unknown [] Suction piping with check valve at tank [X] Suction piping with check valve at pump and inspectable [] Not needed if waste oil

J. Piping Leak Detection Method: (used if pressurized or check valve at tank): [] SIR [X] Tightness testing [] Electronic line leak monitor [] Groundwater monitoring [] Vapor monitoring [] Interstitial monitoring [] Not required [] Unknown

K. Vapor Recovery/Stage II CARB #: [] Fiberglass [] Other (specify): [] Flexible [] Operational - Provide Date (mo/day/yr):

L. TAN KCONTENTS (Current, or previous product if tank now empty) [] Diesel [] Leaded [] Unleaded [X] Fuel Oil [] Gasohol [] Other (Specify): [] Empty [] Sand/Gravel/Slurry* [] Unknown* [] Premix [] Waste/Used Motor Oil [] Chemical [] Kerosene [] Aviation [] Hazardous Waste*

M. If chosen, this tank is NOT PECFA eligible. Geo Latitude: Geo Longitude:

N. If Tank Closed, Abandoned or Out of Service, give date (mo/day/yr): JUNE 19 2001 Has a site assessment been completed (see reverse side for details) [X] Yes [] No

O. Owner or Operator Name (please print): RICHARD M. ADAMS, Indicate whether: [] Owner or [X] Operator. Owner or Operator Signature: R. M. Adams, Date Signed: 6/19/01

Note: Refer to comments on reverse side of form. IS-7437 (R. 04/98)

Complete one form for each site closure.

CHECKLIST FOR TANK CLOSURE

RETURN COMPLETED CHECKLIST TO:

The information you provide may be used for secondary purposes [Privacy Law, s.15.04 (1)(m)].

CHECK ONE:
 UNDERGROUND
 ABOVEGROUND
 FOR PORTIONS OF THE FORM THAT DO NOT APPLY, CHECK THE N/A BOX BELOW

Wisconsin Department of Commerce
 ERS Division
 Bureau of Storage Tank Regulation
 P.O. Box 7837
 Madison, WI 53707-7837

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

1. Site Name: MIRRO COMPANY 2. Owner Name: NEWELL RUBBERMAID INC
 Site Street Address (not P.O. Box): 1312 WASHINGTON STREET Owner Street Address: 6833 STALTER DRIVE
 City Village Town of: MANITOWOC City Village Town of: ROCKFORD State: IL Zip Code: 61108
 State: WISCONSIN Zip Code: 54221-1330 County: MANITOWOC County: ROCKFORD Telephone No. (include area code): (815) 381-8121
 3. Closure Company Name (print): ENVIRONMENTAL SERVICES PLUS Closure Company Street Address: W1732 COUNTY RD KR
 Closure Company Telephone No. (include area code): (920) 766-6756 Closure Company City, State, Zip Code: KAUKAUNA WI 54130
 4. Name of Company Performing Closure Assessment: Northern Environmental Assessment Company Street Address, City, State, Zip Code: 1 Circle Dr., Green Bay WI 54304
 Telephone No. (include area code): (920) 598-8400 Certified Assessor Name (print): Nicole LaPlont Assessor Signature: [Signature] Assessor Certification No.: 46836

Tank ID #	Closure	Temp. Closure	Closure in Place	Tank Capacity	Contents*	Closure Assessment
1. 414569	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	4406	#2 F.O	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
2. 414570	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	4406	#2 F.O	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
3. 414571	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	4406	#2 F.O	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
4. 414688	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	4406	#2 F.O	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N

* Indicate which product: Diesel; Leaded; Unleaded; Fuel Oil; Gasohol; Aviation Fuel; Kerosene; Premix; Waste/Used Motor Oil; Flammable/Combustible Hazardous Waste; Chemical (indicate the chemical name(s) _____ and CAS number(s) _____); Other _____

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

	Remover Verified	Inspector Verified	NA
1. Product Removed	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA
a. Product lines drained into tank (or other container) and resulting liquid removed, AND	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA
b. All product removed to bottom of suction line, OR	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA
c. All product removed to within 1" of bottom.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA
2. Fill pipe, gauge pipe, tank truck vapor recovery fittings, and vapor return lines capped.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA
3. All product lines at the islands or pumps located elsewhere are removed and capped, OR	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA
4. Dispensers/pumps left in place but locked and power disconnected.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA
5. Vent lines left open.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA
6. Inventory form filed indicating temporary closure.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA

C. CLOSURE BY REMOVAL

1. Product from piping drained into tank (or other container).	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA
2. Piping disconnected from tank and removed.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA
3. All liquid and residue removed from tank using explosion proof pumps or hand pumps.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA
4. All pump motors and suction hoses bonded to tank or otherwise grounded.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA
5. Fill pipes, gauge pipes, vapor recovery connections, submersible pumps and other fixtures removed.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA
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.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA
7. Tank openings temporarily plugged so vapors exit through vent.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA
8. Tank atmosphere reduced to 10% of the lower flammable range (LEL) - see Section F.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA
9. Tank removed from excavation after PURGING/INERTING; placed on level ground and blocked to prevent movement.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA
10. Tank cleaned before being removed from site.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> NA

C. CLOSURE BY REMOVAL (continued)

	Remover Verified		Inspector Verified	NA
11. Tank labeled in 2" high letters after removal but before being moved from site.	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/>
NOTE: COMPLETE TANK LABELING SHOULD INCLUDE WARNING AGAINST REUSE, FORMER CONTENTS; VAPOR STATE; VAPOR FREEING TREATMENT; DATE.				
12. Tank vent hole (1/8" in uppermost part of tank) installed prior to moving the tank from site.	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/>
13. Form ERS-7437 or ERS-8731 filed by owner with the Dept. of Commerce indicating closure by removal.	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/>
14. Site security is provided while the excavation is open.	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/>

D. CLOSURE IN PLACE

NOTE: CLOSURES IN PLACE ARE ONLY ALLOWED WITH THE PRIOR WRITTEN APPROVAL OF THE DEPARTMENT OF COMMERCE OR LOCAL AGENT.

1. Product from piping drained into tank (or other container).	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Piping disconnected from tank and removed.	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. All liquid and residue removed from tank using explosion proof pumps or hand pumps.	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. All pump motors and suction hoses bonded to tank or otherwise grounded.	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Fill pipes, gauge pipes, vapor recovery connections, submersible pumps and other fixtures removed.	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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.				
6. Vent lines left connected until tanks purged.	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/>
7. Tank openings temporarily plugged so vapors exit through vent.	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/>
8. Tank atmosphere reduced to 10% of the lower flammable range (LEL) see Section F.	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9. Tank properly cleaned to remove all sludge and residue.	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. Solid inert material (sand, cyclone boiler slag, pea gravel recommended) introduced and tank filled.	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/>
11. Vent line disconnected or removed.	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>
12. Inventory form filed by owner with the Department of Commerce indicating closure in place.	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>

E. CLOSURE ASSESSMENTS

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

1. Individual conducting the assessment has a closure assessment plan (written) which is used as the basis for their work on the site.	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Do points of obvious contamination exist?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Are there strong odors in the soils?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Was a field screening instrument used to pre-screen soil sample locations?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Was a closure assessment omitted because of obvious contamination?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Was the DNR notified of suspected or obvious contamination?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Agency, office and person contacted: <u>to be contacted via fax</u>				
7. Contamination suspected because of: <input checked="" type="checkbox"/> Odor <input checked="" type="checkbox"/> Soil Staining <input type="checkbox"/> Free Product <input type="checkbox"/> Sheen on Groundwater <input checked="" type="checkbox"/> Field Instrument Test				

F. METHOD OF ACHIEVING 10% LEVEL DESCRIPTION

- Eductor 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 (CO₂ or N₂) **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

(4) 4012 STEEL USTS 60" x 30' FT * Filling of tanks is pending * soil analysis

H. REMOVER/CLEANER INFORMATION

JESSE F ROSE
Remover Name (print) John J Rose
Remover Signature 41240
Remover Certification No. 6/19/0
Date Signed

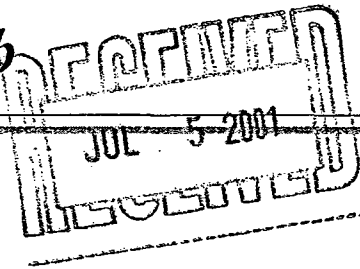
I. INSPECTOR INFORMATION

JAMES KEONOR
Inspector Name (print) James Keonor
Inspector Signature 35036
Inspector Certification No. 36251
Inspector Telephone Number 920-686-6543
Date Signed 6-20-01

ATTACHMENT D

**LABORATORY ANALYSIS REPORTS
AND CHAIN-OF-CUSTODY RECORDS**

U.S. Analytical Lab



NICOLE LA PLANT
 NORTHERN ENVIRONMENTAL
 954 CIRCLE DRIVE
 GREEN BAY WI 54304

Project # ESP 1241
 Project Name MANITOWOC
 Invoice # E33751

Report Date 29-Jun-01

Analyte	Result	Units	LOD	LOQ	Dil	Run Date	Method	Analyst	QC Code
Lab Code	5033751A								
Sample ID	S1								
Sample Type	Soil								
Sample Date	6/20/01								

Inorganic

General

Solids Percent 94.5 % 1 6/21/01 5021 KAH 1

Organic

General

Diesel Range Organics < 10 mg/kg 0.38 1.3 1 6/21/01 DRO95 JDB 1

Lab Code	5033751B								
Sample ID	S2								
Sample Type	Soil								
Sample Date	6/20/01								

Inorganic

General

Solids Percent 94.7 % 1 6/21/01 5021 KAH 1

Organic

General

Diesel Range Organics < 10 mg/kg 0.38 1.3 1 6/21/01 DRO95 JDB 1

Lab Code	5033751C								
Sample ID	S3								
Sample Type	Soil								
Sample Date	6/20/01								

Inorganic

General

Solids Percent 97.3 % 1 6/21/01 5021 KAH 1

Organic

General

Diesel Range Organics 740 mg/kg 0.38 1.3 1 6/21/01 DRO95 JDB 1

Lab Code	5033751D								
Sample ID	S4								
Sample Type	Soil								
Sample Date	6/20/01								

Inorganic

General

Solids Percent 96.2 % 1 6/21/01 5021 KAH 1

Organic

General

Diesel Range Organics 11 mg/kg 0.38 1.3 1 6/21/01 DRO95 JDB 1

U.S. Analytical Lab

NICOLE LA PLANT
 NORTHERN ENVIRONMENTAL
 954 CIRCLE DRIVE
 GREEN BAY WI 54304

Project # ESP 1241
Project Name MANITOWOC
Invoice # E33751

Report Date 29-Jun-01

Analyte	Result	Units	LOD	LOQ	Dil	Run Date	Method	Analyst	QC Code
Lab Code 5033751E							Sample Type Soil		
Sample ID S5							Sample Date 6/20/01		

Inorganic

General

Solids Percent	95.5	%				1	6/21/01	5021	KAH	1
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Organic

General

Diesel Range Organics	< 10	mg/kg	0.38	1.3	1	1	6/21/01	DRO95	JDB	1
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Lab Code 5033751F							Sample Type Soil		
Sample ID S6							Sample Date 6/20/01		

Inorganic

General

Solids Percent	93.8	%				1	6/21/01	5021	KAH	1
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Organic

General

Diesel Range Organics	< 10	mg/kg	0.38	1.3	1	1	6/21/01	DRO95	JDB	1
-----------------------	------	-------	------	-----	---	---	---------	-------	-----	---

Lab Code 5033751G							Sample Type Soil		
Sample ID S7							Sample Date 6/20/01		

Inorganic

General

Solids Percent	85.2	%				1	6/21/01	5021	KAH	1
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Organic

General

Diesel Range Organics	2300	mg/kg	0.38	1.3	1	1	6/21/01	DRO95	JDB	1
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PAH's

Acenaphthene	< 130	ug/kg	130	430	10		6/28/01	M8270	DJM	1
Acenaphthylene	< 100	ug/kg	100	330	10		6/28/01	M8270	DJM	1
Anthracene	< 110	ug/kg	110	370	10		6/28/01	M8270	DJM	1
Benzo(a)anthracene	< 100	ug/kg	100	330	10		6/28/01	M8270	DJM	1
Benzo(a)pyrene	< 170	ug/kg	170	570	10		6/28/01	M8270	DJM	1
Benzo(b)fluoranthene	< 240	ug/kg	240	800	10		6/28/01	M8270	DJM	1
Benzo(g,h,i)perylene	< 100	ug/kg	100	330	10		6/28/01	M8270	DJM	1
Benzo(k)fluoranthene	< 370	ug/kg	370	1200	10		6/28/01	M8270	DJM	1
Chrysene	< 100	ug/kg	100	330	10		6/28/01	M8270	DJM	1

U.S. Analytical Lab

NICOLE LA PLANT
 NORTHERN ENVIRONMENTAL
 954 CIRCLE DRIVE
 GREEN BAY WI 54304

Project # ESP 1241
Project Name MANITOWOC
Invoice # E33751

Report Date 29-Jun-01

Analyte	Result	Units	LOD	LOQ	Dil	Run Date	Method	Analyst	QC Code
Lab Code 5033751G							Sample Type Soil		
Sample ID S7							Sample Date 6/20/01		
Dibenzo(a,h)anthracene	< 100	ug/kg	100	330	10	6/28/01	M8270	DJM	1
Fluoranthene	< 100	ug/kg	100	330	10	6/28/01	M8270	DJM	1
Fluorene	< 110	ug/kg	110	370	10	6/28/01	M8270	DJM	1
Indeno(1,2,3-cd)pyrene	< 130	ug/kg	130	430	10	6/28/01	M8270	DJM	1
1-Methyl naphthalene	390	ug/kg	100	330	10	6/28/01	M8270	DJM	1
2-Methyl naphthalene	540 "J"	ug/kg	170	570	10	6/28/01	M8270	DJM	1
Naphthalene	140 "J"	ug/kg	100	330	10	6/28/01	M8270	DJM	1
Phenanthrene	< 120	ug/kg	120	400	10	6/28/01	M8270	DJM	1
Pyrene	410 "J"	ug/kg	130	430	10	6/28/01	M8270	DJM	1
PVOC									
Benzene	< 25	ug/kg	15	48	1	6/25/01	GRO95	CJR	1
Ethylbenzene	37	ug/kg	7	22	1	6/25/01	GRO95	CJR	1
MTBE	< 25	ug/kg	10	33	1	6/25/01	GRO95	CJR	1
Toluene	< 25	ug/kg	5.7	18	1	6/25/01	GRO95	CJR	1
1,2,4-Trimethylbenzene	1100	ug/kg	24	77	1	6/25/01	GRO95	CJR	1
1,3,5-Trimethylbenzene	430	ug/kg	15	48	1	6/25/01	GRO95	CJR	1
Xylene's	200	ug/kg	18	60	1	6/25/01	GRO95	CJR	1

Lab Code 5033751H							Sample Type Soil		
Sample ID S8							Sample Date 6/20/01		

Inorganic

General

Solids Percent 95.4 % 1 6/21/01 5021 KAH 1

Organic

General

Diesel Range Organics < 10 mg/kg 0.38 1.3 1 6/21/01 DRO95 JDB 1

Lab Code 5033751I							Sample Type Soil		
Sample ID S9							Sample Date 6/20/01		

Inorganic

General

Solids Percent 92.7 % 1 6/21/01 5021 KAH 1

Organic

General

Diesel Range Organics < 10 mg/kg 0.38 1.3 1 6/22/01 DRO95 JDB 1

U.S. Analytical Lab

NICOLE LA PLANT
 NORTHERN ENVIRONMENTAL
 954 CIRCLE DRIVE
 GREEN BAY WI 54304

Project # ESP 1241
 Project Name MANITOWOC
 Invoice # E33751

Report Date 29-Jun-01

Analyte	Result	Units	LOD	LOQ	Dil	Run Date	Method	Analyst	QC Code
Lab Code	5033751J								
Sample ID	S10								
Sample Type	Soil								
Sample Date	6/20/01								

Inorganic

General

Solids Percent	95.7	%			1	6/21/01	5021	KAH	1
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Organic

General

Diesel Range Organics	< 10	mg/kg	0.38	1.3	1	6/22/01	DRO95	JDB	1
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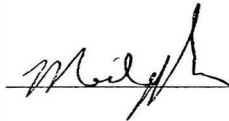
LOD Limit of Detection

"J" Flag: Analyte detected between LOD and LOQ

LOQ Limit of Quantitation

Code	Comment
1	All laboratory QC requirements were met for this sample.

Authorized Signature



CHAIN OF CUSTODY RECORD REQUEST FOR ANALYSIS

Check office originating request

- 1214 W. Venture Ct.
Mequon, WI 53092
262-241-3133
FAX 262-241-8222
- 1203 Storbeck Drive
Waupun, WI 53963
920-324-8600
FAX 920-324-3023

- 372 West County Road D
New Brighton, MN 55112
651-635-9100
FAX 651-635-0643
- 3211 Arnold Lane
Northbrook, IL 60062
847-562-8577
FAX 847-562-8552

954 Circle Drive
Green Bay, WI 54304
920-592-8400
FAX 920-592-8444

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

- 31628 Glendale Ave., Ste 100
Livonia, MI 48150
734-422-2624
FAX 734-422-3530

5033751

Project No: <u>ESP 1241</u> Task No:		Laboratory: <u>U.S. Analytical</u>		Sample Integrity - To be completed by receiving lab Seal intact upon receipt <input type="checkbox"/> yes <input type="checkbox"/> no Method of shipment _____ Contents Temperature _____ °C Refrigerator No. _____											
Project Location: (city) <u>Manitowoc</u>		Wisconsin DNR Certification #:		ANALYSES REQUESTED											
Project Manager: <u>Lynelle Cairne</u>		Laboratory Contact: <u>Mike Richer</u>													
Sampler: (name) <u>Nicole LaPlant</u>		Price Quote: <u>5646</u>		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>Nicole LaPlant</u>		TURNAROUND TIME REQUIRED													
Sampling Date(s): <u>6-20-01</u>		<input type="checkbox"/> Normal <input checked="" type="checkbox"/> Rush													
Reports to be Sent to: <u>Nicole LaPlant</u>		Date Needed <u>6-22-01 (48hrs)</u>													
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>5033751A</u>	<u>51</u>	<u>6-20-01</u>	<u>1150</u>	<u>1-40ml, 1-2oz.</u>		<u>X</u>		<u>ICE</u>	<u>X</u>						
<u>B</u>	<u>52</u>		<u>1200</u>			<u>X</u>			<u>X</u>						
<u>C</u>	<u>53</u>		<u>1205</u>			<u>X</u>			<u>X</u>						
<u>D</u>	<u>54</u>		<u>1210</u>			<u>X</u>			<u>X</u>						
<u>E</u>	<u>55</u>		<u>1215</u>			<u>X</u>			<u>X</u>						
<u>F</u>	<u>56</u>		<u>1220</u>			<u>X</u>			<u>X</u>						
<u>G</u>	<u>57</u>		<u>1230</u>	<u>2-40ml / 1-2oz</u>		<u>X</u>			<u>X</u>		<u>X</u>		<u>X</u>		
<u>H</u>	<u>58</u>		<u>1235</u>	<u>1-40ml / 1-2oz</u>		<u>X</u>			<u>X</u>						
<u>I</u>	<u>59</u>		<u>1240</u>			<u>X</u>			<u>X</u>						
<u>J</u>	<u>510</u>		<u>1245</u>			<u>X</u>			<u>X</u>						
Packed for Shipping by: <u>N. LaPlant</u>				Comments: <u>Hold PVOC analysis for 57 until contacting Northern Env. (Nicole or Lynelle) with results of DRO analysis. Thanks. Run PVOC & ADD PAH To 57 per Mike on 6/24/01</u>											
Shipment Date: <u>6-20-01</u>															
Relinquished By: <u>[Signature]</u>		Date: <u>6-20-01</u>		Relinquished By: _____		Date: _____		Relinquished By: _____		Date: <u>ML</u>		Relinquished By: _____		Date: _____	
Company: <u>[Signature]</u>		Time: <u>3:46</u>		Company: _____		Time: _____		Company: _____		Time: _____		Company: _____		Time: _____	
Received By: <u>[Signature]</u>		Date: <u>6/20/01</u>		Received By: _____		Date: _____		Received By: _____		Date: _____		Received By: _____		Date: _____	
Company: <u>[Signature]</u>		Time: <u>3:46</u>		Company: _____		Time: _____		Company: _____		Time: _____		Company: _____		Time: _____	

RUSH

RECEIVED

NOV 19 2001

FACSIMILE TRANSMISSION

ERS DIVISION
OSHKOSH



Date: 6-26-01
Our Project No.: ESP 1241
From: Nicole LaPlant
Pages To Follow: 3
Time: 3:45 PM

954 Circle Drive 920-592-8400
Green Bay, WI 54304 (800) 854-0606
920-592-8444 FAX

TO: Cindy Egtvedt FAX NUMBER: 492-5859
COMPANY: WDNR

REMARKS: Attached are preliminary lab results for
the closure assessment we completed at the Mirro
Company Plant #9, 1512 Washington Street, Manitowoc, WI
Final lab reports will be available upon receipt of
further PVOc & PAH analysis on soil sample 57. Please
feel free to call if you need further data.

COPY TO: _____ SIGNED: Nicole LaPlant

NOTE TO OPERATOR: Please deliver this facsimile transmission to the above addressee(s).
If you did not receive all of the pages in good condition, please advise sender at your earliest
convenience. THANK YOU.

U.S. Analytical Lab

NICOLE LA PLANT
 NORTHERN ENVIRONMENTAL
 954 CIRCLE DRIVE
 GREEN BAY WI 54304

Project # ESP 1241
 Project Name MANITOWOC
 Invoice # E33751

Report Date 22-Jun-01

Analyte	Result	Units	LOD	LOQ	Dil	Run Date	Method	Analyst	QC Code
---------	--------	-------	-----	-----	-----	----------	--------	---------	---------

Lab Code	S033751A								
Sample ID	S1								
						Sample Type	Soil		
						Sample Date	6/20/01		

Inorganic										
General										
	Solids Percent	94.5	%			1	6/21/01	S021	KAH	1
Organic										
General										
	Diesel Range Organics	< 10	mg/kg	0.38	1.3	1	6/21/01	DRO95	JDB	1

Lab Code	S033751B								
Sample ID	S2								
						Sample Type	Soil		
						Sample Date	6/20/01		

Inorganic										
General										
	Solids Percent	94.7	%			1	6/21/01	S021	KAH	1
Organic										
General										
	Diesel Range Organics	< 10	mg/kg	0.38	1.3	1	6/21/01	DRO95	JDB	1

Lab Code	S033751C								
Sample ID	S3								
						Sample Type	Soil		
						Sample Date	6/20/01		

Inorganic										
General										
	Solids Percent	97.3	%			1	6/21/01	S021	KAH	1
Organic										
General										
	Diesel Range Organics	740	mg/kg	0.38	1.3	1	6/21/01	DRO95	JDB	1

Lab Code	S033751D								
Sample ID	S4								
						Sample Type	Soil		
						Sample Date	6/20/01		

Inorganic										
General										
	Solids Percent	96.2	%			1	6/21/01	S021	KAH	1
Organic										
General										
	Diesel Range Organics	11	mg/kg	0.38	1.3	1	6/21/01	DRO95	JDB	1

U.S. Analytical Lab

NICOLE LA PLANT
 NORTHERN ENVIRONMENTAL
 954 CIRCLE DRIVE
 GREEN BAY WI 54304

Project # BSP 1241
 Project Name MANITOWOC
 Invoice # E33751

Report Date 22-Jun-01

Analyte	Result	Units	LOD	LOQ	DII	Run Date	Method	Analyst	QC Code
---------	--------	-------	-----	-----	-----	----------	--------	---------	---------

Lab Code	5033751E					Sample Type	Soil		
Sample ID	S5					Sample Date	6/20/01		

Inorganic
 General
 Solids Percent 95.5 % 1 6/21/01 5021 KAH 1

Organic
 General
 Diesel Range Organics < 10 mg/kg 0.38 1.3 1 6/21/01 DR095 JDB 1

Lab Code	5033751F					Sample Type	Soil		
Sample ID	S6					Sample Date	6/20/01		

Inorganic
 General
 Solids Percent 93.8 % 1 6/21/01 5021 KAH 1

Organic
 General
 Diesel Range Organics < 10 mg/kg 0.38 1.3 1 6/21/01 DR095 JDB 1

Lab Code	5033751G					Sample Type	Soil		
Sample ID	S7					Sample Date	6/20/01		

Inorganic
 General
 Solids Percent 95.2 % 1 6/21/01 5021 KAH 1

Organic
 General
 Diesel Range Organics 2300 mg/kg 0.38 1.3 1 6/21/01 DR095 JDB 1

Lab Code	5033751H					Sample Type	Soil		
Sample ID	S8					Sample Date	6/20/01		

Inorganic
 General
 Solids Percent 95.4 % 1 6/21/01 5021 KAH 1

Organic
 General
 Diesel Range Organics < 10 mg/kg 0.38 1.3 1 6/21/01 DR095 JDB 1

U.S. Analytical Lab

NICOLE LA PLANT
 NORTHERN ENVIRONMENTAL
 954 CIRCLE DRIVE
 GREEN BAY WI 54304

Project # ESP 1241
 Project Name MANTOWOC
 Invoice # E33751

Report Date 22-Jun-01

Analyte	Result	Units	LOD	LOQ	Dil	Run Date	Method	Analyst	QC Code
Lab Code	50337511								
Sample ID	S9								
Sample Type	Soil								
Sample Date	6/20/01								

Inorganic

General

Solids Percent 92.7 % 1 6/21/01 5021 KAH 1

Organic

General

Diesel Range Organics < 10 mg/kg 0.38 1.3 1 6/22/01 DRO95 JDB 1

Lab Code	50337511	Sample Type	Soil
Sample ID	S10	Sample Date	6/20/01

Inorganic

General

Solids Percent 95.7 % 1 6/21/01 5021 KAH 1

Organic

General

Diesel Range Organics < 10 mg/kg 0.38 1.3 1 6/22/01 DRO95 JDB 1

LOD Limit of Detection

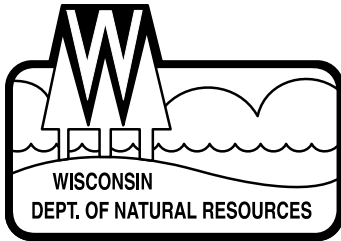
"J" Flag: Analyte detected between LOD and LOQ

LOQ Limit of Quantitation

Code Comment

1 All laboratory QC requirements were met for this sample.

Authorized Signature _____



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott McCallum, Governor
Darrell Bazzell, Secretary
Ronald W. Kazmierczak, Regional Director

Northeast Region Headquarters
1125 N. Military Ave., P.O. Box 10448
Green Bay, Wisconsin 54307-0448
Telephone 920-492-5800
FAX 920-492-5913
TTY 920-492-5912

June 27, 2001

Dr. Peter J. Schultz, Ph. D.
Newell Rubbermaid, Inc.
6833 Stalter Drive, Suite 101
Rockford, IL 61108

SUBJECT: Petroleum Contamination from Underground Storage Tank System
Mirro Plant #9, 1512 Washington Street, Manitowoc, Wisconsin
WDNR BRRTS #03-36-274209

Dear Dr. Schultz:

On June 21, 2001, the Department of Natural Resources received notification from Karen A. Demcak of Mirro Company on your behalf that petroleum contamination was discovered on June 20, 2001, while performing a tank closure assessment at the above referenced location.

Based on the information received by the DNR, we believe that you are 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 **July 27, 2001**, please submit **written** verification (such as a letter from the consultant), to the DNR staff person whose name is listed at the bottom of this page, 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 DNR staff person 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 **August 27, 2001**, your consultant should 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 the DNR informed of what is being done at your site. It is requested that you or your consultant 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.
4. When the site investigation is complete, NR 716.15(1) requires that you or your consultant submit to the DNR a full report (within 30 days of completion of the 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.

Unless otherwise requested, **please send only one duplexed (printed on both sides) 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. **Your correspondence and reports regarding this site should be sent to the Department at the following address:**

**Keld Lauridsen
P. O. Box 10448
Green Bay, WI 54307-0448
920/492-5921**

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

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 the 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 Wisconsin Department of Commerce (DCOM) administers the fund. Please contact DCOM at (608) 266-2424 for more information on eligibility and regulations for this program.

Thank you for your cooperation.

Sincerely,

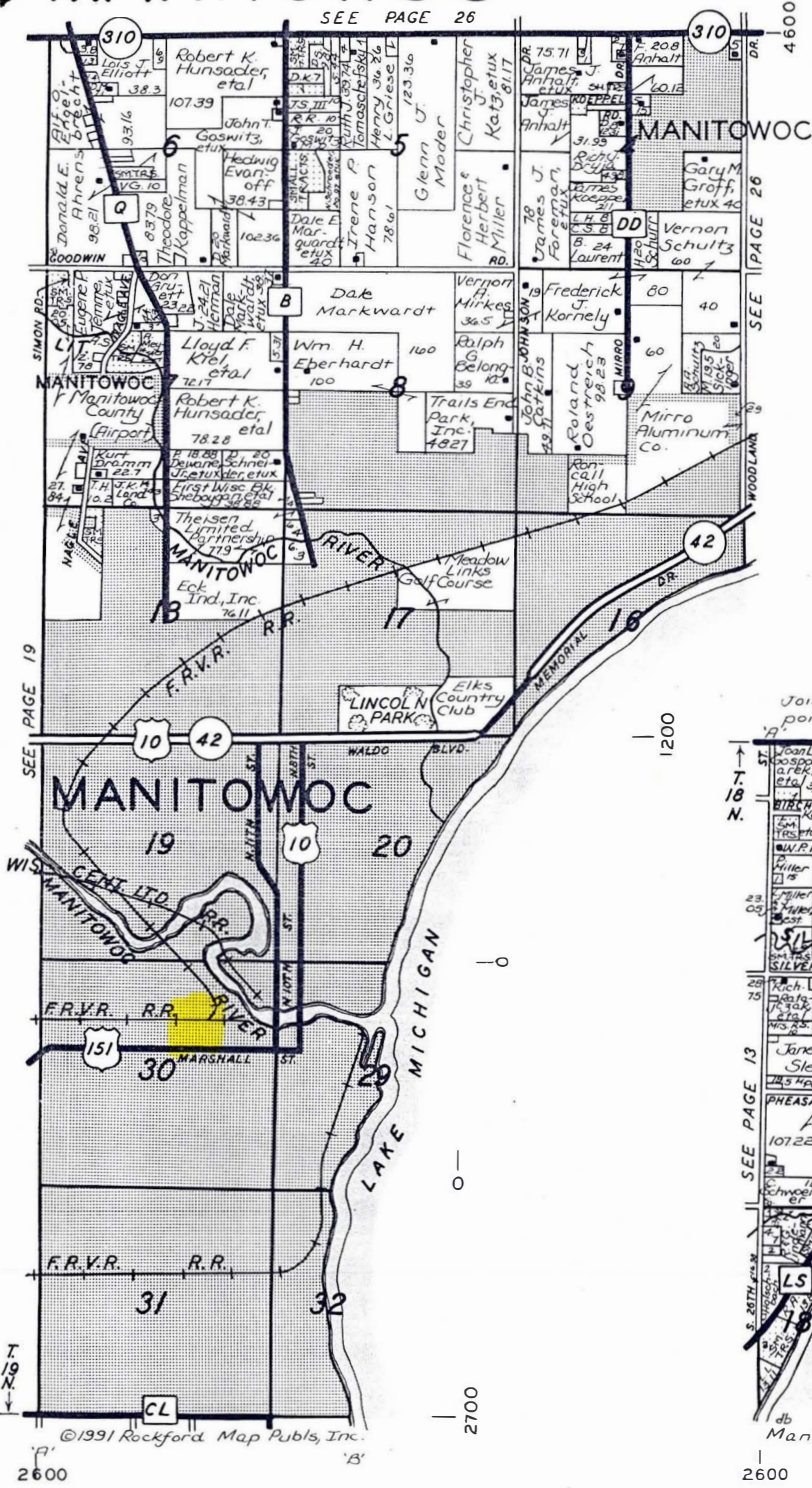
Cynthia R. Egtvedt
Program Assistant
Bureau for Remediation & Redevelopment

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
Information About PECFA

cc: Karen Demcak; Mirro Company; P. O. Box 1330; Manitowoc; WI; 54221-1330
Lynelle Caine; Northern Environmental; 954 Circle Drive; Green Bay, WI 54304
K. Lauridsen/Green Bay

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