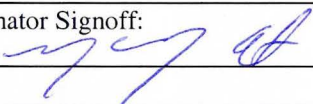


State of Wisconsin Substance Release Notification Form
Department of Natural Resources Form 4400-91 (Rev. 12-04, e-form)
24-Hour Emergency Hotline Number: 1-800-943-0003

Page 1 of 2

Date & Military Time of Incident: 02/05/2005 0500hrs		Date & Military Time Reported: 02/05/2005 0536hrs		Spill File # ner02052005_01 BRRTS #	
Person Reporting: MIKE BOOZER, ENVIRO. CONSULTANT		Representing: VALLEY CAST		Phone # 262-859-3068 Office (O) Fax #	
Responsible Party (RP) / Spiller: VALLEY CAST		RP Decision Based On: PROTOCOL		Phone # 920-915-0624 Office (O) Fax #	
RP Address: 908 N. LAWE ST.		City APPLETON State WI Zip Code 54911-			
RP Contact Name & Title: MIKE BOOZER/RON MOODES, ENG. DIRECTOR		Phone # 920-915-0624 Cell (C) Fax #			
Substance Involved: WATER SOLUBLE OIL (SOAP)		Amount & Units Released: 100 GAL 600		Amount & Units Recovered: UNKNOWN	
<input type="checkbox"/> Solid <input type="checkbox"/> Semisolid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas Color: Odor:					
Exact Location Of Incident: (including street name, bldg. #, mileage, etc.) SAME AS ABOVE 908 N Lawe St.				Facility Name / Property Owner: VALLEY CAST	
<input checked="" type="checkbox"/> City <input type="checkbox"/> Village <input type="checkbox"/> Township APPLETON		County OUTAGAMIE		Latitude/Longitude deg. ' ", deg. ' "	
DNR Region: NER		1/4 1/4 Sec T N R <input type="checkbox"/> E <input type="checkbox"/> W		Weather Conditions: CLEAR, ABOVE FREEZING	
Cause of Incident: OVERFLOW--SEE NEXT PAGE Flexible tubing for the streamer discharge from Bull blocks 1 & 4 became plugged					
Spilled Substance Impact To: (check X all that apply) <input type="checkbox"/> Air <input type="checkbox"/> Potential <input checked="" type="checkbox"/> Concrete/Asphalt <input type="checkbox"/> Potential <input type="checkbox"/> Contained/Recovered <input type="checkbox"/> Groundwater <input type="checkbox"/> Potential <input type="checkbox"/> Private Well <input type="checkbox"/> Potential <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Potential <input type="checkbox"/> Soil <input type="checkbox"/> Potential <input checked="" type="checkbox"/> Storm Sewer <input type="checkbox"/> Potential <input checked="" type="checkbox"/> Surface Water <input type="checkbox"/> Potential Name: FOX RIVER <input checked="" type="checkbox"/> Other: flow p.t		Spill Cause and/or Site: <input type="checkbox"/> Ag Coop/Food Factory <input type="checkbox"/> Airport Facility <input type="checkbox"/> Railroad Facility <input type="checkbox"/> Construction, Excavation, Wrecking, Quarry, Mine <input type="checkbox"/> Gas/Service Station/Garage/Auto Dealer/Repair Shop <input type="checkbox"/> Hydraulic Line Break <input checked="" type="checkbox"/> Industrial Facility <input type="checkbox"/> Paper Mill <input type="checkbox"/> Chemical Co. <input type="checkbox"/> Pipeline/Terminal/Tank Farm/Oil Jobber/Wholesaler <input type="checkbox"/> Private Property (home/farm) <input type="checkbox"/> Public Property (city, state, church, school, etc.) <input type="checkbox"/> Transportation Accident, Fuel Tank Spill <input type="checkbox"/> Transportation Accident, Load Spill <input type="checkbox"/> Utility Co. Power Generating/Transfer Facility <input type="checkbox"/> Other:		Action Taken By Spiller: <input checked="" type="checkbox"/> Cleanup Method: <input type="checkbox"/> Absorbent <input type="checkbox"/> Excavation <input checked="" type="checkbox"/> VACCUM <input checked="" type="checkbox"/> Containment <input checked="" type="checkbox"/> Contractor Hired Name: CHEIF LIQUID WASTE SYSTEM <input type="checkbox"/> Monitor <input type="checkbox"/> No Action Needed <input type="checkbox"/> No Action Taken <input type="checkbox"/> Waste Destination: <input type="checkbox"/> Other:	
Injuries? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes how many?		Has An Evacuation Occurred? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Potential? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Are There Any Resource Damages? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Potential What Kind? FOX RIVER					
Other Agencies Notified: (check first column, if notified; check both columns, if on the scene) <input type="checkbox"/> Fire Department <input checked="" type="checkbox"/> Local DNR <input type="checkbox"/> EPA <input type="checkbox"/> Local Law Enforcement <input type="checkbox"/> Div. Emerg. Mgt. <input type="checkbox"/> Nat'l Resp Ctr 800-442-8802 <input type="checkbox"/> LEPC or Local Emer. Mgt. <input type="checkbox"/> Coast Guard <input type="checkbox"/> Chemtrec 800-424-9300 <input type="checkbox"/> Level A/Level B Team <input type="checkbox"/> DHFS 608-258-0099 <input type="checkbox"/> Other:					Incident Commander: N/A Phone #
Prepared By: THOMAS VANHAREN	Phone # 608-266-3244	Date: 02/05/2005	Rpt'd To DATCP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Date: Tnsfed. To DATCP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Date:		
Person Notified: WARDEN ROMBERG	Phone # 920-832-1802	Date: 02/05/2005 Time:	Spill Packet Sent? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Date: To:		
Investigated By:		Sign:	Date:	Transferred to ERP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Date: Case #	
Spill Coordinator Signoff: 		Date: 6-2-05		NFA Letter Sent? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Date: Incident Closed? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Date: 6-2-05	
<input type="checkbox"/> See Additional Comments On Reverse (Please, print page 2 of 2)					

State of Wisconsin Substance Release Report (Cont'd)
Form 4400-91 (Rev 12-04, e-form)

Page 2 of 2

Date and Military Time Of Incident: 02/05/2005
0500hrs

Responsible Party: VALLEY CAST

Additional Comments : THIS FACILITY MAKES BRASS WIRE. THE WIRE IS RUN THROUGH A TANK OF WATER THAT HAS A LITTLE SOAP (LIKE DOVE DISHWASHING SOAP) IN IT TO ACT AS A LUBRICANT. THE WATER ALSO PICKS UP A LITTLE OIL FROM MFG. PROCESS. THIS TANK OF WATER RAN OVER DUE TO A PLUG OR CLOG IN DRAIN. THE WATER NORMALLY GOES TO A SANITARY SEWER. THE FACILITY DOES HAVE A STORM WATER DISCHARGE PERMIT. THE OVERFLOWING WATER FROM THE WIRE LUBRICATING TANK RAN ONTO FLOOR IN THE BUILDING AND EVENTUALLY SOME RAN OUT OF THE BUILDING INTO A NEARBY STORM SEWER DRAIN. ESTIMATED THAT NO MORE THAN A COUPLE HUNDRED GALLONS OF THIS WATER (WITH SMALL AMOUNTS OF SOAP AND WATER SOLUABLE OIL) MADE ITS WAY TO STORM SEWER. THE WATER THAT RAN INTO STORM SEWER WAS NOT RECOVERED. THE SEWER IS BELIEVED TO EMPTY INTO FOX RIVER. OTHER MATERIAL SPILLED AND CONTAINED. BEFORE REACHING SEWER, DRAIN WAS VACCUMED UP BY "CHEIF LIQUID WASTE SYSTEMS" (CONTRACTOR). THIS MATERIAL IS NORMALLY DISCHARGED TO THE CITY SANITARY SYSTEM. facility epa id#: wid093430296

Case Activity Report: ☐ Yes ☒ No CAR#:

(Please, attach copy of all CAR and other documentation)

Enforcement Action: ☐ Yes ☒ No (Explain Below)

Date and Military Time Of Incident: 02/05/2005
0500hrs

Responsible Party: VALLEY CAST

Additional Comments : THIS FACILITY MAKES BRASS WIRE. THE WIRE IS RUN THROUGH A TANK OF WATER THAT HAS A LITTLE SOAP (LIKE DOVE DISHWASHING SOAP) IN IT TO ACT AS A LUBRICANT. THE WATER ALSO PICKS UP A LITTLE OIL FROM MFG. PROCESS. THIS TANK OF WATER RAN OVER DUE TO A PLUG OR CLOG IN DRAIN. THE WATER NORMALLY GOES TO A SANITARY SEWER. THE FACILITY DOES HAVE A STORM WATER DISCHARGE PERMIT. THE OVERFLOWING WATER FROM THE WIRE LUBRICATING TANK RAN ONTO FLOOR IN THE BUILDING AND EVENTUALLY SOME RAN OUT OF THE BUILDING INTO A NEARBY STORM SEWER DRAIN. ESTIMATED THAT NO MORE THAN A COUPLE HUNDRED GALLONS OF THIS WATER (WITH SMALL AMOUNTS OF SOAP AND WATER SOLUABLE OIL) MADE ITS WAY TO STORM SEWER. THE WATER THAT RAN INTO STORM SEWER WAS NOT RECOVERED. THE SEWER IS BELIEVED TO EMPTY INTO FOX RIVER. OTHER MATERIAL SPILLED AND CONTAINED. BEFORE REACHING SEWER, DRAIN WAS VACCUMED UP BY "CHEIF LIQUID WASTE SYSTEMS" (CONTRACTOR). THIS MATERIAL IS NORMALLY DISCHARGED TO THE CITY SANITARY SYSTEM. facility epa id#: wid093430296

Case Activity Report: ☐ Yes ☒ No CAR#:

(Please, attach copy of all CAR and other documentation)

Enforcement Action: ☐ Yes ☒ No (Explain Below)

May 23, 2005



Ms. Roxanne Chronert
Northeast Regional Spills Coordinator
Wisconsin Dept. of Natural Resources
PO Box 10448
Green Bay WI 54307-0448

Dear Ms. Chronert:

RE: Valleycast Release Notification – Follow Up Report
908 Lawe Street
Appleton, WI 54911

On May 4, 2005 we sent you a letter explaining the circumstances associated with a release at our client's site into the storm sewer that occurred on February 5, 2005.

In that letter, I explained that we would be taking a soil sample in the near future to determine if the soil was impacted by the release. Based on newly discovered information, we now believe that the soil was not impacted by this release and therefore sampling is unnecessary as explained below:

During the process of implementing one of the corrective actions, namely scraping the inside of the soap tank containment pit so that the walls could be sealed, an employee discovered a small diameter pipe (~1.5 inch) running through the wall. When this pipe was traced, it was found to terminate underneath the elevated walkway where we had formerly believed that the water was coming up from the ground. This was because this overflow pipe terminated on a ledge underneath the walkway and the employees could only see water flowing from the ledge when they looked over the railing. Had they been able to look directly underneath the walkway, they might have seen that the release was actually coming out of the wall (from the pipe) and not up out of the ground.

We have attached a 3-D drawing of the area that should explain what happened. The pipe has since been terminated on both ends so that this situation does not reoccur. Based on this new information, we would like to state for the record that we do not believe the soil was impacted and as result, sampling of the area is unnecessary and this spill report should be closed out.

Should you have any questions, please feel free to contact Ron Moddes of Valleycast at (920) 749-3820 or myself at (262) 654-7020. Thank you.

Sincerely,

CHEMREPORT INCORPORATED



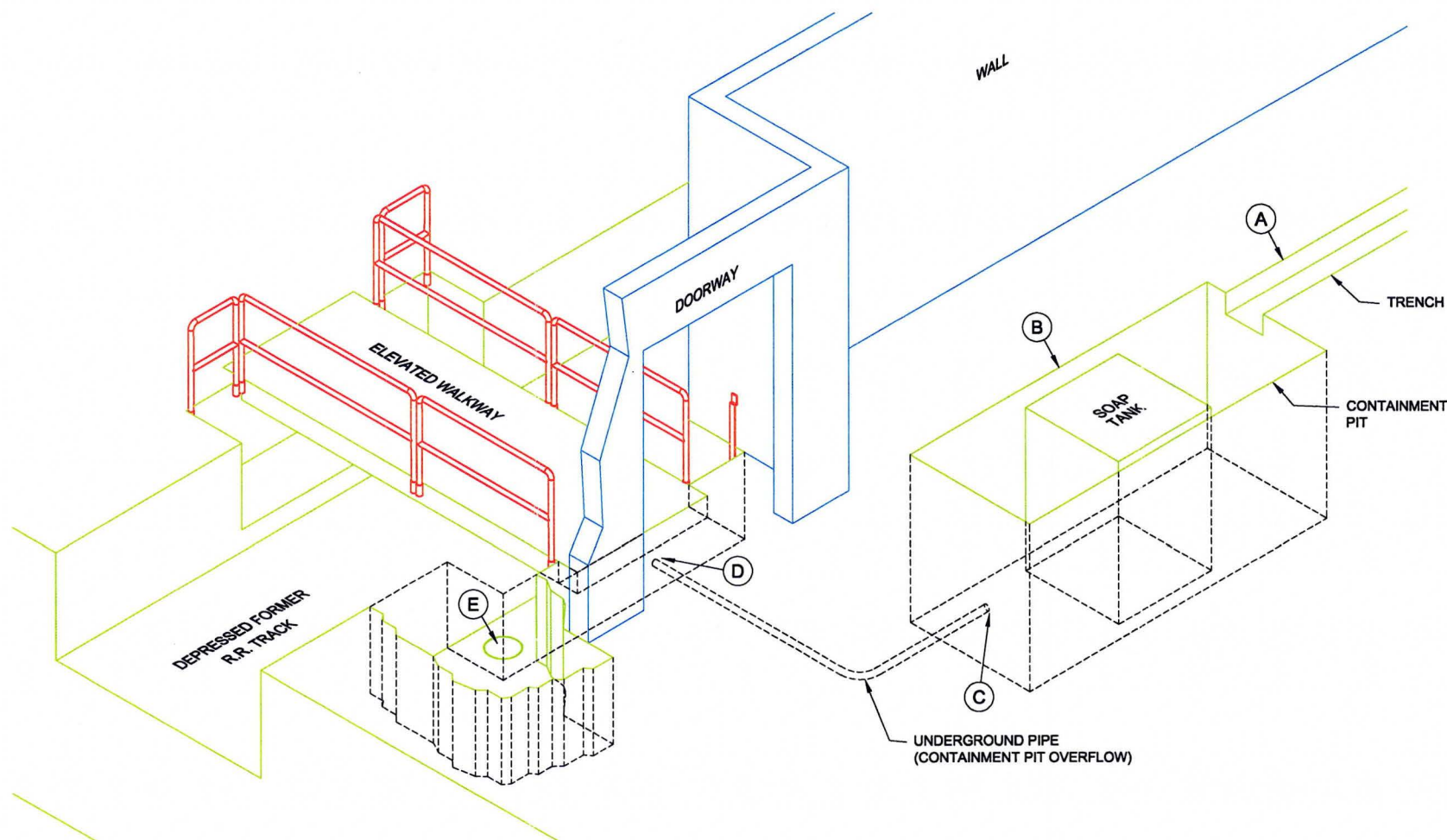
Michael G. Boozer
Project Manager

cc: Mark Debaker – Wisconsin Department Natural Resources Stormwater Permit Section
Rob Biersteker – Outokumpu Copper Valleycast LLC
Ron Moddes – Outokumpu Copper Valleycast LLC
Earl Robinson – Outokumpu American Brass

Attachment: 3-D Drawing

VALLEYCAST
SOAP SPILL 3-D AREA ENLARGEMENT
908 N. LAWE STREET
APPLETON, WI

Approved By: S. CRANLEY	Figure 1
Date Approved: 5/18/05	1 of 1
Date Drawn: 5/18/05	
Drawn by: B. MURPHY	



CHRONOLOGY

- A = WATER IS RELEASED FROM BROKEN HOSE AND FILLS TRENCH "A".
- B = TRENCH "A" EMPTIES INTO SOAP CONTAINMENT PIT "B".
- C = CONTENTS OF CONTAINMENT PIT ARE RELEASED THROUGH NEWLY DISCOVERED OVERFLOW PIPE "C" WHICH IS LOCATED ON THE SIDE WALL OF THE CONTAINMENT PIT.
- D = RELEASE EXITS THE OVERFLOW PIPE UNDERNEATH THE ELEVATED WALKWAY AND STARTS TRAVELING TOWARDS STORM SEWER MANHOLE "E".
- E = WATER FLOWS DOWN STORM SEWER "E".



NORTH

1 SOAP SPILL 3-D AREA ENLARGEMENT
NOT TO SCALE



May 4, 2005

Ms. Roxanne Chronert
Northeast Regional Spills Coordinator
Wisconsin Dept. of Natural Resources
PO Box 10448
Green Bay WI 54307-0448

Dear Ms. Chronert:

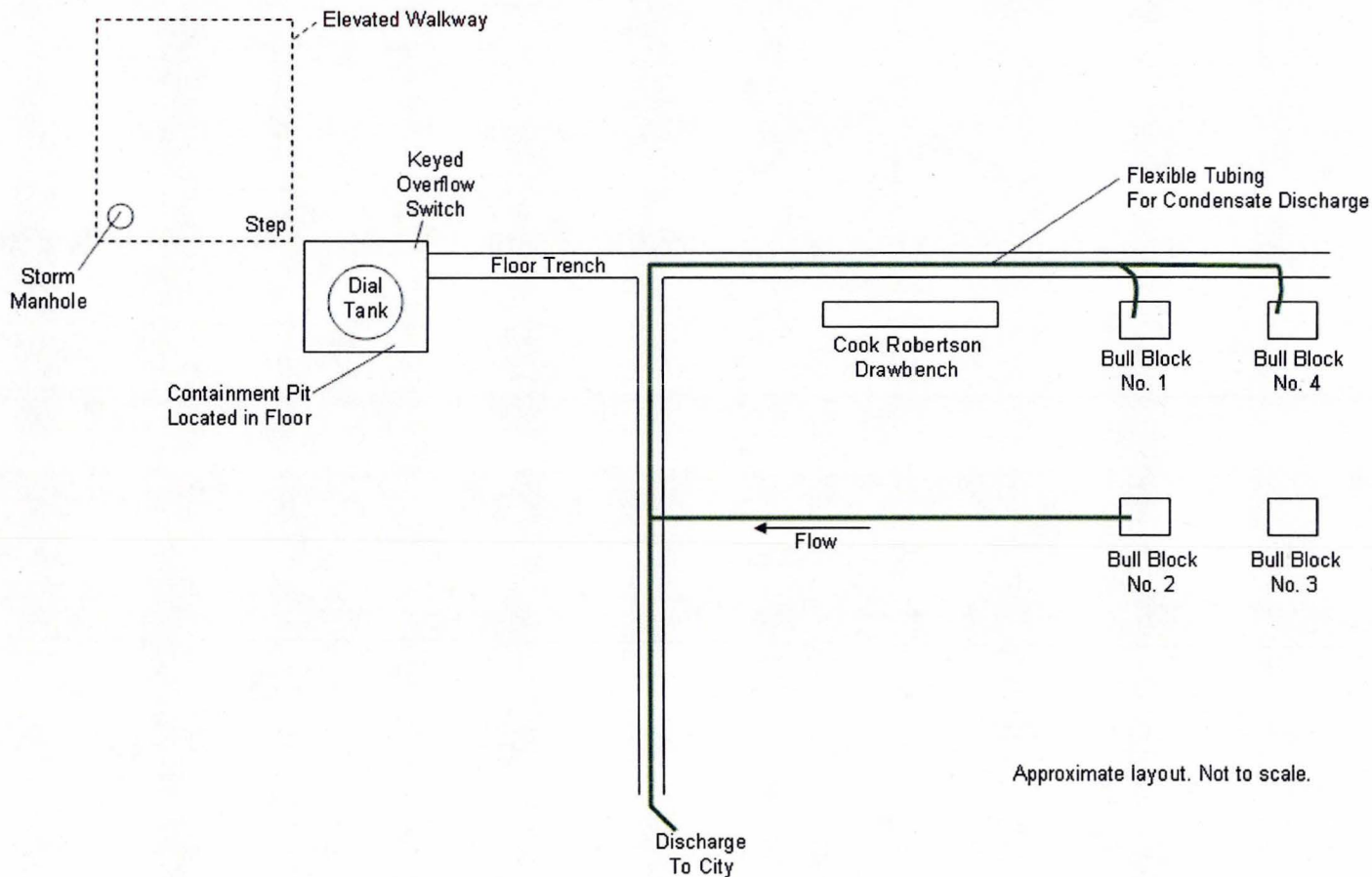
RE: Valleycast Release Notification – Written Report
908 Lawe Street
Appleton, WI 54911

The Outokumpu Copper Valleycast LLC Appleton Facility experienced a reportable release on February 5, 2005 which was reported to the Wisconsin Department of Natural Resources. This document explains the circumstances and corrective actions associated with this incident.

Steam condensate from Bullblock operations No. 1, 2 and 4 are normally discharged to the City of Appleton under a local discharge permit. In the permit, the Bullblock operations are referred to as the "steamers". The condensate from the steamers is pumped from the Bullblock operations through flexible tubing that is laid inside of a floor trench. This tubing continues to traverse the floor trench until it reaches the permitted discharge point to the city sanitary sewer. An occasional discharge from a small brine based water softener also discharges into the same line and becomes commingled with the steamer discharge. The steamers typically discharge approximately 5,000 gallons per day, or about 200 gallons per hour according to a meter which measures total flow into the sanitary discharge point.

Sometime during the early morning hours of February 5, 2005, the flexible tubing for the steamer discharge from Bullblocks 1 and 4 became plugged. Maintenance personnel "blew" the line with compressed air in an attempt to free the plug. The force of the compressed air ruptured the discharge hose. This rupture went unnoticed for approximately three (3) hours.

The steamer condensate began leaking unnoticed into the floor trench. The floor trench terminates into two areas. It leads to the final city sanitary discharge point and also branches off such that it discharges to a secondary containment floor pit that contains a small soap dip tank (Dial Soap Tank). See figure below.



Due to the slope of the floor trench, the majority of the steam condensate from the ruptured line entered the containment floor pit. The containment floor pit was designed to contain any overflow from either the soap dip tank and/or the floor trench. There exists a keyed overflow switch within the pit that when activated, pumps the contents of the pit directly to the sanitary sewer. However, this connection has been disconnected.

As this water had no place to go once it entered the pit, it began to seep through cracks in the pit walls. This seepage into the ground eventually bubbled back up to the surface near a step located underneath an elevated walkway. The water (steam condensate) flowed underneath the walkway and entered a manhole leading directly to the storm sewer which discharges into the Fox River.

Notification:

Ron Moddes of Valleycast telephoned Michael Boozer of ChemReport at approximately 5:00 AM on February 5, 2005 to seek advice on the reporting of the release. The full extent of the release was unclear at that time, although it did appear that the release was reportable to the Wisconsin Department of Natural Resources for two reasons:

- The unauthorized discharge of any material into a storm sewer is reportable under Valleycast's storm water permit.
- The unauthorized discharge of any material into a storm sewer is reportable under the Wisconsin Spills Statute.

Mr. Boozer phoned the WDNR's spill reporting hotline at 5:22 AM and reported that approximately 200 gallons of water were discharged to the Fox River through the storm drain and that the water may have contained a trace amount of soap. The duty officer who took the call informed Mr. Boozer that a WDNR representative would contact him for more details. At 6:10 AM, Tom VanHarem of the WDNR contacted Mr. Boozer, Mr. Boozer informed him that the spill was contained and did not represent an emergency situation. Mr. VanHarem agreed and indicated that he "might" stop by the plant. He never did.

Site Visit:

On February 22, 2005, Mr. Boozer visited the facility to review the release circumstances and to review corrective actions that have been implemented. A physical inspection of the area showed oil staining in the containment pit which ran approximately 5 feet up the containment pit wall. Additionally, oil staining was observed on the floor underneath the elevated walkway leading to the storm sewer manhole. The oil staining is attributable to the discharge of hot water coming from the trench which had accumulated years of grease, oil and debris.

Contaminants Discharged:

Based on the above information, it appears that approximately 600 gallons (200 gallon per hour for 3 hours) of steam condensate was discharged into the ground through holes in the cracked containment pit. This water carried a trace amount of soap from the dip tank drippage and some amount of oil. This same water/soap and oil mixture bubbled back up to the surface and entered the storm sewer which discharges to the Fox River.

Corrective Actions Implemented:

- Valleycast's plumber is investigating the suitability of the continued use of flexible tubing for the steam condensate discharge. If this investigation shows that the tubing is not suited for high heat applications, it will be replaced with suitable material or hard piping.
- The open ended trench leading to the city sanitary discharge is being sealed off to prevent unauthorized trench discharges to the city sanitary sewer system.
- The keyed overflow sump in the containment pit has been eliminated.
- The trenches are now monitored by plant personnel.

Release Investigation:

Mr. Boozer contacted Roxanne Chronert (920 492-5592 Northern Regional Spill Coordinator) on February 25, 2005 to inquire what type of written report is required for the release notification made on February 5, 2005. According to Ms. Chronert, Valleycast must provide the WDNR with a written response within 45 days of the Spill. However, Ms. Chronert allowed Valleycast to have 90 days.

Detailed information concerning the release was conveyed to Ms. Chronert. Based on this new information, it was felt that a soil sample should be taken in the vicinity of the area where the water bubbled back up out of the ground and that this sample should be tested for oil contaminant indicators (PHAs). Sampling and analysis of the soil where the released water initially entered the ground from the containment pit has not been completed due to the recent sale of the company. This area is intended to be sampled in the near future once the conditions of the sale have been finalized.

Stormwater Permit:

Valleycast's Tier I Stormwater Permit also requires release notification of un-permitted discharges to the storm sewer. This issue was conveyed to Mr. VanHarem on February 5, 2005 and it was felt that the February 5, 2005 notification was sufficient to meet all WDNR spill reporting requirements. On February 25, 2005, Mr. Boozer contacted Mark Debaker of the DNR's stormwater permitting division. He was unsure if dual reporting was required and requested ChemReport to provide his office with a copy of the formal response to the spills department so that he could put it in their file. Mr. Boozer indicated that it would be a few weeks before a formal response could be provided.

Valleycast's consultant is in the process of identifying how EPA's new SPCC requirements will impact the facility. Spill Prevention Countermeasure Control (SPCC) is a required component of the Oil Pollution Prevention Act. After this review has been completed, an analysis of all potential discharge scenarios to navigable waterways will be performed and pro-active measures will be implemented according to the requirements and time table established in the SPCC regulations.

Should you have any questions in the interim, please feel free to contact Ron Moddes of Valleycast at (920) 749-3820 or myself at (262) 654-7020. Thank you.

Sincerely,

CHEMREPORT INCORPORATED



Michael G. Boozer
Project Manager

CC: Mark Debaker – Wisconsin Department Natural Resources Stormwater Permit Section
Rob Biersteker – Outokumpu Copper Valleycast LLC
Ron Moddes – Outokumpu Copper Valleycast LLC
Earl Robinson – Outokumpu American Brass

Chronert, Roxanne N.

From: Romberg, Wade A.
Sent: Tuesday, February 08, 2005 8:12 AM
To: Chronert, Roxanne N.
Subject: FW: ner02052005_01

The only thing I did was to get the GPS reading as I drove past. N44 16.177' W088 23.820'

From: Evans, Jessica L.
Sent: Monday, February 07, 2005 1:11 PM
To: Van Haren, Thomas; Romberg, Wade A.; Duty Officer WEM; James Drew; Jessica Evans; Roxanne Chronert
Subject: ner02052005_01



ner02052005_01.d
oc

For your records.