GIS REGISTRY
Cover Sheet

March, 2010
(RR 5367)

Source Property Information

CLOSURE DATE: Jan 20, 2012

BRRTS #: **02-36-544601**

FID #: 436106110

ACTIVITY NAME: Skana (K&V) (Sumps)

DATCP #:

PROPERTY ADDRESS: 2009 Mirro Dr

COMM #:

MUNICIPALITY: City of Manitowoc

PARCEL ID #: 052-809-401-010.00

***WTM COORDINATES:**

X: **709769** Y: **408731**

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

WTM COORDINATES REPRESENT:

- (•) Approximate Center Of Contaminant Source
- ( ) Approximate Source Parcel Center

Please check as appropriate: (BRRTS Action Code)

Contaminated Media:

- [X] Groundwater Contamination > ES *(236)*
  - [ ] Contamination in ROW
  - [ ] Off-Source Contamination

  (***note:*** *for list of off-source properties see "Impacted Off-Source Property" form)*
- [ ] Soil Contamination > *RCL or **SSRCL *(232)*
  - [ ] Contamination in ROW
  - [ ] Off-Source Contamination

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

Land Use Controls:

- [ ] N/A (*Not Applicable*)
- [ ] Soil: maintain industrial zoning *(220)*

  (***note:*** *soil contamination concentrations between non-industrial and industrial levels)*
- [ ] Structural Impediment *(224)*
- [ ] Site Specific Condition *(228)*
- [X] Cover or Barrier *(222)*

  (***note:*** *maintenance plan for groundwater or direct contact)*
- [ ] Vapor Mitigation *(226)*
- [ ] Maintain Liability Exemption *(230)*

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

Monitoring Wells:

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

(•) Yes ( ) No ( ) N/A

** Residual Contaminant Level*
***Site Specific Residual Contaminant Level*

State of Wisconsin
Department of Natural Resources
http://dnr.wi.gov

GIS Registry Checklist

Form 4400-245 (R 3/10)

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

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

BRRTS #: 02-36-544601 PARCEL ID #: 052-809-401-010.00

ACTIVITY NAME: Skana (K&V) (SUMPS) WTM COORDINATES: X: 709769 Y: 408731

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

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

SOURCE LEGAL DOCUMENTS

- [X] **Deed:** The most recent deed as well as legal descriptions, for the **Source Property** (where the contamination originated). Deeds for other, off-source (off-site) properties are located in the **Notification** section.
  Note: *If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.*
- [X] **Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map *for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map.* (lots on subdivided or platted property (e.g. lot 2 of xyz subdivision)).

  Figure #: **Title: Property Map, CSM Volume 24, page 63, April 14, 2010**
- [X] **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description accurately describes the correct contaminated property.

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

Maps must be no larger than 11 x 17 inches unless the map is submitted electronically.

- [X] **Location Map:** A map outlining all properties within the contaminated site boundaries on a U.S.G.S. topographic map or plat map in sufficient detail to permit easy location of all parcels. If groundwater standards are exceeded, include the location of all potable wells within 1200 feet of the site.
  Note: *Due to security reasons municipal wells are not identified on GIS Packet maps. However, the locations of these municipal wells must be identified on Case Closure Request maps.*

  Figure #: 1 **Title: Skana Location**
- [X] **Detailed Site Map:** A map that shows all relevant features (buildings, roads, individual property boundaries, contaminant sources, utility lines, monitoring wells and potable wells) within the contaminated area. This map is to show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding a ch. NR 140 Enforcement Standard (ES), and/or in relation to the boundaries of soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Levels (SSRCL) as determined under s. NR 720.09, 720.11 and 720.19.

  Figure #: 2, 2 **Title: Property Map of Skana, Detailed Site Map Sumps (VOC) Area**
- [ ] **Soil Contamination Contour Map:** For sites closing with residual soil contamination, this map is to show the location of all contaminated soil and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeds a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL)as determined under s. NR 720.09, 720.11 and 720.19.

  Figure #: **Title:**

BRRTS #: 02-36-544601 ACTIVITY NAME: Skana (K&V) (SUMPS)

MAPS (continued)

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

Figure #: 5 **Title: West to East and North to South Geologic Cross Sections**

Figure #: **Title:**

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

Figure #: 12 **Title: VOC Summary of Last Reported Data Available, September/December 2011**

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

Figure #: 8 **Title: Groundwater Contours August 27, 2011**

Figure #: **Title:**

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

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

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

Table #: **Title:**

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

Table #: 1 **Title: Wells Sampled to Characterize the Sump Area for VOCs, Individual Well Tables**

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

Table #: 1 **Title: see Individual Well Tables**

IMPROPERLY ABANDONED MONITORING WELLS

For each monitoring well not properly abandoned according to requirements of s. NR 141.25 include the following documents.
Note: *If the site is being listed on the GIS Registry for only an improperly abandoned monitoring well you will only need to submit the documents in this section for the GIS Registry Packet.*

☒ **Not Applicable**

☐ **Site Location Map:** A map showing all surveyed monitoring wells with specific identification of the monitoring wells which have not been properly abandoned.
Note: *If the applicable monitoring wells are distinctly identified on the Detailed Site Map this Site Location Map is not needed.*

Figure #: **Title:**

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

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

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

BRRTS #: 02-36-544601 ACTIVITY NAME: Skana (K&V) (SUMPS)

NOTIFICATIONS

Source Property

☒ **Not Applicable**

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

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

Off-Source Property

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

☒ **Not Applicable**

☐ **Letter To "Off-Source" Property Owners:** Copies of all letters sent by the Responsible Party (RP) to owners of properties with groundwater exceeding an Enforcement Standard (ES), and to owners of properties that will be affected by a land use control under s. 292.12, Wis. Stats.
Note: *Letters sent to off-source properties regarding residual contamination must contain standard provisions in Appendix A of ch. NR 726.*

Number of "Off-Source" Letters:

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

☐ **Deed of "Off-Source" Property:** The most recent deed(s) as well as legal descriptions, for all affected deeded **off-source property(ies).** This does not apply to right-of-ways.
Note: *If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.*

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

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

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Northeast Region Headquarters
2984 Shawano Avenue
Green Bay WI 54313-6727

Scott Walker, Governor
Cathy Stepp, Secretary
Jean Romback-Bartels, Regional Director
Telephone 920-662-5100
FAX 920-662-5413
TTY Access via relay - 711

January 20, 2012

VPLE #06-36-556282

(sent via email to Ken.Kazmierczak@skanaaluminum.com)

Kenneth Kazmierczak CFO, VP Administration
Skana Aluminum Company
PO Box 1477
Manitowoc, WI 54220

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

Subject: Final Case Closure with Continuing Obligations
Skana Aluminum (K&V) Sumps (chlorinated solvents)
Building 5C at 2009 Mirro Drive, Manitowoc Wisconsin
WDNR Environmental Repair Activity # 02-36-544601

Dear Mr. Kazmierczak:

The Department of Natural Resources (DNR) considers the "sumps" (chlorinated solvents) case closed, with continuing obligations. No further investigation or remediation is required at this time. However, you and future property owners must comply with the continuing obligations as explained in the conditions of closure in this letter. Please read over this letter closely to ensure that you comply with all conditions and other on-going requirements. Provide this letter and the attached maintenance plan to anyone who purchases this property from you.

This final closure decision is based on the correspondence and data provided, and is issued under ch. NR 726, Wisconsin Administrative Code. The Northeast Region Closure Committee reviewed the request for Closure on December 2, 2011. The Closure Committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. A conditional closure letter was issued by the DNR on December 6, 2011and documentation that the conditions in that letter were met was received on January 9, 2012.
The following documentation was received:

- NR 141 Wis Adm. Code well abandonment forms: MW-06.16, MW-06.05, MW-06.08, MW-06.11, MW-06.19,MW-08.22, MW-08.24, MW-08.26, TW-06.18, TW-06.19, TW-06.20, TW-06.21, TW-06.22, TW-06.23, TW-06.24, TW-06.25, TW-06.26
- Cap Maintenance Plan
- DOT specifications for concrete pavement and asphaltic surfaces
- VOC contour map for GIS Registry documentation

The "Sumps" case is an apparent historic release of chlorinated solvents (primarily trichloroethylene) in the vicinity of Building 5C of this former Mirro facility now owned and operated by Skana Aluminum. The conditions of closure and continuing obligations required were based on the property being used for **Industrial purposes.**

Continuing Obligations

The continuing obligations for this site are summarized below. Further details on actions required are found in the section Closure Conditions.

- Groundwater contamination is present above ch. NR 140 enforcement standards.
- Residual soil contamination exists that must be properly managed should it be excavated or removed.
- Building 5C and the surrounding pavement must be maintained over contaminated soil and the state must approve any changes to this barrier.
- Before the land use may be changed from industrial to non-industrial, additional environmental work must be completed.
- Site-specific exposure assumptions were used. Current industrial land or property use must be maintained to be protective. If changes to the current property use or land use are planned, an assessment must be made of whether the closure is still protective.
- Remaining soil contamination could result in vapor intrusion if future construction activities occur. If new building construction is planned, vapor control technologies will be required for occupied buildings, unless the property owner assesses the potential for vapor intrusion, and the DNR agrees that conditions are protective of the new use.

GIS Registry

This site will be listed on the Remediation and Redevelopment Program's internet accessible Geographic Information System (GIS) Registry, to provide notice of residual contamination and of any continuing obligations. DNR approval prior to well construction or reconstruction is required for all sites shown on the GIS Registry, in accordance with s. NR 812.09(4) (w), Wis. Adm. Code. To obtain approval, complete and submit Form 3300-254 to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line at http://dnr.wi.gov/org/water/dwg/3300254.pdf or at the web address listed below for the GIS Registry.

All site information is also on file at the Northeast Regional DNR office, at 2984 Shawano Avenue in Green Bay. This letter and information that was submitted with your closure request application, including the maintenance plan, will be included on the GIS Registry in a PDF attachment. To review the site on the GIS Registry web page, visit the RR Sites Map page at http://dnr.wi.gov/org/aw/rr/gis/index.htm.

Prohibited Activities

Certain activities are prohibited at closed sites because maintenance of a barrier is intended to prevent contact with any remaining contamination. When a barrier is required, the condition of closure requires notification of the DNR before making a change, in order to determine if further action is needed to maintain the protectiveness of the remedy employed. The following activities are prohibited on any portion of the property where pavement and the building foundation are required, as shown on the shaded area of **attached Figure 2**, unless prior written approval has been obtained from the DNR:

- removal of the existing barrier;
- replacement with another barrier;
- excavating or grading of the land surface;
- filling on covered or paved areas;
- plowing for agricultural cultivation;
- construction or placement of a building or other structure;

- changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings;

Closure Conditions

Compliance with the requirements of this letter is a responsibility to which the current property owner, and any subsequent property owners must adhere. DNR staff will conduct periodic prearranged inspections to ensure that the conditions included in this letter and the attached maintenance plans are met. If these requirements are not followed, the DNR may take enforcement action under s. 292.11, Wisconsin Statutes to ensure compliance with the specified requirements, limitations or other conditions related to the property.

Residual Groundwater Contamination (ch. NR 140, Wis. Adm. Code)
Groundwater contamination greater than enforcement standards is present on this contaminated property as shown on the **attached Figure 12**. If you intend to construct a new well, or reconstruct an existing well, you'll need prior DNR approval.

Residual Soil Contamination (ch. NR 718, or ch. 289, Stats.; chs. 500 to 536, Wis. Adm. Code)
Residual soil contamination remains under Building 5C. If soil under Building 5C is excavated in the future, the property owner at the time of excavation must sample and analyze the excavated soil to determine if contamination remains. If sampling confirms that contamination is present, the property owner at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

Cover or Barrier (s. 292.12 (2) (a), Wis. Stats)
The pavement and building that exists in the shaded areas shown on the **attached Figure 2** shall be maintained in compliance with the **attached maintenance plan** in order to minimize the infiltration of water and prevent additional groundwater contamination that would violate the groundwater quality standards in ch. NR 140, Wis. Adm. Code, and to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

A cover or barrier for industrial land uses, or certain types of commercial land uses may not be protective if use of the property were to change such that a residential exposure would apply. This may include, but is not limited to single or multiple family residences, a school, day care, senior center, hospital or similar settings. Before using the property for such purposes, you must notify the DNR to determine if additional response actions are warranted. A request may be made to modify or replace a cover or barrier. The replacement or modified cover or barrier must be protective of the revised use of the property, and must be approved in writing by the DNR prior to implementation. The **attached maintenance plan and inspection log** are to be kept up-to-date and on-site. Submit the inspection log to the DNR only upon request.

Vapor Mitigation or Evaluation
Vapor intrusion is the movement of vapors coming from volatile chemicals in the soil or groundwater, into buildings where people may breathe air contaminated by the vapors. Vapor mitigation systems are used to interrupt the pathway, thereby reducing or preventing vapors from moving into the building.

Chlorinated solvents remain in subslab and groundwater beneath building 5C, as shown on the **attached Figure 12**, at levels that may be of concern for vapor intrusion in the future, depending on construction and occupancy of a building. Currently the building is used for industrial purposes, therefore, before a new

building is constructed, the property owner must notify the DNR. Vapor control technologies are required for construction of occupied buildings unless the property owner assesses the vapor pathway and DNR concurs that conditions at the property are protective of the new use.

In addition, depending on site-specific conditions, construction over contaminated materials may result in vapor migration of contaminants into enclosed structures or migration along newly placed underground utility lines. The potential for vapor inhalation and means of mitigation should be evaluated when planning any future redevelopment, and measures should be taken to ensure the continued protection of public health, safety, welfare and the environment at the site.

The following DNR fact sheet, "Continuing Obligations for Environmental Protection", RR-819, was included with this letter, to help explain a property owner's responsibility for continuing obligations on their property. If the fact sheet is lost, you may obtain a copy at http://dnr.wi.gov/org/aw/rr/archives/pubs/RR819.pdf.

Please send written notifications in accordance with the above requirements to the Northeast Regional Headquarters, to the attention of RR Program Environmental Associate.

We appreciate your efforts to restore the environment at this site and enroll the property in the Voluntary Party Liability Exemption (VPLE) process. Your Certificate of Completion will be issued in the next several weeks. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Annette Weissbach at 920-662-5165.

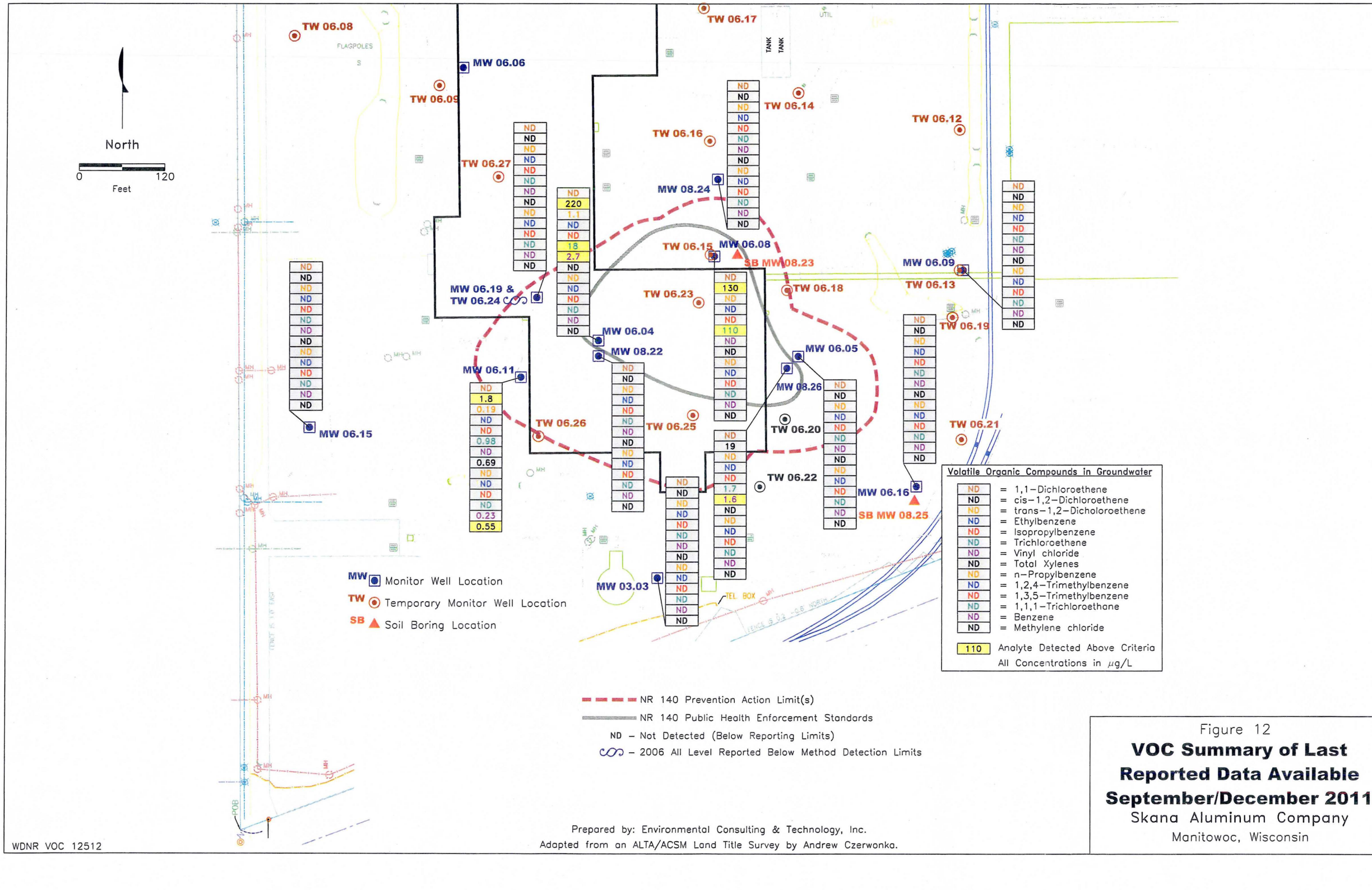
Sincerely,

B. G. Urben

Bruce Urben, Air and Waste Division Leader
Northeast Region

Attachments:
- Barrier/Cap Maintenance Plan
- Figure 12 remaining groundwater contamination map
- Publication RR 819 Continuing Obligations

e-cc: Paul Kuplic – paulk@communitybankandtrust.com
James Bolger – JBI Inc., jim@jbidata.com
Michael Hebert – ECT, Inc., MHebert@ectinc.com
Michael Prager – RR/5



Prepared by: Environmental Consulting & Technology, Inc.
Adapted from an ALTA/ACSM Land Title Survey by Andrew Czerwonka.

Figure 12

VOC Summary of Last Reported Data Available September/December 2011

Skana Aluminum Company

Manitowoc, Wisconsin

SKANA ALUMINUM CO

MAKING FRIENDS IS OUR MISSION

BARRIER/CAP MAINTENANCE PLAN

Date of Preparation: 25 January 2012
Date of Initiation: 15 February 2012

Subject Property: SKANA ALUMINUM COMPANY
2009 Mirro Drive
Manitowoc, Wisconsin 54221

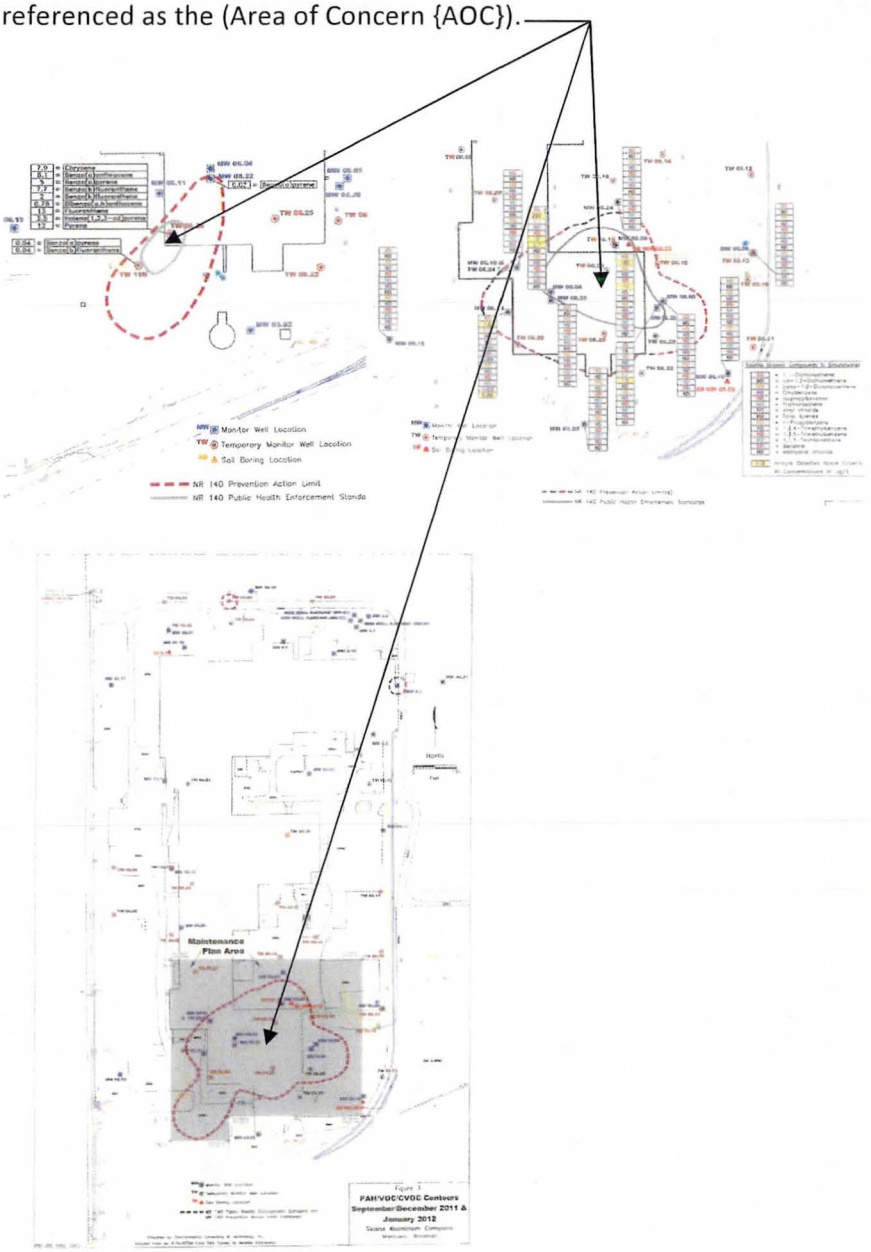
VLPE #06-36-556282
WI DNR Environmental Repair Activity # 02-36-544601/02-36-550138
Facility ID# 436106110

Legal Description: *All that part of the Southeast Quarter (SE ¼) of Section Nine (9) North, Range Twenty-four (24) East, lying North of the Chicago and Northwestern Railway Company right of way, partially in the City of Manitowoc and partially in the Town of Manitowoc, County of Manitowoc, State of Wisconsin, EXCEPTING THEREFROM Lot One (1) of a Certified Survey recorded in Volume 24 of Certified Survey Maps, Page 63 as Document No.967193. ALSO EXCEPTING portion conveyed for street purposes by Quit Claim Deeds recorded in Volume 1995, Page 230, Document No. 969539 and in Volume 1995, Page 231 as Document No. 969540.*

The Southwest Quarter (SW ¼) of the Northeast Quarter (NE ¼) and the South Half (S ½) of the Northwest Quarter (NW ¼) of the Northeast Quarter (NE ¼) of Section Nine (9), Township Nineteen (19) North, Range Twenty-four (24) East, in the City of Manitowoc, County of Manitowoc, State of Wisconsin. EXCEPTING portion conveyed for street purposes by Quit Claim Deed recorded in Volume 1995, Page 230, as Document No. 969539.

Introduction

This document (BARRIER/CAP MAINTENANCE PLAN) is herein referenced as the **Maintenance Plan** for the existing concrete floors associated with Building 5C and those existing asphalt pavement areas surrounding Building 5C. These structures (concrete floors/asphalt pavement) are referenced as engineering controls (vapor-contact barrier/water infiltration cover) at the referenced subject property in accordance with the requirements of NR 724.13(2), Wisconsin Administrative Code. The maintenance activities relate to the existing (concrete floors associated with Building 5C and those asphalt pavement areas surrounding Building 5C) occupying the area over the residual contaminated groundwater/soil regimes associated with WI DNR Repair Activities #02-36-544601/02-36-550138, is hereafter referenced as the (Area of Concern {AOC}).



No contamination associated with this Maintenance Plan has extended off site is likely to migrate off site under the current conditions.

More site-specific information about this property may be found in:

- The case-file retained by the regulatory agency
  State of Wisconsin
  Department of Natural Resources
  Northeast Regional Headquarters
  2984 Shawano Avenue
  Green Bay, WI 54313-6727

- BRRTS on the Web (WI DNR's internet based data base of contaminated sites): http://dnr.wi.gov/botw/SetUpBasicSearchForm.do

02-36-544601 SKANA (K&V) (SUMPS)

ERP - OPEN

Location Name Click Name to View Details and Other Activities				County	WDNR Region
SKANA ALUMINUM CO				MANITOWOC	NORTHEAST
Address				Municipality	
2009 MIRRO DR				MANITOWOC CITY	
Public Land Survey System			Latitude	Google Maps™	RR Sites Map
NW 1/4 of the SE 1/4 of Sec 09, T19N, R24E			44.128693	CLICK TO VIEW	CLICK TO VIEW
Additional Location Description			Longitude	Facility ID	Size (Acres)
NONE			-87.6286078	436106110	>100 Acres
Jurisdiction	PECFA No.	EPA Cerclis ID	Start Date	End Date	Last Action
DNR RR			2005-12-12		2011-12-02

Characteristics						
EPA NPL Site?	DSPS Tracked?	Eligible for PECFA Funds?	Above Ground Storage Tank?	Drycleaner?	Co-Contamination?	On GIS Registry?
No	No	No	No	No	No	No

02-36-550138 SKANA (K&V) SITEWIDE

ERP - OPEN

Location Name Click Name to View Details and Other Activities				County	WDNR Region
SKANA ALUMINUM CO				MANITOWOC	NORTHEAST
Address				Municipality	
2009 MIRRO DR				MANITOWOC CITY	
Public Land Survey System			Latitude	Google Maps™	RR Sites Map
NW 1/4 of the SE 1/4 of Sec 09, T19N, R24E			44.12948	CLICK TO VIEW	CLICK TO VIEW
Additional Location Description			Longitude	Facility ID	Size (Acres)
NONE			-87.6273142	436106110	>100 Acres
Jurisdiction	PECFA No.	EPA Cerclis ID	Start Date	End Date	Last Action
DNR RR			2005-12-12		2011-12-05

Characteristics						
EPA NPL Site?	DSPS Tracked?	Eligible for PECFA Funds?	Above Ground Storage Tank?	Drycleaner?	Co-Contamination?	On GIS Registry?
No	No	No	No	No	No	No

- GIS Registry PDF file for further information on the nature and extent of contamination: http://dnrmaps.wisconsin.gov/imf/imf.jsp?site=brrts2; and

- The WI DNR project manager for Manitowoc County (County Code 36):
  State of Wisconsin
  Department of Natural Resources
  Northeast Regional Headquarters
  Remediation & Redevelopment Program

2984 Shawano Avenue
Green Bay, WI 54313-6727
Phone: (920) 662-5100

Description of Contamination

The shallow unconsolidated/vadose zone soils and saturated zone(s) within the AOC have been identified as contaminated by one or more of the following:

CAS 56553	Benzo(a)anthracene	CAS 50328	Benzo(a)pyrene
CAS 205992	Benzo(b)fluoranthene	CAS 207089	Benzo(k)fluoranthene
CAS 107-06-2	Cis-1, 2-Dichloroethene	CAS 218019	Chrysene
CAS 53703	Dibenzo(a,h)anthacene	CAS 193395	Indeno(1,2,3-cd)pyrene
CAS 129000	Pyrene	CAS 79016	Trichloroethylene
CAS 75014	Vinyl Chloride		

The unconsolidated vadose zone soils are defined as those soils in the AOC which are not saturated with groundwater below the elevation of (+/- 605 ft MSL) and limited to a maximum depth of 30 ft below ground surface or 575 ft MSL). Saturated zone(s) or those sediments which have the potential to produce non-potable and/or potable water (groundwater) within the AOC defined in the unconsolidated soils above the elevation of 575 ft MSL.

The following figures are presented as Exhibit A to support and define the AOC:

- Well Locations, Screen Depths & Soil Sample Locations
  (All wells points within the AOC have been sealed before the Initiation date of this Maintenance Plan)
- VOC Contour September 2011
  NR 140 Pubic Heath Enforcement Standards
  NR 140 Prevention Action Limits
- Summary of PAH Concentrations Groundwater Regime -2011
  NR 140 Pubic Heath Enforcement Standards
  NR 140 Prevention Action Limits
- PAH/VOC/CVOC Contour September/December 2011 & January 2012
  Inspection Area for this Maintenance Plan, (Light Grey)

Description of the Surface Structures to be Maintained

The concrete floor/surface structures supporting Building 5C and those existing asphalt pavement areas surrounding Building 5C are herein described and consists of the following matrix:

Building 5C Floor/Surface Structures Supporting Building 5C

Existing Floors	(typical 8-12 inches of concrete {3,200 psi}) (*minimum maintained cover 6 inch of concrete*)

Effective February 15, 2012, an inspection of the concrete floors within the AOC will be conducted and any voids not occupied by sealed equipment will be sealed to comply with the minimum 6 inch maintained concrete cover.

Concrete surfaces will be maintained/repaired in accordance with the Wisconsin Department of Transportation Specifications for Concrete Pavement (Section 415), reference Annotated 2012 Edition of Standard Specifications. (Attachment No. 1)

Asphalt Pavement Areas Surrounding Building 5C

Asphalt Pavement (typical 4 inches of asphalt cover)
(minimum thickness 4 inches of asphalt)

Effective June 15, 2012, an inspection of the asphalt pavement within the AOC will be conducted and any voids through the pavement will be repaired and/or sealed before August 15, 2012 to comply with the minimum 4 inch maintained asphalt cover.

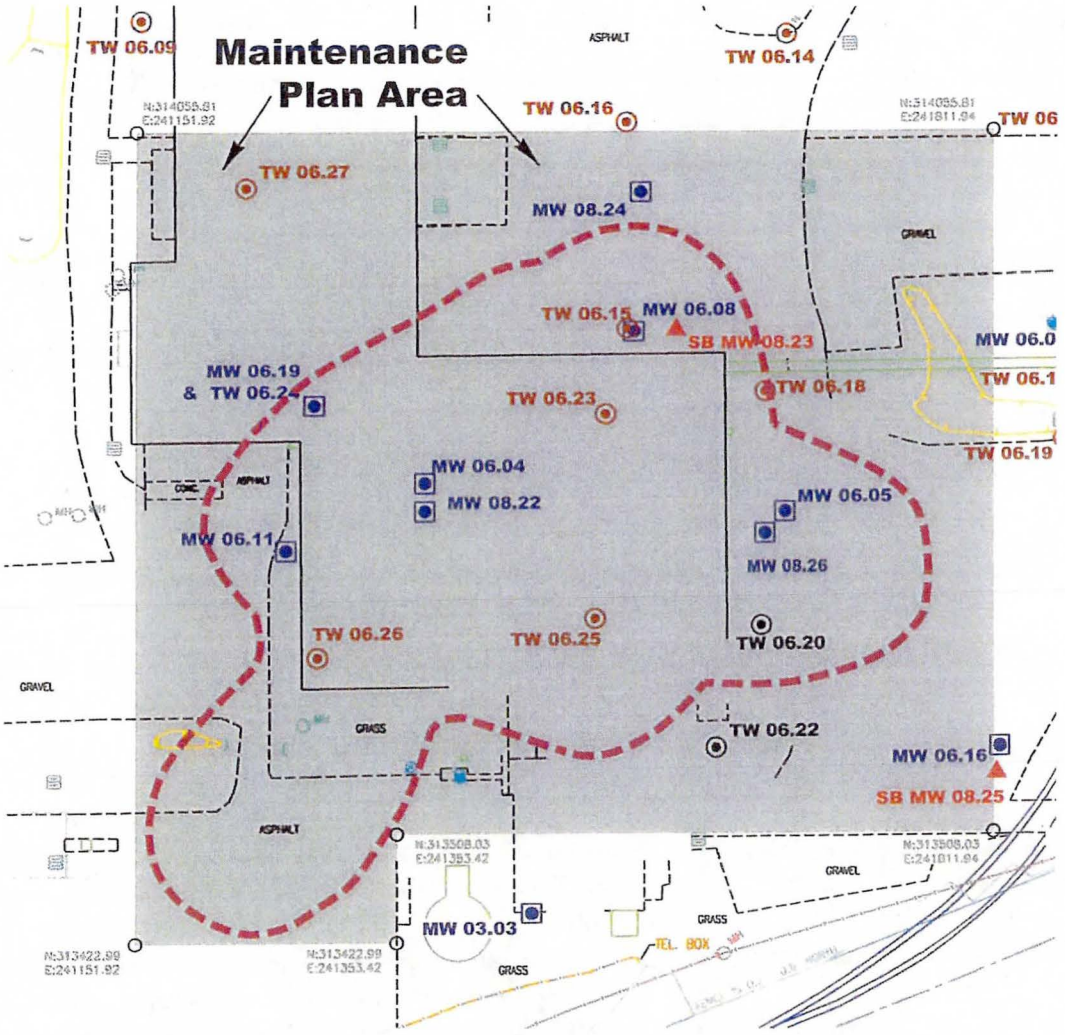
Asphalt surfaces will be maintained/repaired in accordance with the Wisconsin Department of Transportation Specifications for Asphaltic Pavement/Surface (Sections 450 and 465), reference Annotated 2012 Edition of Standard Specifications. (Attachment No. 2)

Existing surface structures (concrete for Building 5C and those asphalt areas surrounding Building 5C) as defined within the AOC are those structures that cover earth within the area shown on the Figure entitled: PAH/VOC/CVOC Contour September/December 2011 & January 2012 (Light Grey). These surface structures are subject to the controls as referenced, and may not be removed with written receipt of authorization from the WI DNR.

The concrete/asphalt over the contaminated groundwater and soil regimes serve as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. These concrete/asphalt cover(s) also act as a partial infiltration barrier to minimize future soil-to-groundwater contamination migration that would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code. In addition, the concrete floor within Building 5C acts as a barrier to prevent accumulation of chlorinated solvents/PAHs within the ambient air space of said Building 5C. Based on the current and future use of the property, the barrier(s) should function as intended unless disturbed.

Annual Inspection

The concrete/asphalt structures overlying the contaminated groundwater and soil regimes as depicted in the flowing figures entitled (VOC Contour September 2011, and Summary of PAH Concentrations Groundwater Regime -2011) and/or as outlined in light grey on the figure entitled (PAH/VOC/CVOC Contour September/December 2011 & January 2012,) will be inspected once a year, normally in the spring after all snow and ice is gone (*i.e. no later than June 15 of each year*), for deterioration, cracks and other potential problems that can cause additional surface water infiltration/subsurface erosion/ or allow human exposure to the underlying soils.



The inspections will be performed by SKANA ALUMINUM COMPANY (property owner) or their designated engineering representative. The inspection(s) will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed and/or where surface water infiltration is being or likely to become acerbated will be documented. A log of the inspections and any repairs will be maintained by the SKANA ALUMINUM COMPANY. The Inspection Log is included as Exhibit B. The Inspection Log will include recommendations for necessary repair of any areas where underlying soils are exposed [and] where infiltration from the surface will not be effectively minimized. Once repairs are completed, (i.e. before August 15 of each year) they will be documented/photographed and incorporated in the Inspection Log/ Maintenance Plan. A copy of the Inspection Log will be kept at the subject property (SKANA ALUMINUM COMPANY, 2009 Mirro Drive, Manitowoc, WI) and be available for inspection by WI DNR representatives upon their request. In addition, no later than September 1 of each year a copy of the Inspection Log, photographic documentation of repairs/condition of the barrier(s)/cover(s)/surface structure(s) and general statement

documenting the condition of said barrier(s)/cover(s)/surface structure(s) will be forward by SKANA ALUMINUM COMPANY to the WI DNR:

State of Wisconsin
Department of Natural Resources
Northeast Regional Headquarters
Remediation & Redevelopment Program
2984 Shawano Avenue
Green Bay, WI 54313-6727
Phone: (920) 662-5100

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical.

- Exterior - Repairs can include patching and filling or larger resurfacing or construction operations.
- Interior - Repairs can include industrial epoxy crack sealing (full depth), patching or larger resurfacing or construction.

In the event that necessary maintenance activities expose the underlying soil, or maintenance crews enter into a defined confined space which is below the ground surface elevation, SKANA ALUMINUM COMPANY will inform maintenance workers of the direct contact exposure hazard, vapor potential and provide them with appropriate personal protection equipment ("PPE"). The SKANA ALUMINUM COMPANY will also sample any soil that is excavated from the AOC prior to conducting off-site disposal activities to ascertain data concerning the levels of any residual contamination. The soil will be treated, stored and disposed of by SKANA ALUMINUM COMPANY in accordance with applicable local, state and federal law.

In the event the concrete/asphalt materials overlying the contaminated groundwater/soil regimes are removed or required replacement, the replacement barrier must be of equal impervious and consistent with the minimum thickness specified in this document. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the WI DNR or its successor. SKANA ALUMINUM COMPANY, in order to maintain the integrity of the concrete/asphalt barrier(s), will maintain a copy of this Maintenance Plan on-site and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

Prohibition of Activities and Notification of WI DNR

These prohibitions may not be violated unless prior written approval has been obtained from the **WI DNR** on any portion of the property defined as part of the AOC which supports a surface cover/barrier structure which limits human exposure to the underlying residual contaminated and limits surface water infiltration:

- removal of the existing barrier
- replacement with another barrier (that does not comply with this Maintenance Plan)
- excavating or grading of the land surface
- filling on capped or paved areas
- plowing for agriculture
- installation of wells for the purpose of generating a water source

It is herein noted that this written approval requirement, does not justify the owner/responsible parties to not undertake actions should an immediate dangerous environment/condition develop in the AOC which poses an immediate risk to the general public or the environment. Under these conditions emergency trained personnel may take actions to protect the general public and the environment, but concurrently SKANA ALUMINUM COMPANY administration (property owner) must take immediate actions (defined as 24 hours) to notify the WI DNR of said emergency condition.

Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can be amended or withdrawn by the SKANA ALUMINUM COMPANY (current property owner) and its successors with the written approval of WI DNR.

Maintenance Plan Contact Information

The following contact information is herein provided to WI DNR. In the event the contact information must be amendments, the existing property owner or the contact listed below is responsible for notifying the WI DNR within +/-15 days of the amendment.

Contact Information

[January 2012 - _____]

Site Owner and Operator: SKANA ALUMINUM COMPANY
2009 Mirro Drive, P.O. Box 1477
Manitowoc, WI 54221 USA
Phone: 920.482.0599 / Fax: 920.482.1039

Name: Kenneth Kazmierczak
Title: CFO, VP Administration
Email: Ken.Kazmierczak@skanaaluminum.com

Environmental Consultant: Cardinal Environmental
3303 Paine Ave
Sheboygan, WI 53081
Phone: 800.413.7225
Scott Hanson

Environmental Consulting & Technology, Inc.
3125 Sovereign Drive
Lansing, Michigan 48911
Phone: 517.272.9200
Michael T. Hebert, CPG, CHMM, PG, CUSTP

WI DNR Project Manager: Annette Weissbach
(Manitowoc County) State of Wisconsin
Department of Natural Resources
Northeast Regional Headquarters
Remediation & Redevelopment Program
2984 Shawano Avenue
Green Bay, WI 54313-6727
Phone: 920.662.5100 or (5165)

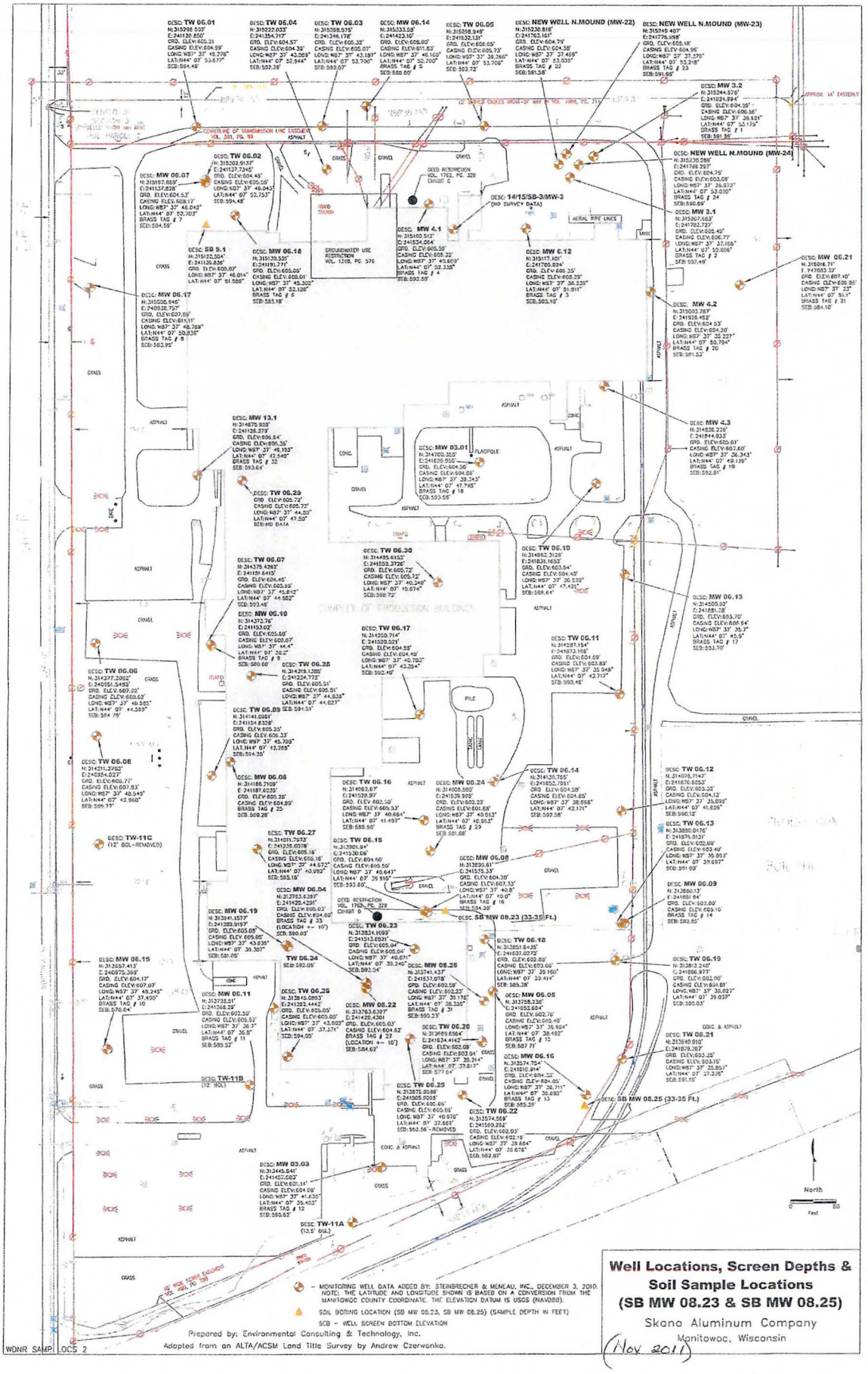
EXHIBIT A

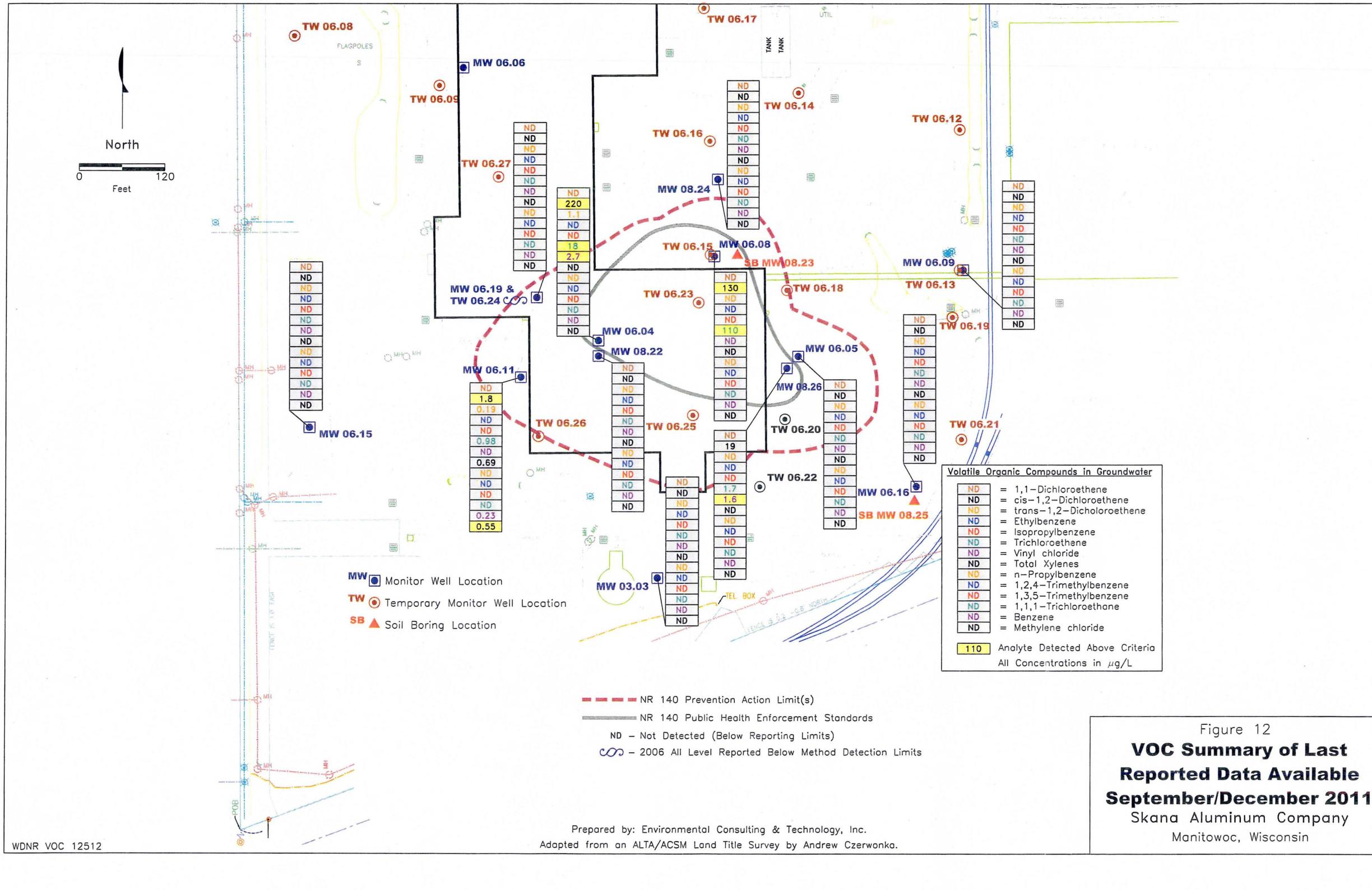
Well Locations, Screen Depths & Soil Sample Locations

VOC summary of Last Reported Data Available

Summary of PAH Concentrations Groundwater Regime 2011

PAH/VOC/CVOC Contour September/December 2011 & January 2012


DESC: TW 06.01
DESC: TW 06.04
DESC: TW 06.03
DESC: MW 06.14
DESC: TW 06.05
DESC: NEW WELL N.MOUND (MW-22)
DESC: NEW WELL N.MOUND (MW-23)
DESC: MW 3.2
DESC: NEW WELL N.MOUND (MW-24)
DESC: TW 06.02
DESC: MW 06.07
DESC: 14/15/SB-3/MW-3
(NO SURVEY DATA)
DESC: MW 3.1
DESC: SB 9.1
DESC: MW 06.18
DESC: MW 4.1
DESC: MW 6.12
DESC: MW 06.21
DESC: MW 06.17
DESC: MW 4.2
DESC: MW 13.1
DESC: MW 03.01
DESC: MW 4.3
DESC: TW 06.29
DESC: TW 06.30
DESC: TW 06.10
DESC: TW 06.07
DESC: TW 06.13
DESC: TW 06.10
DESC: TW 06.17
DESC: TW 06.11
DESC: TW 06.06
DESC: TW 06.28
DESC: TW 06.09
DESC: TW 06.16
DESC: MW 06.24
DESC: TW 06.14
DESC: TW 06.12
DESC: TW 06.08
DESC: MW 06.06
DESC: TW 06.27
DESC: TW 06.15
DESC: TW 06.13
DESC: TW-11C
(12" BGL - REMOVED)
DESC: MW 06.08
DESC: MW 06.09
DESC: MW 06.04
DESC: SB MW 08.23 (33-35 Ft.)
DESC: MW 06.19
DESC: TW 06.23
DESC: TW 06.18
DESC: TW 06.19
TW 06.24
DESC: MW 06.15
DESC: MW 06.26
DESC: MW 06.22
DESC: MW 06.05
DESC: MW 06.11
DESC: MW 06.20
DESC: MW 06.21
DESC: TW-11B
(12" BGL)
DESC: MW 06.25
DESC: MW 06.16
DESC: SB MW 08.25 (33-35 Ft.)
DESC: TW 06.22
DESC: MW 03.03
DESC: TW-11A
(12.5' BGL)
GROUNDWATER USE RESTRICTION
VOL. 1368, PG. 576
DEED RESTRICTION
VOL. 1762, PG. 329
Exhibit C
AERIAL FIRE LINES
GRAVEL
ASPHALT
CONC.
GRASS
FLAGPOLE
TANK
FILE
North
0
60
Feet
- MONITORING WELL DATA ADDED BY: STEINBRECHER & MENEAU, INC., DECEMBER 3, 2010. NOTE: THE LATITUDE AND LONGITUDE SHOWN IS BASED ON A CONVERSION FROM THE MANITOWOC COUNTY COORDINATE. THE ELEVATION DATUM IS USGS (NAVD88).
SOIL BORING LOCATION (SB MW 08.23, SB MW 08.25) (SAMPLE DEPTH IN FEET)
SCB - WELL SCREEN BOTTOM ELEVATION
Prepared by: Environmental Consulting & Technology, Inc.
Adapted from an ALTA/ACSM Land Title Survey by Andrew Czerwonka.
WDNR SAMP LOCS 2
Well Locations, Screen Depths & Soil Sample Locations
(SB MW 08.23 & SB MW 08.25)
Skana Aluminum Company
Manitowoc, Wisconsin
(Nov 2011)



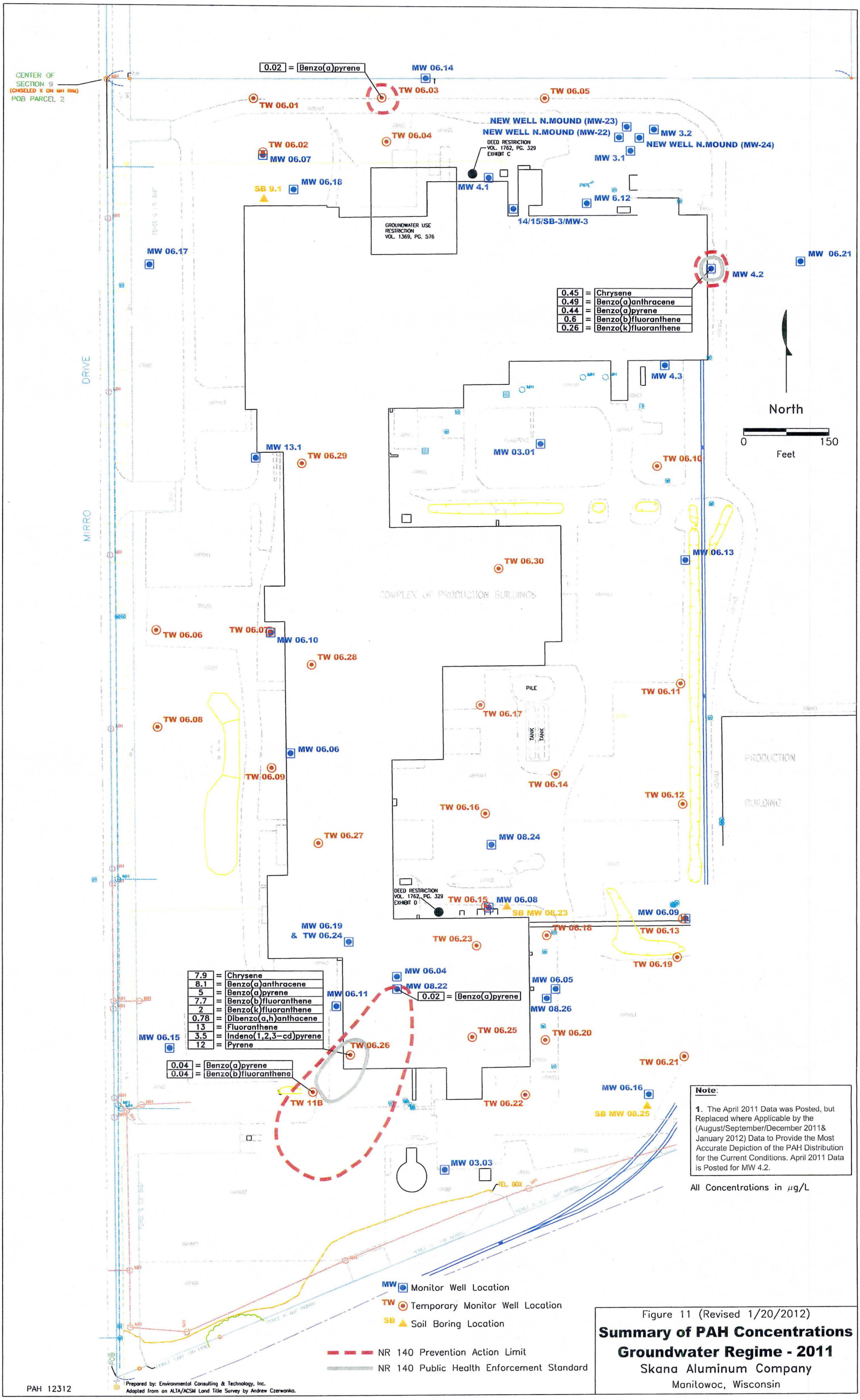
Prepared by: Environmental Consulting & Technology, Inc.
Adapted from an ALTA/ACSM Land Title Survey by Andrew Czerwonka.

Figure 12

VOC Summary of Last Reported Data Available September/December 2011

Skana Aluminum Company

Manitowoc, Wisconsin



Note:

1. The April 2011 Data was Posted, but Replaced where Applicable by the (August/September/December 2011& January 2012) Data to Provide the Most Accurate Depiction of the PAH Distribution for the Current Conditions. April 2011 Data is Posted for MW 4.2.

All Concentrations in $\mu g/L$

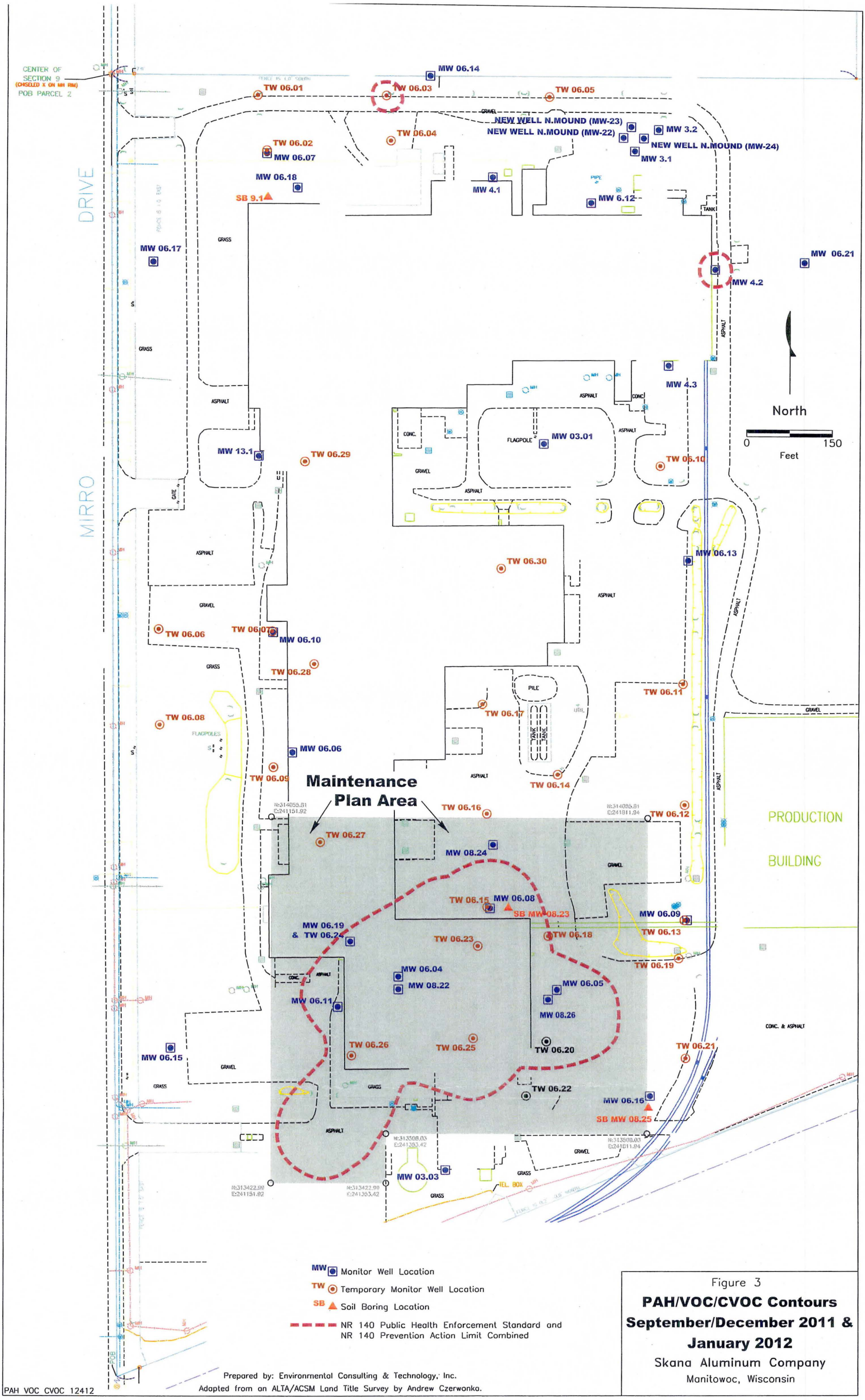
Figure 11 (Revised 1/20/2012)

Summary of PAH Concentrations Groundwater Regime - 2011

Skana Aluminum Company

Manitowoc, Wisconsin

PAH 12312



Prepared by: Environmental Consulting & Technology, Inc.
Adapted from an ALTA/ACSM Land Title Survey by Andrew Czerwonka.

PAH VOC CVOC 12412

Figure 3

PAH/VOC/CVOC Contours
September/December 2011 & January 2012

Skana Aluminum Company
Manitowoc, Wisconsin

EXHIBIT B

Inspection Log

INSPECTION LOG

Date: / /20

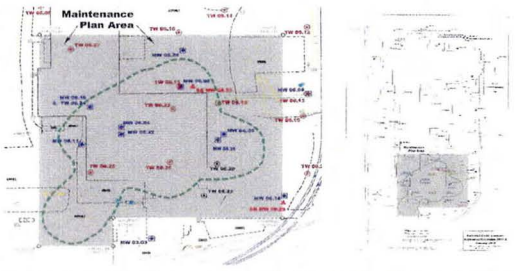
SKANA ALUMINUM COMPANY
2009 Morro Drive
Manitowoc, Wisconsin 54221

VLPE #06-36-556282
WI DNR Environmental Repair Activity # 02-36-544601/02-36-550138
Facility ID# 436106110

INSPECTOR NAME: _____
_____
_____
_____
_____
(May Attach Business Card)

Concrete - Building 5C

Asphalt - Exterior Building 5C



Barrier INSPECTION and MAINTENANCE LOG Item No.#

General Area		Condition of Surface			New or Old Condition (location)
Interior/Exterior	Location Marked w/Paint Yes / No	Good	Need Repair	Describe Condition (crack/void/settling, ...)	
Describe Location:					
Recommended Repair:					
Date Repair was Conducted : / / 20		Name Documenting Repair Completed:			

Barrier INSPECTION and MAINTENANCE LOG Item No.#

General Area		Condition of Surface			New or Old Condition (location)
Interior/Exterior	Location Marked w/Paint Yes / No	Good	Need Repair	Describe Condition (crack/void/settling, ...)	
Describe Location:					
Recommended Repair:					
Date Repair was Conducted : / / 20		Name Documenting Repair Completed:			

Barrier INSPECTION and MAINTENANCE LOG Item No.#

General Area		Condition of Surface			New or Old Condition (location)
Interior/Exterior	Location Marked w/Paint Yes / No	Good	Need Repair	Describe Condition (crack/void/settling, ...)	
Describe Location:					
Recommended Repair:					
Date Repair was Conducted : / / 20		Name Documenting Repair Completed:			

INSPECTION LOG

Date: / /20

SKANA ALUMINUM COMPANY
2009 Morro Drive
Manitowoc, Wisconsin 54221

VLPE #06-36-556282
WI DNR Environmental Repair Activity # 02-36-544601/02-36-550138
Facility ID# 436106110

Item No

If subcontractor used for repairs (attach Invoice)
WI DNR Approval Required (attach Approval Letter)

Condition At Time of Inspection	Repair Conducted (if needed)

Item No

If subcontractor used for repairs (attach Invoice)
WI DNR Approval Required (attach Approval Letter)

Condition At Time of Inspection	Repair Conducted (if needed)

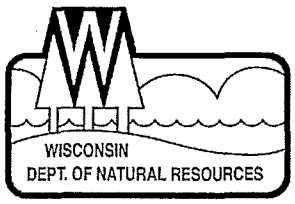
Item No

If subcontractor used for repairs (attach Invoice)
WI DNR Approval Required (attach Approval Letter)

Condition At Time of Inspection	Repair Conducted (if needed)

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Northeast Region Headquarters
2984 Shawano Avenue
Green Bay WI 54313-6727

Scott Walker, Governor
Cathy Stepp, Secretary
Jean Romback-Bartels, Regional Director
Telephone 920-662-5100
FAX 920-662-5413
TTY Access via relay - 711



December 6, 2011

VPLE #06-36-556282

(sent via email to Ken.Kazmierczak@skanaaluminum.com)

Kenneth Kazmierczak CFO, VP Administration
Skana Aluminum Company
PO Box 1477
Manitowoc, WI 54220

Subject: Conditional Closure Decision with Requirements to Achieve Final Closure
Skana Aluminum (K&V) Sumps (chlorinated solvents)
Building 5C at 2009 Mirro Drive, Manitowoc Wisconsin
WDNR Environmental Repair Activity # 02-36-544601

Dear Mr. Kazmierczak:

On December 2, 2011, the Northeast Region Closure Committee reviewed your request for closure of the case described above. The Committee reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. After careful review of the closure request, the Closure Committee has determined that the chlorinated solvent contamination on the site from the historic use of trichloroethylene solvents in the Building 5C vicinity appears to have been investigated for soil, vapor and groundwater conditions to the extent practicable under site conditions.

You should be aware that contaminated soil, vapor, and groundwater remain under and near building 5C. The building is acting as a "cap" to prevent infiltration of water that could cause spreading of the currently static contaminant plume, therefore the "cap" has to be maintained. The sumps in building 5C are artificially lowering the water table otherwise the contaminated soil would likely be saturated. Anyone planning any future excavation activity in the building 5C vicinity should know that contaminated soil and groundwater may be encountered and appropriate action should be taken. Regarding the vapors below the building, the Department has reviewed the sub slab vapor sampling that was completed and concurs with your consultant that no additional action is need to characterize or mitigate the vapors in building 5C.

A site specific closure letter will be written once the conditions in this letter are met. Furthermore, since you are enrolled in Wisconsin's Voluntary Party Liability Exemption Process, a Certificate of Completion (COC) will be issued for the Property after all contamination cases on the property are closed. As we discussed on the phone on November 28th, Skana will be relying on natural attenuation to restore groundwater quality as part of this Closure. Because you will receive a COC prior to achieving compliance with the groundwater enforcement standards, Skana will be paying an environmental insurance fee. This insurance fee is in addition to the required VPLE application and oversight fees.

The chlorinated solvents case in Building 5C has been addressed to Department standards in accordance with s. NR 726.05, Wis. Adm. Code and will be closed if the following conditions are satisfied:

MONITORING WELL ABANDONMENT

The monitoring wells at the site must be properly abandoned in accordance with ch. NR 141, Wis. Adm. Code. Documentation of well abandonment must be submitted to me on Form 3300-005, found at http://dnr.wi.gov/org/water/dwg/gw/ or provided by the Department of Natural Resources. Any remaining purge water and investigative wastes generated as part of the site investigation must be disposed of or treated in accordance with Department of Natural Resources' rules. Please confirm in the cover letter submitted with the abandonment forms that all remaining purge waters and investigative wastes have been properly addressed.

BUILDING "CAP" MAINTENANCE PLAN

This case will be closed with ch. NR 140 Wis. Adm. Code groundwater Enforcement Standard exceedances and will require a "cap" maintenance plan for Building 5C and the asphalt pavement surrounding it. The building is acting as a cap to prevent infiltration of water that could cause migration of the contaminant plume, therefore the "cap" has to be maintained. Please submit a Maintenance Plan that describes how you intend to maintain the existing cap (facility building) at the site. The "cap" covers the remaining residual soil and groundwater contamination at the site and allows the site to be closed despite exceedances of standards. The Cap is to be maintained in accordance with a plan prepared and submitted to the Department pursuant to s. NR 724.13(2), Wis. Adm. Code. An example plan can be found at http://dnr.wi.gov/org/aw/rr/technical/maintenance-plan.pdf

When the above conditions have been satisfied, please submit the appropriate documentation to verify that applicable conditions have been met, and your case will be closed. Your site will be listed on the DNR's Remediation and Redevelopment GIS Registry. Information that was submitted with your closure request application will be included on the GIS Registry. To review the site on the GIS Registry web page, visit the RR Sites Map page at: http://dnr.wi.gov/org/aw/rr/gis/index.htm.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at 920-662-5165.

Sincerely,

Annette Weissbach
Hydrogeologist
Remediation & Redevelopment Program

e-cc: James Bolger – JBI Inc., jim@jbidata.com
Michael Hebert – Environmental Consulting & Technology, Inc., MHebert@ectinc.com
Michael Prager – RR/5

BRRTS #: 02-36-544601
FID #: 436106110
SITE NAME: SKANA (K&V) (SUMPS)

Associated VPLE Site

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

BRRTS #	SITE NAME
06-36-556282	SKANA ALUMINUM CO (VPLE)

State Bar of Wisconsin Form 3-2003

QUIT CLAIM DEED

DOC # 1081280

Document Name

VOL 2550 PG 286

THIS DEED, made between **Michael S. Polsky as Receiver for Koenig & Vits, Inc.**

("Grantor," whether one or more), and **Skana Aluminum Company, a Wisconsin corporation**

("Grantee," whether one or more).

Grantor quit claims to Grantee the following described real estate, together with the rents, profits, fixtures and other appurtenant interests, in **Manitowoc** County, State of Wisconsin ("Property") (if more space is needed, please attach addendum):

STATE OF WI - MTWC CO
PRESTON JONES REG/DEEDS
RECEIVED FOR RECORD
04/30/2010 3:00:16 PM

Recording Area 13+6075 clk

Name and Return Address Title Trends, Inc. TK-6265
Godfrey & Kahn S.C.
Attorney Charles Vogel
780 N. Water Street
Milwaukee, WI 53202-3590

TRANSFER
$ 1075.00
FEE

052-809-401-010.00, 052-809-102-011.00, 052-809-103-011.00, 009-109-013-002.00
Parcel Identification Number (PIN)

This **is not** homestead property.
~~(is)~~ (is not)

See legal description attached.

WS-7

Michael S. Polsky as Receiver for Koenig & Vits, Inc.

Dated April 14, 2010.

(SEAL) *

(SEAL) *Michael S. Polsky, Receiver

(SEAL) *

(SEAL) *

AUTHENTICATION

Signature(s) _____

authenticated on _____.

*

TITLE: MEMBER STATE BAR OF WISCONSIN
(If not, authorized by Wis. Stat. § 706.06)

THIS INSTRUMENT DRAFTED BY:
Michael R. Stein, Esq.
Beck, Chaet, Bamberger & Polsky, S.C.

ACKNOWLEDGMENT

STATE OF **Wisconsin**)
) ss.
Milwaukee COUNTY)

Personally came before me on April 14, 2010, the above-named **Michael S. Polsky as Receiver for Koenig & Vits, Inc.** to me known to be the person(s) who executed the foregoing instrument and acknowledged the same.

CATHY J BEYER NOTARY PUBLIC STATE OF WISCONSIN

* **Cathy J. Beyer**
Notary Public, State of **Wisconsin**
My commission ~~(is permanent)~~ (expires: **December 16, 2012**)

(Signatures may be authenticated or acknowledged. Both are not necessary.)

NOTE: THIS IS A STANDARD FORM. ANY MODIFICATION TO THIS FORM SHOULD BE CLEARLY IDENTIFIED.

PROPERTY MAP

of Parcel 1:
All that part of the Southeast Quarter (SE 1/4) of Section Nine (9), Township Nineteen (19) North, Range Twenty-four (24) East, lying North of Chicago and Northwestern Railway Company right of way, partially in the City of Manitowoc and partially in the Town of Manitowoc, County of Manitowoc, State of Wisconsin.
EXCEPTING THEREFROM Lot One (1) of a Certified Survey recorded in Volume 24 of Certified Survey Maps, Page 63, as Document No. 967193.
EXCEPTING portion conveyed for street purposes by Quit Claim Deed recorded in Volume 1995, Page 230, as Document No. 969539, and by Quit Claim Deed recorded in Volume 1995, Page 231, as Document No. 969540.

and Parcel 2:
The Southwest Quarter (SW 1/4) of the Northeast Quarter (NE 1/4) and South Half (S 1/2) of the Northwest Quarter (NW 1/4) of the Northeast Quarter (NE 1/4) of Section 9, Township Nineteen (19) North, Range Twenty-four (24) East, in the City of Manitowoc, County of Manitowoc, State of Wisconsin.
EXCEPTING portion conveyed for street purposes by Quit Claim Deed recorded in Volume 1995, Page 230, as Document No. 969539.

FOR Skana Aluminum Company and Chicago Title Insurance Company

Meets and Bounds description of Parcel 1:
All that part of the SE¼ of Section 9, T19N, R24E lying North of Chicago and Northwestern Railway Company right of way, partially in the City of Manitowoc and partially in the Town of Manitowoc, Manitowoc County, Wisconsin described as follows:
Commencing at the S¼ corner of said Section 9; thence N00°28'47"W, 404.57 feet; thence thence Northeasterly along the arc of a curve to the left, 47.76 feet, having a radius of 5680.15 feet, a central angle of 0°28'54"and whose long chord bears N89°56'12"E, 47.73 feet to the point of beginning of the following described parcel;
thence N0°28'47"W, 2224.90 feet to the ¼ section line; thence N89°39'15"E, 2533.05 feet along ¼ section line; thence S0°44'41"E, 718.19 feet along the west line of Woodland Drive to the north line of CSM 24-63; thence S89°30'16"W, 1543.40 feet along said line; thence S44°30'20"W, 42.43 feet along northwesterly line of said CSM; thence S00°29'40"E, 1096.87 feet along west line of said CSM; thence S88°13'16"W, 885.97 feet along northerly right-of-way line of said railway company; thence continue Southwesterly along the arc of a curve to the right, 146.19 feet, having a radius of 5680.15 feet, a central angle of 1°28'29"and whose long chord bears S88°57'30"W, 146.19 feet to the place of beginning.
Containing 3,095,139 square feet (71.055 acres) of land, more or less.

Meets and Bounds description of Parcel 2:
That part of the S½ of the NW¼ of the NE¼ and the SW¼ of the NE¼ of Section 9, T19N, R24E, City of Manitowoc, Manitowoc County, Wisconsin, described as follows:
Commencing at the S¼ corner of said Section 9; thence N00°28'47"W, 2645.58 feet to the Center of said Section 9; thence N89°39'15"E, 45.00' to the point of beginning of the following described parcel; thence N0°22'16"W, 1961.40 feet along the east right-of-way line of Mirro Drive; thence N89°22'17"E, 1288.15 feet along the north line of the S½ of the NW¼-NE¼ of said section; thence S0°15'05"E, 1967.68 feet along 1/16 section line; thence S89°39'15"W, 1264.02 feet along ¼ section line to the place of beginning.
Containing 2,487,341 square feet (57.101 acres) of land, more or less.

CSM Volume 24 page 63
April 14, 2010

N¼ CORNER SEC.9 (PK NAIL)

CITY LIMITS

Kamely Frederick Jr.
TAX NO. 052-508-102-012.00

N½ – NW¼ – NE¼
FARMED FIELD

N89°22'17"E 1313.15'
90' WIDE OFFICIAL MAP STREET
TOCE & IR ON PROP. LINE
N89°22'17"E 1288.15'

LOW AREA
WOODS
AS PER CITY TOPO MAP

TAX NO. 052-509-102-011.00
S½ – NW¼ – NE¼

John C. Henry and Annette M. Henry
TAX NO. 009-109-001-000.00
Vol. 1502, Pg. 713

NE¼ – NE¼
1/16 SEC. LINE

FARMED FIELD

WOODS
FARMED SLOPE

PARCEL 2
2,487,341 SF = 57.101 AC

SW¼ – NE¼
TAX NO. 052-509-102-011.00

N00°22'16"W 1961.40'

80' WIDE OFFICIAL MAP STREET

S00°15'05"E CITY LIMITS

Paul Bohrke
TAX NO. 009-109-004-001.00
Vol. 1375, Pg. 571

FARMED FIELD

TOWN OF MANITOWOC
SE¼ – NE¼

Michael M. Sicklinger and Laurel L. Sicklinger
TAX NO. 009-109-004-000.00
Vol. 878, Pg. 633

WOODS

NE CORNER SEC.9 (PK NAIL)

CENTER OF SECTION 9 (CHISELED X ON MH RIM)

Ref. Parcel 2

N89°39'15"E 1309.02'
1284.01'
N89°36'15"E
2533.05'
1269.02'
1309.02'

E¼ CORNER SEC. (3/4 IP)

CITY LIMITS

ROAD SURVEYED JULY, 2009

PARCEL 1
3,095.139 SF = 71.055 AC

TAX NO. 052-509-401-010

WOODS

MIRRO DRIVE

WOODLAND DRIVE (49.5' WIDE)

S89°30'20"W 1543.40'

LOW AREA

LOW AREA

TAX NO. 052-509-401-033

15' UTILITY & DRAINAGE EASEMENT

CITY LIMITS

COMPLEX OF PRODUCTION BUILDINGS

SE¼ SEC. 9–19–24

LOT 1, CSM V.24, PG.63

355.0'
250.00'
S00°29'40"E 100.00'

717.32'

N00°22'16"W 2654.58'

2224.90'

227.8'

327.5'

50' EASEMENT "C"

UTILITY EASEMENT V.2453, P.570

ENCLOSED BRIDGE - CONVEYOR

15' UTILITY & DRAINAGE EASEMENT

INGRESS & EGRESS EASEMENT "A"

EASEMENT "B"

S89°39'12"E 1008.24'
N89°39'12"E 941.95'
N89°36'15"E 656.18'
N89°13'16"E 374.30'
S00°12'16"W 1133.83'

25.00'

64.39'

RAIL ROAD (C. & NW. R. CO.)
80' WIDE

N89°31'13"E 100.43'

I = 1°28'29"
R = 5680.15'
A = 146.19'
N88°57'30"E
CH=146.186'

I = 0°28'54"
R = 5680.15'
A = 47.76'
S89°56'12"W
CH=47.759'

WISCONSIN
ANDREW CZERWONKA
S-2404
TWO RIVERS WIS.
LAND SURVEYOR

"I HEREBY CERTIFY THAT I HAVE PREPARED THE MAP OF THE ABOVE DESCRIBED PROPERTY AND THAT THE ABOVE MAP IS A TRUE REPRESENTATION THEREOF AND THAT THE SURVEY IS CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

This survey is made for the exclusive use of the present owners of the property, and also those who purchase, mortgage, or insure the title thereto within one (1) year from date hereof; and as to them I warrant the accuracy of said survey map.

ANDREW CZERWONKA, Registered Land Surveyor
APR 14, 2010

NOTES:

(1) THIS MAP IS PREPARED ON THE BASE OF 2003 ALTA SURVEY FOR KOENIG & VITS, INC.

(2) THE MAP WAS UPDATED AS FOLLOWS:
(A) BOUNDARY LINES AS PER Security Union Title Insurance Commitment Number TK-6265,
(B) EASEMENTS AS PER CSM V.24,P.63,
(C) UTILITY EASEMENT V.2453, P.570.

(3) All the improvements shown on this map are as per previous surveys and are not field verified.

LEGEND:
( ) AS RECORDED
SET 1.5"x18" IRON PIPE WEIGHING NOT LESS THAN 1.13 LBS/LIN FT.
FOUND 1.5" IRON PIPE
FOUND 3/4" STEEL ROD
SET PK NAIL OR AS NOTED
FENCE, GATE
PALET
STREET LIGHT
HYDRANT
WATER VALVE
MANHOLE
AERIAL ELECTRIC LINE
CAS LINE
STORM SEWER
SANITARY SEWER
WATER LINE
BURIED PHONE CABLE
WOODS AS PER CITY TOPO MAP
TRANSFORMER

BEARINGS ARE REFERENCED TO MANITOWOC COUNTY COORDINATE SYSTEM.

GRAPHIC SCALE
150 75 0 150

Lakeside Surveying LLC
(920) 793-1471
315 Park Road, Two Rivers, WI 54241
CA 10002

S¼ CORNER SEC.9 (PK NAIL)

SE CORNER SEC.9 (PK NAIL)

SIGNED STATEMENT / CERTIFICATION

The purpose of this certification is to verify that the provided legal description for each of the contaminated properties has been submitted. The signatory is not required to attest to the accuracy of the attached legal description.

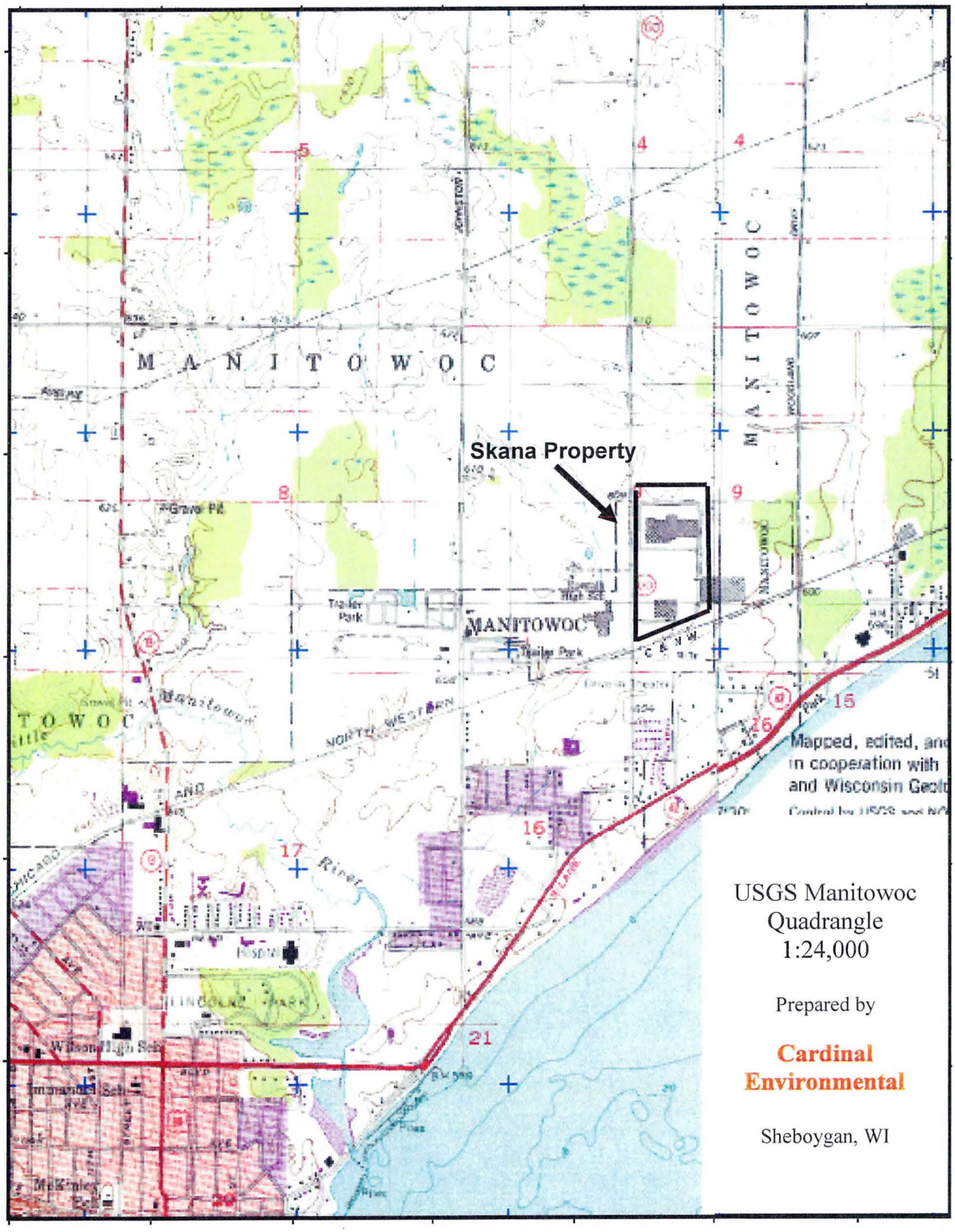
I, Kenneth J. Kazmierczak, Agent of or Responsible Party (RP) for the site investigation and remediation at the Skana Aluminum Company property located at 2009 Mirro Drive, Manitowoc, Wisconsin (WDNR BRRTS: #02-36-544601, #02-36-550138, and #02-36-555268), do hereby certify that to the best of my knowledge the legal description has been attached for each property that is within, or partially within, the contaminant site boundary.

Kenneth J Kazmierczak 2/10/12

Signature of RP or Agent CFO

CARDINAL
ENVIRONMENTAL

Figure 1 – Skana Location



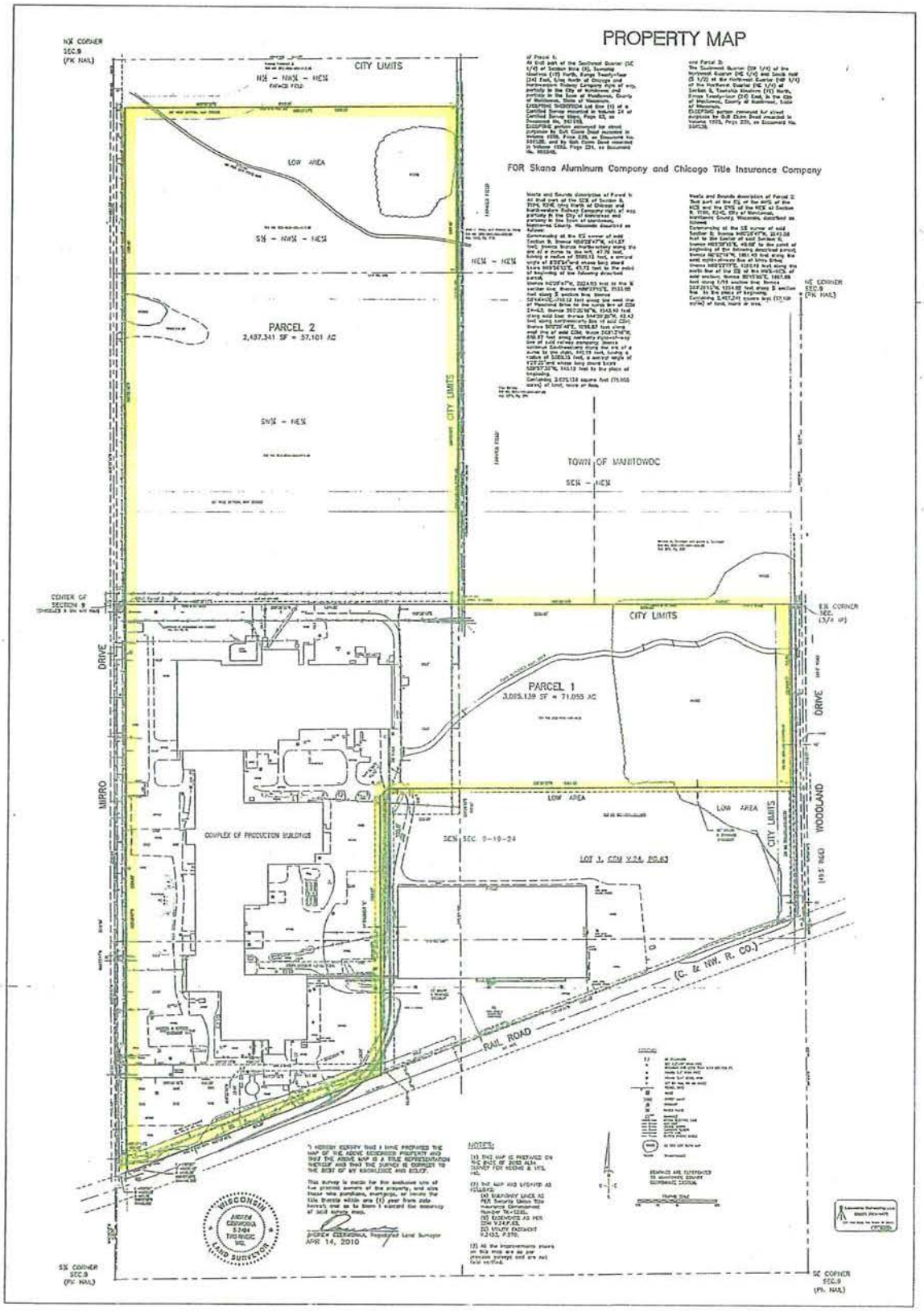
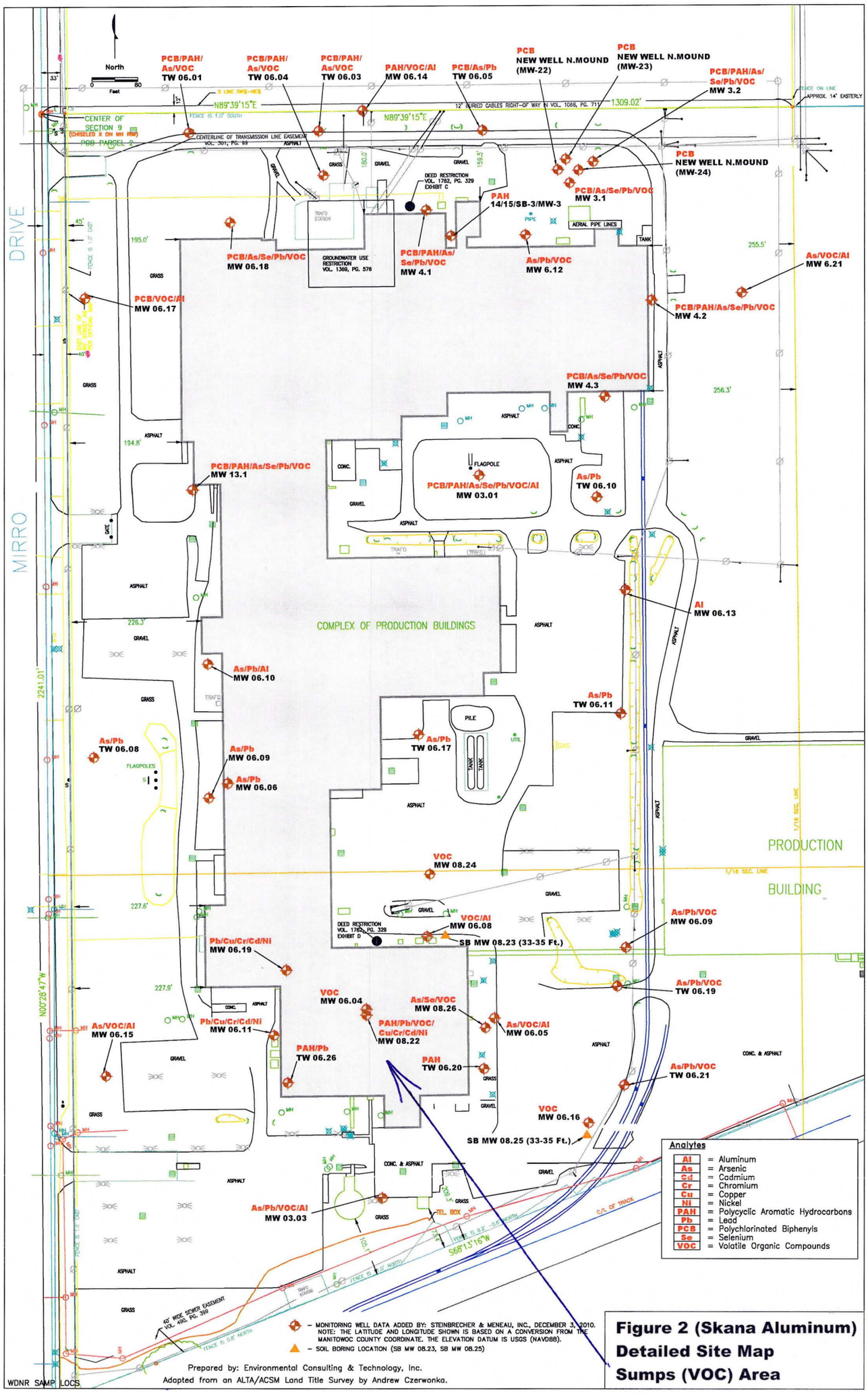
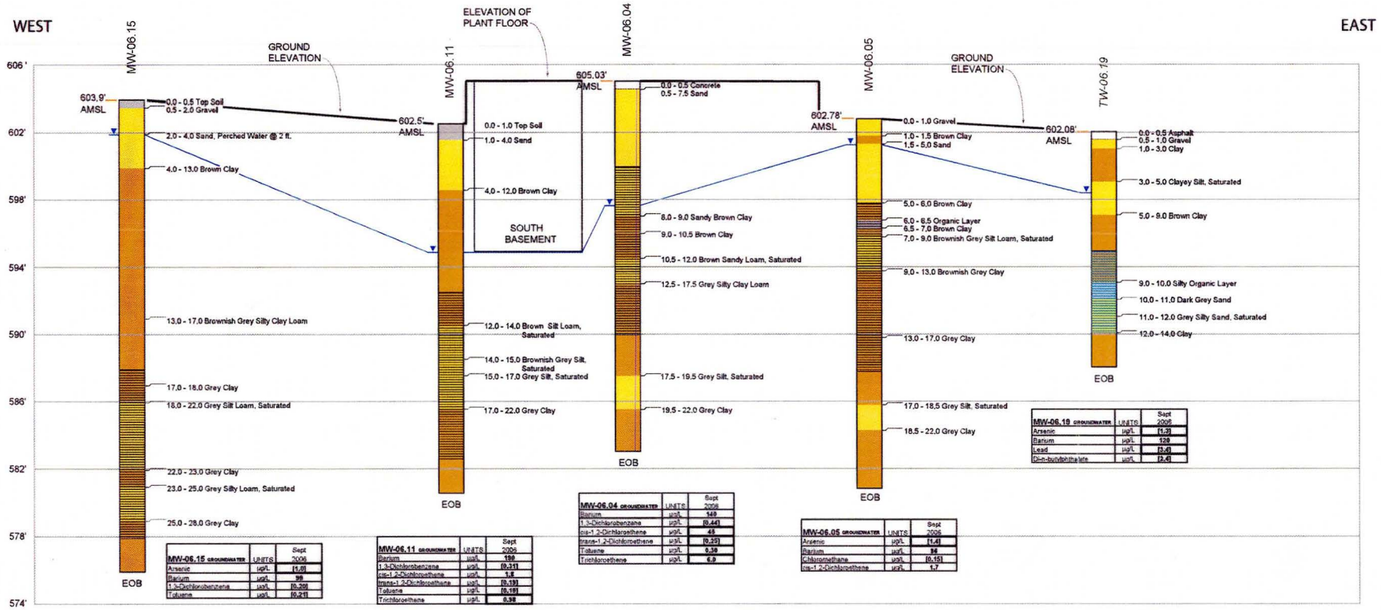
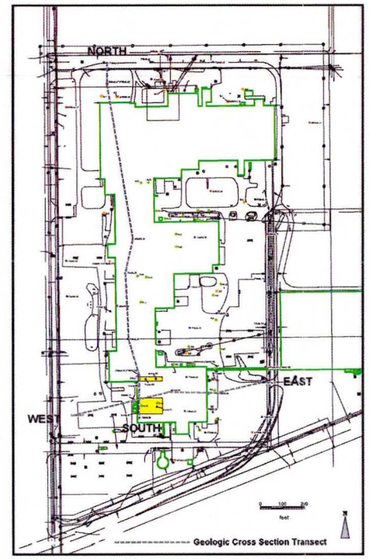


Figure 2 – Property Map of Skana


PCB/PAH/ As/VOC TW 06.01
PCB/PAH/ As/VOC TW 06.04
PCB/PAH/ As/VOC TW 06.03
PAH/VOC/Al MW 06.14
PCB/As/Pb TW 06.05
PCB NEW WELL N.MOUND (MW-22)
PCB NEW WELL N.MOUND (MW-23)
PCB/PAH/As/ Se/Pb/VOC MW 3.2
PCB NEW WELL N.MOUND (MW-24)
PCB/As/Se/Pb/VOC MW 3.1
PAH 14/15/SB-3/MW-3
PCB/As/Se/Pb/VOC MW 06.18
PCB/PAH/As/ Se/Pb/VOC MW 4.1
As/Pb/VOC MW 6.12
As/VOC/Al MW 6.21
PCB/PAH/As/Se/Pb/VOC MW 4.2
PCB/VOC/Al MW 06.17
PCB/As/Se/Pb/VOC MW 4.3
PCB/PAH/As/Se/Pb/VOC MW 13.1
PCB/PAH/As/Se/Pb/VOC/Al MW 03.01
As/Pb TW 06.10
Al MW 06.13
COMPLEX OF PRODUCTION BUILDINGS
As/Pb/Al MW 06.10
As/Pb TW 06.11
As/Pb TW 06.08
As/Pb MW 06.09
As/Pb MW 06.06
As/Pb TW 06.17
VOC MW 08.24
PRODUCTION BUILDING
VOC/Al MW 06.08
SB MW 08.23 (33-35 Ft.)
As/Pb/VOC MW 06.09
Pb/Cu/Cr/Cd/Ni MW 06.19
As/Pb/VOC TW 06.19
VOC MW 06.04
As/Se/VOC MW 08.26
PAH/Pb/VOC/ Cu/Cr/Cd/Ni MW 08.22
As/VOC/Al MW 06.05
As/VOC/Al MW 06.15
Pb/Cu/Cr/Cd/Ni MW 06.11
PAH/Pb TW 06.26
PAH TW 06.20
As/Pb/VOC TW 06.21
VOC MW 06.16
SB MW 08.25 (33-35 Ft.)
As/Pb/VOC/Al MW 03.03
DRIVE
MIRRO
North
Feet
CENTER OF SECTION 9
POB PARCEL 2
CENTERLINE OF TRANSMISSION LINE EASEMENT VOL. 301, PG. 99
N89°39'15"E
1,309.02'
12' BURIED CABLES RIGHT-OF WAY IN VOL. 1088, PG. 711
DEED RESTRICTION VOL. 1782, PG. 329 EXHIBIT C
GROUNDWATER USE RESTRICTION VOL. 1369, PG. 576
DEED RESTRICTION VOL. 1782, PG. 328 EXHIBIT D
AERIAL PIPE LINES
FLAGPOLE
PILE
TANK
TRAFO STATION
ASPHALT
GRAVEL
GRASS
CONC.
CONC. & ASPHALT
FENCE ON LINE APPROX. 14' EASTERLY
FENCE IS 1.0' SOUTH
FENCE IS 0.8' NORTH
FENCE IS 0.7' EAST
FENCE IS 0.2' NORTH
FENCE IS 0.6' NORTH
45' WIDE SEWER EASEMENT VOL. 490, PG. 399
TEL. BOX
C/L OF TRACK
1/16 SEC. LINE
S68°13'16"W
N00°28'47"W
2241.01'
1,320.0'
195.0'
194.8'
226.3'
227.6'
227.9'
255.5'
256.3'
180.0'
159.5'
Analytes
Al = Aluminum
As = Arsenic
Cd = Cadmium
Cr = Chromium
Cu = Copper
Ni = Nickel
PAH = Polycyclic Aromatic Hydrocarbons
Pb = Lead
PCB = Polychlorinated Biphenyls
Se = Selenium
VOC = Volatile Organic Compounds
– MONITORING WELL DATA ADDED BY: STEINBRECHER & MENEAU, INC., DECEMBER 3, 2010. NOTE: THE LATITUDE AND LONGITUDE SHOWN IS BASED ON A CONVERSION FROM THE MANITOWOC COUNTY COORDINATE. THE ELEVATION DATUM IS USGS (NAVD88).
– SOIL BORING LOCATION (SB MW 08.23, SB MW 08.25)
Prepared by: Environmental Consulting & Technology, Inc.
Adapted from an ALTA/ACSM Land Title Survey by Andrew Czerwonka.
WDNR SAMP LOCS
Figure 2 (Skana Aluminum)
Detailed Site Map
Sumps (VOC) Area

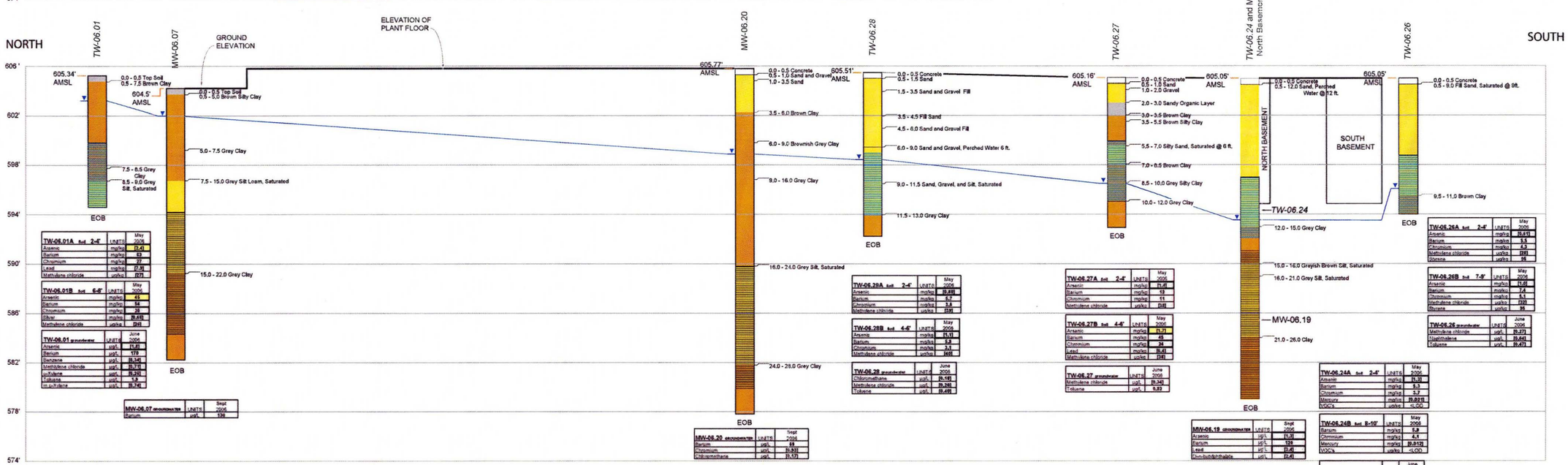




Summary of Static Water Elevation Data, Selected Wells

Well	Top of Casing Elevation	Depth to Water 7/17/2006	Static Water Level 7/17/2006	Depth to Water 12/28/2006	Static Water Level 12/28/2006
TW-06.01	605.53	4.45	601.08	2.16	603.37
TW-06.19	602.05	5.37	596.68	3.55	598.50
TW-06.24	605.05	11.31	593.74	11.09	593.96
TW-06.26	605.05	9.11	595.94	8.77	596.28
TW-06.27	605.16	8.48	596.68	8.34	596.82
TW-06.28	605.51	7.13	598.38	6.93	598.58
MW-06.04	605.03	na	na	7.32	597.71
MW-06.05	605.47	na	na	4.36	601.11
MW-06.07	608.08	na	na	5.79	602.29
MW-06.11	606.52	na	na	10.32	595.20
MW-06.15	606.93	na	na	5.13	601.80
MW-06.20	605.77	na	na	6.77	599.00

Notes: na - not available
TW- temporary monitoring well
MW - NR141 monitoring well



Soil Data Box Notes

REFERENCES:
1) Bold values indicate a compound was detected above the laboratory limit of detection (LOD).
2) Bold and bordered values indicates compounds that were detected above soil criteria protective of Non-industrial Direct Contact.
3) Bold, Italicized and light grey shaded values indicate compounds detected above soil criteria Protective of the Groundwater .
4) Values shaded in light yellow indicate a compound was detected above the Industrial Direct Contact, Residual Contaminant Level.
5) Values in brackets represent results greater than or equal to the Limit of Detection (LOD) but less than the Limit of Quantifications (LOQ) and are within a region of "Less-Certain Quantitation Results greater than or equal to the LOQ are considered to be in the region of "Certain Quantitation". All LOD/LOQs adjusted to reflect dilution.
6) na - indicates sample was not analyzed.

Groundwater Data Box Notes

REFERENCES:
1) Bold values indicate a compound was detected above the laboratory limit of detection (LOD).
2) Bold and bordered values indicate the compound was detected above the NR 140 PAL.
3) Bold, bordered, italicized and light grey shaded values indicate the compound was detected above the NR 140 ES.
4) Values in brackets represent results greater than or equal to the Limit of Detection (LOD) but less than the Limit of Quantifications (LOQ) and are within a region of "Less-Certain Quantitation Results greater than or equal to the LOQ are considered to be in the region of "Certain Quantitation". All LOD/LOQs adjusted to reflect dilution.
5) na - indicates sample was not analyzed.

Scale: 1" = 60' Horizontal
1" = 4' Vertical

LEGEND

Depth to Water Measured on December 28, 2006

EOB - End of Boring

Monitoring Well Screen

Temporary Well Screen

Silt, Sand, or Gravel

Clay

Organic Layer

Concrete/Asphalt Pavement

FIGURE 5

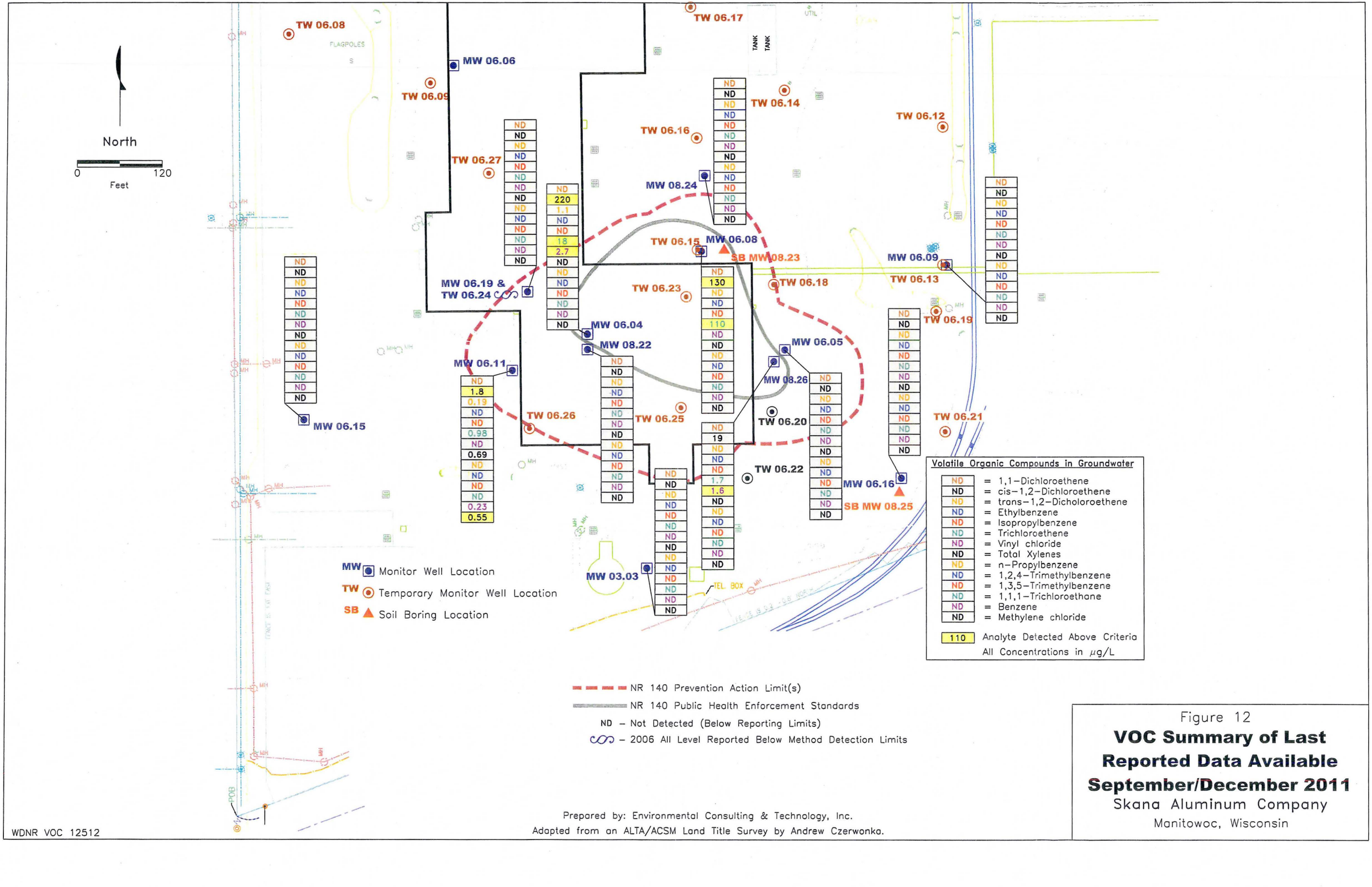
West to East and North to South Geologic Cross Sections

KOENIG & VITS, INC.
MANITOWOC, WISCONSIN

GLEC

Project #1805 JHB

A Files/GLEC/Koenig&Vits/Publish/Fig5 Cross Section east west 1.4.08_print.pdf



Prepared by: Environmental Consulting & Technology, Inc.
Adapted from an ALTA/ACSM Land Title Survey by Andrew Czerwonka.

WDNR VOC 12512

Figure 12

VOC Summary of Last Reported Data Available

September/December 2011

Skana Aluminum Company

Manitowoc, Wisconsin

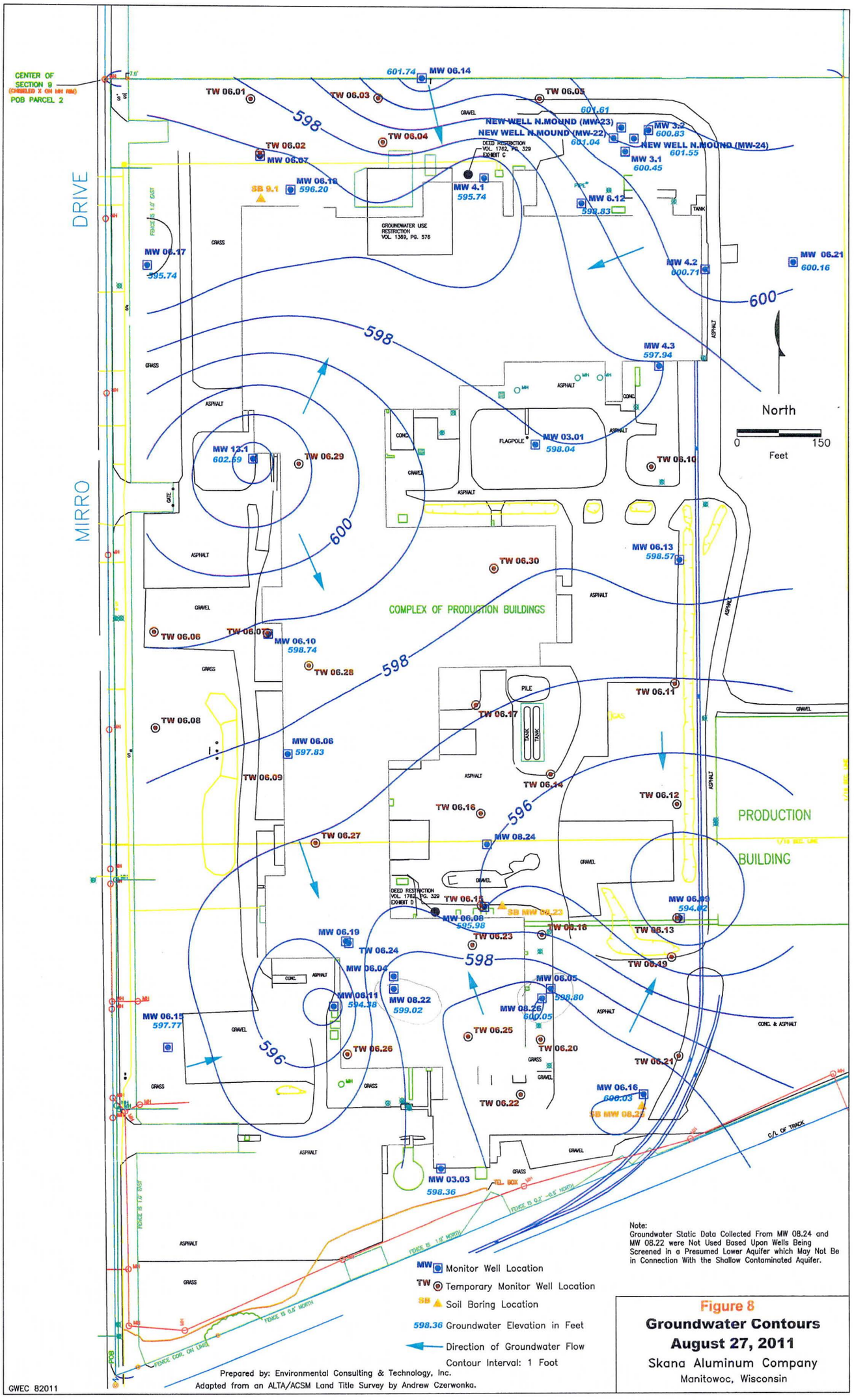

CENTER OF SECTION 9
(CHISELED X ON MH RIM)
POB PARCEL 2
DRIVE
MIRRO
601.74
MW 06.14
TW 06.01
TW 06.03
TW 06.05
601.61
NEW WELL N.MOUND (MW-23)
NEW WELL N.MOUND (MW-22)
601.04
MW 3.2
600.83
NEW WELL N.MOUND (MW-24)
601.55
MW 3.1
600.45
TW 06.04
TW 06.02
MW 06.07
DEED RESTRICTION
VOL. 1762, PG. 329
EXHIBIT C
SB 9.1
MW 06.18
596.20
MW 4.1
595.74
MW 6.12
599.83
GROUNDWATER USE
RESTRICTION
VOL. 1389, PG. 576
MW 06.17
595.74
MW 4.2
600.71
MW 06.21
600.16
598
600
MW 4.3
597.94
MW 13.1
602.69
TW 06.29
MW 03.01
598.04
TW 06.10
FLAGPOLE
COMPLEX OF PRODUCTION BUILDINGS
MW 06.13
598.57
TW 06.30
TW 06.06
TW 06.07
MW 06.10
598.74
TW 06.28
TW 06.08
MW 06.06
597.83
TW 06.09
TW 06.11
TW 06.17
TW 06.14
TW 06.12
TW 06.16
PRODUCTION
BUILDING
596
TW 06.27
MW 08.24
TW 06.15
SB MW 08.23
MW 06.09
594.02
MW 08.08
595.98
TW 06.18
TW 06.13
TW 06.23
MW 06.19
TW 06.24
MW 06.04
TW 06.19
MW 06.11
594.38
MW 08.22
599.02
MW 06.05
598.80
MW 08.26
600.05
MW 06.15
597.77
TW 06.25
TW 06.26
TW 06.20
TW 06.21
MW 06.16
596.03
SB MW 08.22
TW 06.22
MW 03.03
598.36
TANK
PILE
GRAVEL
ASPHALT
CONC.
GRASS
FENCE IS 1.0' EAST
FENCE IS 1.5' WEST
FENCE IS 0.2' -6.5' NORTH
FENCE IS 1.5' NORTH
FENCE IS 0.5' NORTH
FENCE COR. ON LINE
C/L OF TRACK
CONC. & ASPHALT
North
0
150
Feet
Note:
Groundwater Static Data Collected From MW 08.24 and MW 08.22 were Not Used Based Upon Wells Being Screened in a Presumed Lower Aquifer which May Not Be in Connection With the Shallow Contaminated Aquifer.
MW Monitor Well Location
TW Temporary Monitor Well Location
SB Soil Boring Location
598.36 Groundwater Elevation in Feet
Direction of Groundwater Flow
Contour Interval: 1 Foot
Prepared by: Environmental Consulting & Technology, Inc.
Adapted from an ALTA/ACSM Land Title Survey by Andrew Czerwonka.
GWEC 82011
Figure 8
Groundwater Contours
August 27, 2011
Skana Aluminum Company
Manitowoc, Wisconsin

Table 1 – Wells Sampled to Characterize the Sump Area for VOC's

Well / Location	Results Round 1	Results Round 2	Results Round 3
MW-03.03	VOC = ND Phthalates = ND	VOC =ND Phthalates = ND	
MW-06.04	VOC = ND	Cis 1,2 DCE = 190 TCE = 25	VC=2.7 Cis-1,2-DCE=220 TCE=18
MW-06.05	VOC = ND	VOC = ND	
MW-06.08	1,1 –DCE = 1.6 Cis-1,2 DCE = 340 Trans-1,2 DCE = 18 TCE = 170 Vinyl Chloride = 6	Cis-1,2 DCE = 130 TCE = 110	
MW-06.16	VOC = ND	VOC = ND	Pb=<1
MW-08.22	VOC's=ND	VOC's = ND Benzo(a)pyrene =0.02	
MW-08.24	VOC = ND	VOC = ND	
MW-08.26	Cis-1,2-DCE=66 Trans-1,2-DCE=1.9 TCE=3.4 Vinyl Chloride= 2.5	Cis-1,2-DCE = 7.8 TCE = 0.8	Cis-1,2-DCE=19 TCE=1.7 Vinyl Chloride= 1.6

SKANA Aluminum Company, 2009 Mirro Drive, Manitowoc, Wisconsin

BRRTS # 02-36-544601 BRRTS # 02-36-550138 BRRTS # 02-36-555268

Well ID	Northing	Easting	Top of Casing Elevation	Ground Elevation	Longitude	Latitude	Static Water Level (TOC)	Groundwater Elevation	ALTA/ACSM Land Title Survey by Andrew Czerwonka
MW - 03.03	313445.641'	241457.603'	604.08	601.14	W87° 37' 41.635"	N44° 07' 35.403"	5.72	598.36	Static Water Level Date: August 27,2011 (1030-1230)

Installation (Year):	2003
Installed by:	JBI/Quantum Env.

Only Detected Concentrations Exceeding NR 140 Preventive Action Limits (PAL) are Reported

"Analyzed - RL" Indicates No Parameters Above Reported LOD/Reporting Limit

NR 140 Enforcement Standard (ES)

Summary of Analytical Data

Sample Analysis Date	Lab	Metals		PAL	ES	PCB's		PAL	ES	VOC's		PAL	ES	DRO, SVOC's & PAH's		PAL	ES
		Metal	µ\L	µ\L	µ\L	Aroclor	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L
9/25/2003	Quantum	Not Analyzed				Not Analyzed				Benzene	0.76	0.5	5	Analyzed for PAH's Extended List			
										sec-Butlbenzene	0.54			Diethylphthalate	17		
										Ethybenzene	0.46	140	700				
										p-Isopropyltoluene	0.89						
										Naphthalene	1.2	10	100				
										Xylene	0.56	400	2000				
										Toluene	0.66	160	800				
										1.2.4-TMB	2	96	480				
										MTBE	37	12	60				
6/5/2006		Not Analyzed				Not Analyzed				Not Analyzed				Not Analyzed			
9/29/2006		Analyzed - NR				Not Analyzed				Toluene	0.18	160	800	Not Analyzed			
		Arsenic	1.1	1	10												
		Barium	70	1.5	15												
10/24/2010	BV	Arsenic	<5	1	10	Not Analyzed				Analyzed - RL				Analyzed for Phthalates - RL			
		Lead	<3	1.5	15												
4/5/2011	BV	Aluminum	520	20	200	Not Analyzed				Analyzed - RL				Analyzed for Phthalates - RL			
		Arsenic	<5	1	10												
		Lead	<3	1.5	15												
September 2011	NLS	Aluminum	14	20	200	Not Analyzed				Not Analyzed				Not Analyzed			
		Arsenic	7.8	1	10												
		Lead	<1	1.5	15												

Narrative:

This well was installed during 2003 Initial ESA for Koenig & Vits (MW-3). Renamed MW-03.03. The sampling done in October 2010 and April 2011 (Rounds 1 & 2) showed non-detectable concentrations for lead and arsenic; aluminum was non-detectable in April. However, the DL's established by Bureau Veritas' QA/QC system were above the PAL for the three metals. BV reviewed the QC data in July but was unable to adjust the DL for lead or arsenic. This well was sampled in August for aluminum, lead and arsenic (Filtered Levels Posted 9/2011); methods used achieved legitimate detection levels at or below the state PALs.

SKANA Aluminum Company, 2009 Mirro Drive, Manitowoc, Wisconsin
BRRTS # 02-36-544601 BRRTS # 02-36-550138 BRRTS # 02-36-555268

Well ID	Northing	Easting	Top of Casing Elevation	Ground Elevation	Longitude	Latitude	Static Water Level (TOC)	Groundwater Elevation	ALTA/ACSM Land Title Survey by Andrew Czerwonka
MW - 06.04	313763.6397'	241429.4291'	604.6	605.03			5.58	599.02	Static Water Level Date: August 27,2011 (1030-1230)

Installation (Year):	2006
Installed by:	Envirotech Contracting - NLS

Only Detected Concentrations Exceeding NR 140 Preventive Action Limits (PAL) are Reported

"Analyzed - RL" Indicates No Parameters Above Reported LOD/Reporting Limit

NR 140 Enforcement Standard (ES)

Summary of Analytical Data

Sample Analysis Date	Lab	Metals		PAL	ES	PCB's		PAL	ES	VOC's		PAL	ES	DRO, SVOC's & PAH's		PAL	ES
		Metal	µ\L	µ\L	µ\L	Aroclor	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L
6/5/2006	NLS	Arsenic	7.3	1	10	Not Analyzed				Ethybenzene	170	140	700	Not Analyzed			
										Isopropylbenzene	22						
										n-propylbenzene	4						
										TMB	7	96	480				
										Xylene	0.56	400	2000				
9/29/2006	NLS	Barium	140	400	2000	Not Analyzed				cis-1,2-Dichloroethene	45	7	70	Analyzed - RL			
										TCE	6	0.5	5				
										1,3-DCB	0.44						
										Trans-1,2- DCE	0.25	20	100				
										Toluene	0.3	160	800				
10/24/2010	BV	Not Analyzed				Not Analyzed				cis-1,2-Dichloroethene	170	7	70	Not Analyzed			
										TCE	20	0.5	5				
4/5/2011	BV	Not Analyzed				Not Analyzed				cis-1,2-Dichloroethene	190	7	70	Not Analyzed			
										TCE	25	0.5	5				
September 2011	BV/NLS	Arsenic	1.4	1	10	Not Analyzed				Vinyl chloride	2.7	0.02	0.2	Not Analyzed			
										cis-1,2-Dichloroethene	220	7	70				
										TCE	18	0.5	5				

Narrative:

This well was installed during the Phase 2 ESA for Koenig & Vits. The well was constructed as a permanent NR 140 well, labeled MW-06.04, and was sampled in September 2006. The results for metals were all ND; aresenic was reported as ND with an LOD of 0.57 ug/L and and LOQ of 2.0 ug/L; lead was reported as ND with with an LOD of 1.3 ug/L and a LOQ of 4.3 ug/l. Cis-1,2-dichlorothene was detected at 45 ug/L and trichloroethylene was detected at 6 ug/L. The well was resampled in October 2010, and again in April 2011, as part of the first and second round of sampling planned for the site under the VPLE program. Cis-1,2-dichlorothene was detected at 45 ug/L and trichloroethylene was detected at 6 ug/L. The well was resampled in October 2010, and again in April 2010. Cis-1,2-dichlorothene and trichloroethylene were detected in both samples, as shown in the table above. No further sampling for VOC's is proposed. The well will be included in the attempt during the final round of sampling to better define the extent of aluminum contamination throughout the site. The sampling done in October 2010 and April 2011 (Rounds 1 & 2) showed non-detectable concentrations for lead and arsenic; aluminum was non-detectable in April. However, the DL's established by Bureau Veritas' QA/QC system were above the PAL for the three metals. BV reviewed the QC data in July and was able to adjust the DL for lead to 1.0 ppb, but the DL for arsenic could not be adjusted. This well was sampled in September for arsenic (Filtered Data Posted 9/2011) and VOC; methods used to achieved legitimate detection levels at or below the state PALs.

SKANA Aluminum Company, 2009 Mirro Drive, Manitowoc, Wisconsin

BRRTS # 02-36-544601 BRRTS # 02-36-550138 BRRTS # 02-36-555268

Well ID	Northing	Easting	Top of Casing Elevation	Ground Elevation	Longitude	Latitude	Static Water Level (TOC)	Groundwater Elevation	ALTA/ACSM Land Title Survey by Andrew Czerwonka
MW - 06.05	313758.236'	241652.684'	605.4	602.76	W87° 37' 38.964"	N44° 07' 38.492"	6.6	598.8	Static Water Level Date: August 27,2011 (1030-1230)

Installation (Year):	2006
Installed by:	Envirotech Contracting - NLS

Only Detected Concentrations Exceeding NR 140 Preventive Action Limits (PAL) are Reported

"Analyzed - RL" Indicates No Parameters Above Reported LOD/Reporting Limit

NR 140 Enforcement Standard (ES)

Summary of Analytical Data

Sample Analysis Date	Lab	Metals		PAL	ES	PCB's		PAL	ES	VOC's		PAL	ES	DRO, SVOC's & PAH's		PAL	ES
		Metal	µ\L	µ\L	µ\L	Aroclor	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L
6/5/2006	NLS	Aesenic	3.5	1	10	Not Analyzed				Ethybenzene	0.21	140	700	Not Analyzed			
		Lead	2.7	1.5	15					Methylrnr chloride	0.19	0.5	5				
		Barium	96	400	2000					Toluene	0.3	160	800				
9/29/2006	NLS	Aesenic	1.4	1	10	Not Analyzed				Not Analyzed				Analyzed - RL			
		Barium	86	400	2000												
10/24/2010	BV	Aesenic	<5	1	10	Not Analyzed				Analyzed - RL				Not Analyzed			
		Lead	<3	1.5	15												
4/5/2011	BV	Aluminum	120	20	200	Not Analyzed				Analyzed - RL				Not Analyzed			
		Aesenic	<5	1	10												
September 2011	BV/NLS	Lead	<1	1.5	15	Not Analyzed				Not Analyzed				Not Analyzed			
		Aluminum	10	40	200												
		Aesenic	4.1	1	10												

Narrative:

This well was installed during the Phase 2 ESA for Koenig & Vits. The sampling done in October 2010 and April 2011 (Rounds 1 & 2) showed non-detectable concentrations for lead and arsenic; aluminum was non-detectable in April. However, the DL's established by Bureau Veritas' QA/QC system were above the PAL for the three metals. BV reviewed the QC data in July but was unable to adjust the DL for lead or arsenic (Filtered Data Posted 9/2011). This well was sampled in August for aluminum, lead and arsenic; methods used achieved legitimate detection levels at or below the state PALs.

SKANA Aluminum Company, 2009 Mirro Drive, Manitowoc, Wisconsin
BRRTS # 02-36-544601 BRRTS # 02-36-550138 BRRTS # 02-36-555268

Well ID	Northing	Easting	Top of Casing Elevation	Ground Elevation	Longitude	Latitude	Static Water Level (TOC)	Groundwater Elevation	ALTA/ACSM Land Title Survey by Andrew Czerwonka
MW - 06.08	313899.61'	241535.33'	607.33	604.3	W87° 37' 40.8"	N44° 07' 40.0"	11.35	595.98	Static Water Level Date: August 27,2011 (1030-1230)

Installation (Year):	2006
Installed by:	Envirotech Contracting - NLS

Only Detected Concentrations Exceeding NR 140 Preventive Action Limits (PAL) are Reported

"Analyzed - RL" Indicates No Parameters Above Reported LOD/Reporting Limit

NR 140 Enforcement Standard (ES)

Summary of Analytical Data

Sample Analysis Date	Lab	Metals		PAL	ES	PCB's		PAL	ES	VOC's		PAL	ES	DRO, SVOC's & PAH's		PAL	ES
		Metal	µ\L	µ\L	µ\L	Aroclor	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L
6/5/2006	NLS	Lead	3.7	1.5	15	Not Analyzed				Toluene	0.53	160	800	Not Analyzed			
		Barium	54	400	2000												
9/29/2006	NLS	Analyzed - NR				Not Analyzed				cis-1,2-Dichloroethene	200	7	70	Analyzed - NR			
										Trans-1,2- DCE	10	20	100				
										Vinyl chloride	3.3	0.02	0.2				
										TCE	120	0.5	5				
10/24/2010	BV	Not Analyzed				Not Analyzed				1,1-Dichloroethene	1.6	0.7	7	Not Analyzed			
										cis-1,2-Dichloroethene	340	7	70				
										TCE	170	0.5	5				
										1,1-DCE	1.6	0.7	7				
										Trans-1,2- DCE	18	20	100				
										Vinyl chloride	6	0.02	0.2				
4/5/2011	BV	Aluminum	1,900	40	200	Not Analyzed				cis-1,2-Dichloroethene	130	7	70	Not Analyzed			
										TCE	110	0.5	5				
September 2011	NLS	Aluminum	220	40	200	Not Analyzed				Not Analyzed				Not Analyzed			

Narrative:

This well was installed during the Phase 2 ESA for Koenig & Vits. Samples collected in September 2006, October 2010, and April show a consistent level of TCE and degradtion products. No additionl sampling for VOC's is planned. A high level of aluminum was detected in April 2011; the well will be included in the attempt during the final round of sampling to better define the extent of aluminum contamination throughout the site (Filtered Data Posted 9/2011).

SKANA Aluminum Company, 2009 Mirro Drive, Manitowoc, Wisconsin

BRRTS # 02-36-544601 BRRTS # 02-36-550138 BRRTS # 02-36-555268

Well ID	Northing	Easting	Top of Casing Elevation	Ground Elevation	Longitude	Latitude	Static Water Level (TOC)	Groundwater Elevation	ALTA/ACSM Land Title Survey by Andrew Czerwonka
MW - 06.11	313728.51'	241268.29'	605.52	602.5	W87° 37' 36.7"	N44° 07' 36.8"	11.14	594.38	Static Water Level Date: August 27,2011 (1030-1230)

Installation (Year):	2006
Installed by:	Envirotech Contracting - NLS

Only Detected Concentrations Exceeding NR 140 Preventive Action Limits (PAL) are Reported

"Analyzed - RL" Indicates No Parameters Above Reported LOD/Reporting Limit

NR 140 Enforcement Standard (ES)

Summary of Analytical Data

Sample Analysis Date	Lab	Metals		PAL	ES	PCB's		PAL	ES	VOC's		PAL	ES	DRO, SVOC's, PAH's, Phthalates		PAL	ES
		Metal	µ\L	µ\L	µ\L	Aroclor	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L
6/5/2006	NLS	Lead	2.1	1.5	15	Not Analyzed				Methylene chloride	0.55	0.5	5	Not Analyzed			
		Barium	39	400	2000					Benzene	0.23	0.5	5				
										Xylene	0.69	400	2000				
										Toluene	1.6	160	800				
9/29/2006	NLS	Barium	39	400	2000	Not Analyzed				1,3-DCB	0.31	120	600	Analyzed for PAH's - RL			
										cis-1,2-Dichloroethene	1.8	7	70				
										Trans-1, 2-DCE	0.19	20	100				
										Toluene	1.6	160	800				
										TCE	0.98	0.5	5				
4/5/2011	BV	Nickel	6	20	100	Not Analyzed				Not Analyzed				Not Analyzed			
12/13/2011	BV	Not Analyzed				Not Analyzed				Not Analyzed				Analyzed for PAH's - RL			
														Analyzed for Phthalates - RL			

Narrative:

This well was installed during the Phase 2 ESA for Koenig & Vits. The sampling done in 2006 indicated that all parameters were non-detectable at stated DL's that were at or below the PALs. No additional sampling of this well is planned.

SKANA Aluminum Company, 2009 Mirro Drive, Manitowoc, Wisconsin

BRRTS # 02-36-544601 BRRTS # 02-36-550138 BRRTS # 02-36-555268

Well ID	Northing	Easting	Top of Casing Elevation	Ground Elevation	Longitude	Latitude	Static Water Level (TOC)	Groundwater Elevation	ALTA/ACSM Land Title Survey by Andrew Czerwonka
MW - 06.15	313657.413'	240975.369'	607.07	604.17	W87° 37' 48.249"	N44° 07' 37.490"	9.3	597.77	Static Water Level Date: August 27,2011 (1030-1230)

Installation (Year):	2006
Installed by:	Envirotech Contracting - NLS

Only Detected Concentrations Exceeding NR 140 Preventive Action Limits (PAL) are Reported

"Analyzed - RL" Indicates No Parameters Above Reported LOD/Reporting Limit

NR 140 Enforcement Standard (ES)

Summary of Analytical Data

Sample Analysis Date	Lab	Metals		PAL	ES	PCB's		PAL	ES	VOC's		PAL	ES	DRO, SVOC's & PAH's		PAL	ES
		Metal	µ\L	µ\L	µ\L	Aroclor	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L
6/5/2006	NLS	Arsenic	0.85	1	10	Not Analyzed				cis--1,2-Dichloroethene	690	7	70	Not Analyzed			
		Barium	56	400	2000					TCE	110	0.5	5				
										Trans-1,2- DCE	20	20	100				
9/29/2006	NLS	Arsenic	1	1	10	Not Analyzed				1,3-DCB	0.2			Analyzed for PAH's - RL			
		Barium	99	400	2000					Toluene	0.21	160	800				
10/24/2010	BV	Arsenic	<5	1	10	Not Analyzed				Not Analyzed				Not Analyzed			
4/5/2011	BV	Aluminum	<100	40	200	Not Analyzed				Not Analyzed				Not Analyzed			
		Arsenic	<5	1	10												
September 2011	NLS	Aluminum	10	40	200	Not Analyzed				Not Analyzed				Not Analyzed			
		Arsenic	1.8	1	10												

Narrative:

This well was installed during the Phase 2 ESA for Koenig & Vits. The sampling done in October 2010 and April 2011 (Rounds 1 & 2) showed non-detectable concentrations of arsenic;. however, the DL established by Bureau Veritas' QA/QC system was above the PAL. BV reviewed the QC data in July but the DL for arsenic could not be adjusted. This well was sampled in August for aluminum and arsenic (Filtered Data Posted 9/2011) to achieve legitimate detection levels at or below the state PALs, and to better define the aluminum contamination across the site.

SKANA Aluminum Company, 2009 Mirro Drive, Manitowoc, Wisconsin

BRRTS # 02-36-544601 BRRTS # 02-36-550138 BRRTS # 02-36-555268

Well ID	Northing	Easting	Top of Casing Elevation	Ground Elevation	Longitude	Latitude	Static Water Level (TOC)	Groundwater Elevation	ALTA/ACSM Land Title Survey by Andrew Czerwonka
MW - 06.16	313574.754'	241816.914'	604.05	604.33	W87° 37' 36.711"	N44° 07' 36.682"	4.02	600.03	Static Water Level Date: August 27,2011 (1030-1230)

Installation (Year):	2006
Installed by:	Envirotech Contracting - NLS

Only Detected Concentrations Exceeding NR 140 Preventive Action Limits (PAL) are Reported

"Analyzed - RL" Indicates No Parameters Above Reported LOD/Reporting Limit

NR 140 Enforcement Standard (ES)

Summary of Analytical Data

Sample Analysis Date	Lab	Metals		PAL	ES	PCB's		PAL	ES	VOC's		PAL	ES	DRO, SVOC's & PAH's		PAL	ES
		Metal	µ\L	µ\L	µ\L	Aroclor	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L
6/5/2006	NLS	Barium	74	400	2000	Not Analyzed				Not Analyzed				Not Analyzed			
9/29/2006	NLS	Barium	65	400	2000	Not Analyzed				Analyzed - RL				Not Analyzed			
10/24/2010	BV	Not Analyzed				Not Analyzed				Analyzed - RL				Not Analyzed			
4/5/2011	BV	Not Analyzed				Not Analyzed				Analyzed - RL				Not Analyzed			
September 2011	BV	Lead	<1	1.5	15	Not Analyzed				Not Analyzed				Not Analyzed			

Narrative:

This well was installed during the Phase 2 ESA for Koenig & Vits. It was analyzed for metals and VOC's in 2006; all results were ND. However, a sample collected at TW-06.21 contained lead at a concentration slightly above the PAL. This well, the closest permenant well to TW-06.21, was tested in August for lead (Filtered Data Posted 9/2011) to establish credible data for the GW in the area.

SKANA Aluminum Company, 2009 Mirro Drive, Manitowoc, Wisconsin

BRRTS # 02-36-544601 BRRTS # 02-36-550138 BRRTS # 02-36-555268

Well ID	Northing	Easting	Top of Casing Elevation	Ground Elevation	Longitude	Latitude	Static Water Level (TOC)	Groundwater Elevation	ALTA/ACSM Land Title Survey by Andrew Czerwonka
MW - 08.22	313763.6397'	241429.4301'	604.62	605.03			8.11	596.51	Static Water Level Date: April 2011

Installation (Year):	2010
Installed by:	Cardinal Env./JBI

Only Detected Concentrations Exceeding NR 140 Preventive Action Limits (PAL) are Reported

"Analyzed - NR" indicates no parameters detected above the PAL

NR 140 Enforcement Standard (ES)

Summary of Analytical Data

Sample Analysis Date	Lab	Metals		PAL	ES	PCB's		PAL	ES	VOC's		PAL	ES	DRO, SVOC's & PAH's		PAL	ES
		Metal	µ\L	µ\L	µ\L	Aroclor	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L
10/24/2010	BV	Not Analyzed				Not Analyzed				Analyzed - NR				Not Analyzed			
4/5/2011	BV	Lead	<1	1.5	15	Not Analyzed				Analyzed - NR				Benzo(a)pyrene	0.02	0.02	0.2
		Arsenic	<5	1	10									Analyzed All Others - NR			
		Analyzed All Others - NR															

Narrative:

This well was installed during 2011 to further evaluate vertical groundwater migration in the vicility of MW-06.04. While MW-06.04 showed consistent concentrations of cis-1,2,-dichloroethylene and TCE, MW-08.22 was ND for all VOC's. No additional sampling is planned for this well.

SKANA Aluminum Company, 2009 Mirro Drive, Manitowoc, Wisconsin

BRRTS # 02-36-544601 BRRTS # 02-36-550138 BRRTS # 02-36-555268

Well ID	Northing	Easting	Top of Casing Elevation	Ground Elevation	Longitude	Latitude	Static Water Level (TOC)	Groundwater Elevation	ALTA/ACSM Land Title Survey by Andrew Czerwonka
MW - 08.24	314008.580'	241539.995'	601.88	602.22	W87° 37' 40.513"	N44° 07' 40.963"	5.63	596.25	Static Water Level Date: August 27,2011 (1030-1230)

Installation (Year):	2010
Installed by:	Cardinal Env./JBI

Only Detected Concentrations Exceeding NR 140 Preventive Action Limits (PAL) are Reported

"Analyzed - NR" indicates no parameters detected above the PAL

NR 140 Enforcement Standard (ES)

Summary of Analytical Data

Sample Analysis Date	Lab	Metals		PAL	ES	PCB's		PAL	ES	VOC's		PAL	ES	DRO, SVOC's & PAH's		PAL	ES
		Metal	µ\L	µ\L	µ\L	Aroclor	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L
10/24/2010	BV	Not Analyzed				Not Analyzed				Analyzed - RL				Not Analyzed			
4/5/2011	BV	Not Analyzed				Not Analyzed				Analyzed - RL				Not Analyzed			
September 2011		Not Analyzed				Not Analyzed				Not Analyzed				Not Analyzed			

Narrative:

This well was installed during 2011 to evaluate vertical groundwater migration. The well was sampled in October 2010 and April 2011; all results were below DL's. No further sampling is being planned for this well.

SKANA Aluminum Company, 2009 Mirro Drive, Manitowoc, Wisconsin

BRRTS # 02-36-544601 BRRTS # 02-36-550138 BRRTS # 02-36-555268

Well ID	Northing	Easting	Top of Casing Elevation	Ground Elevation	Longitude	Latitude	Static Water Level (TOC)	Groundwater Elevation	ALTA/ACSM Land Title Survey by Andrew Czerwonka
MW - 08.26	313741.437'	241637.078'	602.23	602.59	W87° 37' 39.178"	N44° 07' 38.326"	2.18	600.05	Static Water Level Date: August 27,2011 (1030-1230)

Installation (Year):	2010
Installed by:	Cardinal Env./JBI

Only Detected Concentrations Exceeding NR 140 Preventive Action Limits (PAL) are Reported

"Analyzed - NR" indicates no parameters detected above the PAL

NR 140 Enforcement Standard (ES)

Summary of Analytical Data

Sample Analysis Date	Lab	Metals		PAL	ES	PCB's		PAL	ES	VOC's		PAL	ES	DRO, SVOC's & PAH's		PAL	ES
		Metal	µ\L	µ\L	µ\L	Aroclor	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L	Compound	µ\L	µ\L	µ\L
10/24/2010	BV	Arsenic	<5	1	10	Not Analyzed				cis-1,2-Dichloroethene	66	7	70	Not Analyzed			
		Lead	<3	1.5	15					TCE	3.4	0.5	5				
										Vinyl chloride	2.5	0.02	0.2				
										trans-1, 2-Dichloroethene	1.9	20	100				
4/4/2011	BV	Not Analyzed				Not Analyzed				cis-1,2-Dichloroethene	7.8	7	70	Not Analyzed			
										TCE	0.8	0.5	5				
September 2011	BV	Not Analyzed				Not Analyzed				cis-1,2-Dichloroethene	19	7	70	Not Analyzed			
										TCE	1.7	0.5	5				
										Vinyl chloride	1.6	0.02	0.2				

Narrative:

This well was installed during 2011 to evaluate vertical groundwater migration in the vicinity of MW-06.05. The well exhibited very low concentrations of cis-1,2,dichloroethene and TCE, just above the PAL, while MW-06.05 was ND for all compounds. This well was sampled to better understand conditions in the screened zone.