

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

Form 4400-237 (R 10/21)

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Notice: Use this form to request a **written response (on agency letterhead)** from the Department of Natural Resources (DNR) regarding technical assistance, a post-closure change to a site, a specialized agreement or liability clarification for Property with known or suspected environmental contamination. A fee will be required as is authorized by s. 292.55, Wis. Stats., and NR 749, Wis. Adm. Code., unless noted in the instructions below. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Public Records law [ss. 19.31 - 19.39, Wis. Stats.].

Definitions

"Property" refers to the subject Property that is perceived to have been or has been impacted by the discharge of hazardous substances.

"Liability Clarification" refers to a written determination by the Department provided in response to a request made on this form. The response clarifies whether a person is or may become liable for the environmental contamination of a Property, as provided in s. 292.55, Wis. Stats.

"Technical Assistance" refers to the Department's assistance or comments on the planning and implementation of an environmental investigation or environmental cleanup on a Property in response to a request made on this form as provided in s. 292.55, Wis. Stats.

"Post-closure modification" refers to changes to Property boundaries and/or continuing obligations for Properties or sites that received closure letters for which continuing obligations have been applied or where contamination remains. Many, but not all, of these sites are included on the GIS Registry layer of RR Sites Map to provide public notice of residual contamination and continuing obligations.

Select the Correct Form

This form should be used to request the following from the DNR:

- Technical Assistance
- Liability Clarification
- Post-Closure Modifications
- Specialized Agreements (tax cancellation, negotiated agreements, etc.)

Do not use this form if one of the following applies:

- Request for an **off-site liability exemption or clarification** for Property that has been or is perceived to be contaminated by one or more hazardous substances that originated on another Property containing the source of the contamination. Use DNR's Off-Site Liability Exemption and Liability Clarification Application Form 4400-201.
- Submittal of an Environmental Assessment for the **Lender Liability Exemption**, s 292.21, Wis. Stats., **if no response or review by DNR is requested**. Use the Lender Liability Exemption Environmental Assessment Tracking Form 4400-196.
- Request for an **exemption to develop on a historic fill site** or licensed landfill. Use DNR's Form 4400-226 or 4400-226A.
- **Request for closure** for Property where the investigation and cleanup actions are completed. Use DNR's Case Closure - GIS Registry Form 4400-202.

All forms, publications and additional information are available on the internet at: dnr.wi.gov/topic/Brownfields/Pubs.html.

Instructions

1. Complete sections 1, 2, 6 and 7 for all requests. Be sure to provide adequate and complete information.
2. Select the type of assistance requested: Section 3 for technical assistance or post-closure modifications, Section 4 for a written determination or clarification of environmental liabilities; or Section 5 for a specialized agreement.
3. Include the fee payment that is listed in Section 3, 4, or 5, unless you are a "Voluntary Party" enrolled in the Voluntary Party Liability Exemption Program **and** the questions in Section 2 direct otherwise. Information on to whom and where to send the fee is found in Section 8 of this form.
4. Send the completed request, supporting materials and the fee to the appropriate DNR regional office where the Property is located. See the map on the last page of this form. A paper copy of the signed form and all reports and supporting materials shall be sent with an electronic copy of the form and supporting materials on a compact disk. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>

The time required for DNR's determination varies depending on the complexity of the site, and the clarity and completeness of the request and supporting documentation.

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Section 1. Contact and Recipient Information

Requester Information

This is the person requesting technical assistance or a post-closure modification review, that his or her liability be clarified or a specialized agreement and is identified as the requester in Section 7. DNR will address its response letter to this person.

Last Name Brown	First Joe	MI	Organization/ Business Name Wisconsin Aluminum Foundry Co.
Mailing Address 838 S. 16th Street		City Manitowoc	State WI
		ZIP Code 54220	
Phone # (include area code) (608) 515-4549	Fax # (include area code)	Email jbbrown@wafco.com	

The requester listed above: (select all that apply)

- | | |
|---|---|
| <input type="checkbox"/> Is currently the owner | <input type="checkbox"/> Is considering selling the Property |
| <input type="checkbox"/> Is renting or leasing the Property | <input checked="" type="checkbox"/> Is considering acquiring the Property |
| <input type="checkbox"/> Is a lender with a mortgagee interest in the Property | |
| <input type="checkbox"/> Other. Explain the status of the Property with respect to the applicant: | |

Contact Information (to be contacted with questions about this request)

Select if same as requester

Contact Last Name Brown	First Joe	MI	Organization/ Business Name Wisconsin Aluminum Foundry Co.
Mailing Address 838 S. 16th Street		City Manitowoc	State WI
		ZIP Code 54220	
Phone # (include area code) (608) 515-4549	Fax # (include area code)	Email jbbrown@wafco.com	

Environmental Consultant (if applicable)

Contact Last Name Olson	First Bruce	MI	Organization/ Business Name Short Elliott Hendrickson, Inc.
Mailing Address 10 N. Bridge Street		City Chippewa Falls	State WI
		ZIP Code 54729	
Phone # (include area code) (715) 271-7515	Fax # (include area code)	Email bolson@sehinc.com	

Attorney (if applicable)

Contact Last Name	First	MI	Organization/ Business Name
Mailing Address		City	State
		ZIP Code	
Phone # (include area code)	Fax # (include area code)	Email	

Property Owner (if different from requester)

Contact Last Name Tegen	First Adam	MI	Organization/ Business Name City of Manitowoc
Mailing Address 900 Quay Street		City Manitowoc	State WI
		ZIP Code 54220	
Phone # (include area code) (920) 686-6930	Fax # (include area code)	Email ategen@manitowoc.org	

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Section 2. Property Information

Property Name MIRRO PLT 9 (FORMER) - LGU		FID No. (if known) 436033730	
BRRTS No. (if known) 02-36-545108	Parcel Identification Number		
Street Address 1512 Washington Street	City Manitowoc	State WI	ZIP Code 54220
County Manitowoc	Municipality where the Property is located <input checked="" type="radio"/> City <input type="radio"/> Town <input type="radio"/> Village of Manitowoc	Property is composed of: <input checked="" type="radio"/> Single tax parcel <input type="radio"/> Multiple tax parcels	Property Size Acres

1. Is a response needed by a specific date? (e.g., Property closing date) Note: Most requests are completed within 60 days. Please plan accordingly.

No Yes

Date requested by: _____

Reason:

2. Is the "Requester" enrolled as a Voluntary Party in the Voluntary Party Liability Exemption (VPLE) program?

No. **Include the fee that is required for your request in Section 3, 4 or 5.**

Yes. **Do not include a separate fee.** This request will be billed separately through the VPLE Program.

Fill out the information in Section 3, 4 or 5 which corresponds with the type of request:

Section 3. Technical Assistance or Post-Closure Modifications;

Section 4. Liability Clarification; or Section 5. Specialized Agreement.

Section 3. Request for Technical Assistance or Post-Closure Modification

Select the type of technical assistance requested: [**Numbers in brackets are for WI DNR Use**]

- No Further Action Letter (NFA) (Immediate Actions) - NR 708.09, [183] - Include a fee of \$350. Use for a written response to an immediate action after a discharge of a hazardous substance occurs. Generally, these are for a one-time spill event.
- Review of Site Investigation Work Plan - NR 716.09, [135] - **Include a fee of \$700.**
- Review of Site Investigation Report - NR 716.15, [137] - **Include a fee of \$1050.**
- Approval of a Site-Specific Soil Cleanup Standard - NR 720.10 or 12, [67] - **Include a fee of \$1050.**
- Review of a Remedial Action Options Report - NR 722.13, [143] - **Include a fee of \$1050.**
- Review of a Remedial Action Design Report - NR 724.09, [148] - **Include a fee of \$1050.**
- Review of a Remedial Action Documentation Report - NR 724.15, [152] - **Include a fee of \$350**
- Review of a Long-term Monitoring Plan - NR 724.17, [25] - **Include a fee of \$425.**
- Review of an Operation and Maintenance Plan - NR 724.13, [192] - **Include a fee of \$425.**

Other Technical Assistance - s. 292.55, Wis. Stats. [97] (For request to build on an abandoned landfill use Form 4400-226)

- Schedule a Technical Assistance Meeting - **Include a fee of \$700.**
- Hazardous Waste Determination - **Include a fee of \$700.**
- Other Technical Assistance - **Include a fee of \$700.** Explain your request in an attachment.

Post-Closure Modifications - NR 727, [181]

- Post-Closure Modifications: Modification to Property boundaries and/or continuing obligations of a closed site or Property; sites may be on the GIS Registry. This also includes removal of a site or Property from the GIS Registry. **Include a fee of \$1050, and:**
 - Include a fee of \$300 for sites with residual soil contamination; and
 - Include a fee of \$350 for sites with residual groundwater contamination, monitoring wells or for vapor intrusion continuing obligations.

Attach a description of the changes you are proposing, and documentation as to why the changes are needed (if the change to a Property, site or continuing obligation will result in revised maps, maintenance plans or photographs, those documents may be submitted later in the approval process, on a case-by-case basis).

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- Skip Sections 4 and 5 if the technical assistance you are requesting is listed above and complete Sections 6 and 7 of this form.

Section 4. Request for Liability Clarification

Select the type of liability clarification requested. Use the available space given or attach information, explanations, or specific questions that you need answered in DNR's reply. Complete Sections 6 and 7 of this form. **[Numbers in brackets are for DNR Use]**

- "Lender" liability exemption clarification - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the real Property, and/or the personal Property and fixtures;
- (2) an environmental assessment, in accordance with s. 292.21, Wis. Stats.;
- (3) the date the environmental assessment was conducted by the lender;
- (4) the date of the Property acquisition; for foreclosure actions, include a copy of the signed and dated court order confirming the sheriff's sale.
- (5) documentation showing how the Property was acquired and the steps followed under the appropriate state statutes.
- (6) a copy of the Property deed with the correct legal description; and,
- (7) the Lender Liability Exemption Environmental Assessment Tracking Form (Form 4400-196).
- (8) If no sampling was done, please provide reasoning as to why it was **not** conducted. Include this either in the accompanying environmental assessment or as an attachment to this form, and cite language in s. 292.21(1)(c)2., h.-i., Wis. Stats.:
 - h. The collection and analysis of representative samples of soil or other materials in the ground that are suspected of being contaminated based on observations made during a visual inspection of the real Property or based on aerial photographs, or other information available to the lender, including stained or discolored soil or other materials in the ground and including soil or materials in the ground in areas with dead or distressed vegetation. The collection and analysis shall identify contaminants in the soil or other materials in the ground and shall quantify concentrations.
 - i. The collection and analysis of representative samples of unknown wastes or potentially hazardous substances found on the real Property and the determination of concentrations of hazardous waste and hazardous substances found in tanks, drums or other containers or in piles or lagoons on the real Property.

- "Representative" liability exemption clarification (e.g. trustees, receivers, etc.) - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the Property;
- (2) the date of Property acquisition by the representative;
- (3) the means by which the Property was acquired;
- (4) documentation that the representative has no beneficial interest in any entity that owns, possesses, or controls the Property;
- (5) documentation that the representative has not caused any discharge of a hazardous substance on the Property; and
- (6) a copy of the Property deed with the correct legal description.

- Clarification of local governmental unit (LGU) liability exemption at sites with: (select all that apply)

- hazardous substances spills - s. 292.11(9)(e), Wis. Stats. [649];
- Perceived environmental contamination - [649];
- hazardous waste - s. 292.24 (2), Wis. Stats. [649]; and/or
- solid waste - s. 292.23 (2), Wis. Stats. [649].

❖ **Include a fee of \$700, a summary of the environmental liability clarification being requested, and the following:**

- (1) clear supporting documentation showing the acquisition method used, and the steps followed under the appropriate state statute(s).
- (2) current and proposed ownership status of the Property;
- (3) date and means by which the Property was acquired by the LGU, where applicable;
- (4) a map and the ¼, ¼ section location of the Property;
- (5) summary of current uses of the Property;
- (6) intended or potential use(s) of the Property;
- (7) descriptions of other investigations that have taken place on the Property; and
- (8) (for solid waste clarifications) a summary of the license history of the facility.

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Section 4. Request for Liability Clarification (cont.)

- Lease liability clarification - s. 292.55, Wis. Stats. [646]
- ❖ **Include a fee of \$700 for a single Property, or \$1400 for multiple Properties and the information listed below:**
 - (1) a copy of the proposed lease;
 - (2) the name of the current owner of the Property and the person who will lease the Property;
 - (3) a description of the lease holder's association with any persons who have possession, control, or caused a discharge of a hazardous substance on the Property;
 - (4) map(s) showing the Property location and any suspected or known sources of contamination detected on the Property;
 - (5) a description of the intended use of the Property by the lease holder, with reference to the maps to indicate which areas will be used. Explain how the use will not interfere with any future investigation or cleanup at the Property; and
 - (6) all reports or investigations (e.g. Phase I and Phase II Environmental Assessments and/or Site Investigation Reports conducted under s. NR 716, Wis. Adm. Code) that identify areas of the Property where a discharge has occurred.

General or other environmental liability clarification - s. 292.55, Wis. Stats. [682] - Explain your request below.

- ❖ **Include a fee of \$700 and an adequate summary of relevant environmental work to date.**

- No Action Required (NAR) - NR 716.05, [682]

- ❖ **Include a fee of \$700.**

Use where an environmental discharge has or has not occurred, and applicant wants a DNR determination that no further assessment or clean-up work is required. Usually this is requested after a Phase I and Phase II environmental assessment has been conducted; the assessment reports should be submitted with this form. This is not a closure letter.

- Clarify the liability associated with a "closed" Property - s. 292.55, Wis. Stats. [682]

- ❖ **Include a fee of \$700.**

- Include a copy of any closure documents if a state agency other than DNR approved the closure.

Use this space or attach additional sheets to provide necessary information, explanations or specific questions to be answered by the DNR.

Please see attachment.

Section 5. Request for a Specialized Agreement

Select the type of agreement needed. Include the appropriate draft agreements and supporting materials. Complete Sections 6 and 7 of this form. More information and model draft agreements are available at: dnr.wi.gov/topic/Brownfields/Igu.html#tabx4.

- Tax cancellation agreement - s. 75.105(2)(d), Wis. Stats. [654]

- ❖ **Include a fee of \$700, and the information listed below:**

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description.

- Agreement for assignment of tax foreclosure judgement - s.75.106, Wis. Stats. [666]

- ❖ **Include a fee of \$700, and the information listed below:**

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description.

- Negotiated agreement - Enforceable contract for non-emergency remediation - s. 292.11(7)(d) and (e), Wis. Stats. [630]

- ❖ **Include a fee of \$1400, and the information listed below:**

- (1) a draft schedule for remediation; and,
- (2) the name, mailing address, phone and email for each party to the agreement.

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Section 6. Other Information Submitted

Identify all materials that are included with this request.

Send both a paper copy of the signed form and all reports and supporting materials, and an electronic copy of the form and all reports, including Environmental Site Assessment Reports, and supporting materials on a compact disk.

Include one copy of any document from any state agency files that you want the Department to review as part of this request. The person submitting this request is responsible for contacting other state agencies to obtain appropriate reports or information.

- Phase I Environmental Site Assessment Report - Date: _____
- Phase II Environmental Site Assessment Report - Date: _____
- Legal Description of Property (required for all liability requests and specialized agreements)

Map of the Property (required for all liability requests and specialized agreements)

Analytical results of the following sampled media: Select all that apply and include date of collection.

Groundwater Soil Sediment Other medium - Describe: _____

Date of Collection: _____

- A copy of the closure letter and submittal materials
- Draft tax cancellation agreement
- Draft agreement for assignment of tax foreclosure judgment
- Other report(s) or information - Describe: _____

For Property with newly identified discharges of hazardous substances only: Has a notification of a discharge of a hazardous substance been sent to the DNR as required by s. NR 706.05(1)(b), Wis. Adm. Code?

- Yes - Date (if known): _____
- No

Note: The Notification for Hazardous Substance Discharge Form - Non-Emergency Only (Form 4400-225) is accessible through the RR Program Submittal Portal application. Directions for using the form and the Submittal Portal application are available on the [Submittal Portal web page](#).

Section 7. Certification by the Person who completed this form

- I am the person submitting this request (requester)
- I prepared this request for: Wisconsin Aluminum Foundry Co.
Requester Name

I certify that I am familiar with the information submitted on this request, and that the information on and included with this request is true, accurate and complete to the best of my knowledge. I also certify I have the legal authority and the applicant's permission to make this request.

Signature

Principal, Regional Practice Center Leader

Title

05/24/2023

Date Signed

715.271.7515

Telephone Number (include area code)

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Section 8. DNR Contacts and Addresses for Request Submittals

Send or deliver one paper copy and one electronic copy on a compact disk of the completed request, supporting materials, and fee to the region where the property is located to the address below. Contact a [DNR regional brownfields specialist](#) with any questions about this form or a specific situation involving a contaminated property. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>.

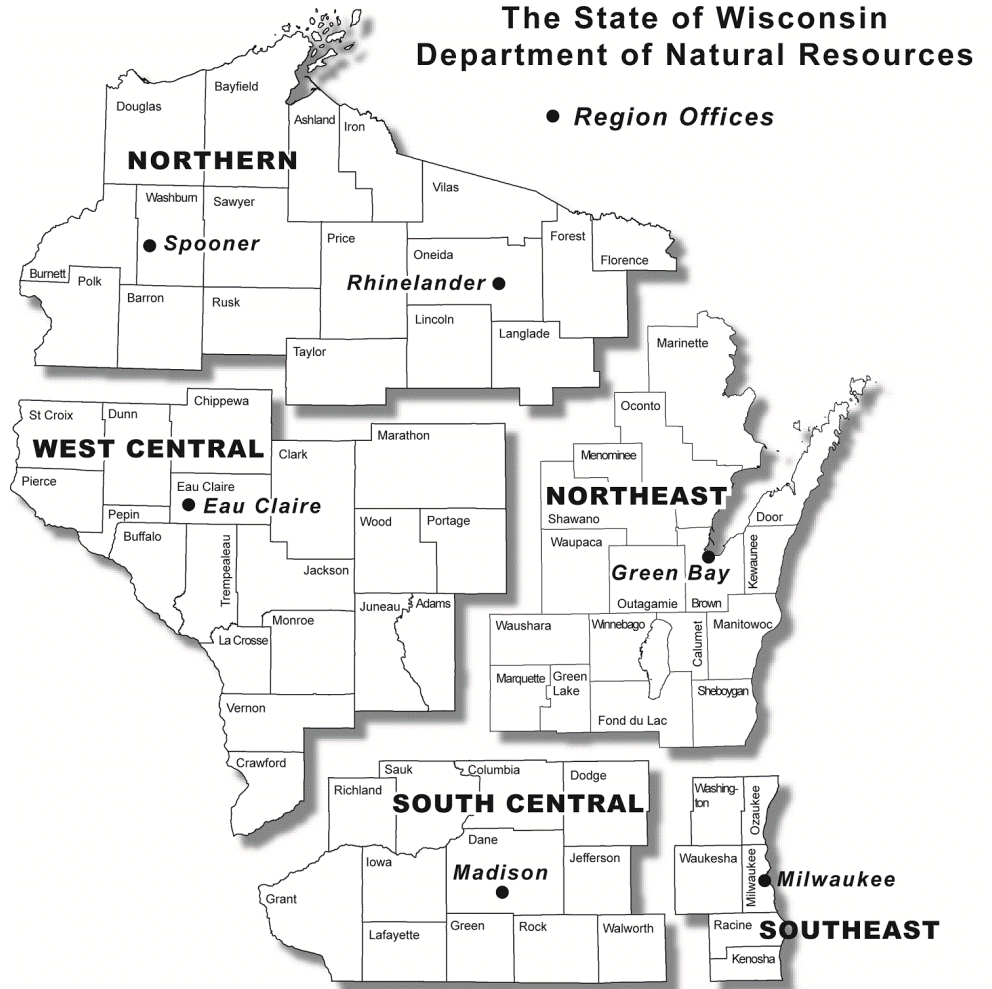
DNR NORTHERN REGION
 Attn: RR Program Assistant
 Department of Natural Resources
 223 E Steinfest Rd Antigo, WI 54409

DNR NORTHEAST REGION
 Attn: RR Program Assistant
 Department of Natural Resources
 2984 Shawano Avenue
 Green Bay WI 54313

DNR SOUTH CENTRAL REGION
 Attn: RR Program Assistant
 Department of Natural Resources
 3911 Fish Hatchery Road
 Fitchburg WI 53711

DNR SOUTHEAST REGION
 Attn: RR Program Assistant
 Milwaukee DNR Office
 1027 West St. Paul Ave
 Milwaukee WI 53233

DNR WEST CENTRAL REGION
 Attn: RR Program Assistant
 Department of Natural Resources
 1300 Clairemont Ave.
 Eau Claire WI 54702



Note: These are the Remediation and Redevelopment Program's designated regions. Other DNR program regional boundaries may be different.

DNR Use Only			
Date Received	Date Assigned	BRRTS Activity Code	BRRTS No. (if used)
DNR Reviewer		Comments	
Fee Enclosed? <input type="radio"/> Yes <input type="radio"/> No	Fee Amount \$	Date Additional Information Requested	Date Requested for DNR Response Letter
Date Approved	Final Determination		



Building a Better World
for All of Us®

May 24, 2023

RE: Wisconsin Aluminum Foundry Co.
Request for Technical Assistance –
General Liability Clarification for Former
Mirro Site
SEH No. 170479 14.00

Tauren Beggs
Hydrogeologist
Wisconsin Department of Natural Resources
2984 Shawano Ave.
Green Bay, WI 54313-6727

Dear Mr. Beggs:

On behalf of Wisconsin Aluminum Foundry Co. (WAF), Short Elliott Hendrickson Inc. (SEH®) is submitting this Technical Assistance Request to the Wisconsin Department of Natural Resources (WDNR) related to the property located at 1512 Washington Street in Manitowoc, Manitowoc County, Wisconsin. This property is currently listed with the WDNR as Bureau for Remediation and Redevelopment Tracking System (BRRTS) No. 02-36-545108, MIRRO PLT 9 (FORMER) – LGU (the Site). WAF is considering the potential acquisition of a portion of the Site, and the following sections describe the site setting, proposed property acquisition, and general liability clarification questions.

Site Setting and Proposed Property Acquisition

The Site is an approximately 3.72 acre parcel located in the City of Manitowoc, Manitowoc County, Wisconsin. The City of Manitowoc currently owns the property. According to the [City of Manitowoc Zoning Map](#), the northern portion of the property is zoned for heavy industrial land use, while the southern portion of the property is zoned for multiple-family district. The Site was formerly operated by the Mirro Company for heavy industrial operations and manufacturing of aluminum cookware. The Site was listed as an Environmental Repair Program (ERP) case with the WDNR in March 2006, and site investigation activities are ongoing at the Site.

WAF currently operates an aluminum foundry at the northwest corner of the intersection of S. 16th Street and Franklin Street (838 S. 16th Street) in the City of Manitowoc, Manitowoc County, Wisconsin. WAF is considering the potential acquisition of the approximately northern one-half of the Site, consisting of the northern 270' (north-south) of the Site by the entire width (east-west) of the Site. In the short term, WAF anticipates utilizing the property for paved parking. Future potential property use by WAF may include the construction of a storage building, which would not be occupied by WAF personnel. The approximate extent of the proposed property to be acquired by WAF is shown on Figure 1.

General Liability Clarification Questions

As WAF considers the potential acquisition, WAF requests clarification on general environmental liability with respect to the Site, its ongoing investigation activities and future remedial actions that may be required by WDNR, and WAF's proposed uses of the property. These general liability questions are

Engineers | Architects | Planners | Scientists

Short Elliott Hendrickson Inc., 10 North Bridge Street, Chippewa Falls, WI 54729-2550

715.720.6200 | 800.472.5881 | 888.908.8166 fax | sehinc.com

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discussed below, and WAF would appreciate WDNR addressing other liability-related issues not asked below but that WDNR is aware of or may consider based on its role as the regulatory agency overseeing the Site investigation and cleanup activities.

Based on an online meeting held between WDNR, WAF, and SEH on May 2, 2023, a comprehensive summary of the relevant environmental work completed at the Site to date has not been included. These general liability questions have been generated based primarily on a review of the NR 716 Site Investigation Report (Ramboll, 2022) found on BRRTS on the Web (BOTW) for the Site, and these questions are specifically with respect to WAF's potential acquisition of the northern portion of the Site depicted on Figure 1.

- **Question 1 – Site Investigation:** The Site appears to currently be in the site investigation phase of the Wis. Adm. Code NR 700 process. If WAF were to acquire the northern portion of the Site during the ongoing site investigation activities, how would that affect WAF's liability? What would be required of WAF, by WDNR, with respect to the current and any future site investigation activities being completed on WAF's potential portion of the Site?
- **Question 2 – Remedial Actions:** As remedial actions have not yet been completed for the Site, how does that affect WAF's liability? What would be required of WAF, by WDNR, with respect to any future remedial actions being completed on WAF's potential portion of the Site?
- **Question 3 – Remedial Action led by Responsible Party:** Newell Operating Company (Newell), as the currently identified Responsible Party (RP), is currently conducting the investigation activities for the Site. What is WAF's liability as the current RP is conducting the investigation and subsequent cleanup? What is WAF's potential or actual liability if the RP no longer continues to make acceptable progress in the Wis. Adm. Code NR 700 process or ceases to be a viable RP?
- **Question 4 – Long-Term Operation, Monitoring, and Maintenance:** As the remedial actions to be completed for the Site have not yet been determined and have the potential to range significantly in spatial and temporal scales, how does that affect WAF's liability and any future requirements of WAF by the WDNR? For example, if monitoring wells or treatment system equipment were to remain on-site for long-term monitoring or operation, how does that affect WAF's liability? Additionally, if a direct contact cover would be required for the Site, what is WAF's liability with respect to cap maintenance and inspections?
- **Question 5 – Property Use:** How does the planned use as a paved parking area affect WAF's liability? If WAF were to construct a storage building in the future, how does that affect WAF's liability? If the subgrade structures that remain in place at the site (including tunnels, building foundations, and pits) were to be encountered during WAF's use of the property, either in establishing a paved parking area or in constructing a storage building, how does that affect WAF's liability?
- **Question 6 – Construction:** What is WAF's liability or obligation during construction of a parking area or other development, especially if a remedy (such as a direct contact cover) has not been approved by WDNR at the time of purchase or planned construction? How would WDNR engage in WAF's development and construction plans?

- **Question 7 – Reopening Closed Cases:** There are several BRRTS cases listed with the WDNR for the Site, of which only one is currently an open ERP case. Under what conditions would the WDNR potentially consider reopening the closed cases for the Site, and how would that affect WAF's liability?
- **Question 8 – Other Regulatory Programs:** Can the WDNR comment on any additional potential liability clarifications under other (non-NR 700) WDNR regulatory programs or other federal, state, or local regulatory programs? Are there any such other local, state, or federal regulatory programs that the WDNR is aware of and for which WDNR would recommend WAF seek liability clarification?
- **Question 9 – Other Ownership Scenarios:** What is WAF's liability or obligation under other occupancy scenarios (i.e., lease, lease to own) that may be considered?

Closing

SEH has prepared this letter on behalf of WAF to request the WDNR's clarification on potential environmental liabilities associated with a potential acquisition of the northern portion of the Site (Figure 1). The Technical Assistance, Environmental Liability Clarification, or Post-Closure Modification Request form (WDNR Form 4400-237) is attached, and the required "Other Technical Assistance" review fee of \$700 will be submitted under separate cover. The WDNR's timely review of this request is appreciated.

If you have any questions or require additional information, please contact me via email (bolson@sehinc.com) or via phone (715.271.7515).

Sincerely,

SHORT ELLIOTT HENDRICKSON INC.

Bruce Olson, P.E. (Lic. IN, IL, WI)
Principal, Regional Practice Center Leader

AMR/BKO

Attachment: Figure 1 – Proposed Property Acquisition
WDNR Form 4400-237

c: Joe Brown, Wisconsin Aluminum Foundry Co.

Path: X:\UZ\W\WALU170479\5-final-dsgn\51-drawings\90-GIS\Maps\Fig1_Site_Layout.mxd



0 75 150 Feet

Project: WIALU 170479
Print Date: 5/19/2023

Map by: msteuernagel
Projection: Manitowoc County
Coordinates
Source: ESRI, GeoData WIS,
Manitowoc County

PROPOSED PROPERTY ACQUISITION

Former Mirro Plant 9 (BRRTS No. 02-36-545108)
1512 Washington Street, Manitowoc, Wisconsin

Figure
1

This map is neither a legally recorded map nor a survey map and is not intended to be used as one. This map is a compilation of records, information, and data gathered from various sources listed on this map and is to be used for reference purposes only. SEH does not warrant that the Geographic Information System (GIS) Data used to prepare this map are error free, and SEH does not represent that the GIS Data can be used for navigational, tracking, or any other purpose requiring exacting measurement of distance or direction or precision in the depiction of geographic features. The user of this map acknowledges that SEH shall not be liable for any damages which arise out of the user's access or use of data provided.