

FV STEEL AND WIRE COMPANY
5430 LBJ Freeway, Suite 1700
Dallas, Texas 75240
(972) 458-0028

October 4, 2016

VIA EMAIL AND US MAIL

Ms. Jennifer Borski
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
625 E. County Road Y, STE. 700
Oshkosh, Wisconsin 54901-9731
Jennifer.borski@wisconsin.gov

RE: Correction of Responsible Party for BRRS Activity No. 02-45-560221

Dear Ms. Borski,

I am writing on behalf of FV Steel and Wire Company ("FV Steel and Wire") to request that the Wisconsin Department of Natural Resources ("WDNR") identify FV Steel and Wire as the responsible party for BRRS Activity No. 02-45-560221, rather than Keystone Consolidated Industries, Inc. ("Keystone"), the parent company of FV Steel and Wire. FV Steel and Wire, not Keystone, is the owner and past operator of the subject property at 111 N. Douglas St., Hortonville, WI. Any documents submitted to WDNR by AECOM regarding this Site should have been submitted on behalf of FV Steel and Wire. To the extent they were not, this was an error.

As set forth in more detail below, the subject property has been owned by FV Steel and Wire (formerly known as Wire Products, Inc. and other names) since 1948. FV Steel and Wire conducted manufacturing operations on the property from 1948 until 2001. The property has never been owned by Keystone. Keystone has never owned or operated any property in Hortonville, WI. Accordingly, because Keystone has never owned or operated the subject property, Keystone is not responsible for any violations relating to the subject property. Any remediation obligations are solely the responsibility of FV Steel and Wire and the listing should reflect that fact.

1. Corporate History of FV Steel and Wire

FV Steel and Wire is a Wisconsin Corporation, is in good standing, and has been in continuous existence since 1948. Attached as Exhibit "A" is the certificate of good standing. The Wisconsin Department of Financial Institutions identifies the corporation now known as FV Steel and Wire as a "Domestic Business" with Entity ID "1W06737." This corporation was originally incorporated in 1948 as "Wire Products, Inc." In 1982, the corporation changed its name to "Wire Products Company." In 1995, it changed its name to "Fox Valley Steel and Wire Company." In 2001, it changed its name to "FV Steel and Wire Company." Attached as Exhibit "B" is the relevant entry from the Wisconsin Department of Financial Institutions website setting forth this chronology and identifying all prior names used by this corporation. As shown in this attachment, this corporation has never been known as "Keystone Consolidated Industries, Inc.", "Keystone", or any name containing the word Keystone.

The Wisconsin Department of Financial Institutions has a separate listing for Keystone Consolidated Industries, Inc., which is correctly identified as a "Foreign Business Corporation," organized in the State of Delaware. The Department has assigned Keystone Entity ID "2K00433." This corporation has never been named Wire Products, Inc., Wire Products Company, Fox Valley Steel and Wire Company, or FV Steel and Wire Company. Attached as Exhibit "C" is the relevant entry from the Wisconsin Department of Financial Institutions website setting forth this chronology and identifying all prior names used by this corporation.

2. Ownership of the Subject Parcel

FV Steel and Wire (f/k/a Wire Products, Inc.; Entity ID 1W06737) has continuously owned the subject property since 1948. It is our understanding that you may have seen a reference to Keystone in the County property ownership database, so we ordered a chain of title report to verify and confirm the chain of ownership for this property. Please see the enclosed chain of title report prepared by EDR verifying that Wire Products, Inc. purchased the property from a Mr. and Mrs. Schwebs in 1948. The ownership of the property has remained with that entity since that time. The report thus confirms that FV Steel and Wire is the current owner of the property, and that FV Steel and Wire has continuously owned the property since 1948. The report also establishes that Keystone has never owned the subject property. Attached as Exhibit "D" is a copy of the chain of title report for the subject property.

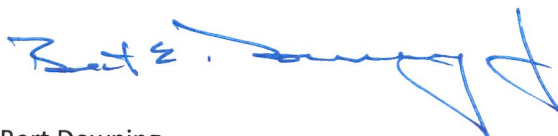
3. There is No Legal Basis for Keystone to be Named as the Responsible Entity

Because Keystone has never owned or operated the subject property, and the remediation activities at the property are being funded entirely by FV Steel and Wire, Keystone should not be named as the responsible party. Because it has never owned or operated the subject property, Keystone has never possessed, controlled or caused a hazardous discharge at the property. See Wis. Stat. 292.11(3). Any documents submitted to WDNR should have been submitted by FV Steel and Wire, not Keystone. To the extent they were not, this was an error, and we apologize for any confusion this error may have caused.

FV Steel and Wire Company is preparing to sell the property and appreciates the WDNR's cooperation in correcting the responsible party designation at this site as soon as possible by revoking the responsible party letter that was sent to Keystone Consolidated Industries, Inc. and issuing a new (or clarification) responsible party letter to FV Steel and Wire Company to me at the address above.

Thank you for your prompt attention to this matter. Please feel free to contact me or Courtney Riley at 972-448-1466 if you have any questions or would like to discuss this matter further.

Regards,



Bert Downing
Vice President and Treasurer

cc: Courtney Riley (FV Steel and Wire)
Steve Schubring (AECOM) steve.schubring@aecom.com

Exhibit A

United States of America
State of Wisconsin

DEPARTMENT OF FINANCIAL INSTITUTIONS

Division of Corporate & Consumer Services



To All to Whom These Presents Shall Come, Greeting:

I, GEORGE PETAK, Administrator of the Division of Corporate and Consumer Services, Department of Financial Institutions, do hereby certify that

F V STEEL AND WIRE COMPANY

is a domestic corporation or a domestic limited liability company organized under the laws of this state and that its date of incorporation or organization is April 28, 1948.

I further certify that said corporation or limited liability company has, within its most recently completed report year, filed an annual report required under ss. 180.1622, 180.1921, 181.1622 or 183.0120 Wis. Stats., and that it has not filed articles of dissolution.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the official seal of the Department on May 16, 2016.

A handwritten signature in cursive script that reads "George Petak".

GEORGE PETAK, Administrator
Division of Corporate and Consumer Services
Department of Financial Institutions

DFI/Corp/33

To validate the authenticity of this certificate

Visit this web address: <http://www.wdfi.org/apps/ccs/verify/>

Enter this code: **176278-81FBD0C7**

Exhibit B

Wisconsin Department of Financial Institutions

Strengthening Wisconsin's Financial Future

Search for:

[Search](#)
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[Name Availability](#)

Corporate Records

Result of lookup for **1W06737** (at 9/28/2016 4:21 PM)

F V STEEL AND WIRE COMPANY

You can: [File an Annual Report](#) - [Request a Certificate of Status](#) - [File a Registered Agent/Office Update Form](#)

Vital Statistics

Entity ID 1W06737

Registered Effective Date 04/28/1948

Period of Existence PER

Status Restored to Good Standing [Request a Certificate of Status](#)

Status Date 05/20/1988

Entity Type Domestic Business

Annual Report Requirements Business Corporations are required to file an Annual Report under s.180.1622 WI Statutes.

Addresses

Registered Agent Office CORPORATION SERVICE COMPANY
 8040 EXCELSIOR DRIVE
 SUITE 400
 MADISON , WI 53717

[File a Registered Agent/Office Update Form](#)

Principal Office 5430 LBJ FREEWAY, SUITE 1700
 DALLAS , TX 75240

Historical Information

Annual Reports

Year	Reel	Image	Filed By	Stored On
2016	000	0000	online	database
2015	000	0000	online	database
2014	000	0000	online	database
2013	000	0000	online	database

2012	000	0000	online	database
2011	000	0000	online	database
2010	000	0000	online	database
2009	000	0000	online	database
2008	000	0000	online	database
2007	000	0000	online	database
2006	000	0000	online	database
2005	000	0000	online	database
2004	000	0000	online	database
2003	000	0000	online	database
2002	000	0000	online	database
2001	013	1088	paper	microfilm
2000	010	2094	paper	microfilm
1999	012	0241	paper	microfilm
1998	014	0528	paper	microfilm
1997	014	2496	paper	microfilm
1996	012	0365	paper	microfilm
1995	010	0961	paper	microfilm
1994	010	1460	paper	microfilm

[File an Annual Report](#) - [Order a Document Copy](#)

Certificates of Newly-elected Officers/Directors

Year	Reel	Image	Filed By	Stored On
1980	153	0348	paper	microfilm

[Order a Document Copy](#)

Old Names

Change Date	Name
Current	F V STEEL AND WIRE COMPANY
01/29/2001	FOX VALLEY STEEL AND WIRE COMPANY
03/17/1995	WIRE PRODUCTS COMPANY
04/02/1982	WIRE PRODUCTS INC.

Chronology

Effective Date	Transaction	Filed Date	Description
04/28/1948	Incorporated/Qualified/Registered	04/28/1948	
12/09/1952	Amendment	12/09/1952	
07/14/1953	Change of Registered Agent	07/14/1953	
04/18/1966	Change of Registered Agent	04/18/1966	
12/14/1972	Change of Registered Agent	12/14/1972	
09/13/1977	Change of Registered Agent	09/13/1977	

07/16/1980	Change of Registered Agent	07/16/1980	
04/02/1982	Amendment	04/02/1982	NAME CHG
04/01/1983	In Bad Standing	04/01/1983	
05/16/1983	Restored to Good Standing	05/16/1983	
02/20/1984	Change of Registered Agent	02/20/1984	
10/16/1986	Change of Registered Agent	10/16/1986	
04/01/1988	In Bad Standing	04/01/1988	
05/20/1988	Restored to Good Standing	05/20/1988	
09/11/1990	Change of Registered Agent	09/11/1990	
03/17/1995	Amendment	03/17/1995	NAME CHG
01/29/2001	Amendment	02/01/2001	Old Name = FOX VALLEY STEEL AND WIRE COMPANY
06/11/2002	Change of Registered Agent	06/11/2002	FM16-E-Form
07/01/2003	Change of Registered Agent	07/01/2003	Bulk Filing-Image
06/27/2006	Change of Registered Agent	06/27/2006	FM16-E-Form
10/04/2006	Change of Registered Agent	10/10/2006	
07/02/2007	Change of Registered Agent	07/02/2007	FM16-E-Form
05/01/2008	Change of Registered Agent	05/01/2008	Bulk Filing
06/13/2008	Change of Registered Agent	06/13/2008	FM16-E-Form
07/01/2011	Change of Registered Agent	07/01/2011	FM16-E-Form
05/01/2014	Change of Registered Agent	05/01/2014	BULK FILING

[Order a Document Copy](#)

Exhibit C

Wisconsin Department of Financial Institutions

Strengthening Wisconsin's Financial Future

Search for:

2k00433

Search Records

[Search](#)
[Advanced Search](#)
[Name Availability](#)

Corporate Records

Result of lookup for **2K00433** (at 10/4/2016 2:41 PM)

KEYSTONE CONSOLIDATED INDUSTRIES, INC.

You can: [File an Annual Report](#) - [Request a Certificate of Status](#) - [File a Registered Agent/Office Update Form](#)

Vital Statistics

Entity ID	2K00433
Registered Effective Date	12/16/1968
Period of Existence	PER
Status	Withdrawal Request a Certificate of Status
Status Date	11/29/1985
Entity Type	Foreign Business Corporation
Annual Report Requirements	Foreign Business Corporations are required to file an Annual Report under s.180.1622 WI Statutes.
Foreign Organization Date	05/18/1955
Paid Capital Represented	\$304,000
Foreign State	DE

Addresses

Registered Agent Office
 C T CORPORATION SYSTEM
 222 W WASHINGTON AVE
 MADISON , WI 53703
[File a Registered Agent/Office Update Form](#)

Principal Office
 100 W. TENTH STREET
 WILMINGTON , DE 19801
 UNITED STATES OF AMERICA

Historical Information

Annual Reports

Year	Reel	Image	Filed By	Stored On
1984	057	1018	paper	microfilm
1983	060	0187	paper	microfilm

[File an Annual Report](#) - [Order a Document Copy](#)

Exhibit D

EDR Chain of Title

The EDR Chain of Title Report tracks a line of successive owners from the present back to 1940 of a particular parcel of property, linked together by recorded transactions which pass title. Available nationwide, this report provides a summary of a property's ownership history and is a valuable source for determining the prior uses of a property.

A network of professional abstractors following established procedures, uses client supplied address information to locate:

- Historical Chain of Title research
- Leases and Miscellaneous

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EDR Chain of Title

TARGET PROPERTY INFORMATION

ADDRESS

Fox Valley Steel and Wire
111 N Douglas St
Hortonville, WI 54944

Research Source

Source 1: County Recorder of Deeds Outagamie County, WI
Source 2: NA
Examiner's Note: Public records of Outagamie County, WI were searched from January 1, 1940 to September 9, 2016, and no other deeds vesting title in the subject property were found of record during the period searched.

PROPERTY DESCRIPTION

Current Owner: Wire Products Company a/k/a FV Steel and Wire Company
Legal Description: As recorded in the deed below.
Property Identifiers: APN: 24-0-0311-00
General Comments:

HISTORICAL CHAIN OF TITLE

See Exhibit "A"

LEASES AND MISCELLANEOUS

See Exhibit "B"

EDR Chain of Title

Chain of Title

Exhibit "A"

EDR Chain of Title

LEASES and MISCELLANEOUS

Exhibit "B"

This Indenture, Made by Victor Schwabs and Alice Schwabs, his wife, VOL 354 PAGE 117

grantors of Hortonville, Outagamie County, Wisconsin, hereby convey and warrant to ~~the undersigned~~ Wire Products, Inc.

grantee of Chicago, Cook Illinois County/Wisconsin, for the sum of One Dollar (\$1.00) and other valuable consideration the following tract of land in Outagamie County, State of Wisconsin;

A parcel of land containing 6.64 acres in the Northwest Quarter of the Southwest Quarter of Section 35, Township 22 North, Range 15 East, Village of Hortonville, Outagamie County, Wisconsin, described as follows: Beginning at an iron stake in the east and west quarter section line and 200 feet West from the Northeast corner of the Northwest Quarter of the Southwest Quarter of said Section 35; thence West on said quarter section line 771.2 feet to the northerly line of the right of way of the C. and N. W. Rys Company; thence South-easterly on the northerly line of said right of way 1203 feet to the east line of the Northwest quarter of the said Southwest quarter; thence north on said east line 440 feet more or less to a point that is 247 feet South of the quarter Section line; thence West and parallel to the quarter section line 200 feet to an iron stake; thence North 247 feet to an iron stake on the quarter section line and the place of beginning.

for 21



In Witness Whereof, the said grantors have hereunto set their hand and seal this 22nd day of January, A. D., 1918.

Signed and Sealed in Presence of

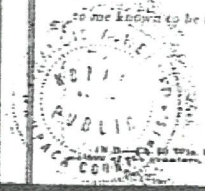
Francis A. Werner (Notary Seal)
M.F. Ziehm (Notary Seal)
Victor Schwabs (Seal)
Alice Schwabs (Seal)

State of Wisconsin, Outagamie County, ss.

Personally came before me, this 22nd day of January, A. D., 1918, the above named Victor Schwabs and Alice Schwabs, his wife,

and known to be the person who executed the foregoing instrument and acknowledged the same.

Francis A. Werner
Notary Public, Waupaca County, Wis.
My Commission expires July 15, A. D., 1919.



62856

No. _____

Victor Schwaba and Wife

Hortonville, Wisconsin

To

WIRE PRODUCTS, INC.

Gloucestergrove, Wisconsin

WARRANTY DEED

REGISTER'S OFFICE,

State of Wisconsin,

OUTAGAMIE County.

Received for Record this 2nd day of

Aug 19 28

at 9 o'clock P.M. and recorded in

Vol. 354 of Deeds on page 117

S. M. Carter
311 Register of Deeds.

Deputy.

J. W. ...

Autball

1550727

STATE BAR OF WISCONSIN FORM 1 - 1998
WARRANTY DEED

Document Number:

This Deed, made between Wire Products Company n/a F V Steel and Wire Company

Grantor, and Melody M. Genke *Single*

Grantee:
Grantor, for a valuable consideration, conveys and warrants to Grantee the following described real estate in Outagamie County, State of Wisconsin (The "Property")

The East 200 feet of the North 247 feet of the NW 1/4 of the SW 1/4, Section 35, Township 22 North, Range 15 East, Village of Hortonville, Outagamie County, Wisconsin.

OUTAGAMIE COUNTY
RECEIVED FOR RECORD

JUN 13 2003
AT 7:45 O'CLOCK A.M.
JANICE FLENZ
REGISTER OF DEEDS

*pd
\$11.00*

Recording Area
Name and Return Address
Melody Genke
130 Baake
Hortonville, WI 54944

24-0-0310-00
Parcel Identification Number (PIN)
This is not homestead property
 (is not)

TRANSFER
\$ 81.00
FEE

Together with all appurtenant rights, title and interests.

Grantor warrants that the title to the Property is good, indefeasible in fee simple and free and clear of encumbrances except Municipal and zoning ordinances recorded building and use restriction and covenants, the general real estate taxes levied in the year of closing and recorded easements for public utilities.

Dated this 12th day of MAY, 2003

F V Steel and Wire Company

X Bert E. Downing, Jr.
VP - Treasurer

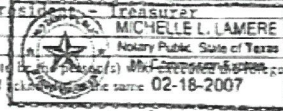
AUTHENTICATION

Signature(s) _____
authenticated this _____ day of _____, 2003

ACKNOWLEDGMENT

STATE OF TEXAS)
) ss
DALLAS County)
Personally came before me this 12th day of
May, 2003 the above named

Bert E. Downing, Jr., the
Vice President - Treasurer



To me known to be the Person(s) who executed this instrument and acknowledged the same 02-18-2007

Michelle L. Lamere
Notary Public, State of Texas
My Commission is permanent (if not, state expiration date)
February 18, 2007

TITLE MEMBER STATE BAR OF WISCONSIN

(If not, _____
authorized by § 766.06, Wis. Stats.)

THIS INSTRUMENT WAS DRAFTED BY
F V, Steel and Wire Company

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

*Names of persons signing in any capacity should be typed or printed below their signatures