



October 21, 2016

BERT DOWNING JR – CFO
KEYSTONE CONSOLIDATED INDUSTRIES INC
5430 LBJ FREEWAY STE 1700
DALLAS TX 75240

Subject: New Determination Regarding Responsible Party at
111 N. Douglas St., Hortonville, Outagamie County, WI
Former DNR BRRTS Site Name: Keystone Consolidated Industries, Inc.
Current DNR BRRTS Site Name: F V Steel and Wire Company
DNR BRRTS # 02-45-560221

Dear Mr. Downing, Jr.:

On April 10, 2013, the Wisconsin Department of Natural Resources (DNR) notified you that volatile organic compounds (VOCs) and polycyclic aromatic hydrocarbons (PAHs) had been detected at 111 North Douglas Street in Hortonville, Outagamie County, Wisconsin (the "Property") as report by United Engineering Consultants, Inc. (UEC) on behalf of Fox Valley Steel & Wire Co. (tenant at Property in 2012). Based on the information submitted to the DNR between 2009 and 2012, Keystone Consolidated Industries, Inc. ("Keystone") was sent a letter on April 10, 2013 explaining its obligations for restoring the environment at the referenced site under s. 292.11, Wisconsin Statutes.

This second letter is being sent to notify Keystone, that based on an evaluation of all the information that is now available to the DNR, Keystone is not required to conduct a site investigation under ch. NR 716, Wis. Adm. Code for the site described above. This is in response to a packet of information received on October 11, 2016 from F V Steel and Wire Company (f.k.a Fox Valley Steel and Wire Company, Wire Products Company and Wire Products Inc.) including the following:

- A narrative of corporate history of "F V Steel and Wire Company" and Property ownership since 1948;
- Certificate of good standing for "F V Steel and Wire Company" from Wisconsin Department of Financial Institutions (DFI);
- DFI Corporate Records for "F V Steel and Wire Company" dated 09/28/2016;
- DFI Corporate Records for "Keystone Consolidated Industries, Inc." dated 10/04/2016; and
- Chain of title results from Environmental Data Resources, Inc.(EDR) for search from January 1, 1940 to September 9, 2016 for the Property.

The Bureau for Remediation and Redevelopment Tracking System ("BRRTS") will now show the activity name for the site described above as "F V STEEL AND WIRE COMPANY". Using the BRRTS identification number, (02-45-560221), you may view the information related to this site at any time (<http://dnr.wi.gov/topic/Brownfields/clean.html>) and use the feedback system to alert us to any errors in the data.

If you want a more detailed written response from the DNR, please be advised that application for a General Liability Clarification (GLC) letter should be submitted along with the *Technical Assistance*,

October 21, 2016
Mr. Bert Downing, Jr.
Keystone Consolidated Industries, Inc.
New Determination Regarding Responsible Party at
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DNR BRRTS # 02-45-560221

Environmental Liability Clarification or Post-Closure Modification Request, Form 4400-237 that is found at the following link: <http://dnr.wi.gov/files/PDF/forms/4400/4400-237.pdf>. In addition, under ch. NR 749, Wis. Adm. Code, a \$700 fee is required for a GLC letter.

Please contact me in Oshkosh by phone at 920-424-7887 or by email at jennifer.borski@wisconsin.gov with any questions.

Sincerely,



Jennifer Borski
Hydrogeologist
Remediation & Redevelopment Program

cc: Courtney Riley, Keystone Consolidated Industries, Inc., criley@valhi.net
Steve Schubring, AECOM, steve.schubring@aecom.com
Registered Agent: C T Corporation System, 222 W. Washington Ave., Madison, WI 53703