

March 11, 2022

Elizabeth Runge
Economic Development Director
1717 E. Park Street
PO Box 87
Two Rivers, WI 54241

**RE: Historical Use and Ownership Assessment to Determine Potentially Responsible Parties
Bright Horizon Properties, LLC (former)
1621 14th Street (formerly 1702 13th St)
Two Rivers, WI
DNR BRRTS Activity # 02-36-589295
DNR FID # 436010300**

Dear Ms. Runge:

At the request of Scott Crawford, Inc., Fehr Graham reviewed historical records for 1621 14th Street, Two Rivers, Wisconsin 54241 (PIN: 053-000-083-011-04) (herein referred to as the Subject Property). The objective of the assessment was to review historical use and ownership information to determine potential responsible parties for the contamination discovered at the Subject Property during a Phase II Environmental Site Assessment (ESA) completed in September 2021.

Fehr Graham has previously completed other environmental work for the Subject Property. The information obtained as a result of this work was reviewed to determine potentially responsible parties. Previous environmental reports and letters used for the review include:

- » Phase I ESA, dated November 17, 2021
- » Phase II ESA, dated November 17, 2021
- » Environmental Lien Search letter, dated January 20, 2022

The results of the potential responsible party assessment are described in the following sections along with attached Figure 1 and Figure 2 for geographical and analytical information.

HISTORICAL INFORMATION SUMMARY

The following Recognized Environmental Conditions (RECs) were determined by the Phase I ESAs that were performed at the Subject Property.

BRRTS Case #02-36-521430, WI DOT EGGERS INDUSTRIES WEST PLT

Continuing obligations for the Subject Property related to the closed Environmental Repair Property (ERP) case WI DOT EGGERS INDUSTRIES WEST PLT (BRRTS 02-36-521430). This ERP case was closed by the Wisconsin Department of Natural Resources on January 10, 2007 with continuing obligations – residual soil contamination and maintain cap over contaminated area. It should be noted, polycyclic aromatic hydrocarbons (PAHs) were identified in soil above relevant standards, including 1- and 2-Methylnaphthalene, and volatile organic compounds (VOCs) were identified in groundwater, including Trimethylbenzene and tetrachloroethylene; however were not detected above standards.

This identified contamination appears to be limited to the far northwest of the Subject Property, at the location of the former warehouse/storage for the collocated historical industrial operations.

Contaminants related to the closed ERP case include PAHs and VOCs.

The responsible party is identified in BRRTS as EGGERS INDUSTRIES JAMES BRUECHERT, TWO RIVERS, WI 54241; however, Eggers Industries, Inc. was acquired by VT Industries, Inc. in 2018.

Railroad and Railroad Spurs

According to historical Sanborn maps, a railroad was constructed through the southeast corner of the Subject Property prior to 1913 and two rail spurs leading to the manufacturing facility on the Property were constructed prior to 1891 (west spur) and 1922 (east spur). Historical aerial photographs depict the railroad and spur remained on the Subject Property through the early 1980s. In addition, one spur and evidence of the former railroad was visible during the site reconnaissance.

The potential for contamination from the railroad and/or railroad spurs appears to be limited to the southeast area of the Subject Property.

Contaminants related to railroad operations and rail spurs, such as those identified on the Subject Property, may be from track treatments, engine emissions, accidental spills, and leaching from rail tracks and ties. In addition, railroad spurs indicate the potential for spills or leaks from train fueling and/or loading/unloading of bulk materials used in manufacturing operations.

As such, potential contaminants include, but are not limited to: Petroleum and Non-petroleum related VOCs and PAHs, Pentachlorophenol (PCP) (from affiliated lumber yard), PCBs, Gasoline Range Organics (GRO), Diesel Range Organics (DRO), and Resource Conservation and Recovery Act (RCRA) Metals.

The potentially responsible party for railroad-related contamination appears to have originally been constructed (circa 1913) to serve the historical south adjoining site's "The Fuel & Supply Company", with the spur to the Subject Property constructed (circa 1922) to extend from the then "Nelson Lumber Company" to the then Subject Property owner "Aluminum Goods Manufacturing Company Plant No. 4", which was rebranded as Mirro Aluminum Company in 1917 and eventually acquired by The Newell Companies in 1983.

Underground Storage Tanks (USTs)

The 1922 Sanborn map depicts at least 11 buried storage tanks on the eastern and central portions of the Subject Property.

- » Three tanks are depicted in the southeastern corner of the Subject Property, south of the former railroad track, including one 8,000-gallon fuel oil tank and two 6,000-gallon fuel oil tanks.
- » Five tanks are depicted southeastern portion of the Subject Property, including three 10,000-gallon fuel oil tanks, one 8,000-gallon fuel oil tank, and one 65-gallon gasoline tank.
- » Three buried tanks of unknown contents (two 220-gallon and one 1,000-gallon) are depicted in the central portion of the Property.

In addition, records on file with the Two Rivers Building Department include a bid document from 1984 with cost estimates for potential removal of two storage tanks during demolition, and a 1962 plant addition building plan which notes the presence of four 1,000-gallon tanks on the Subject Property. However, the UST database records indicate only one 20,000-gallon fuel oil tank was removed from the Subject Property. No information was found to identify if the 11 buried tanks depicted in the 1922 Sanborn Map nor the six storage tanks mentioned in the Building Department files that were ever removed or abandoned.

The locations of these buried storage tanks appear to be limited to the eastern portion and the southeastern corner of the Subject Property.

Contaminants related to the buried storage tanks include the following: Petroleum-related VOCs and PAHs and RCRA Metals.

The responsible party for the 20,000-gallon former UST closed/removed from the Subject Property in 1986 is identified in Wisconsin Department of Agriculture, Trade, and Consumer Protection as Eggers Industries Inc; however, Eggers Industries, Inc. was acquired by VT Industries, Inc. in 2018.

The potentially responsible party for the remaining buried storage tanks identified at the Subject Property appear to have been originally installed (circa 1922) by “Aluminum Goods Manufacturing Company Plant No. 4”, which was rebranded as Mirro Aluminum Company in 1917 and eventually acquired by The Newell Companies in 1983.

Historical Manufacturing Operations

According to the Sanborn Maps, the Subject Property was first developed for industrial purposes prior to 1885. Historical operations included the following list of identified manufacturing conducted on the Subject Property:

- ◇ chair manufacturing (1885 - 1904)
- ◇ mitten factory and glass works (1913 - 1922)
- ◇ aluminum goods manufacturing (1913 - at least 1967)

Details on the Sanborn Maps depict those areas of the Property were used for a sawmill, warehousing, painting, oil storage, machine shop, veneering, metal finishing/polishing, aluminum smelting, coal storage, dust collection, cutting and stamping, and annealing. In addition, multiple buried storage tanks and a creosote block floor in the rolling mill are identified in the 1922 Sanborn map.

Furthermore, records on file with the Two Rivers Building Department indicate the facility contained multiple paint storage rooms, a paint drain, and paint spill vault in a 1984 addition. No information was found regarding the handling of paint waste and/or pumping or inspections of the paint spill vault.

Database records also indicate that the facility was a Large Quantity Generator between at least 1986 and 1992, with one RCRA violation with no additional records reported in 1987, and a Small Quantity Generator between at least 1999 and 2010.

Historical industrial and/or manufacturing operations appear to have been conducted at all areas of the Subject Property.

Contaminants related to the historical manufacturing operations include, but are not limited to, the following: Petroleum-related VOCs and PAHs used in all site operations throughout the site’s history, non-petroleum-related VOCs and PAHs related to various operations across all facilities occupying the site , PCP used in wood treatment, chlorinated solvents, and lead used in paint operations, PCBs from various identified operations, and various metals including RCRA Metals related to the aluminum manufacturing operations.

The potentially responsible party for the historical manufacturing operations appear to have originally been the “Two Rivers Manufacturing Company” prior to and up to 1887, followed by “Aluminum Goods Manufacturing Company Plant No. 4” and “Standard Aluminum Company”, which were rebranded as Mirro Aluminum Company in 1917 and eventually acquired by The Newell Companies (Newell Brands) in 1983, as well as “Eggers Industries, Inc.”, who further developed the site with paint-related facilities in 1984 and occupied the site from 1984 until 2018 when Eggers Industries, Inc. was acquired by VT Industries, Inc.

As a result of the identification of RECs on the Subject Property from the completed Phase I ESA, Fehr Graham conducted a Phase II ESA on the Subject Property, which included soil and groundwater sampling and the following analytes:

Substance	Type
Volatile Organic Compounds	VOC
Polynuclear Aromatic Hydrocarbons	Petroleum
Metals	Metals
Polychlorinated Biphenyl	PCB

The results of the Phase II ESA indicated that historical operations at the Subject Property related to the RECs determined by the Phase I ESA had impacted soil and groundwater at the Subject Property.

As additional due diligence, Fehr Graham conducted an Environmental Lien and Activity Use Limitation (AUL) Search on the Subject Property. Based on the review of the title records, there have been four Subject Property owners since 1980. Mirro Corporation owned the Subject Property since prior to 1980 to 1984, the City of Two Rivers briefly owned the Subject Property in 1984, but quickly granted ownership to Eggers Industries, Inc. Eggers Industries, Inc. owned the Subject Property from 1984 to 2018, when the current owner, Bright Horizons Properties, LLC took ownership from 2018 to the present. See Table A below for details of the chain of title.

Table A: Historical Chain of Title From 1980

Recorded	Grantee	Grantor
June 8, 2018	Bright Horizons Properties, LLC	Eggers Industries, Inc.
June 21, 1984	City of Two Rivers	Mirro Corporation
June 19, 1984	Eggers Industries, Inc.	City of Two Rivers

In addition, the land title records review did not reveal any environmental liens or AULs recorded against or relating to the Subject Property.

CONCLUSION

Based on the review of the historical use and ownership assessment at the Subject Property, the following Potentially Responsible Parties for the contamination have been identified:

- » **VT Industries, Inc.** - VT Industries, Inc. appears to be the most current potentially responsible party for the contamination caused by historical manufacturing operations conducted on the Subject Property. Eggers Industries, acquired by VT Industries, Inc., was identified as the entity operating the Subject Property from 1984 to 2018.
 - ◇ **Potentially Responsible for the following contamination from paint-related industrial manufacturing operations, the closed ERP case, and historical fill materials: VOCs, PAHs, chlorinated VOCs, lead, unknown contaminants from historical fill materials**

- » **Newell Brands** – Newell brands is an additional potential responsible party for the contamination caused by historical manufacturing operations conducted on the Subject Property. Mirro Aluminum Company, also known as Aluminum Manufacturing Company and Standard Aluminum Company, was acquired by Newell Brands. Mirro Aluminum Company was identified as the entity operating the Subject Property from approximately 1913 to 1984. Mirro Aluminum Company used the Subject Property for the longest known duration of time and the most evidence of historical chemical use identified in the Sanborn Maps appears to have been associated with Mirro Aluminum Company.
 - ◇ **Potentially Responsible for the following contamination from aluminum-related industrial manufacturing operations, railroad and rail spur onsite, and underground and buried storage tanks: PVOCs, petroleum-related PAHs, non-petroleum related PAHs, PCBs, GRO, DRO, PCP, chlorinated VOCs, lead, RCRA metals**

- » **Unknown Historical Fill** – It is likely that historical fill material has been placed at the Subject Property throughout the known developed history, since prior to 1885. Historical fill material at the Subject Property may have been used for building construction, structure demolition backfilling, and regrading; however, specific information on the use, location, and source of the fill material was not identified through available records. According to the available Sanborn Maps and aerial photographs for the Subject Property, construction and demolition of various structures and buildings occurred since prior to 1885 to 1974, and the Subject Property was regraded prior to 1986; therefore, the owner of the Subject Property during the time of placement of fill material onsite is indistinguishable as these years (prior to 1885 to 1986) fall within the timeframe for more than one owner. Contamination found throughout the Subject Property may also be caused by and/or co-mingled with the above contamination identified for the Subject Property.
 - ◇ **This contamination is potentially located across the Subject Property, as no information was identified through available records to sufficiently identify any details on the placement of the historical fill materials at the Subject Property, or the source of historical fill materials. Therefore, the contaminated fill placement**

March 11, 2022

Historical Use and Ownership Assessment to Determine Potentially Responsible Parties

1621 14th Street, Two Rivers, Wisconsin 54241

Page 6

on the Subject Property cannot be attributed to a specific responsible party. Contaminants related to historical fill materials are unknown as the characteristics and source(s) of the fill material(s) are unknown. Potential contaminants related to historical fill materials include, but are not limited to: PVOCs, petroleum-related PAHs, non-petroleum related PAHs, PCBs, GRO, DRO, PCP, chlorinated VOCs, lead, RCRA metals.

We trust this letter meets your needs and look forward to hearing from you.

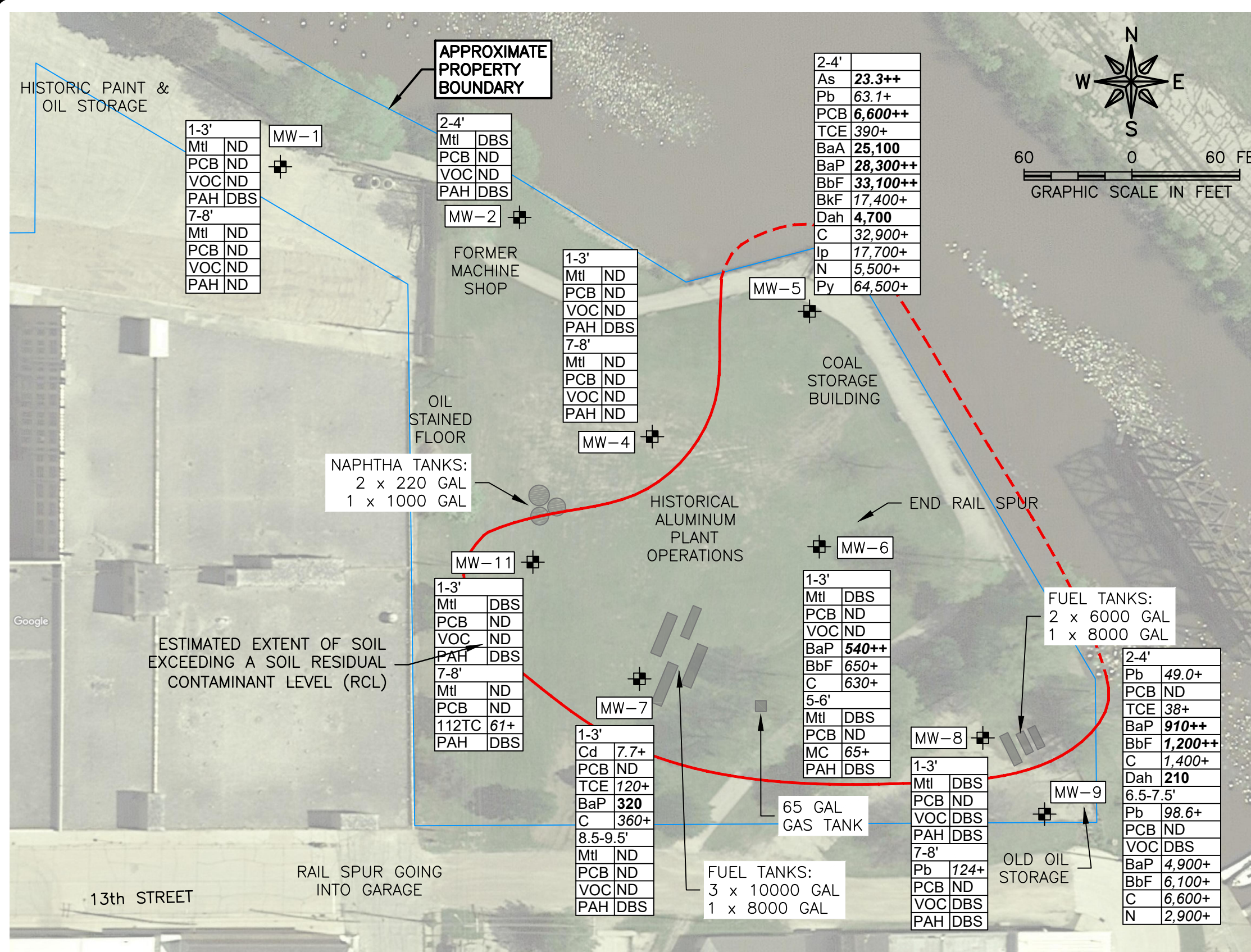
Sincerely,



Matt Dahlem, PG
Branch Manager



Dillon Plamann
Project Hydrogeologist



LEGEND

- ⊕ MONITORING WELL
- As ARSENIC (mg/kg)
- Cd CADMIUM (mg/kg)
- Pb LEAD (mg/kg)
- TCE TRICHLOROETHENE
- MC METHYLENE CHORIDE
- BaA BENZO(a)ANTHRACENE
- BaP BENZO(a)PYRENE
- BbF BENZO(b)FLUORANTHENE
- BkF BENZO(k)FLUORANTHENE
- C CHRYSENE
- Dah DIBENZO(a,h)ANTHRACENE
- Ip INDENO(1,2,3-cd)PYRENE
- N NAPHTHALENE
- Py PYRENE
- Mtl RCRA METALS
- VOC VOLATILE ORGANIC COMPOUNDS
- PCB POLYCHLORINATED BIPHENYLS
- PAH POLYNUCLEAR AROMATIC HYDROCARBONS
- DBS DETECTIONS BELOW STANDARDS
- ND NO DETECTIONS
- ITALICS+* EXCEED GROUNDWATER PATHWAY RCL
- BOLD** EXCEEDS ONLY NON-INDUSTRIAL DIRECT-CONTACT (0-4') RCL
- ITALICS/* EXCEED BOTH PAL & ENFORCEMENT
- BOLD++** STANDARD
- GROUNDWATER FLOW 7/13/21

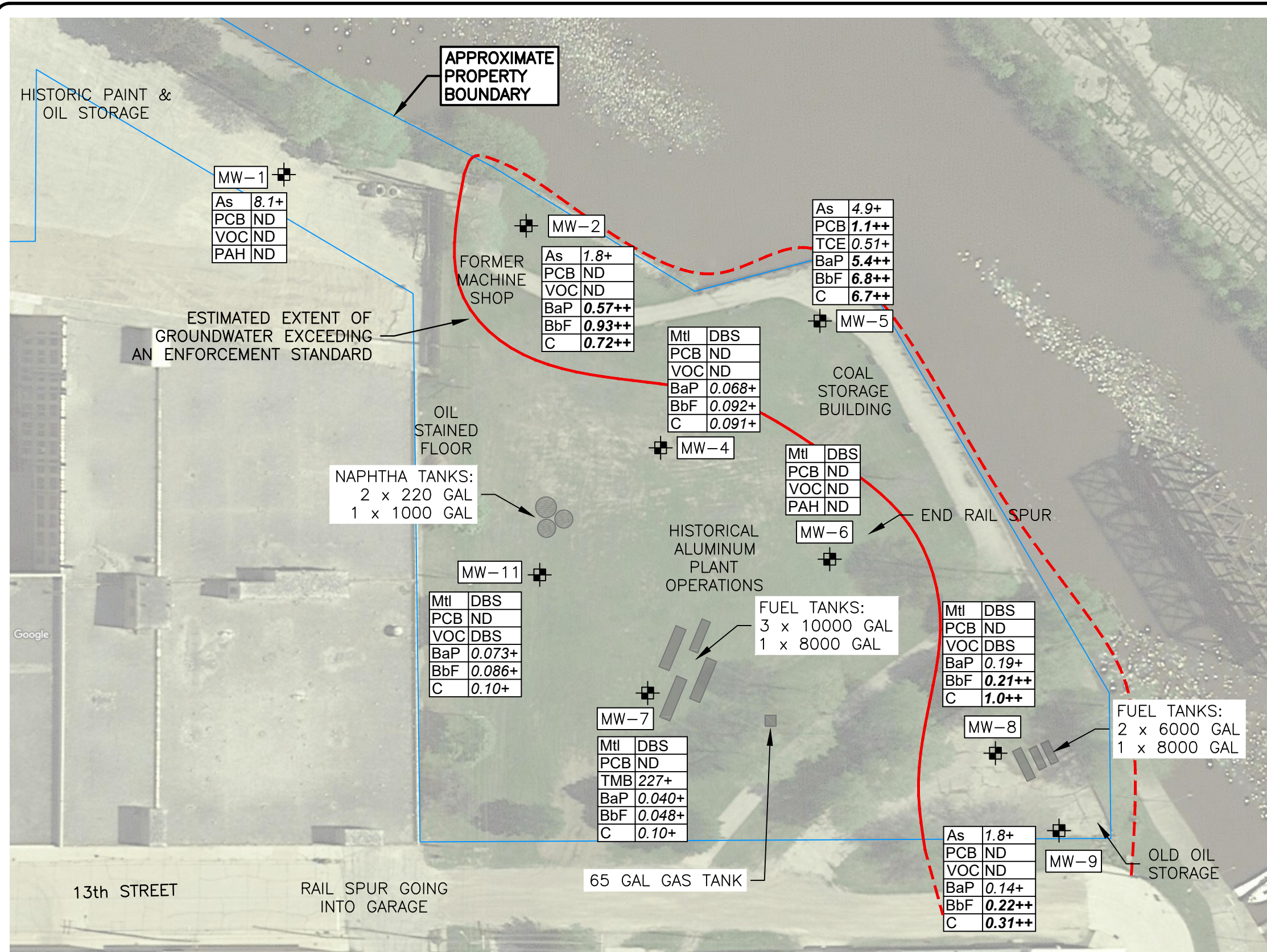
NOTE: RESULTS REPORTED IN ug/kg UNLESS NOTED

FIGURE 1
SOIL CHEMISTRY
 JULY 13, 2021
 1702 13th ST.
 TWO RIVERS, WI 54241
 3/10/22

PARCEL:
 PART OF PROPERTY INDEX NUMBER (PIN)
 05300008301103 CONSISTING OF 5.66 ACRES
 AND LABELED AS "EAST PROPERTY" ON ATTACHED
 "OVERALL SITE PLAN" MAP

FEHR GRAHAM
 ENGINEERING & ENVIRONMENTAL
 ILLINOIS DESIGN FIRM NO. 194-003525
 ILLINOIS
 IOWA
 WISCONSIN
 © 2022 FEHR GRAHAM

G:\C3D\22\22-221\22-221_Design.dwg, Soil Chem_7.13.21
 PLOT DATE: 3/10/22



LEGEND

- ☒ MONITORING WELL
- As ARSENIC
- TCE TRICHLOROETHENE
- TMB TRIMETHYLBENZENES, TOTAL
- BaP BENZO(a)PYRENE
- BbF BENZO(b)FLUORANTHENE
- C CHRYSENE
- Mtl RCRA METALS
- VOC VOLATILE ORGANIC COMPOUNDS
- PCB POLYCHLORINATED BIPHENYLS
- PAH POLYNUCLEAR AROMATIC HYDROCARBONS
- DBS DETECTIONS BELOW STANDARDS
- ND NO DETECTIONS
- ITALICS+* EXCEED PREVENTIVE ACTION LIMIT (PAL)
- ITALICS/* EXCEED BOTH PAL & ENFORCEMENT
- BOLD++** STANDARD (ES)
- GROUNDWATER FLOW DIRECTION 7/13/21

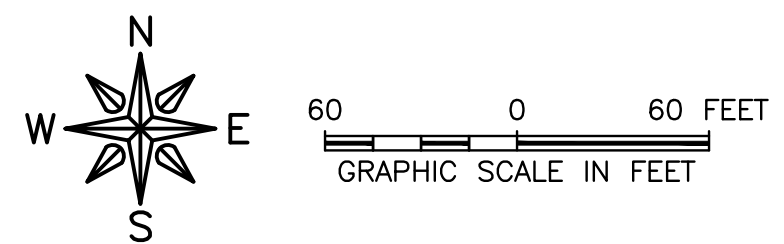
NOTE: RESULTS REPORTED IN ug/L

STORAGE TANK LOCATIONS BASED ON THE 1922 SANBORN MAP. PAINT VAULT LOCATION BASE ON BUILDING DEPARTMENT SITE PLAN DRAWINGS (1984)

LOCATIONS AND ORIENTATION ARE APPROXIMATE. SIZE OF TANKS IS NOT TO SCALE

FIGURE 2
GROUNDWATER CHEMISTRY
 JULY 13, 2021
 1702 13th ST.
 TWO RIVERS, WI 54241

PARCEL:
 PART OF PROPERTY INDEX NUMBER (PIN)
 05300008301103 CONSISTING OF 5.66 ACRES
 AND LABELED AS "EAST PROPERTY" ON ATTACHED
 "OVERALL SITE PLAN" MAP



3/10/22

FEHR GRAHAM
 ENGINEERING & ENVIRONMENTAL
ILLINOIS DESIGN FIRM NO. 194-003525

ILLINOIS
 IOWA
 WISCONSIN