State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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August 9, 2023

Annette Jakubiak
Environmental Coordinator
Master Lock Co., LLC
2600 N 32nd Street
Milwaukee, WI 53210
Via Email Mail Only to ajakubiak@mlock.com

Subject: Master Lock Co., LLC Plant Closing
2600 N 32nd Street, Milwaukee, WI 53210

Dear Ms. Jakubiak,

It has come to the attention of the Wisconsin Department of Natural Resources (DNR) that Master Lock Co., LLC intends to close its facility identified above. The DNR understands this closing will have an impact on Master Lock Co., LLC, and the economic vitality of the community it has served. The purpose of this letter is to provide information regarding the DNR's Wisconsin Plant Recovery Initiative (WPRI), which aims to reduce the adverse effects of such closings and speed up the return of these facilities to productive economic use. Through WPRI, the DNR hopes to proactively work with you and community officials to manage any environmental issues that exist or may arise during closure.

DNR staff resources as well as financial and liability tools are available to assist you. These tools include assistance with environmental issues – for example, potential soil or groundwater contamination – that may have arisen from the use of the property over the years. The DNR has limited federal brownfields assessment funds and contractor services for which you may be eligible to assist with soil and groundwater assessments at plant closings.

Responsibilities
Closing a plant or facility does not alter environmental, health and safety obligations. Based on the DNR's records, it is our understanding that Master Lock Co., LLC has the following environmental conditions present at the property that require further actions prior to closing the plant:

- Aboveground Storage Tanks, Facility ID #419916 – 21580 (2,000 Waste/Used Motor Oil - listed in use), 23366 (5,800 Chemical – listed in use)
- Underground Storage Tanks, Facility ID #419916 – 39602 (2,000 Sand/Gravel/Slurry – listed as Closed Filled with Inert Material), 39631 (2,000 Unknown – listed as Closed Filled with Inert Material), 41305 (150 Other – listed as Closed/Removed), 49926 (1,000 Leaded Gasoline listed as Closed/Removed), 50774 (1,000 Unleaded Gasoline listed as Closed/Removed), 53522 (2,000 Other listed as Closed/Removed), 53523 (2,000 Other listed as Closed/Removed), 53524 (2,000 Other listed as Closed/Removed), 63249 (15,000 Fuel Oil listed as Closed/Removed)
- Large Quantity Hazardous Waste Generator
    - Note – Cathy Baerwald, Hazardous Waste Management Specialist conducted an inspection on June 8, 2021

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- Air Permit #241038820-ROPA
- Pretreatment Permit #0000309-02 (MMSD – coverage since January 2002)
- Wastewater Permit #WI-0046566, discontinued April 14, 2011
- Bureau of Remediation and Tracking System (BRRTS) activities
    - 02-41-000972
    - 02-41-201769 (Open)
    - 02-41-552204
    - 02-41-553429
    - 02-41-563540
    - 02-41-579361 (Open)
    - 03-41-000141
    - 04-41-039550
    - 04-41-039768
    - 04-41-542960
    - 04-41-549540
    - 04-41-550462
    - 04-41-553907
    - 04-41-560439
    - 04-41-578089
    - 09-41-291863

The list above is not exhaustive. It is the responsibility of Master Lock Co., LLC to comply with DNR requirements.

Below are common obligations associated with plant closings for you to consider.

- **Air Permitting and Emission Inventory Reporting**. It is important to notify the DNR when your facility has closed. Based on the date operations cease, there are billing, inspections and reporting obligations that may affect your company.

- **Asbestos management**. Prior to conducting salvage or demolition, contact the DNR to ensure proper management of asbestos issues.

- **Environmental Contamination Requirements.** Wisconsin's Spill Law (Wisconsin Statutes § 292.11) requires owners of properties where there is a hazardous substance discharge, and persons who cause such discharges, to notify the state immediately and take action to restore the environment. If you suspect environmental contamination (e.g., contamination in groundwater or soil) and need financial assistance to conduct an assessment, we may have resources available to assist you. Because Spill Law obligations apply to historical discharges as well as to new owners, a prospective purchaser will want to understand the environmental conditions at a property before acquisition.

- **Solid and Hazardous Waste Management Requirements.** A company should follow local recycling ordinances for recyclable materials and dispose of all remaining non-hazardous solid waste in an approved solid waste management facility. Companies generating or managing listed or characteristic hazardous waste must comply with state and federal laws regarding transportation, storage, treatment and disposal of hazardous wastes.

  Hazardous waste large quantity generator facilities have additional closure requirements and must notify the department prior to closing a facility or a waste accumulation unit using the federal EPA 8700-12 form. The

form and instructions are available on the DNR website. Visit dnr.wi.gov and search "notification of hazardous waste activities." Equipment used to manage hazardous waste, such as pipes, containers, tanks or secondary containment facilities, must be decontaminated and all waste and cleanup residue must be transported off-site to an approved hazardous waste management facility.

- **Other Environmental Responsibilities.** Your facility may be subject to state and federal environmental permits (e.g., storm water, wastewater permits and well abandonment) that involve certain closure requirements, including notification of closure and fee payment to the DNR. Certain reporting obligations may also continue after plant closure.

- **Financial Reporting Disclosures/Sarbanes-Oxley Act.** Recent changes in accounting and disclosure standards may obligate a company to report cleanup costs for contamination related to a plant closure.

DNR Resources and Assistance
The DNR is committed to working with you to help address any environmental issues at your property. Several cleanup and redevelopment tools are available at the state and federal level, including Green Team meetings with experienced DNR and staff, environmental liability protections, environmental assessment grants, cleanup loans and grants, and tax incentives.

Green Team meetings are a collaborative approach that bring business representatives, communities and the DNR together to discuss issues, answer key questions and provide a better understanding of each party's goals and objectives pertaining to the facility/site. Green Team meetings can provide a road map of next steps for the business and community impacted by the facility closure.

The DNR also offers voluntary programs at no charge to support you in maintaining compliance and avoiding future regulatory issues. An Enviro-Check compliance audit uses an independent auditor to help you evaluate your facility's environmental requirements while limiting liability.

Next Steps
While issues surrounding a closing plant or facility are often complicated, we hope Master Lock Co., LLC will work in partnership with the DNR to address any environmental concerns and help return the property to productive use. Additional information on WPRI is available on the DNR's website. Go to dnr.wi.gov and search "WPRI."

If you have any questions regarding this letter or are interested in scheduling a Green Team meeting, please contact me at (608) 219-2148 or Thomas.Coogan@Wisconsin.gov.

Sincerely,

Tom Coogan
Statewide Coordinator, Wisconsin Plant Recovery Initiative
Remediation and Redevelopment Program

cc:
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