

October 25, 2018

**VIA FEDERAL EXPRESS
AND EMAIL**

Tauren R. Beggs
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313

Gabriel M. Rodriguez
(312) 258.5516
grodriguez@schiffhardin.com

**Re: Reported Contamination at Mirro Plt 9 (Former) - Responsibilities of Newell Brands, Inc.
at 1512 Washington Street, Manitowoc, WI**

BRRTS Activity # 02-36-545108

Dear Mr. Beggs:

I am one of the attorneys for Newell Brands Inc. ("the Company") regarding the above-referenced matter. This is Newell Brands Inc.'s response to your September 24, 2018 letter, which we received via email on September 25, 2018.

A thumb-drive with documents containing information responsive to requests 1 and 2 of your letter is enclosed. These documents are Bates numbered **NewellMNine 000001** through **NewellMNine 000171**. We note that we are not reproducing documents that are otherwise publically available on the Wisconsin Department of Natural Resources BRRTS web database for Activity No. 02-36-545108.

With respect to request 3, Newell states that Mirro Corporation was a wholly-owned subsidiary of Newell Operating Company. Mirro Corporation no longer exists.

Newell is continuing its investigation of this matter and reserves the right to supplement this response.

As directed by your letter, Newell contacted the City of Manitowoc Community Development Authority in order to discuss coordinating with the City and its consultant and to secure information about the site. We have not heard back from Mr. Braun. Newell intends to explore coordinating with the City.

Sincerely,



Gabriel M. Rodriguez

GMR/dl
Enclosure

SEE INSTRUCTIONS ON REVERSE SIDE OF COPY 6.



STATE OF WISCONSIN

Chapter 291, Wis. Stats.
Form 4400-66P

Rev. 1-99

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PLEASE TYPE

State of Wisconsin
Department of Natural Resources
Bureau of Waste Management
Box 8094
Madison, WI 53708

FOR DNR USE ONLY

Form designed for use on elite (12-pitch) typewriter.

Form Approved. OMB No. 2050-0039

| | | | | | | | | | |
|---|--|--|--|---|--|---|--|---|--|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator's US EPA ID No. WID006076574 | | Manifest Document No. 15385 | | 2. Page 1 of 1 | | Information in the shaded areas is not required by Federal law. | |
| 3. Generator's Name and Mailing Address Miry Corporation Plant #9 P.O. Box 1330 Manitowish WI 54220 | | | | Site Location If Different 1512 WASHINGTON ST. 1512 WASHINGTON ST. | | A. State Manifest Document Number WIK 113325 | | | |
| 4. Generator's Phone (800) 684-3479 ext 6322 | | | | 6. US EPA ID Number WID988566543 | | B. State Generator's ID | | | |
| 5. Transporter 1 Company Name Superior Special Services Inc | | | | 8. US EPA ID Number | | C. State Transporter's ID | | | |
| 7. Transporter 2 Company Name | | | | 10. US EPA ID Number WID988566543 | | D. Transporter's Phone 1800 688-4005 | | | |
| 9. Designated Facility Name and Site Address Superior Special Services 1275 Mineral Springs Drive Port Washington, WI 53074 | | | | 12. Containers No. Type | | 13. Total Quantity | | 14. Unit Wt/Vol | |
| 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. RA Hazardous Waste Solid, n.o.s. (lead), 9, NA3077, P011 (0008) 0.01 DF | | | | 13. Total Quantity 002.50 P | | 14. Unit Wt/Vol D.O.O.S | | I. Waste No. | |
| J. Additional Descriptions for Materials Listed Above WS# 28714 Approval Code SH300 | | | | K. Handling Codes for Wastes Listed Above | | | | | |
| 15. Special Handling Instructions and Additional Information FRG # 171 Emergency phone # 1(800) 688-4005 | | | | | | | | | |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. | | | | | | | | | |
| Printed/Typed Name & Position Title KAREN A. DEMACK, ENVMT. ENGINEER | | | | Signature Karen A. Demack | | | | Date 03/13/2000 | |
| 17. TRANSPORTER 1 Acknowledgement of Receipt of Materials Printed/Typed Name & Position Title | | | | Signature | | | | Date | |
| 18. TRANSPORTER 2 Acknowledgement of Receipt of Materials Printed/Typed Name & Position Title | | | | Signature | | | | Date | |
| 19. Discrepancy Indication Space | | | | | | | | | |
| 20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. | | | | | | | | | |
| Printed/Typed Name & Position Title | | | | Signature | | | | Date | |

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution: 1 - Generator send to Wis. DNR

4 - Facility retain

Emergency 24 Hour Assistance and Spill Reporting

2 - Generator retain

5 - Facility send to Generator

Telephone Number: (800) 943-0003

3 - Facility send to Wis. DNR

6 - Transporter retain

Copies 1 & 3 mail to Wis. DNR at above address.

NewellMNine000001

COPY 2-
GENERATOR RETAIN

SEE INSTRUCTIONS ON REVERSE SIDE OF COPY 6.



STATE OF WISCONSIN

Chapter 291, Wis. Stats.
Form 4400-66P

Rev. 1-99

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Form Approved. OMB No. 2050-003

| | | | | | | |
|---|--|---|--|---|---|---------------|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator's US EPA ID No. WID006076574 | Manifest Document No. 11313025 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law. | |
| 3. Generator's Name and Mailing Address Mirco Corporation PLANT #9 1512 WASHINGTON ST. PORT WASHINGTON WI 54220 | | Site Location If Different | | A. State Manifest Document Number WI K 113325 | | |
| 4. Generator's Phone (920) 684-3479 ext 6322 | | 6. US EPA ID Number WID988566543 | | B. State Generator's ID | | |
| 5. Transporter 1 Company Name Superior Special Services Inc | | 7. US EPA ID Number | | C. State Transporter's ID | | |
| 7. Transporter 2 Company Name | | 8. US EPA ID Number | | D. Transporter's Phone 1800 688-4000 | | |
| 9. Designated Facility Name and Site Address Superior Special Services 1275 Mineral Springs Drive Port Washington WI 53074 | | 10. US EPA ID Number WID988566543 | | E. State Transporter's ID | | |
| | | | | F. Transporter's Phone | | |
| | | | | G. State Facility's ID | | |
| | | | | H. Facility's Phone (262) 284-8900 | | |
| 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) | | 12. Containers No. | Type | 13. Total Quantity | 14. Unit Wt/Vol | I. Waste No. |
| a. RG Hazardous Waste Solids, a.c.s. (100%), 9, NA3077, PGIII (2008) | | 0.91 | DF | 002.50 | P | D.0.08 |
| b. | | | | | | |
| c. | | | | | | |
| d. | | | | | | |
| J. Additional Descriptions for Materials Listed Above WSH 28714 SO# 22171 | | K. Handling Codes for Wastes Listed Above DX# 0032312062^{CP} | | | | |
| 15. Special Handling Instructions and Additional Information FRG # 171 Emergency phone # 1(800) 688-4005 | | | | | | |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. | | | | | | |
| Printed/Typed Name & Position Title KAREN A. DEMAK, ENVMT. ENGINEER | | Signature <i>Karen A. Demak</i> | | Date 03/13/2010 | | |
| 17. TRANSPORTER 1 Acknowledgement of Receipt of Materials | | | | | | |
| Printed/Typed Name & Position Title ROGER E. SACIA FOREMAN | | Signature <i>Roger E. Sacia</i> | | Date 03/15/2010 | | |
| 18. TRANSPORTER 2 Acknowledgement of Receipt of Materials | | | | | | |
| Printed/Typed Name & Position Title | | Signature | | Date | | |
| 19. Discrepancy Indication Space | | | | | | |
| 20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. | | | | | | |
| Printed/Typed Name & Position Title William Hill Operations Manager | | Signature <i>William Hill</i> | | Date 03/15/2010 | | |

EPA Form 8700/22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution: 1 - Generator send to Wis. DNR
2 - Generator retain

4 - Facility retain
5 - Facility send to Generator
6 - Transporter retain

Emergency 24 Hour Assistance and Spill Reporting

Telephone Number: (800) 943-0003

NewellMNine000002

Copies 1 & 5 mail to Wis. DNR at above address.

COPY 5-

FACILITY SEND TO GENERATOR

LAND DISPOSAL RESTRICTION NOTIFICATION FORM
(AS REQUIRED BY 40 CFR 268.7)

Generator Name: Mirro Corporation
 EPA ID#: _____ MANIFEST #: WIK113325

SECTION 1

This shipment contains wastes bearing USEPA waste codes as noted below which are subject to the land disposal restrictions contained in 40 CFR 268. Specific treatment standards for the waste codes noted are contained in 40 CFR 268.40.

| Waste Stream Number | EPA Waste Code* | Subcategory** if applicable | Wastewater (WW) or Nonwastewater (NWW) |
|---------------------|-----------------|-----------------------------|--|
| <u>28714</u> | <u>D008</u> | | <u>NWW</u> |
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*For F001 - F005 waste codes complete Section 2.
 **Unless otherwise noted all D001 excluding high TOC subcategory, D002, or D012 - D043 waste codes are designated as being in the subcategory: managed in non-CWA/non-CWA equivalent/non-Class 1 SDWA systems, and must be accompanied by an Underlying Hazardous Constituent (UHC) Notification Form (one UHC Form per waste stream).

SECTION 2 F001 - F005 Spent Solvents

| Regulated Constituent | Regulated Constituent | Regulated Constituent |
|----------------------------|------------------------|---------------------------------------|
| Acetone | Ethyl acetate | Pyridine |
| Benzene | Ethyl benzene | Tetrachloroethylene |
| n-Butyl alcohol | Ethyl ether | Toluene |
| Carbon disulfide | Isobutyl alcohol | 1,1,1-Trichloroethane |
| Carbon tetrachloride | Methanol | 1,1,2-Trichloroethane |
| Chlorobenzene | Methylene chloride | Trichloroethylene |
| Cresol (m- and p- isomers) | Methyl ethyl ketone | 1,1,2-Trichloro-1,2,2-trifluoroethane |
| o- Cresol | Methyl isobutyl ketone | Trichloromonofluoro-methane |
| Cyclohexanone | Nitrobenzene | Xylenes (total) |
| o-Dichlorobenzene | | |

I hereby certify that all information contained in this and all attached documents contains true and accurate descriptions of this waste.

Karen A. Demcak
 Signature
KAREN A. DEMCAK
 Printed Name

3-13-00
 Date
ENV. M.T. ENGINEER
 Title

LAND DISPOSAL RESTRICTION NOTIFICATION FORM
(AS REQUIRED BY 40 CFR 268.7)

Generator Name:

Micro Corporation

EPA ID#:

MANIFEST #:

WIK113325

SECTION 1

This shipment contains wastes bearing USEPA waste codes as noted below which are subject to the land disposal restrictions contained in 40 CFR 268. Specific treatment standards for the waste codes noted are contained in 40 CFR 268.40.

| Waste Stream Number | EPA Waste Code* | Subcategory** if applicable | Wastewater (WW) or Nonwastewater (NWW) |
|---------------------|-----------------|-----------------------------|--|
| <i>28714</i> | <i>D008</i> | | <i>NWW</i> |
| | | | |
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*For F001 - F005 waste codes complete Section 2.

**Unless otherwise noted all D001 excluding high TOC subcategory, D002, or D012 - D043 waste codes are designated as being in the subcategory: managed in non-CWA/non-CWA equivalent/non-Class 1 SDWA systems, and must be accompanied by an Underlying Hazardous Constituent (UHC) Notification Form (one UHC Form per waste stream).

SECTION 2 F001 - F005 Spent Solvents

| Regulated Constituent | Regulated Constituent | Regulated Constituent |
|----------------------------|------------------------|---------------------------------------|
| Acetone | Ethyl acetate | Pyridine |
| Benzene | Ethyl benzene | Tetrachloroethylene |
| n-Butyl alcohol | Ethyl ether | Toluene |
| Carbon disulfide | Isobutyl alcohol | 1,1,1-Trichloroethane |
| Carbon tetrachloride | Methanol | 1,1,2-Trichloroethane |
| Chlorobenzene | Methylene chloride | Trichloroethylene |
| Cresol (m- and p- isomers) | Methyl ethyl ketone | 1,1,2-Trichloro-1,2,2-trifluoroethane |
| o- Cresol | Methyl isobutyl ketone | Trichloromonofluoro-methane |
| Cyclohexanone | Nitrobenzene | Xylenes (total) |
| o-Dichlorobenzene | | |

I hereby certify that all information contained in this and all attached documents contains true and accurate descriptions of this waste.

Karen A. Demcak
Signature

3-13-00
Date

KAREN A. DEMCAK
Printed Name

ENUMT. ENGINEER
Title

** BATTERY CHANGING STATION - 1st. FLR. PLT. 9
CLEAN UP CONTAMINATION ON FLOOR*



STATE OF WISCONSIN
Chapter 144, Wis. Stats.
Form 4400-66P Rev. 5-95

State of Wisconsin
Department of Natural Resources
Bureau of Solid and Hazardous Waste Mgt.
Box 8094
Madison, Wisconsin 53708

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Form Approved. OMB No. 2050-0039. Expires 9-30-9

| | | | | | | |
|---|--|--|---------------------------------|---|---|------------------------------------|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator's US EPA ID No. WID98676574 | Manifest Document No. 531723 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law. | |
| 3. Generator's Name and Mailing Address 1512 Washington St. Manitowoc WI 54226 | | Site Location If Different Mirro Company Plant #9 1512 Washington Street Manitowoc WI 54221 | | A. State Manifest Document Number WI J733923 | | |
| 4. Generator's Phone (414) 684-4421 | | 6. US EPA ID Number WID988566543 | | B. State Generator's ID | | |
| 5. Transporter 1 Company Name Superior Special Services, Inc. | | 8. US EPA ID Number | | C. State Transporter's ID | | |
| 7. Transporter 2 Company Name | | 10. US EPA ID Number WID988566543 | | D. Transporter's Phone (414) 284-4885 | | |
| 9. Designated Facility Name and Site Address Superior Special Services, Inc. 1275 Mineral Springs Drive Port Washington WI 53074 | | 12. Containers | | E. State Transporter's ID | | |
| | | 13. Total Quantity | | F. Transporter's Phone | | |
| | | 14. Unit Wt/Vol | | G. State Facility's ID 53237 | | |
| | | I. Waste No. | | H. Facility's Phone (414) 284-6855 | | |
| 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) | | 12. Containers | | I. Waste No. | | |
| a. RQ Hazardous Waste Solid, n.o.s. 9, NA3077, PGIII (D660) | | No. Type 002 C, F | | 13. Total Quantity 90520 P | | |
| b. | | | | | | |
| c. | | | | | | |
| d. | | | | | | |
| J. Additional Descriptions for Materials Listed Above A: W27556; (EQ364B); ERG#171; RQ=1# | | | | K. Handling Codes for Wastes Listed Above | | |
| 15. Special Handling Instructions and Additional Information Project# 22987 Emergency Contact# 1-355-688-4885 CERTIFICATE OF DISPOSAL REQUIRED | | | | | | |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. | | | | | | |
| Printed/Typed Name & Position Title KAREN A. DEMCAY, ENVMT. ENGINEER | | | | Signature <i>Karen A. Demcay</i> | | Date Month Day Year 04 23 97 |
| 17. TRANSPORTER 1 Acknowledgement of Receipt of Materials | | | | | | |
| Printed/Typed Name & Position Title Peter E. Anthony Driver | | | | Signature <i>Peter E. Anthony</i> | | Date Month Day Year 04 23 97 |
| 18. TRANSPORTER 2 Acknowledgement of Receipt of Materials | | | | | | |
| Printed/Typed Name & Position Title | | | | Signature | | Date Month Day Year |
| 19. Discrepancy Indication Space | | | | | | |
| 20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. | | | | | | |
| Printed/Typed Name & Position Title DAVID BRAUN OPERATIONS SUPERVISOR | | | | Signature <i>David Braun</i> | | Date Month Day Year 04 23 97 |

LAND DISPOSAL RESTRICTION NOTIFICATION FORM
(AS REQUIRED BY 40 CFR 268.7)

Generator Name: Mirro Company Plant #9

EPA ID#: WID006076574 MANIFEST #: WIJ 733923

SECTION 1

This shipment contains wastes bearing USEPA waste codes as noted below which are subject to the land disposal restrictions contained in 40 CFR 268. Specific treatment standards for the waste codes noted are contained in 40 CFR 268.40.

| Waste Stream Number | EPA Waste Code* | Subcategory** if applicable | Wastewater (WW) or Nonwastewater (NWW) |
|---------------------|-----------------|-----------------------------|--|
| 7556 | D009 | Low mercury < 260 ppm | NWW |
| | | | |
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*For F001 - F005 waste codes complete Section 2.

**Unless otherwise noted all D001 excluding high TOC subcategory, D002, or D012 - D043 waste codes are designated as being in the subcategory: managed in non-CWA/non-CWA equivalent/non-Class 1 SDWA systems, and must be accompanied by an Underlying Hazardous Constituent (UHC) Notification Form (one UHC Form per waste stream).

SECTION 2 F001 - F005 Spent Solvents

| Regulated Constituent | Regulated Constituent | Regulated Constituent |
|----------------------------|------------------------|---------------------------------------|
| Acetone | Ethyl acetate | Pyridine |
| Benzene | Ethyl benzene | Tetrachloroethylene |
| n-Butyl alcohol | Ethyl ether | Toluene |
| Carbon disulfide | Isobutyl alcohol | 1,1,1-Trichloroethane |
| Carbon tetrachloride | Methanol | 1,1,2-Trichloroethane |
| Chlorobenzene | Methylene chloride | Trichloroethylene |
| Cresol (m- and p- isomers) | Methyl ethyl ketone | 1,1,2-Trichloro-1,2,2-trifluoroethane |
| o- Cresol | Methyl isobutyl ketone | Trichloromonofluoro-methane |
| Cyclohexanone | Nitrobenzene | Xylenes (total) |
| o-Dichlorobenzene | | |

I hereby certify that all information contained in this and all attached documents contains true and accurate descriptions of this waste.

Karen A. Demcak
Signature

KAREN A. DEMCAK
Printed Name

4-23-97
Date

ENVIRONMENTAL ENGINEER
Title



STATE OF WISCONSIN
Chapter 291, Wis. Stats.
Form 4400-66P

Rev. 1-99

State of Wisconsin
Department of Natural Resources
Bureau of Waste Management
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Form Approved. OMB No. 2050-0039.

| | | | | | | |
|---|--|---|---|--|---|--|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator's US EPA ID No. WID006076574 | Manifest Document No. 418151812 | 2. Page 1 1 of 1 | Information in the shaded areas is not required by Federal law. | |
| 3. Generator's Name and Mailing Address MIRRO CO - PLANT 9 1512 WASHINGTON ST., MANITOWOC, WI 54220 | | | | Site Location If Different | | A. State Manifest Document Number WI K248582 |
| 4. Generator's Phone (920)608-4421 | | | | | | B. State Generator's ID |
| 5. Transporter 1 Company Name HYDRITE CHEMICAL - OSH | | 6. US EPA ID Number WID000712935 | | C. State Transporter's ID UPW1000118N | | D. Transporter's Phone 920-233-8181 |
| 7. Transporter 2 Company Name TRANSWOOD | | 8. US EPA ID Number NE0000080580 | | E. State Transporter's ID UPW05407770E | | F. Transporter's Phone 800-220-1555 |
| 9. Designated Facility Name and Site Address POLLUTION CONTROL INDUSTRIES 4343 KENNEDY AVENUE EAST CHICAGO, IN 46312 | | 10. US EPA ID Number IND000646943 | | G. State Facility's ID | | H. Facility's Phone 219-397-3951 |
| 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) | | | 12. Containers No. | 13. Total Quantity | 14. Unit Wt/Vol | I. Waste No. |
| a. WASTE PETROLEUM DISTILLATES, N.O.S., COMBUSTIBLE LIQUID, UN1268, PGIII, (D018) | | | 1 | 35 | 6 | D018 |
| b. RQ, WASTE PAINT RELATED MATERIAL, 3, UN1263, PGII, (F005) | | | 1 | 20 | 6 | F005 |
| c. | | | | | | |
| d. | | | | | | |
| J. Additional Descriptions for Materials Listed Above b) D001 D018 D035 F003 | | | | K. Handling Codes for Wastes Listed Above 80 | | |
| 15. Special Handling Instructions and Additional Information a)H121367OSA143508 b)H16615OSA143506 EMERGENCY PHONE NUMBER: 800-255-3924 | | | | | | |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. | | | | | | |
| Printed/Typed Name & Position Title <i>Douglas Decker</i> | | | Signature <i>[Signature]</i> | | Date Month Day Year <i>4/23/12</i> | |
| 17. TRANSPORTER 1 Acknowledgement of Receipt of Materials | | | | | | |
| Printed/Typed Name & Position Title <i>DALE J. GUDDEN / DRIVER</i> | | | Signature <i>[Signature]</i> | | Date Month Day Year <i>04/23/2012</i> | |
| 18. TRANSPORTER 2 Acknowledgement of Receipt of Materials | | | | | | |
| Printed/Typed Name & Position Title <i>Delmar Friedrichs - Driver</i> | | | Signature <i>[Signature]</i> | | Date Month Day Year <i>04/29/2012</i> | |
| 19. Discrepancy Indication Space | | | | | | |
| 20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. | | | | | | |
| Printed/Typed Name & Position Title <i>Joseph L. Reid</i> | | | Signature <i>[Signature]</i> | | Date Month Day Year <i>04/23/12</i> | |



STATE OF WISCONSIN
Chapter 291, Wis. Stats.
Form 4400-66P

Rev. 1-99

State of Wisconsin
Department of Natural Resources
Bureau of Waste Management
Box 8094
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Form Approved. OMB No. 2050-0039.

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| 3. Generator's Name and Mailing Address MIRRO CO - PLANT 9 1512 WASHINGTON ST., MANITOWOC, WI 54220 | | | Site Location If Different | | A. State Manifest Document Number WI K248582 | |
| 4. Generator's Phone (920)608-4421 | | | 6. US EPA ID Number WID000712935 | | B. State Generator's ID | |
| 5. Transporter 1 Company Name HYDRITE CHEMICAL - OSH | | 7. Transporter 2 Company Name TRANSWOOD | | C. State Transporter's ID UPW100011MN | | |
| 9. Designated Facility Name and Site Address POLLUTION CONTROL INDUSTRIES 4343 KENNEDY AVENUE EAST CHICAGO, IN 46312 | | 8. US EPA ID Number NE0000080580 | | D. Transporter's Phone 920-233-8181 | | |
| | | 10. US EPA ID Number IND000646943 | | E. State Transporter's ID UPW05407770E | | |
| | | | | F. Transporter's Phone 800-220-1555 | | |
| | | | | G. State Facility's ID | | |
| | | | | H. Facility's Phone 219-397-3951 | | |
| 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) | | | 12. Containers No. | Type | 13. Total Quantity | 14. Unit Wt/Vol |
| a. WASTE PETROLEUM DISTILLATES, N.O.S., COMBUSTIBLE LIQUID, UN1268, PGIII, (D018) | | | 1 | DM | 35 | G |
| b. RQ, WASTE PAINT RELATED MATERIAL, 3, UN1263, PGII, (F005) | | | 1 | DM | 20 | G |
| c. | | | | | | |
| d. | | | | | | |
| J. Additional Descriptions for Materials Listed Above b) D001 D018 D035 F003 | | | K. Handling Codes for Wastes Listed Above | | | |
| 15. Special Handling Instructions and Additional Information a)H121367OSA143508 b)H16615OSA143506 EMERGENCY PHONE NUMBER: 800-255-3924 | | | | | | |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. | | | | | | |
| Printed/Typed Name & Position Title Douglas Deaton General Foreman | | | Signature <i>[Signature]</i> | | Date Month Day Year 04/23/2002 | |
| 17. TRANSPORTER 1 Acknowledgement of Receipt of Materials | | | | | | |
| Printed/Typed Name & Position Title DALE J. GUDDEN / DRIVER | | | Signature <i>[Signature]</i> | | Date Month Day Year 04/23/2002 | |
| 18. TRANSPORTER 2 Acknowledgement of Receipt of Materials | | | | | | |
| Printed/Typed Name & Position Title | | | Signature | | Date Month Day Year | |
| 19. Discrepancy Indication Space | | | | | | |
| 20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. | | | | | | |
| Printed/Typed Name & Position Title | | | Signature | | Date Month Day Year | |

SEE INSTRUCTIONS ON REVERSE SIDE OF COPY 6.



STATE OF WISCONSIN
Chapter 291, Wis. Stats.
Form 4400-66P

Rev. 1-99

State of Wisconsin
Department of Natural Resources
Bureau of Waste Management
Box 8094
Madison, WI 53708

FOR DNR USE ONLY

ALL COPIES MUST BE LEGIBLE,
PLEASE TYPE

Form designed for use on elite (12-pitch) typewriter.

Form Approved. OMB No. 2050-0039

| | | | | | | | |
|---|-------------------------------------|--|------------------------------------|---|---|--------------|--|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator's US EPA ID No. WID006076574 | Manifest Document No. 712101019 | 2. Page 1 of | Information in the shaded areas is not required by Federal law. | | |
| 3. Generator's Name and Mailing Address Miro Company PH. 9430 45. 9005 16th Street 1512 WASHINGTON ST. Manitowoc WI 54220 | | Site Location If Different | | A. State Manifest Document Number WI K169196 | | | |
| 4. Generator's Phone (800) 518-6245 | | | | B. State Generator's ID | | | |
| 5. Transporter 1 Company Name Onyx Environmental SVCS LLC | 6. US EPA ID Number NTD080631369 | | | C. State Transporter's ID 16139 | | | |
| 7. Transporter 2 Company Name | 8. US EPA ID Number | | | D. Transporter's Phone 262-255-6655 | | | |
| 9. Designated Facility Name and Site Address Onyx Environmental Services W124 N9451 Boundary Rd Menomonee Falls, WI 53051 | | 10. US EPA ID Number WID003967148 | | E. State Transporter's ID | | | |
| | | | | F. Transporter's Phone | | | |
| | | | | G. State Facility's ID 03135 | | | |
| | | | | H. Facility's Phone 262-255-6655 | | | |
| 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) | | 12. Containers No. | Type | 13. Total Quantity | 14. Unit Wt/Vol | I. Waste No. | |
| a. RA-Waste Hydrochloric Acid, 8, UN1789, II (D002) | | 0101 | DF | 900.55 | G | D0102 | |
| b. | | | | | | | |
| c. | | | | | | | |
| d. | | | | | | | |
| J. Additional Descriptions for Materials Listed Above a) DW00127, 550851 | | | | K. Handling Codes for Wastes Listed Above | | | |
| 15. Special Handling Instructions and Additional Information PC165 Emergency number - infotrac: 800 535 5053 | | | | | | | |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. | | | | | | | |
| Printed/Typed Name & Position Title KAREN A DENNAK ENVIRONMENTAL ENGINEER | | Signature <i>Karen A. Denna</i> | | Date Month Day Year 05/24/2001 | | | |
| 17. TRANSPORTER 1 Acknowledgement of Receipt of Materials | | | | | | | |
| Printed/Typed Name & Position Title Linda Schmidt chemist | | Signature <i>Linda Schmidt</i> | | Date Month Day Year 05/24/2001 | | | |
| 18. TRANSPORTER 2 Acknowledgement of Receipt of Materials | | | | | | | |
| Printed/Typed Name & Position Title | | Signature | | Date Month Day Year | | | |
| 19. Discrepancy Indication Space | | | | | | | |
| 20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. | | | | | | | |
| Printed/Typed Name & Position Title | | Signature | | Date Month Day Year | | | |

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution: 1 - Generator send to Wis. DNR

4 - Facility retain

Emergency 24 Hour Assistance and Spill Reporting

2 - Generator retain

5 - Facility send to Generator

Telephone Number: (800) 943-0003

3 - Facility send to Wis. DNR

6 - Transporter retain

Copies 1 & 3 mail to Wis. DNR at above address.

NewellMNine000009

COPY 2-

GENERATOR RETAIN

SEE INSTRUCTIONS ON REVERSE SIDE OF COPY 6.



STATE OF WISCONSIN

Chapter 291, Wis. Stats.
Form 4400-66P

Rev. 1-99

State of Wisconsin
Department of Natural Resources
Bureau of Waste Management
Box 8094
Madison, WI 53708

FOR DNR USE ONLY

ALL COPIES MUST BE LEGIBLE,
PLEASE TYPE

Form designed for use on elite (12-pitch) typewriter.

Form Approved. OMB No. 2050-003

| | | | | | | | |
|---|--|--|----------------------------------|--|---|---------------------------|-----------------------|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator's US EPA ID No. WID006076574 | Manifest Document No. 7121014 | 2. Page 1 of | Information in the shaded areas is not required by Federal law. | | |
| 3. Generator's Name and Mailing Address Mitic Company PH. 9736 45. 1512 WASHINGTON ST. Mantowoc WI 54220 | | Site Location If Different | | A. State Manifest Document Number WIK169196 | | | |
| 4. Generator's Phone (908) 610-1245 | | 6. US EPA ID Number NTD080631364 | | B. State Generator's ID | | | |
| 5. Transporter 1 Company Name City Environmental Services LLC | | 8. US EPA ID Number | | C. State Transporter's ID 16139 | | | |
| 7. Transporter 2 Company Name | | 10. US EPA ID Number WED065907144 | | D. Transporter's Phone 262-255-6655 | | | |
| 9. Designated Facility Name and Site Address City Environmental Services W124 N. 451 E. Unity Rd Menomonee Falls, WI 53051 | | 12. Containers No. Type 901 DF | | 13. Total Quantity 990.55 | | 14. Unit Wt/Vol G | I. Waste No. 90102 |
| 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. RC-Waste Hydrochloric Acid, 2, UN1791 II (D002) | | 15. Special Handling Instructions and Additional Information RC 165 Emergency number: 800 655 6055 | | K. Handling Codes for Wastes Listed Above | | | |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. | | Printed/Typed Name & Position Title KAREN H. DEWICK, ENVIRONMENTAL ENGINEER | | Signature Karen H. Dewick | | Date 05/24/2001 | |
| 17. TRANSPORTER 1 Acknowledgement of Receipt of Materials | | Printed/Typed Name & Position Title Linda Schmidt, chemist | | Signature Linda Schmidt | | Date 05/24/2001 | |
| 18. TRANSPORTER 2 Acknowledgement of Receipt of Materials | | Printed/Typed Name & Position Title | | Signature | | Date | |
| 19. Discrepancy Indication Space | | 20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. | | Printed/Typed Name & Position Title TRUDY WARNKE / RECV COORD | | Signature Trudy Warnke | |
| | | | | | | Date 05/29/2001 | |

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution: 1 - Generator send to Wis. DNR

4 - Facility retain

Emergency 24 Hour Assistance and Spill Reporting

2 - Generator retain

5 - Facility send to Generator

Telephone Number: (800) 943-0003

3 - Facility send to Wis. DNR

6 - Transporter retain

Copies 1 & 3 mail to Wis. DNR at above address.

NewellMNine000010

COPY 5- FACILITY SEND TO GENERATOR

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name: MTRC Company EPA ID # W1A006076574 State Manifest No. WIK/69/96

- 1. If waste is a wastewater (see 40 CFR 268.2) place "w" next to the applicable code(s)
2. If waste is subject to any California List restriction enter the letter from below next to each restriction that is applicable. HOC, PCBs, Metals, Acid

3. CODES WITH SUBCATEGORIES (place appropriate letter from section 9 before each code that applies) (See 40 CFR 268 for details)

- D001 Hi-TOC D003 Unexp Ord. Emg K006 Hydrated P047 Salts P092 Hi Inc./RMERC Res.
D001 < 10% TOC-CWA D003 Other Reactives K006 Anhydrous P047 Nonsalts U151 Lo RMERC Res.
D001 < 10% TOC-Non/CWA D006 Batteries K069 Calcium Sulfate P065 Lo Inc. Res. U151 Lo Not RMERC Res.
D002 Non-CWA D008 Lead acid batteries K069 Not Calcium Sulfate P065 Lo RMERC Res. U151 Hi Hg
D002 CWA D009 Organic Hg > 260ppm K071 Rmerc Res. P065 Not Inc./RMERC Res. U240 2, 4 D
D003 Reactive Cyanide D009 Inorg. Hg > 260 K071 Not Rmerc Res. P065 Hi Inc./RMERC Res. U240 2, 4 esters & Salts
D003 Reactive Sulfide D009 Hg < 260 K106 Lo Rmerc Res. P092 Lo Inc. Res.
D003 Explosive F025 Light ends K106 Not Rmerc Res. P092 Lo RMERC Res.
D003 Water Reactives F025 Spent filter K106 > 260 ppm Hg P092 Not Inc./RMERC Res.

The subcategory for D018-D043 waste is "treated in nonCWA/nonSDWA facility" unless the following box is checked: [] "treated in CWA/SDWA facility"

4. COMMON CODES (Place appropriate letter from section 9 before each code that applies)

- D004 D005 D006 D007 D008 D009 D010 D011 D012 D013 D014 D015 D016 D017 D018 D019
D020 D021 D022 D023 D024 D025 D026 D027 D028 D029 D030 D031 D032 D033 D034 D035
D036 D037 D038 D039 D040 D041 D042 D043 F001 F002 F003 F004 F005 U002 U003 U006
U007 U044 U061 U072 U080 U108 U117 U122 U123 U136 U154 U188 U213 U220 U226 U279
P012 P030 P051 P098 P105 P205 F006 F007 F008 F009 F010 F011 F012 F019 F039 K061

ADDITIONAL CODES (Enter all codes not identified above which are associated with waste)

Table with 3 columns: 5. USEPA HAZARDOUS WASTE CODE(S), 6. TREATMENT STANDARDS FOR NON-PHASE II STATES (INDICATE THE APPLICABLE TREATMENT STANDARD 268.41, 268.43 OR SPECIFIED TECHNOLOGY BELOW), 7. HOW MUST THE WASTE BE MANAGED? ENTER THE LETTER FROM BELOW

To identify F039, or UHCs managed in non-CWA, use the "F039/Underlying Hazardous Constituents Form" provided (CWM-2004) and check here: []
If no UHCs are present upon generation check here: [] Check here if disposal facility will check for all UHCs [] (i.e. no UHC form required)
To list additional EPA waste code(s), use the supplemental sheet and check here: [] In lieu of supplemental sheet you may use multiple copies of this form.

8. SOLVENT CONSTITUENTS (F001 - F005) Check here if disposal facility will check for all spent solvents []

- Acetone Benzene n-Butyl alcohol Carbon disulfide
Carbon Tetrachloride Chlorobenzene O-Cresol Cresols (m&p)
Cyclohexanone o-Dichlorobenzene 2-Ethoxyethanol Ethyl acetate
Ethyl benzene Ethyl ether Isobutanol Methanol
Methylene chloride Methyl ethyl ketone Methyl isobutyl ketone Nitrobenzene
2-Nitropropane Pyridine Tetrachloroethylene Toluene
1,1,1 Trichloroethane 1, 1, 2-Trichloroethane 1, 1, 2-Trichloro, 1, 2, 2-trifluoroethane Trichloroethylene
Trichloromonofluoromethane Xylenes

9. (States authorized by EPA to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed to refer to those state citations instead of the 40 CFR citations.)

- A. Or [] RESTRICTED WASTE REQUIRES TREATMENT
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268 Subpart D, 268.32, or RCRA Section 3004(d)
[] For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."
B.1 [] RESTRICTED WASTE TREATMENT TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268, Subpart D, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."
B.2 RESTRICTED WASTES FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY)
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."
B.3 GOOD FAITH AND ANALYTICAL CERTIFICATION - FOR INCINERATED ORGANICS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by incineration in units operated in accordance with 40 CFR Part 264, Subpart O, or 40 CFR Part 265, Subpart O, or by combustion in fuel substitution units operating in accordance with applicable technical requirements, and I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are a significant penalties for submitting a false certification, including the possibility of fine and imprisonment."
B.4 DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."
C. RESTRICTED WASTE SUBJECT TO A VARIANCE
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 7 above.
[] For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."
D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
"I have determined that this waste meets all applicable treatment standards set forth in 40 CFR Part 268 Subpart D, and all applicable prohibition levels set forth in Section 268.32 or RCRA Section 3004(d), and therefore, can be land disposed without further treatment. A copy of all applicable treatment standards and specified treatment methods is maintained at the treatment, storage and disposal facility named above." "I certify under penalty of law that I have personally examined and am familiar with the waste through analysis and testing or thorough knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."
E. WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS
This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

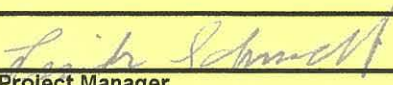
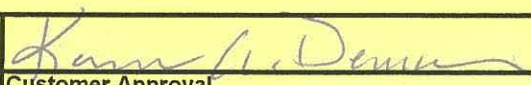
I hereby certify that all information in this and all associated documents is complete and accurate, to the best of my knowledge and information.

Signature: [Handwritten Signature]
Title: ENVT. ENGINEER

NewellMNine000011

Date: 5-24-01

Onyx Environmental Services Project Summary

| | | | | | | | |
|---|----------------------------|------------------------|--|---|---------------|-------------|------------|
| Project Name: <i>Mirco Company</i> | | | Recycling | Quantity | Drum Size | Net Weight | Units |
| Location: <i>900 South 16th Street Providence, RI 02902</i> | | | Sandblast Grit | | | | lb(s) |
| Date: <i>5-24-01</i> | | | Bioremediation | | | | lb(s) |
| P.O. #: | | | Nickel-Cadmium Batteries | | | | lb(s) |
| Mobilization: Non-Milkrun Milkrun | | | Elemental Mercury | | | | lb(s) |
| | | | Lead-Acid Batteries | | | | lb(s) |
| | | | CRTs | | | | lb(s) |
| | | | E-Scrap | | | | lb(s) |
| | | | Ballasts/Capacitors | | | | lb(s) |
| | | | 4-Foot Bulbs | | | | Bulb(s) |
| | | | 8-Foot Bulbs | | | | Bulb(s) |
| Supplies/Equipment | Quantity | Units | HID Lamps | | | | Bulb(s) |
| 85 DM | | Drum(s) | Circular Bulbs | | | | Bulb(s) |
| 55 DM | | Drum(s) | U-Shaped Bulbs | | | | Bulb(s) |
| 55 DP | <i>1</i> | Drum(s) | Other Bulbs | | | | Bulb(s) |
| 30 DM | | Drum(s) | Other Recycling | | | | lb(s) |
| 30 DF | | Drum(s) | Fuels Blending: Wastestream | Category | Quantity | Drum Size | Net Weight |
| 14 DF | | Drum(s) | | | | | |
| 05 DF | | Drum(s) | | | | | |
| 05 DP | <i>1</i> | Drum(s) | | | | | |
| PIH Box | | Box(es) | | | | | |
| Cubic Yard Box | | Box(es) | | | | | |
| Vermiculite | | Bag(s) | Solid Fuels Blending (Need Net Weight) | | | | |
| Oil Dry | | Bag(s) | Incineration | Quantity | Drum Size | Net Weight | Units |
| Sample Kit | <i>1</i> | Kit(s) | RCRA Solvents | | | | lb(s) |
| Plastic Sheeting/Equivalent | <i>1</i> | Roll(s) | Liquids BTU < 5000 | | | | lb(s) |
| Rolloff Liner | | Liner(s) | Pesticide: Liquids / Solids | | | | lb(s) |
| Tent | | Day(s) | Pesticide: Liquids / Solids | | | | lb(s) |
| Mercury Vacuum | | Day(s) | Pesticide: Liquids / Solids | | | | lb(s) |
| Cleansweep PPE | | Persons/Day | Pesticide: Liquids / Solids | | | | lb(s) |
| Skidloader: <u> </u> Dropoff <u> </u> Pickup | | Day(s) | Ballasts/Capacitors | | | | lb(s) |
| Sludge/Wastewater Evacuation | | Day(s) | PCB: Liquids / Solids | | | | lb(s) |
| Labpacks: Net Weight | | | PCB: Liquids / Solids | | | | lb(s) |
| | Aerosols | lb(s) | Organic Solids/Semisolids | | | | lb(s) |
| | Non-reactives | lb(s) | Soils w/ F-Listed Solvents | | | | lb(s) |
| | Reactives | lb(s) | Other Incineration | | | | lb(s) |
| | Dioxins | lb(s) | Landfill | Quantity | Drum Size | Net Weight | Units |
| | Stablex Mercury | lb(s) | Asbestos: ORC / Roofing Tar | | | | lb(s) |
| | Specimens | lb(s) | Stabilization (WDL HAZ) | | | | lb(s) |
| | PCBs | lb(s) | Stabilization (ORC HAZ) | | | | lb(s) |
| | Medical Waste | lb(s) <u> </u> Min. | Ballasts/Capacitors | | | | lb(s) |
| | Non-RCRA | lb(s) | Direct Landfill/Subtitle C | | | | lb(s) |
| | Acids/Bases | lb(s) | Non-Haz: ORC / WDL LIQ / SOL | | | | lb(s) |
| | Other Labpacks <u> </u> | lb(s) | Non-Haz: ORC / WDL LIQ / SOL | | | | lb(s) |
| | Unknown Fingerprints | Test(s) | Non-Haz: ORC / WDL LIQ / SOL | | | | lb(s) |
| | Labpack Minimums | | Non-Haz: ORC / WDL LIQ / SOL | | | | lb(s) |
| Analytical | Quantity | Units | Empty Containers | | | | lb(s) |
| Profiling | | Each | Other Landfill | | | | lb(s) |
| PCB Analytical | | Each | Aqueous Treatment | Quantity | Drum Size | Net Weight | Units |
| Other Analytical <u> </u> | | Each | <i>DW00127</i> | <i>1</i> | <i>55 gal</i> | | |
| Other Analytical <u> </u> | | Each | Manpower: Name | Start | Finish | Lunch (hrs) | Comment |
| Transportation-Bulk Only | Quantity | Units | <i>Thomas Reiner</i> | <i>9:00</i> | <i>10:15</i> | <i>-</i> | |
| Demurrage | | Hour(s) | <i>Kurt Schmidt</i> | <i>9:00</i> | <i>10:15</i> | <i>-</i> | |
| Rolloff/lugger Rental <u> </u> Unit(s) | | Day(s) | | | | | |
| Mobile Collection Unit | | Day(s) | | | | | |
| Latex Paint | | lb(s) | | | | | |
| Garbage | | Rolloff(s) | | | | | |
| Miles: <u> </u> Running / Loaded | | Miles | | | | | |
| Comments: | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
|  Onyx Project Manager | | | |  Customer Approval | | | |
| NewellMINE000012 | | | | | | | |

ONYX ENVIRONMENTAL SERVICES, L.L.C.



Phoenix, AZ
602-243-6154

Garden City, ID
208-221-7060

Ledgewood, NJ
973-448-2884

Philadelphia, PA
215-289-3700

Azusa, CA
626-334-5117

Calumet City, IL
773-646-6660

Albany, NY
518-437-8304

York, PA
717-764-8877

Fremont, CA
510-651-2964

Saugel, IL
618-271-2804

East Farmingdale, NY
516-391-9557

Baytown, TX
281-427-4099

Richmond, CA
510-233-8001

Louisville, KY
502-961-9924

Syracuse, NY
315-484-8030

Port Arthur, TX
409-736-4176

Huntington Beach, CA
714-379-6000

Baton Rouge, LA
504-293-4600

Tonawanda, NY
716-679-0600

Scales, VA
540-775-9000

Henderson, CO
303-289-4827

Marlboro, MA
508-804-4830

Charlotte, NC
704-522-8823

Tukwila, WA
206-841-3900

New Britain, CT
860-223-0550

Southfield, MI
510-353-8844

Creekside, NC
919-528-3996

Vancouver, WA
360-260-0882

Pensacola, FL
850-479-1788

Blaine, MN
612-936-0510

North Jackson, OH
930-538-0600

Menomonee Falls, WI
414-253-3348
414-255-6655

West Melbourne, FL
407-722-2453

Butte, MT
406-792-4201

Columbus, OH
614-276-8530

Caguas, PR
787-764-0070

Morrow, GA
404-361-6181

Flanders, MI
973-347-7111

West Carrollton, OH
937-859-6101

WASTESTREAM INFORMATION PROFILE



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
 P.O. Box 7035
 Indianapolis, IN 46207-7035

PLEASE PRINT OR TYPE

(Form designed for use on elite (12-pitch) typewriter.)

Form Approved: OMB No. 2050-0039. Expires 9-30-2000

UNIFORM HAZARDOUS WASTE MANIFEST

| | | | |
|--|-----------------------|---|---|
| 1. Generator's U.S. EPA ID Number W I D 0 0 6 0 7 6 5 7 4 0 1 1 0 3 | Manifest Document No. | 2. Page 1 of | Information in the shaded areas is not required by Federal Law, but items D, F, H, I and K are required by State Law. |
| 3. Generator's Name and Mailing Address Mirro Company-Plant #9 1512 Washington Street Manitowoc, WI 54220 | | A. State Manifest Document Number INA 1504724 | |
| 4. Generator's Telephone Number (900) 518-6245 x. 6426 Attn: K. Demcak | | B. State Generator's ID | |
| 5. Transporter 1 Company Name Pollution Control Industries | | C. State Transporter's ID | |
| 6. U.S. EPA ID Number I N D 0 0 0 6 4 6 9 4 3 | | D. Transporter's Phone (219) 397-3951 | |
| 7. Transporter 2 Company Name | | E. State Transporter's ID | |
| 8. U.S. EPA ID Number | | F. Transporter's Phone | |
| 9. Designated Facility Name and Site Address Pollution Control Industries 4343 Kennedy Avenue East Chicago, IN 46312 | | G. State Facility's ID n/a | |
| 10. U.S. EPA ID Number I N D 0 0 0 6 4 6 9 4 3 | | H. Facility's Phone (219) 397-3951 | |

| 11. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) | 12. Containers | | 13. Total Quantity | 14. Unit Wt/Vol. | 1. Waste No. |
|--|----------------|------|--------------------|------------------|--------------|
| | No. | Type | | | |
| a. RQ, Waste Hydrochloric Acid, 3, UN 1799, PG II, RQ (D002) ERG #157 | 04 | D | 001 | G | D002 |
| b. RQ, Waste Sodium Hydroxide Solution, 3, UN 1824 PG II, RQ (D002) ERG #154 | 01 | D | 001 | G | D002 |
| c. Waste Flammable Liquids, n.o.s., 3, UN 1993, PG II ERG #128 | 01 | D | 001 | G | U162 |
| d. Waste Corrosive Liquids, Toxic, n.o.s., 3, UN 2922, PG II (DOT-E 9723) ERG #154 | 01 | D | 001 | G | D002 |

| | |
|---|--|
| J. Additional Descriptions for Materials Listed Above 11a) Bulk Profile #00100254 11b) Bulk Profile #00100255 11c) Drum NIP-1 (also U031, D001) 11d) Drum NIP-2 (also D007) | K. Handling Codes for Wastes Listed Above Lines 11c-d are Lab Packs; Profile #20387 |
|---|--|

15. Special Handling Instructions and Additional Information
24-HOUR EMERGENCY RESPONSE PHONE #1-800-451-8346 (Contact R3 Environmental Mgmt. at 3E Company)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
 If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

| | | |
|--|---------------------------------------|---------------------------------|
| Printed/Typed Name XK... | Signature <i>XK...</i> | Date Month: . Day: . Year: . |
| 17. Transporter 1 - Acknowledgement of Receipt of Materials | | |
| Printed/Typed Name ... | Signature <i>...</i> | Date Month: . Day: . Year: . |
| 18. Transporter 2 - Acknowledgement of Receipt of Materials | | |
| Printed/Typed Name | Signature | Date Month: . Day: . Year: . |
| 19. Discrepancy Indication Space | | |
| 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest (except as noted in Item 19). | | |
| Printed/Typed Name | Signature NewellMNine000014 | Date Month: . Day: . Year: . |

In case of a spill, call the Indiana Office of Environmental Response at 317/233-7745 (day or night) and the National Response Center at 800 / 424-8802 or 202 / 426-2675.

GENERATOR

TRANSPORTER

FACILITY

INA 1504724



PLEASE PRINT OR TYPE

(Form designed for use on elite (12-pitch) typewriter.)

Form Approved: OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's U.S. EPA ID Number

Manifest Document No.

22. Page

Information in the shaded areas is not required by Federal Law, but items L, O, Q, R and T are required by State Law.

110006076574

1011052 of 2

23. Generator's Name

Mirro Company Plant #9

L. State Manifest Document Number

IND1504734

M. State Generator's ID

Same

24. Transporter Company Name

25. U.S. EPA ID Number

.....

N. State Transporter's ID

O. Transporter's Phone

26. Transporter Company Name

26. U.S. EPA ID Number

.....

P. State Transporter's ID

Q. Transporter's Phone

28. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

29. Containers No. Type

30. Total Quantity

31. Unit Wt/Vol.

R. Waste No.

a. Waste Corrosive Liquids, Basic, Inorganic, a.o.s., 3, UN 1266, PG II

ERG #154

0.01

D.P

0.0005

G

3002

b. Waste Mercury, 3, UN 2809, PG III

ERG #172

0.01

D.P

0.0005

G

3003

c. Hazardous Waste, Solid, a.o.s., 9, HA 3072, PG III (Lead/Cadmium Batteries, Dry)

ERG #171

0.01

D.P

0.0005

G

3006

d. Non-RCRA Regulated Material (Petroleum Oil)

0.01

D.M

0.0055

G

None

e. Non-RCRA Regulated Material (Dilute Hydrochloric Acid Cleaner)

0.01

D.P

0.0055

G

None

f. RCRA Empty Container

0.01

D.P

0.0000

G

None

g.

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h.

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i.

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S. Additional Descriptions for Materials Listed Above

28a) Drum NIP-3
 28b) Drum NIP-4
 28c) Drum NIP-5 (also D034)
 28d) Bulk Profile #205873

28e) Bulk Profile #205870
 28f) Bulk Profile #205387
 Lines 28a-c are Lab Packs;
 Profile #203387

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

33. Transporter Acknowledgement of Receipt of Materials

Printed / Typed Name

Signature

DATE

Month Day Year

.....

34. Transporter Acknowledgement of Receipt of Materials

Printed / Typed Name

Signature

DATE

Month Day Year

.....

35. Discrepancy Indication Space

GENERATOR

12/5/00

TRANSPORTER FACILITY

In case of a spill, call the Indiana Office of Environmental Response at 317 / 241-4336 (day or night) and the National Response Center at 800 / 424-8802 or 202 / 426-2675.

NewellMNine000015

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Page 1 of 2

Generator Name/Location Mirro Co., Plant # 9, 1512 Washington St., Manitowoc, WI 54220

EPA ID Number WID00607657A Manifest Number INA1504724

Waste Analysis Available: Yes No On file at facility

NewellMNine000016

| PROFILE # | RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA | RCRA WASTE CODES (List all that apply) | SUBCATEGORY (See Table II and Select Key # if applicable) | TREATABILITY GROUP Please check the applicable treatability group | | REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 | UNDERLYING HAZARDOUS CONSTITUENTS FOR D001*, D002, D003* D004-D043 |
|-----------|---|---|--|--|-----------------|--|---|
| | | | | Non-wastewater >1% TOC & > 1% TSS e | Wastewater f | | |
| a | b | c | D | | | List all applicable constituents from key below g | List all applicable constituents from Table 1 h |
| 00100254 | | D002 | 5 | ✓ | | n/a | 249 |
| 00100255 | | D002 | 5 | ✓ | | ↓ | 249 |
| 20387 | | U162 | n/a | ✓ | | | n/a |
| ↓ | | U031 | n/a | ✓ | | | n/a |
| | | D001 | 1 | ✓ | | | 249 |
| ↓ | | D002 | 5 | ✓ | | | 249 |

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005, (for Column g)

- | | | | |
|----------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o, m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature X Karen A. Demcak Print Name X KAREN A. DEMCAK Date X 12-7-00

Environmental Management

Lab Pack - Drum Inventory

Drum No./Type: NIP-1 55 30 16 5 DF Chemist: Konigford
 Generator Name: Micro Company Plant #9
 Generator Address: 1512 Washington St., Manitowac, WI 54220
 Generator ID No.'s Fed: WID006080683 State: n/a
 Shipping Description: Waste Flammable Liquids, n.o.s., 3,
 Profile No.: 20387 Date: 12/7/00
UN 1993, PG II

ERG # 128

| Quantity | Type | Chemical Description | U.S. E.P.A. Hazard Code(s) | Physical State | Comments (RQ/PIH) |
|----------|----------|---|----------------------------|----------------|-------------------|
| 1 | 6xgal P | Pigment w/ Pine Oil, methyl methacrylate | U162 | L | |
| 2 | 1xgal M | Water-Based Pigment/Ink | NR | | |
| 3 | 4x1qt M | " " " " | ↓ | ↓ | |
| 4 | 2xpt M | " " " " | | | |
| 5 | 3xqt P | " " " " | | | |
| 6 | 2xqt P | Decoflux (water-based) | | | |
| 7 | 1xqt P | Water-Based Pigment | | | |
| 8 | 4xqt P | Pigment w/ n-Butanol, n-Propyl Acetate, 2-Ethoxyethyl Acetate | U031 | | |
| 9 | 1xpt P | " " " " | U031 | | |
| 10 | 1xqt P | Oil | NR | | |
| 11 | 1x8oz P | Pine Oil-Based Degussa | ↓ | ↓ | |
| 12 | 1xpt P | Water-Based Degussa | | | |
| 13 | 1x8oz P | Glycolic Acid-Based Dye (pH ~ 4) | | | |
| 14 | 1x8oz P | Oil | | | |
| 15 | 1x4oz G | Oil | | | |
| 16 | 2x8oz P | Screening medium w/ waxes, Fatty Acid Ethoxylates | | | |
| 17 | 1x2oz P | Water-Based Pigment | NR | | |
| 18 | 1x2gal P | Solvent-Based Cleaner/Degreaser | D001 | | |

R₃ Environmental Management
Lab Pack - Drum Inventory

Drum No./Type: NIP-2 55 30 16 (5) DF Chemist: Konigsford
 Generator Name: Micra Car Plant # 9
 Generator Address: 1512 Washington St., Manitowish, WI 54220
 Generator ID No.'s Fed: WID006080683 State: n/a
 Shipping Description: Waste Corrosive Liquid Toxic, n.o.s.,
 Profile No.: 20307 Date: 12/3/00

8, UN2922, PG II
(DOT-E 9723) ERG # 154

| Quantity | Type | Chemical Description | U.S. E.P.A. Hazard Code(s) | Physical State | Comments (RQ/PIH) |
|----------|------|---|-------------------------------|-------------------|----------------------|
| 2 x 4oz | G | Oxygen Indicator Refill w/ Chromium Chloride, zinc Chloride, Hydrochloric Acid | D002/7 | L | |
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R₂ Environmental Management
Lab Pack - Drum Inventory

Drum No./Type: NIP-3 55 30 16(5)DF Chemist: Konigsford
 Generator Name: Mirro Co. Plant #9
 Generator Address: 1512 Washington St, Manitowoc, WI 54220
 Generator ID No.'s Fed: WID006080683 State: n/a
 Shipping Description: Waste Corrosive Liquids, Basic,
 Profile No.: 20387 Date: 12/5/00
Inorganic, n.o.s., 8, UN 3266, PG II
ERG # 154

| Quantity | Type | Chemical Description | U.S. E.P.A. Hazard Code(s) | Physical State | Comments (RQ/PIH) |
|----------|------|--|----------------------------|----------------|-------------------|
| 2x4oz | G | CO ₂ Indicator Refill w/ Potassium Hydroxide | D002 | L | |
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Environmental Management
Lab Pack - Drum Inventory

Drum No./Type: NIP-455 30 16⑤ DF Chemist: Konigsford
 Generator Name: Micra Co. Plant #9
 Generator Address: 1512 Washington st, Manitowoc, WI 54220
 Generator ID No.'s Fed: WID006089683 State: n/a
 Shipping Description: Waste Mercury, 8, UN 2869, PG III
 Profile No.: 20387 Date: 12/5/00

ERG # 172

| Quantity | Type | Chemical Description | U.S. E.P.A. Hazard Code(s) | Physical State | Comments (RQ/PIH) |
|-----------|------|---------------------------|----------------------------|----------------|-------------------|
| 2 x 1/2oz | G | Mercury - Filled Switches | D009 | L | |
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R₃ Environmental Management
Lab Pack - Drum Inventory

Drum No./Type: NIP-5 55 30 16⑤ DF Chemist: Kenigefeld
 Generator Name: Mirra Company Plant #9
 Generator Address: 1512 Washington St., Manitowoc, WI 54220
 Generator ID No.'s: Fed: WID006080683 State: n/a
 Shipping Description: Hazardous waste, Solid, n.o.s., 9,
 Profile No.: 20387 Date: 12/5/00


NA 3072, PG III
 (Lead/Cadmium-Containing Batteries, Dry) ERG #171

| Quantity | Type | Chemical Description | U.S. E.P.A. Hazard Code(s) | Physical State | Comments (RQ/PIH) |
|-----------|------|-------------------------------------|----------------------------|----------------|-------------------|
| 4x1/16lb | M | Nickel-Cadmium Dry Cell Batteries | D006 | S | |
| 3x1/16lb | P | Lead-Acid Dry Cell Batteries | D008 | S | |
| 19x1/16lb | P | Caustic/Alkaline Dry Cell Batteries | NR | S | |
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Consolidated Reporting System
WI DNR
PO Box 7921
Madison, WI 53707-7921

| | | | |
|------------------------|------------------------|--------------|------------|
| EPA ID: | WID006076574 | Facility ID: | 436033730 |
| Site Name: | Mirro Company Plant 09 | | |
| Site Location: | 1512 WASHINGTON ST | | |
| City, State, Zip Code: | MANITOWOC | WI | 54220 5046 |

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

| | | | |
|---|-----------------------|-----------|---------------------------------|
| A. Please Print Last Name ADAMS | First Name RICHARD | M.I. M | B. Title VP-OPERATIONS |
| C: Signature  | | | D: Date of Signature 2/28/02 |

SECTION I. Site name and location address.

A. Site/Company Name Mirro Company Plant 09 B. EPA ID No. WID006076574
C. Street and Number 1512 WASHINGTON ST D. Facility ID 436033730

E. City, Town, Village MANITOWOC F. State WI G. Zip Code 54220 5046
H. County MANITOWOC

I. Location change Date: / / J. Ownership change Date: / /

Section II Mailing address

A. Changed
B. Address: P.O. BOX 1330
C. City, Town, Village MANITOWOC D. State WI E. Zip Code 54221 133

Section III Name, title, and telephone number of the person who should be contacted if questions arise regarding this report.

A. Contact Person Name DOUGLAS DEATON B. Telephone Number (920) 684-3479
C. Email Address

Section IV North American Industry Classification System Code

A. 49319 B. C. D.

Section V. Certification

A. Last Name ADAMS First Name RICHARD M.I. M B. Title VP-OPERATIONS C. Date 2/28/2002

You must print, sign and mail in the certification form.

Section VI. Generator Status and Reporting Exemption

Type of Generator 2 SQG

Reason for not generating Never generated Out of business Only excluded or delisted waste Only Non-hazardous Waste
 Periodic or occasional generator Waste minimization activity Other

Reporting Exemption Not Exempt

Section VII. On-Site Management Status

A. Storage 1 No NR 680 licensed storage

B. Treatment, Recycling or Disposal 1 No hazardous waste treatment, recycling, or disposal on site during 2001 in a unit requiring an NR 680 license and the site does not plan to develop any on-site NR 680 licensed treatment, recycling, or disposal capacity

C: License-exempt Activities 1 No hazardous waste treatment, recycling, or disposal on-site during 2001 in a unit exempt from NR 680 licensing requirements and the site does not plan to develop any on-site NR 680 license- exempt licensed treatment, recycling, or disposal capacity

Comments:

FORM
FW

| | | | |
|------------------------|------------------------|--------------|------------|
| EPA ID: | WID006076574 | Facility ID: | 436033730 |
| Site Name: | Mirro Company Plant 09 | | |
| Site Location: | 1512 WASHINGTON ST | | |
| City, State, Zip Code: | MANITOWOC WI | | 54220 5046 |

1. Did you generate any hazardous waste in 2001? Yes
If yes, how many lbs. of hazardous waste did you generate? 523

2. Please answer each question in this section:

a. Was the hazardous waste recovered for recycling or reuse (including hazardous wastes incinerated for the purpose of energy recovery)? No
If yes, how many lbs.?

b. Was the waste leachate (which contained hazardous waste) transported to a wastewater treatment plant or discharged directly to a sewer pipe? No
If yes, how many lbs.?

c. Was the hazardous waste removed from a site or facility to repair environmental pollution? No
If yes, how many lbs.?

d. Was the hazardous waste collected by a municipality under a program for the collection and disposal of either household or agricultural hazardous waste? No
If yes, how many lbs.?

Net Waste (calculated from above) + 523
Fee Estimate (Based on net waste) \$215.23

3. During 2001 did you implement any new activities that resulted in minimization of the waste reported above?

4. What activities were implemented in 2001 to achieve the waste minimization results for the waste reported in question 1? Use the comment section to describe these activities.

Comment:

HAZARDOUS WASTE ANNUAL REPORT DATA - 2001

| Plant No.: 09 | | Monthly Disposal Volumes in Pounds | | | | | | | | | | | | |
|-------------------------------------|-----------------|------------------------------------|----------|----------|----------|--------------|----------|----------|----------|----------|----------|----------|----------|--------------|
| Month Gen.: | | JAN. | FEB. | MARCH | APRIL | MAY | JUNE | JULY | AUG. | SEPT. | OCT. | NOV. | DEC. | YE TOT. |
| BROKER | | | | | | | | | | | | | | |
| <i>Onyx</i> | | | | | | | | | | | | | | |
| 1. D002 | Lbs | 0 | 0 | 0 | 0 | 522.5 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 522.5 |
| [w.hydrochloric acid,8,UN1789,PGII] | Gal | | | | | 55 | | | | | | | | |
| | Wt. = 9.5 #/Gal | | | | | | | | | | | | | |
| Monthly Totals Gen.: | | 0 | 0 | 0 | 0 | 522.5 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 522.5 |

NewellMNIne000026



Charles Hauck
Maintenance Manager
Mirro Company
2015 Mirro Drive
Manitowoc, WI 54221

Diane Hammel
Program Assistant
Northeast Region Waste Management Program
Wisconsin Department of Natural Resources
1298 Lombardi Ave.
PO Box 10448
Green Bay, WI 54307-0448

Dear Ms. Hammel:

Please find attached the hard-copy report for one of our plants' hazardous waste 2002 report. This report could not be filed electronically due to computer errors in the data. Please note that the software allowed a printout of the report and that was submitted back on 3/1/03, a copy of that report is included for your reference.

Our other facilities' files were able to execute properly and were submitted on-time electronically via email to Ralph Patterson.

Please call with any questions.

Thank you,

A handwritten signature in black ink that reads "Charles Hauck". The signature is written in a cursive style with a large initial "C".

Charles Hauck
Maintenance Manager
Mirro Co.

Notice: Submission of this form is mandatory. Failure to submit this form may result in a forfeiture of up to \$25,000 per violation pursuant to s. 291.97, Wis. Stats., and chs. NR 600-685, Wis. Adm. Code. Personally identifiable information on this form is not intended to be used for any other purpose.

Instructions: Read and follow the detailed instructions beginning on page 4 of the 2002 Hazardous Waste Report booklet before completing this form.

Section I. Site name and location address - See page 4

A. EPA ID No.

WI D006076574

B. FID No.

436033730

C. Site / Company Name

Mirco CO, Plant # 9

D. Street Name and Number (If not applicable, enter industrial park, building name or other physical location description.)

1572 Washington ST

E. City, Town, Village, etc.

Manitowoc

F. State

WI

G. ZIP Code

54220 5046

H. County

Manitowoc

Location change occurred

Date (MM-DD-YY):

Ownership change occurred

Date (MM-DD-YY):

Section II. Mailing address of site - See page 4

A. Is the mailing address the same as the location address above?

Yes (skip to section III)

No (complete section II)

B. Number and Street Name or P.O. Box

2015 Mirco Dr.

C. City, Town, Village, etc.

Manitowoc

D. State

WI

E. ZIP Code

54221

Section III. Contact Person Information - See page 4

A. Contact First Name

CHARLES

M.I.

D

Last Name

HAUCK

Title

MAINTENANCE MGR.

B. Telephone Number

920-684-4421 Ext. 7158

C. E-Mail Address

chaucke@mirco.com

Section IV. North American Industry Classification System (NAICS) Code - See page 4 and List of NAICS Codes

A.

493190

B.

C.

D.

Section V. Certification - See page 5

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A. Please print.

Last Name

Adams

First Name

Richard

M.I.

M

B. Title

VP Operations

C. Signature

D. Date of Signature (MM/DD/YY)

3/14/2003

Attention: HAZARDOUS WASTE GENERATORS

If your facility was a **Very Small Quantity Generator** (generate less than 220 pounds of hazardous waste in every calendar month and accumulates less than 2,205 pounds of hazardous waste on site at any one time), or a **Non-Generator** (did not generate, transport, treat, store or dispose of any hazardous waste) during 2002, or applied for an EPA ID number for a **one-time clean up** of hazardous waste; you may not need to complete the 2002 Hazardous Waste Annual Report on the enclosed diskette.

You may instead complete the attached **FORM IC** and return it to your local DNR Regional Office (see mailing address and fax number on the map on the back page). Submission of this form will change your generator status and remove your facility from the reporting list (**upon verification of status by Department staff**).

~~An A and /or H (A for Air Emission Inventory Report, H for Hazardous Waste Report) on the mailing label of the enclosed diskette indicates which report(s) are on the diskette and are therefore required to be completed.~~

Please note: completing FORM IC does not in any way affect your requirement to complete the Air Emission Inventory report that may also be on the enclosed diskette.

If you have determined that you are not required to complete the Hazardous Waste Report, just **complete Sections I, II, III, V, and VI of the attached FORM IC.**

Include a reason for the change in generator status in the comment section of the form:

Sections IV and VII do not need to be completed.

Mail or Fax your completed form to your DNR Regional Office (see map on back).

Should you have any questions, please contact your DNR regional contact person identified on the enclosed map.

Company MIRRO COMPANY
 Location/Plant PLANT # 02 MIRRO DRIVE
 Date JULY 1, 2001

ANNUAL PCB DOCUMENT FOR 2000

NOTE: For conversion purposes, 2.21 lbs. equal 1 kg. and 1 gal. PCB fluid equals 12 lbs.

I. Summary Information of PCBs and PCB Items in Service:

(A) PCB Containers (list total weight in kilograms of any PCBs and PCB Items in PCB Containers).

| <u>DESCRIPTION OF PCB CONTAINER</u> | <u>CONTENTS OF CONTAINER</u> | <u>CONTENT WEIGHT (KG.)</u> | <u>LOCATION</u> |
|-------------------------------------|------------------------------|-----------------------------|-----------------|
| N/A | | | |

Total weight in kilograms of PCBs and PCB Items in Containers (summation of weight column): 0

(B) PCB Transformers: Total number of PCB Transformers: 0

Total weight of PCB fluid in these Transformers: N/A kg.

(C) PCB Contaminated Transformers:

Total number of PCB Contaminated Transformers: 0

Total weight of PCB fluid in these Transformers: N/A kg.

(D) Capacitors: Total number of PCB Large High Voltage Capacitors: 0

Total number of PCB Large Low Voltage Capacitors: 0

NewellNine00030

II. Summary Information of PCBs and PCB Items Projected for Disposal:

A. PCBs and PCB Items in PCB Containers

| <u>DESCRIPTION OF PCBs AND PCB ITEMS</u> | <u>FLUID WEIGHT (kg)</u> | <u>DATE REMOVED FROM SERVICE</u> | <u>DATE PLACED INTO STORAGE FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF STORAGE FACILITY (See Section III)</u> | <u>DATE PLACED INTO TRANSPORT FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF DISPOSAL FACILITY</u> |
|--|--------------------------|----------------------------------|--|--|--|--|
|--|--------------------------|----------------------------------|--|--|--|--|

N/A

Total weight in kilograms of PCBs and PCB Items in Containers (summation of above weight column): _____ kg

B. PCB Transformers

| <u>DESCRIPTION OF PCB TRANSFORMER</u> | <u>FLUID WEIGHT (kg)</u> | <u>DATE REMOVED FROM SERVICE</u> | <u>DATE PLACED INTO STORAGE FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF STORAGE FACILITY (See Section III)</u> | <u>DATE PLACED INTO TRANSPORT FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF DISPOSAL FACILITY</u> |
|---------------------------------------|--------------------------|----------------------------------|--|--|--|--|
|---------------------------------------|--------------------------|----------------------------------|--|--|--|--|

Total Number of PCB Transformers: 0

Total Weight in kilograms of PCB fluid in PCB Transformers (summation of above weight column): _____ kg.

NewellMine000031

C. PCB Large High and Low Voltage Capacitors

| <u>DESCRIPTION OF CAPACITOR</u> | <u>DATE REMOVED FROM SERVICE</u> | <u>DATE PLACED INTO STORAGE FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF STORAGE FACILITY (See Section III)</u> | <u>DATE PLACED INTO TRANSPORT FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF DISPOSAL FACILITY</u> |
|-------------------------------------|--------------------------------------|--|--|--|--|
| N/A | | | | | |

Total Number of PCB Large High Voltage Capacitors:

0

Total Number of PCB Large Low Voltage Capacitors:

0

III. Summary Information of Storage Facilities

A. List Location(s) of Storage Site(s) -- assign a number to each site:

① PLANT 02 PCB STORAGE CELL

B. Receipt of PCBs and PCB Items at Storage Site(s):

| <u>STORAGE SITE (# FROM A)</u> | <u>DATE PCBs AND PCB ITEMS RECEIVED</u> | <u>DESCRIPTION OF PCBs AND PCB ITEMS</u> | <u>FACILITY FROM WHICH PCBs AND PCB ITEMS WERE RECEIVED</u> | <u>OWNER OF FACILITY FROM WHICH PCBs AND PCB ITEMS WERE RECEIVED</u> |
|--------------------------------|---|--|---|--|
| N/A | | | | |

C. Removal of PCBs and PCB Items from Storage Site(s): ~~2~~

| <u>STORAGE SITE (# FROM A)</u> | <u>DATE PCBs AND PCB ITEMS RECEIVED</u> | <u>DESCRIPTION OF PCBs AND PCB ITEMS</u> | <u>OWNER AND DESCRIPTION OF FACILITY THAT RECEIVED/REMOVED PCBs AND PCB ITEMS</u> |
|--------------------------------|---|--|---|
| ① | 9-13-00 | 887.3 Kg DEBRIS | SAFETY-KLEEN (PPM), INC. |
| ① | 9-13-00 | 207.3 Kg OIL | SAFETY-KLEEN (PPM), INC. |

D. Inventory Information (Complete D for each storage facility).

Section 1:

| | TOTAL WEIGHT OF PCB LIQUIDS IN CONTAINERS* (kg) | TOTAL WEIGHT OF PCBs IN ARTICLES IN CONTAINERS* (kg) | TOTAL WEIGHT OF PCBs IN PCB TRANSFORMERS (kg) |
|--------------------------|--|---|--|
| Received during year: | 0 | 0 | 0 |
| Transferred during year: | 207.3 | 887.3 | 0 |
| Retained at end of year: | 0 | 0 | 0 |

* Identify contents of PCB Containers: DEBRIS, OIL

Section 2: NOTE: The following table applies only to PCB Articles and PCB Equipment not in PCB Containers.

| PCB ARTICLES AND PCB EQUIPMENT | TOTAL NUMBER OF PCB ARTICLES AND EQUIPMENT RECEIVED DURING YEAR | TOTAL NUMBER OF PCB ARTICLES AND EQUIPMENT TRANSFERRED DURING YEAR | OWNER & DESCRIPTION OF FACILITY THAT RECEIVED TRANSFERRED PCB ARTICLES AND EQUIPMENT | TOTAL NUMBER OF PCB ARTICLES AND EQUIPMENT REMAINING AT YEAR END |
|--------------------------------|---|--|--|--|
|--------------------------------|---|--|--|--|

N/A

NewellMNine000034

Company MICRO COMPANY

Location/Plant PLANT # 9

Date JULY 1, 2001

ANNUAL PCB DOCUMENT FOR 19 2000

NOTE: For conversion purposes, 2.21 lbs. equal 1 kg. and 1 gal. PCB fluid equals 12 lbs.

I. Summary Information of PCBs and PCB Items in Service:

(A) PCB Containers (list total weight in kilograms of any PCBs and PCB Items in PCB Containers).

| <u>DESCRIPTION OF PCB CONTAINER</u> | <u>CONTENTS OF CONTAINER</u> | <u>CONTENT WEIGHT (KG.)</u> | <u>LOCATION</u> |
|-------------------------------------|------------------------------|-----------------------------|-----------------|
| N/A | | | |

Total weight in kilograms of PCBs and PCB Items in Containers (summation of weight column): 0

(B) PCB Transformers: Total number of PCB Transformers: 2

Total weight of PCB fluid in these Transformers: 4091 kg.

(C) PCB Contaminated Transformers:

Total number of PCB Contaminated Transformers: 0

Total weight of PCB fluid in these Transformers: N/A kg.

(D) Capacitors: Total number of PCB Large High Voltage Capacitors: 0

Total number of PCB Large Low Voltage Capacitors: 0

II. Summary Information of PCBs and PCB Items Projected for Disposal:

A. PCBs and PCB Items in PCB Containers

| <u>DESCRIPTION OF PCBs AND PCB ITEMS</u> | <u>FLUID WEIGHT (kg)</u> | <u>DATE REMOVED FROM SERVICE</u> | <u>DATE PLACED INTO STORAGE FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF STORAGE FACILITY (See Section III)</u> | <u>DATE PLACED INTO TRANSPORT FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF DISPOSAL FACILITY</u> |
|--|--------------------------|----------------------------------|--|--|--|--|
|--|--------------------------|----------------------------------|--|--|--|--|

Total weight in kilograms of PCBs and PCB Items in Containers (summation of above weight column): 0 kg

B. PCB Transformers

| <u>DESCRIPTION OF PCB TRANSFORMER</u> | <u>FLUID WEIGHT (kg)</u> | <u>DATE REMOVED FROM SERVICE</u> | <u>DATE PLACED INTO STORAGE FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF STORAGE FACILITY (See Section III)</u> | <u>DATE PLACED INTO TRANSPORT FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF DISPOSAL FACILITY</u> |
|---------------------------------------|--------------------------|----------------------------------|--|--|--|--|
|---------------------------------------|--------------------------|----------------------------------|--|--|--|--|

Total Number of PCB Transformers: 0

Total Weight in kilograms of PCB fluid in PCB Transformers (summation of above weight column): _____ kg

C. PCB Large High and Low Voltage Capacitors

| <u>DESCRIPTION OF CAPACITOR</u> | <u>DATE REMOVED FROM SERVICE</u> | <u>DATE PLACED INTO STORAGE FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF STORAGE FACILITY (See Section III)</u> | <u>DATE PLACED INTO TRANSPORT FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF DISPOSAL FACILITY</u> |
|-------------------------------------|--------------------------------------|--|--|--|--|
|-------------------------------------|--------------------------------------|--|--|--|--|

Total Number of PCB Large High Voltage Capacitors: 0

Total Number of PCB Large Low Voltage Capacitors: 0

III. Summary Information of Storage Facilities

A. List Location(s) of Storage Site(s) -- assign a number to each site:

N/A

B. Receipt of PCBs and PCB Items at Storage Site(s):

| <u>STORAGE SITE (# FROM A)</u> | <u>DATE PCBs AND PCB ITEMS RECEIVED</u> | <u>DESCRIPTION OF PCBs AND PCB ITEMS</u> | <u>FACILITY FROM WHICH PCBs AND PCB ITEMS WERE RECEIVED</u> | <u>OWNER OF FACILITY FROM WHICH PCBs AND PCB ITEMS WERE RECEIVED</u> |
|--|---|--|---|--|
|--|---|--|---|--|

C. Removal of PCBs and PCB Items from Storage Site(s):

| <u>STORAGE SITE (# FROM A)</u> | <u>DATE PCBs AND PCB ITEMS RECEIVED</u> | <u>DESCRIPTION OF PCBs AND PCB ITEMS</u> | <u>OWNER AND DESCRIPTION OF FACILITY THAT RECEIVED/REMOVED PCBs AND PCB ITEMS</u> |
|--|---|--|---|
|--|---|--|---|

D. Inventory Information (Complete D for each storage facility).

Section 1:

| | TOTAL WEIGHT OF PCB LIQUIDS IN CONTAINERS* (kg) | TOTAL WEIGHT OF PCBs IN ARTICLES IN CONTAINERS* (kg) | TOTAL WEIGHT OF PCBs IN PCB TRANSFORMERS (kg) |
|--------------------------|--|---|--|
| Received during year: | 0 | 0 | 0 |
| Transferred during year: | 0 | 0 | 0 |
| Retained at end of year: | 0 | 0 | 0 |

* Identify contents of PCB Containers:

Section 2: NOTE: The following table applies only to PCB Articles and PCB Equipment not in PCB Containers.

| PCB ARTICLES AND PCB EQUIPMENT | TOTAL NUMBER OF PCB ARTICLES AND EQUIPMENT RECEIVED DURING YEAR | TOTAL NUMBER OF PCB ARTICLES AND EQUIPMENT TRANSFERRED DURING YEAR | OWNER & DESCRIPTION OF FACILITY THAT RECEIVED TRANSFERRED PCB ARTICLES AND EQUIPMENT | TOTAL NUMBER OF PCB ARTICLES AND EQUIPMENT REMAINING AT YEAR END |
|--------------------------------|---|--|--|--|
| N/A | | | | |

NewellMNine000039

Company MIRRO COMPANY
Location/Plant PLANT #9
Date July 1, 2002

ANNUAL PCB DOCUMENT FOR 2001

NOTE: For conversion purposes, 2.21 lbs. equal 1 kg. and 1 gal. PCB fluid equals 12 lbs.

I. Summary Information of PCBs and PCB Items in Service:

(A) PCB Containers (list total weight in kilograms of any PCBs and PCB Items in PCB Containers).

| <u>DESCRIPTION OF PCB CONTAINER</u> | <u>CONTENTS OF CONTAINER</u> | <u>CONTENT WEIGHT (KG.)</u> | <u>LOCATION</u> |
|---|----------------------------------|---------------------------------|-----------------|
|---|----------------------------------|---------------------------------|-----------------|

N/A

Total weight in kilograms of PCBs and PCB Items in Containers (summation of weight column): 0 kg.

(B) PCB Transformers: Total number of PCB Transformers: 2

Total weight of PCB fluid in these Transformers: 4091 kg.

(C) PCB Contaminated Transformers:

Total number of PCB Contaminated Transformers: 0

Total weight of PCB fluid in these Transformers: N/A kg.

(D) Capacitors: Total number of PCB Large High Voltage Capacitors: 0

Total number of PCB Large Low Voltage Capacitors: 0

II. Summary Information of PCBs and PCB Items Projected for Disposal:

A. PCBs and PCB Items in PCB Containers

| <u>DESCRIPTION</u> <u>OF PCBs AND</u> <u>PCB ITEMS</u> | <u>FLUID</u> <u>WEIGHT</u> <u>(kg)</u> | <u>DATE REMOVED</u> <u>FROM SERVICE</u> | <u>DATE PLACED</u> <u>INTO STORAGE</u> <u>FOR DISPOSAL</u> | <u>LOCATION AND OWNER</u> <u>OF STORAGE FACILITY</u> <u>(See Section III)</u> | <u>DATE PLACED</u> <u>INTO TRANSPORT</u> <u>FOR DISPOSAL</u> | <u>LOCATION AND OWNER</u> <u>OF</u> <u>DISPOSAL FACILITY</u> |
|--|--|--|--|--|--|--|
|--|--|--|--|--|--|--|

Total weight in kilograms of PCBs and PCB Items in Containers (summation of above weight column): 0 kg

B. PCB Transformers

| <u>DESCRIPTION</u> <u>OF PCB</u> <u>TRANSFORMER</u> | <u>FLUID</u> <u>WEIGHT</u> <u>(kg)</u> | <u>DATE REMOVED</u> <u>FROM SERVICE</u> | <u>DATE PLACED</u> <u>INTO STORAGE</u> <u>FOR DISPOSAL</u> | <u>LOCATION AND OWNER</u> <u>OF STORAGE FACILITY</u> <u>(See Section III)</u> | <u>DATE PLACED</u> <u>INTO TRANSPORT</u> <u>FOR DISPOSAL</u> | <u>LOCATION AND OWNER</u> <u>OF</u> <u>DISPOSAL FACILITY</u> |
|---|--|--|--|--|--|--|
|---|--|--|--|--|--|--|

Total Number of PCB Transformers: 0

Total Weight in kilograms of PCB fluid in PCB Transformers (summation of above weight column): _____ kg

NewellNine00004

C. PCB Large High and Low Voltage Capacitors

| <u>DESCRIPTION OF CAPACITOR</u> | <u>DATE REMOVED FROM SERVICE</u> | <u>DATE PLACED INTO STORAGE FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF STORAGE FACILITY (See Section III)</u> | <u>DATE PLACED INTO TRANSPORT FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF DISPOSAL FACILITY</u> |
|-------------------------------------|--------------------------------------|--|--|--|--|
|-------------------------------------|--------------------------------------|--|--|--|--|

Total Number of PCB Large High Voltage Capacitors: 0Total Number of PCB Large Low Voltage Capacitors: 0

III. Summary Information of Storage Facilities

A. List Location(s) of Storage Site(s) -- assign a number to each site:

N/A

B. Receipt of PCBs and PCB Items at Storage Site(s):

| <u>STORAGE SITE (# FROM A)</u> | <u>DATE PCBs AND PCB ITEMS RECEIVED</u> | <u>DESCRIPTION OF PCBs AND PCB ITEMS</u> | <u>FACILITY FROM WHICH PCBs AND PCB ITEMS WERE RECEIVED</u> | <u>OWNER OF FACILITY FROM WHICH PCBs AND PCB ITEMS WERE RECEIVED</u> |
|--------------------------------|---|--|---|--|
|--------------------------------|---|--|---|--|

C. Removal of PCBs and PCB Items from Storage Site(s):

| <u>STORAGE SITE (# FROM A)</u> | <u>DATE PCBs AND PCB ITEMS RECEIVED</u> | <u>DESCRIPTION OF PCBs AND PCB ITEMS</u> | <u>OWNER AND DESCRIPTION OF FACILITY THAT RECEIVED/REMOVED PCBs AND PCB ITEMS</u> |
|--------------------------------|---|--|---|
|--------------------------------|---|--|---|

D. Inventory Information (Complete D for each storage facility).

Section 1:

| | TOTAL WEIGHT OF PCB LIQUIDS IN CONTAINERS* (kg) | TOTAL WEIGHT OF PCBs IN ARTICLES IN CONTAINERS* (kg) | TOTAL WEIGHT OF PCBs IN PCB TRANSFORMERS (kg) |
|--------------------------|--|---|--|
| Received during year: | 0 | 0 | 0 |
| Transferred during year: | 0 | 0 | 0 |
| Retained at end of year: | 0 | 0 | 0 |

* Identify contents of PCB Containers:

Section 2: NOTE: The following table applies only to PCB Articles and PCB Equipment not in PCB Containers.

| <u>PCB ARTICLES AND PCB EQUIPMENT</u> | <u>TOTAL NUMBER OF PCB ARTICLES AND EQUIPMENT RECEIVED DURING YEAR</u> | <u>TOTAL NUMBER OF PCB ARTICLES AND EQUIPMENT TRANSFERRED DURING YEAR</u> | <u>OWNER & DESCRIPTION OF FACILITY THAT RECEIVED TRANSFERRED PCB ARTICLES AND EQUIPMENT</u> | <u>TOTAL NUMBER OF PCB ARTICLES AND EQUIPMENT REMAINING AT YEAR END</u> |
|---------------------------------------|--|---|---|---|
| N/A | | | | |

NewGIMNine000044

EPA DEFINITIONS / PCB REGULATIONS

1. "PCB Item" means any PCB Article, PCB Container, or PCB Equipment that deliberately or unintentionally contains or has a part of it any PCBs.
2. "PCB Article" means any manufactured item, other than a PCB Container, that contains PCBs and whose surface(s) has been in contact with PCBs. "PCB Article" includes capacitors and transformers.
3. "PCB Container" means any package, can, bottle, bag, barrel, drum, tank, or other device that contains PCBs or PCB Articles and whose surface(s) has been in direct contact with PCBs.
4. "PCB Equipment" means any manufactured item, other than a PCB container, which contains a PCB Article, and includes microwave ovens, electronic equipment, and fluorescent light ballasts and fixtures.
5. "Large High Voltage Capacitor" means a capacitor which contains 1.36 kg (3 lbs.) or more of dielectric fluid and which operate at 2000 volts or above.
6. "Large Low Voltage Capacitor" means a capacitor which contains 1.36 kg (3 lbs.) or more of dielectric fluid and which operates below 2000 volts .
7. "PCB Transformer" means any transformer that contains 500 ppm PCB or greater.
8. "PCB-Contaminated Transformer" means any transformer that contains 50 ppm or greater of PCB but less than 500 ppm PCB.
9. "Leak" means any instance in which a PCB Article, PCB Container, or PCB Equipment has any PCBs on any portion of its external surface.
10. "Moderate Leak" means any leak which results in any quantity of PCBs running off or about to run off the external surface of the PCB unit.

Company MIRRO COMPANY

Location/Plant PLANT #9

Date JULY 1, 2003

ANNUAL PCB DOCUMENT FOR 2002

NOTE: For conversion purposes, 2.21 lbs. equal 1 kg. and 1 gal. PCB fluid equals 12 lbs.

I. Summary Information of PCBs and PCB Items in Service:

(A) PCB Containers (list total weight in kilograms of any PCBs and PCB Items in PCB Containers).

| <u>DESCRIPTION OF PCB CONTAINER</u> | <u>CONTENTS OF CONTAINER</u> | <u>CONTENT WEIGHT (KG.)</u> | <u>LOCATION</u> |
|-------------------------------------|------------------------------|-----------------------------|-----------------|
| N/A | | | |

Total weight in kilograms of PCBs and PCB Items in Containers (summation of weight column): 0 kg.

(B) PCB Transformers: Total number of PCB Transformers: 2

Total weight of PCB fluid in these Transformers: 4091 kg.

(C) PCB Contaminated Transformers:

Total number of PCB Contaminated Transformers: 0

Total weight of PCB fluid in these Transformers: N/A kg.

(D) Capacitors: Total number of PCB Large High Voltage Capacitors: 0

Total number of PCB Large Low Voltage Capacitors: 0

NewellMNine000046

II. Summary Information of PCBs and PCB Items Projected for Disposal:

A. PCBs and PCB Items in PCB Containers

| <u>DESCRIPTION OF PCBs AND PCB ITEMS</u> | <u>FLUID WEIGHT (kg)</u> | <u>DATE REMOVED FROM SERVICE</u> | <u>DATE PLACED INTO STORAGE FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF STORAGE FACILITY (See Section III)</u> | <u>DATE PLACED INTO TRANSPORT FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF DISPOSAL FACILITY</u> |
|--|--------------------------|----------------------------------|--|--|--|--|
|--|--------------------------|----------------------------------|--|--|--|--|

Total weight in kilograms of PCBs and PCB Items in Containers (summation of above weight column): 0

B. PCB Transformers

| <u>DESCRIPTION OF PCB TRANSFORMER</u> | <u>FLUID WEIGHT (kg)</u> | <u>DATE REMOVED FROM SERVICE</u> | <u>DATE PLACED INTO STORAGE FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF STORAGE FACILITY (See Section III)</u> | <u>DATE PLACED INTO TRANSPORT FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF DISPOSAL FACILITY</u> |
|---------------------------------------|--------------------------|----------------------------------|--|--|--|--|
|---------------------------------------|--------------------------|----------------------------------|--|--|--|--|

Total Number of PCB Transformers: 0

Total Weight in kilograms of PCB fluid in PCB Transformers (summation of above weight column): _____ k

NewellNine000047

C. PCB Large High and Low Voltage Capacitors

| <u>DESCRIPTION OF CAPACITOR</u> | <u>DATE REMOVED FROM SERVICE</u> | <u>DATE PLACED INTO STORAGE FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF STORAGE FACILITY (See Section III)</u> | <u>DATE PLACED INTO TRANSPORT FOR DISPOSAL</u> | <u>LOCATION AND OWNER OF DISPOSAL FACILITY</u> |
|-------------------------------------|--------------------------------------|--|--|--|--|
|-------------------------------------|--------------------------------------|--|--|--|--|

Total Number of PCB Large High Voltage Capacitors:

0

Total Number of PCB Large Low Voltage Capacitors:

0

III. Summary Information of Storage Facilities

A. List Location(s) of Storage Site(s) -- assign a number to each site:

N/A

B. Receipt of PCBs and PCB Items at Storage Site(s):

| <u>STORAGE SITE (# FROM A)</u> | <u>DATE PCBs AND PCB ITEMS RECEIVED</u> | <u>DESCRIPTION OF PCBs AND PCB ITEMS</u> | <u>FACILITY FROM WHICH PCBs AND PCB ITEMS WERE RECEIVED</u> | <u>OWNER OF FACILITY FROM WHICH PCBs AND PCB ITEMS WERE RECEIVED</u> |
|--------------------------------|---|--|---|--|
|--------------------------------|---|--|---|--|

C. Removal of PCBs and PCB Items from Storage Site(s):

| <u>STORAGE SITE (# FROM A)</u> | <u>DATE PCBs AND PCB ITEMS RECEIVED</u> | <u>DESCRIPTION OF PCBs AND PCB ITEMS</u> | <u>OWNER AND DESCRIPTION OF FACILITY THAT RECEIVED/REMOVED PCBs AND PCB ITEMS</u> |
|--------------------------------|---|--|---|
|--------------------------------|---|--|---|

D. Inventory Information (Complete D for each storage facility).

Section 1:

| | TOTAL WEIGHT OF PCB LIQUIDS IN CONTAINERS* (kg) | TOTAL WEIGHT OF PCBs IN ARTICLES IN CONTAINERS* (kg) | TOTAL WEIGHT OF PCBs IN PCB TRANSFORMERS (kg) |
|--------------------------|--|---|--|
| Received during year: | ○ | ○ | ○ |
| Transferred during year: | ○ | ○ | ○ |
| Retained at end of year: | ○ | ○ | ○ |

* Identify contents of PCB Containers:

Section 2: NOTE: The following table applies only to PCB Articles and PCB Equipment not in PCB Containers.

| <u>PCB ARTICLES AND PCB EQUIPMENT</u> | <u>TOTAL NUMBER OF PCB ARTICLES AND EQUIPMENT RECEIVED DURING YEAR</u> | <u>TOTAL NUMBER OF PCB ARTICLES AND EQUIPMENT TRANSFERRED DURING YEAR</u> | <u>OWNER & DESCRIPTION OF FACILITY THAT RECEIVED TRANSFERRED PCB ARTICLES AND EQUIPMENT</u> | <u>TOTAL NUMBER OF PCB ARTICLES AND EQUIPMENT REMAINING AT YEAR END</u> |
|---------------------------------------|--|---|---|---|
|---------------------------------------|--|---|---|---|

N/A

NewquinnNine000050

EPA DEFINITIONS / PCB REGULATIONS

1. "PCB Item" means any PCB Article, PCB Container, or PCB Equipment that deliberately or unintentionally contains or has a part of it any PCBs.
2. "PCB Article" means any manufactured item, other than a PCB Container, that contains PCBs and whose surface(s) has been in contact with PCBs. "PCB Article" includes capacitors and transformers.
3. "PCB Container" means any package, can, bottle, bag, barrel, drum, tank, or other device that contains PCBs or PCB Articles and whose surface(s) has been in direct contact with PCBs.
4. "PCB Equipment" means any manufactured item, other than a PCB container, which contains a PCB Article, and includes microwave ovens, electronic equipment, and fluorescent light ballasts and fixtures.
5. "Large High Voltage Capacitor" means a capacitor which contains 1.36 kg (3 lbs.) or more of dielectric fluid and which operate at 2000 volts or above.
6. "Large Low Voltage Capacitor" means a capacitor which contains 1.36 kg (3 lbs.) or more of dielectric fluid and which operates below 2000 volts .
7. "PCB Transformer" means any transformer that contains 500 ppm PCB or greater.
8. "PCB-Contaminated Transformer" means any transformer that contains 50 ppm or greater of PCB but less than 500 ppm PCB.
9. "Leak" means any instance in which a PCB Article, PCB Container, or PCB Equipment has any PCBs on any portion of its external surface.
10. "Moderate Leak" means any leak which results in any quantity of PCBs running off or about to run off the external surface of the PCB unit.



ENVIRONMENTAL & REGULATORY SERVICES DIVISION
BUREAU OF PECFA
2129 Jackson Street
Oshkosh, Wisconsin 54901-1805
TDD #: (608) 264-8777
Fax #: (920) 424-0217
<http://www.commerce.state.wi.us>
<http://www.wisconsin.gov>
Jim Doyle, Governor
Cory L. Nettles, Secretary

November 26, 2003

Mr. Lou Meschede
Newell Rubbermaid, Inc.
6833 Stalter Drive, Suite 101
Rockford, IL 61108

RE: **Final Closure**

Commerce # 54220-5046-12 WDNR BRRTS # 03-36-274209
Mirro Plant #9, 1512 Washington Street, Manitowoc

Dear Mr. Meschede:

The Wisconsin Department of Commerce (Commerce) has received the item required as the condition for closure for the site referenced above. This case is now listed as "closed" on the Commerce database and will be included on the Wisconsin Department of Natural Resources (WDNR) Geographic Information System (GIS) Registry of Closed Remediation Sites to address residual soil contamination. It is in your best interest to keep all documentation related to the environmental activities that were conducted.

If residual contamination is encountered in the future, it must be managed in accordance with all applicable state and federal regulations. If it is determined that any remaining contamination poses a threat, the case may be reopened and further investigation or remediation may be required.

Thank you for your efforts to bring this case to closure. If you have any questions, please contact me in writing at the letterhead address or by telephone at (920) 424-0046.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert H. Klauk', with a stylized flourish at the end.

Robert H. Klauk, PG
Hydrogeologist
Site Review Section

cc: Lynelle P. Caine - Northern Environmental Technologies, Inc.
Case File

LETTER OF TRANSMITTAL

▲ Northern Environmental™
Hydrologists • Engineers • Geologists

954 Circle Drive 1-920-592-8400
 Green Bay, WI 54304-5537 Toll Free 1-800-854-0606
 Web Site: www.northern-env.com Fax 1-920-592-8444

| | |
|---|----------------------|
| Date: 11/24/03 | Project No. ESP-1241 |
| Attention: Mr. Bob Klauk | |
| RE: Soil GIS Packet | |
| Mirro Plant # 9, 1512 Washington Street | |
| Manitowoc, WI | |
| BRRTS #03-36-274209 | |
| Commerce #54220-5046-12 | |

TO: Mr. Bob Klauk

WI. Department of Commerce

2129 Jackson Street

Oshkosh, WI 54901

- WE ARE SENDING YOU:**
- Attached Under Separate Cover
- Shop Drawings Specifications Plans
- Copy of Letter Samples Change Order

| COPIES | DESCRIPTION |
|--------|-----------------|
| 1 | Soil GIS Packet |
| | |
| | |
| | |
| | |

THESE ARE TRANSMITTED

- | | | |
|---|---|---|
| <input type="checkbox"/> For Approval | <input type="checkbox"/> No Exceptions Taken | <input type="checkbox"/> Resubmit _____ Copies for Review |
| <input type="checkbox"/> For Your Use | <input type="checkbox"/> Make Noted Corrections | <input type="checkbox"/> Submit _____ Copies for Distribution |
| <input type="checkbox"/> As Requested | <input type="checkbox"/> Amend and Resubmit | <input type="checkbox"/> Return _____ Corrected Prints |
| <input type="checkbox"/> For Review and Comment | <input type="checkbox"/> _____ | <input type="checkbox"/> Review, Sign and Return |
| <input type="checkbox"/> For Bids Due: _____ | | |

REMARKS: Bob,

The above referenced site received conditional closure on December 18, 2001. As a condition to closure Newell Rubbermaid has opted to add the site to the soil GIS registry. The soil GIS packet is attached and the \$200 fee has been submitted to the WDNR.

Newell Rubbermaid currently owns all of Block #246 – a copy of the legal description for the entire block is attached. According to the Manitowoc County Register is Deeds each lot within the block has a separate deed. The remaining soil contamination is located within Lot 9 of Block #246. The most recent deed for Lot 9 is attached. Please feel free to call with any questions.

COPY TO: Lou Meschede, Newell Rubbermaid

SIGNED: _____
Lynelle P. Caine

Checklist of Documents for GIS Registry Packet

WI DNR, Bureau for Remediation and Redevelopment, PUB-RR-688

(Include with closure request – please assemble in this order. *This checklist applies to closure requests for sites with groundwater exceeding ch. NR 140 standards and/or soil contamination exceeding ch. NR 720 generic or site specific residual contaminant levels (RCLs).)*

- N/A One-time fee of \$250.00 for groundwater, and/or
- \$200 for soil, for each case closed, for maintenance of the registry.
- Copies of the most recent deed including legal descriptions, for all properties within or partially within the contaminated site boundaries. (Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.)
- A copy of the certified surveyed map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. (lots on subdivided or platted property (e.g. lot2 of xyz subdivision))
- Parcel identification number for each property, if the county in which the property is located uses parcel identification numbers. Part of Parcel # 000246000
- Geographic position of all properties within or partially within the contaminated site boundaries. The coordinates need to be for a spot located at least 40 feet inside the property boundary. Refer to NR 716.15(2)(d)7, and (k). The coordinates must be in WTM91 projection. See the following WDNR website address for assistance: www.dnr.state.wi.us/org/at/et/geog/gwur/index.htm.
- A location map which outlines all properties within the contaminated site boundaries on a U.S.G.S. topographic map or plat map in sufficient detail to permit the easy location of all parcels. If groundwater standards are exceeded, the map must also include the location of all municipal and potable wells within 1200 feet of the site. (If only one parcel, combine with next item.)
- A map of all contaminated properties within site boundaries, showing buildings, roads, property boundaries, contaminant sources, utility lines, monitoring wells and potable wells. This map shall also show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding ch. NR 140 enforcement standards, and/or in relation to the boundaries of soil contamination exceeding generic or site-specific residual contaminant levels as determined under s.. NR 720.09, 720.11 and 720.19.
- A table of the most recent analytical results, with sample collection dates: from all monitoring wells, and any potable wells for which samples have been collected for groundwater, and/or showing results for all contaminants found in pre-remedial sampling and in the most recent soil sampling event, for soils (without shading/crosshatching).
- N/A An isoconcentration map, if required as part of the site investigation (SI), of the contaminated properties within the site boundaries. The map should include the areal extent of groundwater contamination exceeding PALs and ESs, groundwater flow directions based on the most recent data, and sample collection dates. If an isoconcentration map was not required as part of the SI, substitute a map showing the horizontal extent of contamination, based on the most recent data.
- N/A A table of the previous 4 water level elevation measurements from all monitoring wells, at a minimum, with the date measurements were made, is to be included. If present, free product is to be noted on the table. In addition, a groundwater flow direction map, representative of groundwater movement at the site. If the flow direction varies by more than 20° over the history of the site, 2 groundwater flow maps showing the maximum variation in flow direction are to be submitted
- For sites closing with residual soil contamination, include a map showing the location of all soil samples and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeds generic or site specific residual contaminant levels.
- N/A A geologic cross section, if required as part of the SI, showing vertical extent and location of residual soil contamination exceeding generic or site specific RCLs and residual groundwater contamination, source extent and location; isoconcentrations for all groundwater contaminants that exceed PALs that remain when closure is requested; water table and piezometric elevations, and the location and elevation of geologic units, bedrock, and confining units, if any.
- A statement signed by the responsible party, which states that he or she believes that the legal descriptions attached to the statement are complete and accurate. (The point here is that the legal descriptions are describing the correct (i.e. contaminated) properties.)
- N/A A copy of the letters sent by the RP to all owners of properties with groundwater exceeding ESs (including the current source-property owner, if the RP is not the current source-property owner.) (Off source properties are listed separately with a link to the source property.)
- N/A A copy of all written notifications provided (to City/village/municipality/state agency or other responsible for maintenance) of a public street or highway or railroad right-of-way, within or partially within the boundaries of the contaminated site, for contamination exceeding groundwater ESs and/or soil exceeding generic or site specific RCLs.

LETTER OF TRANSMITTAL

▲ Northern Environmental™
Hydrologists • Engineers • Geologists

954 Circle Drive 1-920-592-8400
 Green Bay, WI 54304-5537 Toll Free 1-800-854-0606
 Web Site: www.northern-env.com Fax 1-920-592-8444

| | |
|---|----------------------|
| Date: 11/24/03 | Project No. ESP-1241 |
| Attention: Program Assistant | |
| RE: Soil GIS Registry Fee | |
| Mirro Plant # 9, 1512 Washington Street | |
| Manitowoc, WI | |
| BRRTS #03-36-274209 | |
| Commerce #54220-5046-12 | |

TO: WDNR
WI. Department of Natural Resources
PO Box 10448
Green Bay, WI 54307

- WE ARE SENDING YOU:**
- Attached Under Separate Cover
- Shop Drawings Specifications Plans
- Copy of Letter Samples Change Order

| COPIES | DESCRIPTION |
|--------|-----------------------|
| 1 | Soil GIS Registry Fee |
| | |
| | |
| | |
| | |

THESE ARE TRANSMITTED

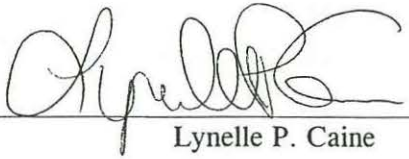
- | | | |
|---|---|---|
| <input type="checkbox"/> For Approval | <input type="checkbox"/> No Exceptions Taken | <input type="checkbox"/> Resubmit _____ Copies for Review |
| <input type="checkbox"/> For Your Use | <input type="checkbox"/> Make Noted Corrections | <input type="checkbox"/> Submit _____ Copies for Distribution |
| <input type="checkbox"/> As Requested | <input type="checkbox"/> Amend and Resubmit | <input type="checkbox"/> Return _____ Corrected Prints |
| <input type="checkbox"/> For Review and Comment | <input type="checkbox"/> _____ | <input type="checkbox"/> Review, Sign and Return |
| <input type="checkbox"/> For Bids Due: _____ | | |

REMARKS:

Enclosed is a check made payable to the WDNR for the Soil GIS Registry for Mirro Plant #9, 1512 Washington Street, Manitowoc, WI (BRRTS#03-36-274209). This site received conditional closure on December 18, 2001. A copy of the GIS packet has been forwarded to Bob Klauk at WDCOMM. Please feel free to call with any questions.

Shank

COPY TO: Lou Meschede, Newell Rubbermaid
Bob Klauk, WDCOMM

SIGNED: 
 Lynelle P. Caine

NORTHERN ENVIRONMENTAL TECHNOLOGIES, INC.
954 CIRCLE DR. PH. 920-592-8400
GREEN BAY, WI 54304

79-1198
759
5900062844

1092

Date 11-21-03

Pay to the
Order of

WVNR

\$ 200.⁰⁰

two hundred and 00/100

Dollars



WELLS FARGO
Wells Fargo Bank Wisconsin, N.A.
1900 S. Webster Ave.
Green Bay, WI 54301
www.wellsfargo.com

Memo ESP. 03-2200-1241

WVNR

⑆075911988⑆5900062844⑆01092

Newell Rubbermaid

November 19, 2003

Transmit via overnight delivery

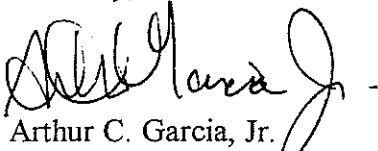
To Whom It May Concern:

Subject: Former Mirro Plant #9, 1512 Washington Street, Manitowoc, WI

This is to confirm that the legal description attached to this letter for the fuel oil release (BRRTS #03-36-274209) at Mirro Plant #9, 1512 Washington Street, Manitowoc, Wisconsin is complete and accurate.

If you have any questions, please feel free to call me at (815) 233-8059.

Sincerely,



Arthur C. Garcia, Jr.
Manager, Real Estate & Property

Enclosures

Legal Description

RECORD LEGAL DESCRIPTION:

All of Block 246, Original Plat of the City of Manitowoc, Manitowoc County, Wisconsin.

NEW MEASURED LEGAL DESCRIPTION:

Lots 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 and 18, Block 246, Original Plat of Manitowoc, City of Manitowoc, Manitowoc County, Wisconsin being more particularly described as follows:

Beginning at the Southeast corner of said Lot 17; thence N89 degrees 37'15"W, 300.00 feet; thence N00 degrees 20'39"E, 540.00 feet; thence S89 degrees 37'15"E, 300.00 feet; thence S00 degrees 20'39"E, 540.00 feet to the point of beginning.

Contained within said bounds 162,000 square feet or 3.7190 acres.

This description describes all the land described in the title commitment identified as Chicago Title Insurance Company Commitment Number X124416 having an effective date of October 20, 2003.

Notes Corresponding to Schedule B

- ⑩ Revocable Occupancy Permit recorded September 27, 2001 in Volume 1557, Page 355 as Document Number 886656. This item is plotted hereon and does affect the subject property.

WARRANTY DEED

No. 104958

This Indenture, Made this 2nd day of April in the year of our Lord, one thousand nine hundred and eleven between Michael E. Klemm and Dora Klemm his wife of Manitowishaugie Wisconsin part 1st of the first part, and Aluminum Goods Mfg. Company a corporation organized under the laws of New Jersey part 2nd of the second part

Witnesseth, That the said part 1st of the first part, for and in consideration of the sum of Four Thousand (4000.00) Dollars to them in hand paid by the said part 2nd of the second part, the receipt whereof is hereby confessed and acknowledged, have given, granted, bargained, sold remised, released, aliened, conveyed and confirmed, and by these presents do give, grant, bargain, sell, remise, release, alien, convey and confirm unto the said part 1st of the second part its successors heirs and assigns forever, the following described real estate, situated in the county of Manitowishaugie and State of Wisconsin, to-wit:

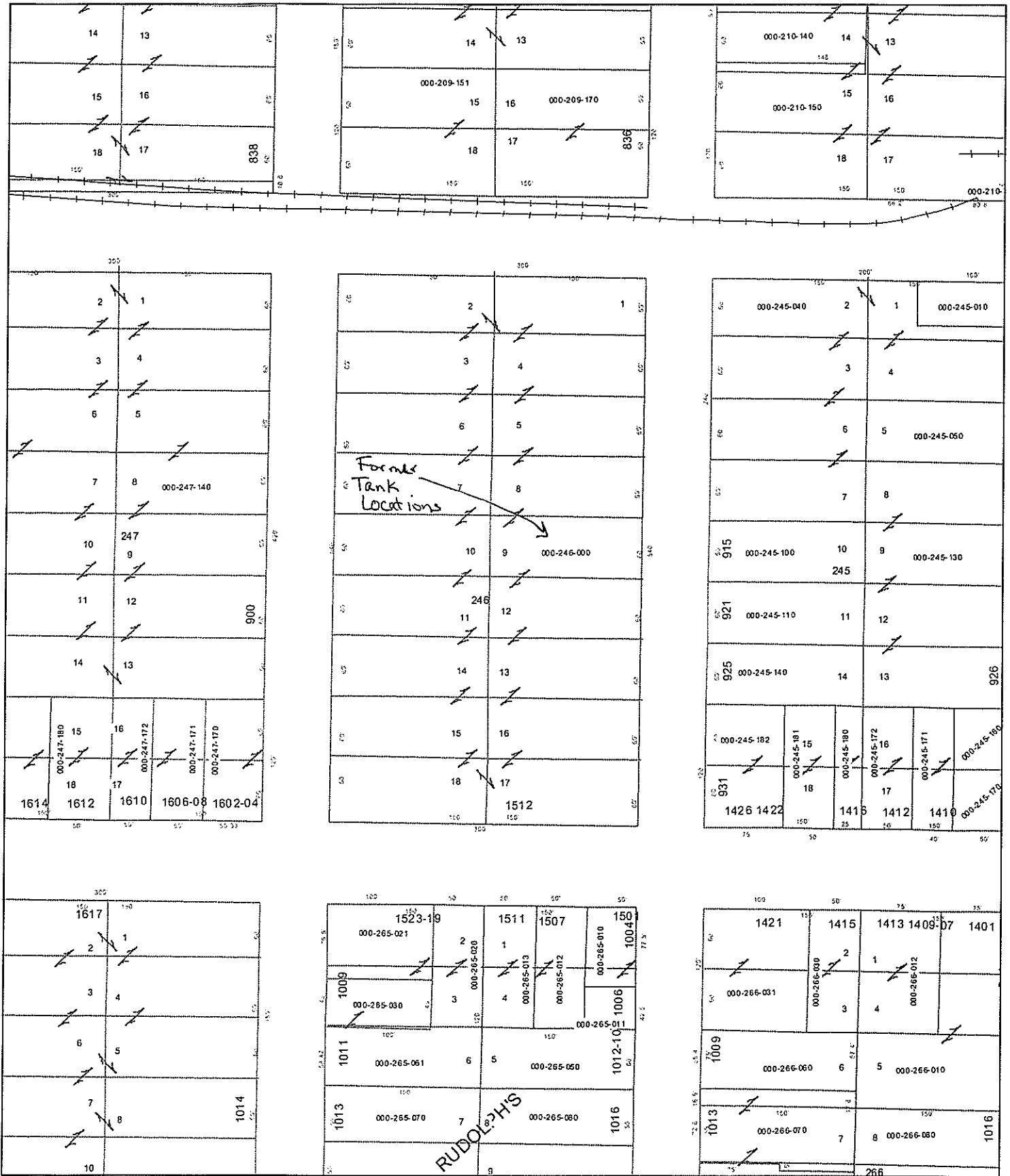
Lot No. Nine (9) in Block No two hundred forty - Six (246) in the city of Manitowishaugie Wisconsin according to the recorded plat thereof

Together with all and singular the hereditaments and appurtenances thereunto belonging or in any wise appertaining, and all the estate, right, title, interest, claim or demand whatsoever, of the said part 1st of the first part, either in law or equity, either in possession or expectancy of, in and to the above bargained premises, and their hereditaments and appurtenances.

To Have and to Hold the said premises as above described, with the hereditaments, and appurtenances, unto the said part 1st of the second part, and to its successors heirs and assigns FOREVER.

And the said Michael E. Klemm and Dora Klemm his wife for themselves their heirs, executors and administrators do covenant, grant, bargain and agree to and with the said part 1st of the second part its successors heirs and assigns that at the time of the execution and delivery of this

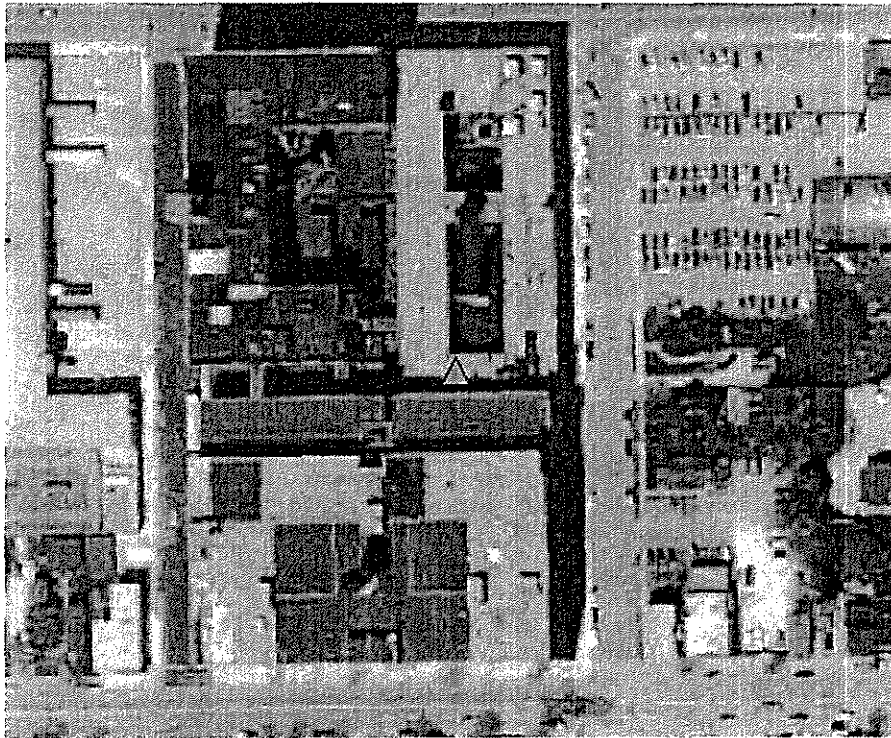
Manitowoc, Wisconsin



Tax parcel maps & data are believed to be accurate, but are not warranted.
 This is not a legal document and is not intended to be.

New Home Time 000060

Scale 1 : 1,537

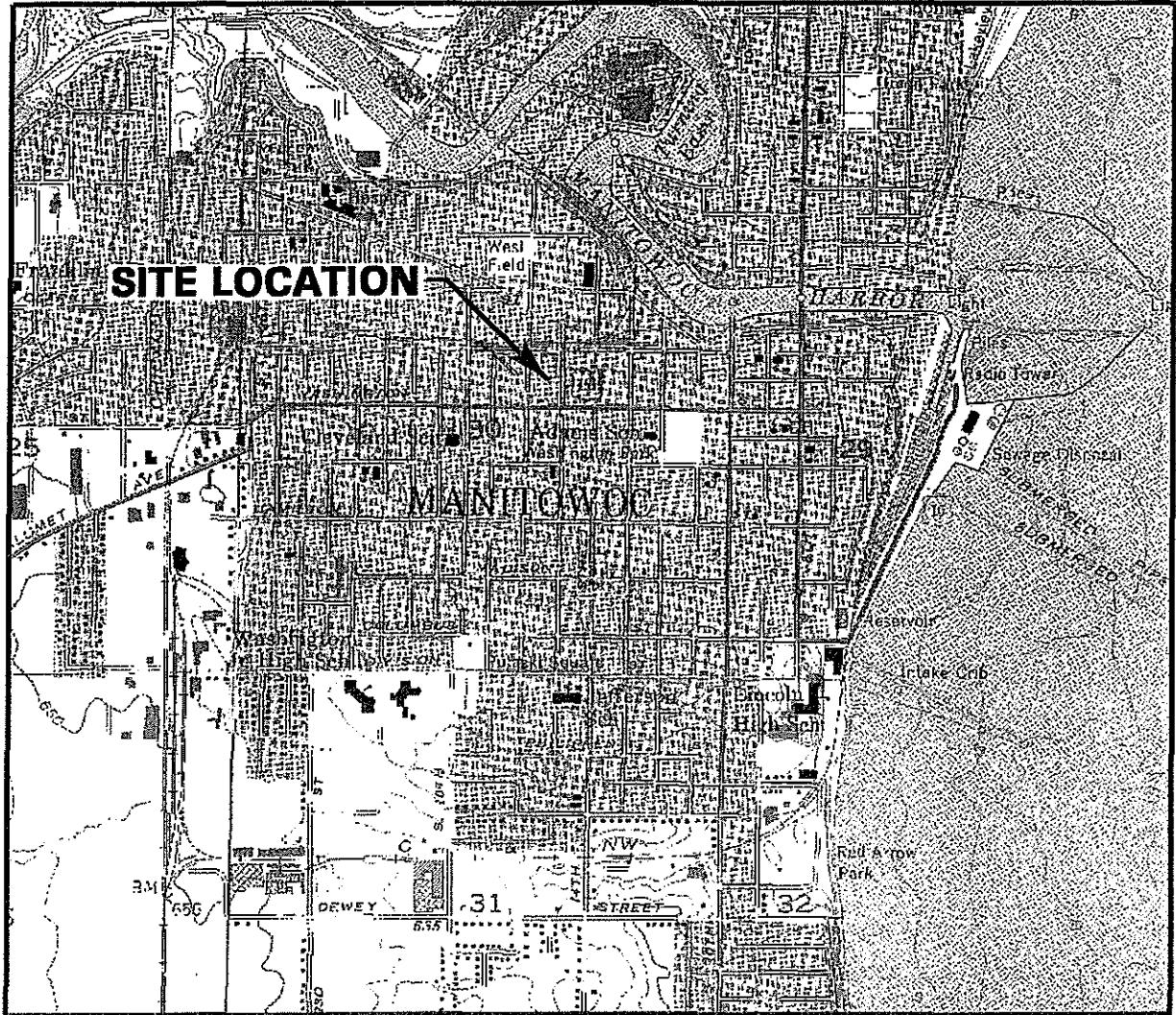


more information.

Please read the documentation for

△WTM coordinates: 706682, 404483

NewellMNine000061



SCALE IN FEET

1" = 2000'



CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929



QUADRANGLE LOCATION

BASE MAP SOURCE: USGS MANITOWOC, WISCONSIN 7.5 MINUTE QUADRANGLE, 1954 (PHOTOREVISED 1973)

DRAWN BY: KRE PROJECT: ESP-1241 DATE: 9/18/01

REV. DATE THIS DRAWING AND ALL INFORMATION CONTAINED THEREON IS THE PROPERTY OF NORTHERN ENVIRONMENTAL INCORPORATED AND SHALL NOT BE COPIED OR USED EXCEPT FOR THE PURPOSE FOR WHICH IT IS EXPRESSLY FURNISHED.

MIRRO COMPANY PLANT #9
MANITOWOC, WISCONSIN

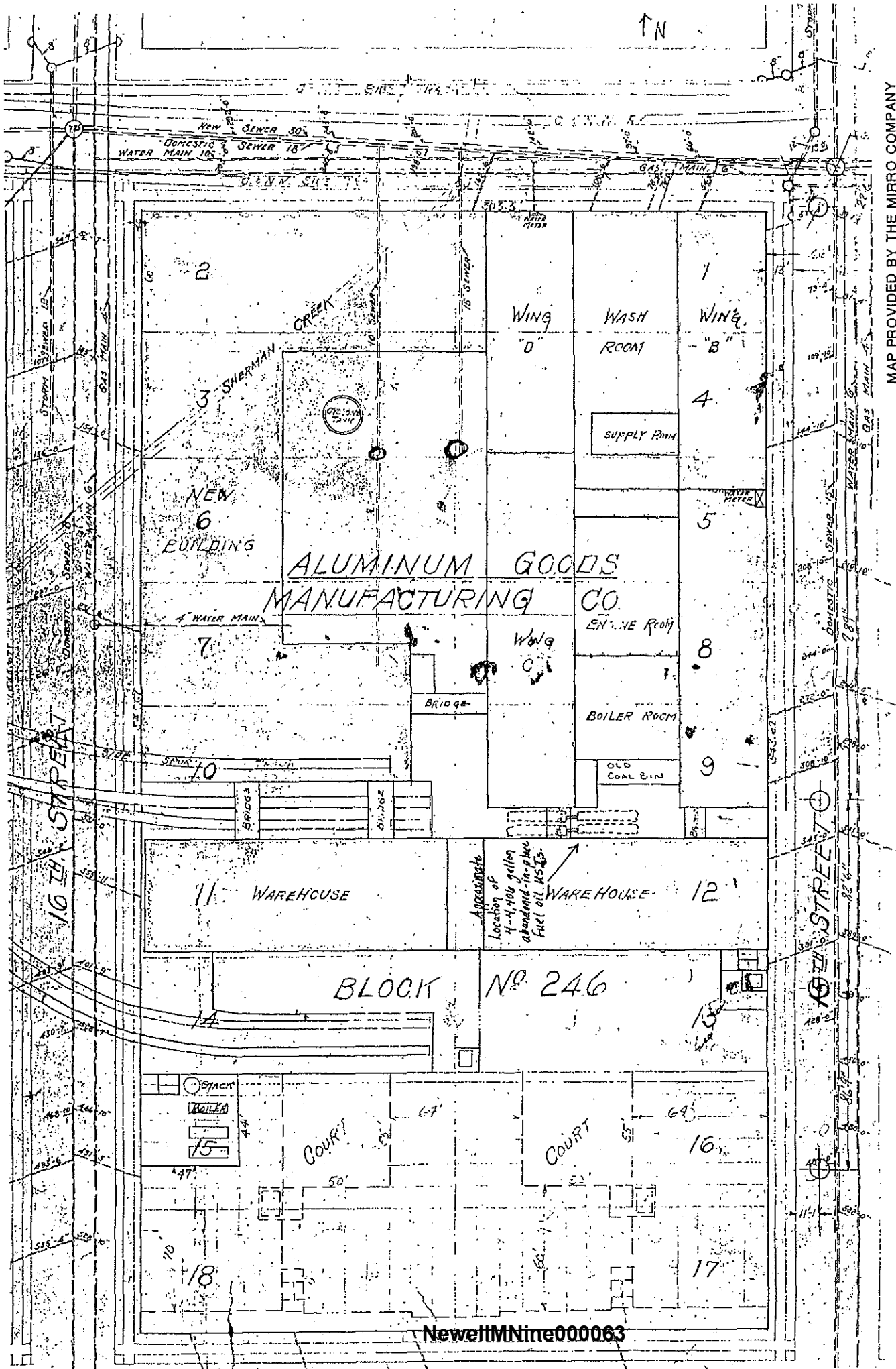
Northern Environmental SM
Hydrologists - Engineers
Newell, Inc. 00062

SITE LOCATION AND
LOCAL TOPOGRAPHY



S:\PROJ\ESP_22001241\DRAWINGS\091801-1.DWG

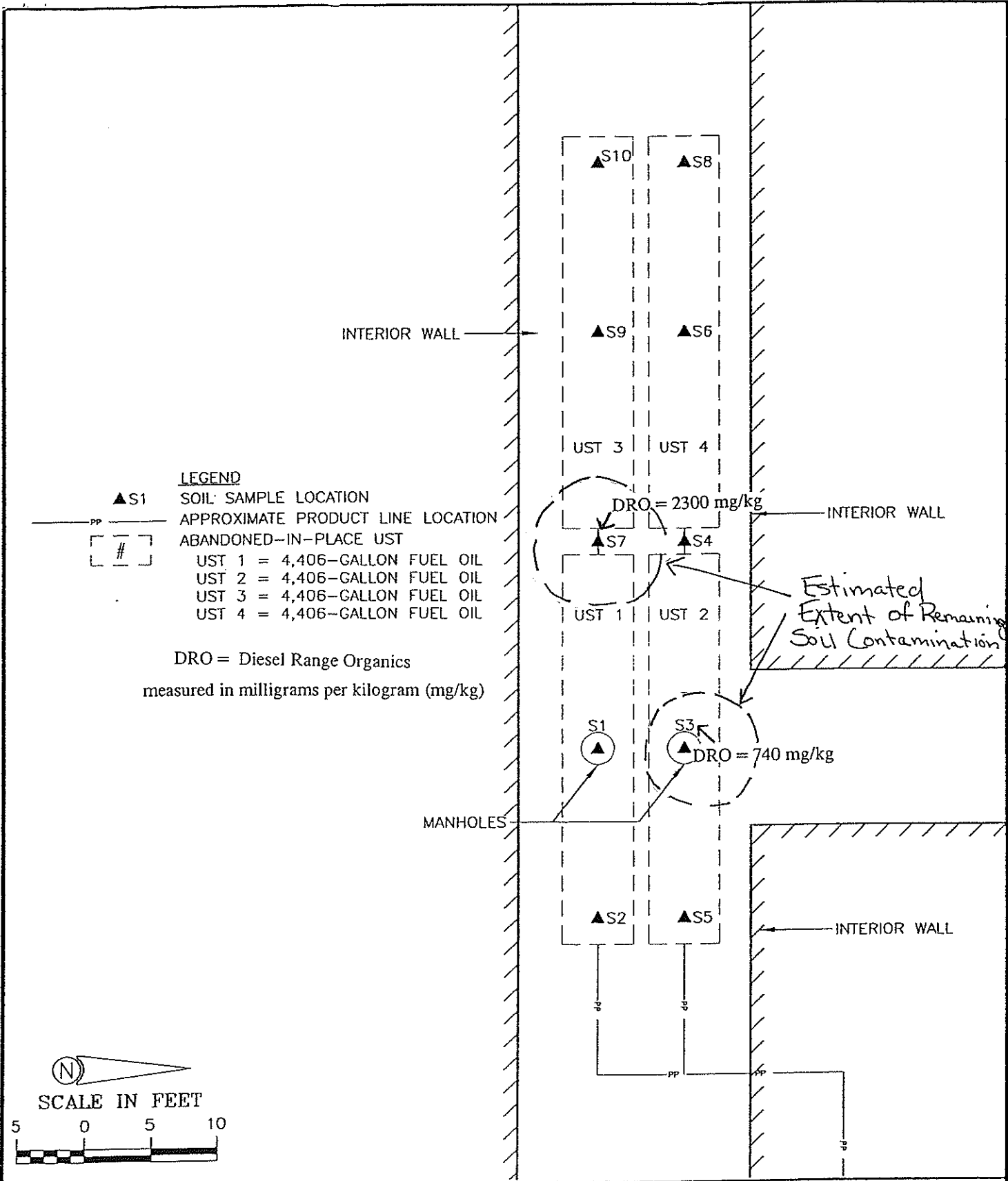
FIGURE 1



MAP PROVIDED BY THE MIRRO COMPANY

FIGURE 1

S:\PROJ\ESP\22001241\DRAWINGS\091801-2.DWG



LEGEND

▲ S1 SOIL SAMPLE LOCATION

— PP — APPROXIMATE PRODUCT LINE LOCATION

[#] ABANDONED-IN-PLACE UST

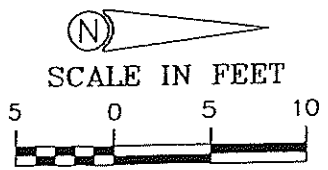
UST 1 = 4,406-GALLON FUEL OIL

UST 2 = 4,406-GALLON FUEL OIL

UST 3 = 4,406-GALLON FUEL OIL

UST 4 = 4,406-GALLON FUEL OIL

DRO = Diesel Range Organics
measured in milligrams per kilogram (mg/kg)



| | | |
|---|---|---------------|
| DRAWN BY: KRE | PROJECT: ESP-1241 | DATE: 9/18/01 |
| REV. DATE | THIS DRAWING AND ALL INFORMATION CONTAINED THEREON IS THE PROPERTY OF NORTHERN ENVIRONMENTAL INCORPORATED AND SHALL NOT BE COPIED OR USED EXCEPT FOR THE PURPOSE FOR WHICH IT IS EXPRESSLY FURNISHED. | |
| Northern Environmental SM Hydrologists - Engineers | | |

MIRRO COMPANY PLANT #9
MANITOWOC, WISCONSIN

SITE LAYOUT WITH
SOIL SAMPLE LOCATIONS

NEWELL INC 000064

FIGURE 2

Table 3, Soil Field Screening Results, Mirro Company, Plant #09, Manitowoc, WI

| Sample Number | Sample Depth (feet) | Sample Petroleum Odor | Sample Description | Date Collected | PID Headspace Analysis | | |
|---------------|---------------------|-----------------------|---|----------------|------------------------|---------------|--------------------|
| | | | | | Time Collected | Time Analyzed | PID Response (IUI) |
| S1 | 7.5 | Slight Fuel Oil | Sand Backfill | 6/20/01 | 1150 | 1300 | 8 |
| S2 | 7.5 | Slight Fuel Oil | Sand Backfill | 6/20/01 | 1200 | 1301 | 16 |
| S3 | 7.5 | Slight Fuel Oil | Sand Backfill | 6/20/01 | 1205 | 1302 | 8 |
| S4 | -7.5 | None | Sand Backfill | 6/20/01 | 1210 | 1303 | 0 |
| S5 | 7.5 | Slight Fuel Oil | Sand Backfill | 6/20/01 | 1215 | 1304 | 8 |
| S6 | 7.5 | None | Sand Backfill | 6/20/01 | 1220 | 1305 | 0 |
| S7 | 7.5 | Old Fuel Oil | Fine Sand, Some Silt Petroleum Staining | 6/20/01 | 1230 | 1306 | 40 |
| S8 | 7.5 | Slight Fuel Oil | Sand Backfill | 6/20/01 | 1235 | 1307 | 4 |
| S9 | 7.5 | Slight Fuel Oil | Sand Backfill | 6/20/01 | 1240 | 1308 | 4 |
| S10 | 7.5 | None | Sand Backfill | 6/20/01 | 1245 | 1309 | 0 |

NewellMINE000065

Key:

- PID = Photoionization Detector
- iui = Instrument units as isobutylene

Table 4 Soil Analytical Results, Mirro Company Plant #09, Manitowoc, Wisconsin

| Sample Number | Date Sampled | DRO (mg/kg) | Relevant and Significant Analytical Results (µg/kg) | | | | | | | | | | |
|--------------------------------|--------------|-------------|---|--------------|------|---------|------------------------|------------------------|---------|----------------------|----------------------|-------------|---------|
| | | | Benzene | Ethylbenzene | MTBE | Toluene | 1,2,4-Trimethylbenzene | 1,3,5-Trimethylbenzene | Xylenes | 1-Methyl Naphthalene | 2-Methyl Naphthalene | Naphthalene | Pyrene |
| WAC Residual Contaminant Level | | 100 | 5.5 | 2900 | NE | 1500 | NE | NE | 4100 | NE | NE | NE | NE |
| S1 | 06/20/01 | < 10 | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| S2 | 06/20/01 | < 10 | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| S3 | 06/20/01 | 740 | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| S4 | 06/20/01 | 11 | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| S5 | 06/20/01 | < 10 | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| S6 | 06/20/01 | < 10 | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| S7 | 06/20/01 | 2300 | < 25 | 37 | < 25 | < 25 | 1100 | 430 | 200 | 390 | 540 "J" | 140 "J" | 410 "J" |
| S8 | 06/20/01 | < 10 | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| S9 | 06/20/01 | < 10 | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| S10 | 06/20/01 | < 10 | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |

- Key:
- DRO = Diesel Range Organics
 - MTBE = Methyl-Tertiary-Butyl-Ether
 - mg/kg = Milligrams per kilogram
 - µg/kg = Micrograms per kilogram
 -
 - NE = Not Analyzed
 - NE = Not Established by Wisconsin Administrative Code
 - 740** = Exceeds RCLs

NewellMNine000066

Newell Rubbermaid[™]

August 18, 2000

Mr. Jim Ross
Vice President Operations
Mirro
1512 Washington Street
P.O. Box 1330
Manitowoc WI 54221-1330

RE: **Environmental Review – 8/1 – 8/2/00**

Dear Jim,

Thank you and the personnel at Mirro for your preparations and efforts related to the Environmental Review, which was very constructive. Many issues of concern were discussed with satisfactory results, such as compliance with permitting and reporting requirements.

The Plant 9 (Washington Street) facility is known to have certain areas of concern which include: (1) two (2) PCB transformers; (2) asbestos containing material inventory; (3) final closure of the TPH cleanup project on both sides of the building; and (4) abandonment of existing fuel oil tanks by the end of this year. Personnel are addressing these concerns responsibly.

The waste compactor at Plant 30 (South 16th Street) uses hydraulic oil and should be decommissioned as soon as possible. A potential exists for oil leakage to drain into the nearby storm sewer.

At Plant 10 (Wollmer Street) personnel are working on the soil/groundwater remediation project and investigating the discharge of solid industrial waste materials into the sanitary sewer which resulted in a Notice of Violation for Zinc dated July 19, 2000. Each of these concerns is being addressed satisfactorily.

The plans at Plant 60 (Mirro Drive) are to abandon two (2) waste oil tanks on-site and remove two (2) fuel oil tanks from the property by the end of this year. This will satisfy State of Wisconsin underground storage tank regulations.

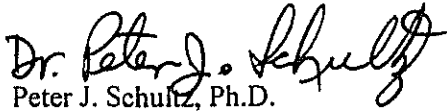
Currently, the most problematic situation occurs at Plant 02 (Mirro Drive) where water seeps inside the plant into cement lined pits constructed for the reheat furnaces. The water is slightly contaminated with PCBs and is not easy to dispose of. The drums of waste liquid also contain material from cleaning out the pits. This situation will be difficult to bring to final resolution because of the logistics of conducting any feasibility studies toward remediation.

August 18, 2000
Mirro Environmental Review
Page 2

WATCH OUT – COMING SOON – the EPA is planning this October to release revised Metal Products Pretreatment Standards for process wastewater discharges from designated operations. The USEPA wishes to finalize the regulations by December 2002. We will need, of course, to assess their impact.

Basically, all of the areas of concern represent a job well done. I will continue to assist plant personnel in these matters.

Sincerely,



Peter J. Schultz, Ph.D.
Director, Environmental Affairs
k

cc: ✓ Andrea L. Horne – Newell Rubbermaid
Thomas Reed -Mirro

Mirro Company Plant Information

| MIRRO COMPANY PLANT INFORMATION SUMMARY | | | | | | | |
|---|-----------|---|---------------|-------------|--------------|----------|-----------|
| Plant | Plt. Code | Address | EPA ID # | D&B Number | NPDES No. | SIC Code | FIC Code |
| ✓ 1 | 10 | 1616 Wollmer St. Manitowoc, WI 54220 | WID 006080683 | 13-609-1642 | 0044938-2 | 3469 | 436035050 |
| ✓ 2 | 20 | 44 Walnut St. Chilton, WI 53014 | WID 006080691 | 13-609-1642 | WI-0001392-5 | 3469 | 408021130 |
| ✓ 3 | 30 | 900 S. 16th St. Manitowoc, WI 54220 | WID 006076574 | 18-773-6533 | 0044938-2 | 3469 | 436020750 |
| 4 | 04 | 1945 S. 26th St. Manitowoc, WI 54220 | NA | | | 4225 | NA |
| 5-Complex | | 2015 Mirro Drive Manitowoc, WI 54220 | WIT 560010803 | 18-773-6533 | 0044938-2 | 3469 | 436037030 |
| 5A | 50 | | | | | | |
| 5B | 50 | | | | | | |
| 5C | 50 | | | | | | |
| 5D | 60 | | | | | | |
| 5E | 70 | | | | | | |
| 6 | 02 | 2401 Mirro Drive Manitowoc, WI 54220 | WID 000808626 | 18-773-6533 | 0044938-2 | 3353 | 436041100 |
| ⑦ | 01 | 2211 Mirro Drive Manitowoc, WI 54220 | WID 980616973 | 18-773-6533 | 0044938-2 | 4225 | NA |
| ✓ 8 | 08 | 2702 Division St. Manitowoc, WI 54220 | WID 006423578 | 14-773-2770 | | 3089 | NA |
| ✓ 9 | 9 | 1512 Washington St. Manitowoc, WI 54220 | WID 006076574 | 18-773-6533 | 0044938-2 | 4225 | 436033730 |

NewellMINE000069

*Federal ID # Mirro/Foley
314 116 228
Anchor/Hook; Federal ID*

plt 30 down March 99

*plt 10 prod Ended Ap. 30, '01
plt 20 prod Ended May 14, '01
Assembly Ended May 21, '01*

**Y
E
S**

YANKO ENVIRONMENTAL SERVICES, INC.
3303 PAINE AVENUE, SHEBOYGAN, WISCONSIN 53081, 414/459-2500

PHASE I
ENVIRONMENTAL AUDIT REPORT
for the
Mirro/Foley Company
Plant Number 9
1512 Washington Avenue
Manitowoc, Wisconsin

December, 1989

ENVIRONMENTAL AUDIT REPORT
for the
Mirro/Foley Company
Plant 9

December, 1989

Introduction

The Mirro/Foley Company plant number 9 is a large brick structure, located in the downtown business district of Manitowoc, Wisconsin. Plant 9 is bordered on the north by Franklin Street, on the south by Washington Street, on the east by 15th Street and on the west by 16th Street. Figure 1 shows the site location on a City of Manitowoc map.

The facility has been constructed as 22 separate buildings and now covers an entire city block. At its tallest point, the main building has seven full stories with a partial eighth floor. Although the entire facility was not constructed at the same time, it has been determined from discussions with Mirro/Foley Company employees that the oldest sections are approximately 75 years old and the newer sections are 40 to 50 years old.

The entire seventh floor and a portion of the sixth floor are occupied by the Mirro/Foley Company corporate offices and corporate support services, such as the printing shop, product quality control, and environmental engineering. A small portion of the fifth floor is utilized for light assembly. Throughout the buildings, there are many isolated areas that are used for warehouse and storage purposes. The first floor is served by several truck-loading docks that are actively used.

The heating plant (boiler room) is located on the first floor and in the basement, near the center of the facility. The boilers are fired by natural gas and are equipped with back-up burners for fuel oil. From the boiler room, there is a system of tunnels running beneath the first floor that contains piping for steam heat, water distribution piping, drain lines and electrical conduits.

Exterior construction is primarily brick with many large sections of glass windows.

The main entrance is at 1512 Washington Avenue, where the elevator bypasses the first six floors and leads to the seventh floor reception area. Therefore, plant visitors are restricted to the first floor entrance and the seventh floor unless accompanied by a Mirro/Foley Company escort. There is also an entrance for use by Mirro/Foley Company employees on 15th Street.

A listing of the buildings on the property, their construction materials, primary past usages and ages are shown on Table 1. A plot plan, showing the relative location of the 22 buildings at plant 9, is shown in Figure 2.

Property History

The facility was constructed by the Aluminum Goods Manufacturing Company which later merged with other companies to form the Mirro Corporation. The company began by manufacturing aluminum novelty items and then grew to become a major aluminum cookware producer. At the plant 9 facility, the production of aluminum cookware involved stamping, drawing, cleaning, and buffing of sheet aluminum. Near the center of the first floor, there is an area that was used for anodizing. In approximately 1965, automatic parts washers and spray painting operations were added to the facility for the application of non-stick surface coatings to aluminum cookware surfaces. Spray painting equipment included paint booths and low-temperature drying ovens.

The Mirro/Foley Company plants in the Manitowoc area have recently been renumbered. Many of the plant 9 facility records are found in files labeled "plant 2".

Applicable Environmental Regulations

Because plant 9 is no longer a manufacturing facility, the plant is not subject to most environmental control regulations. The cooling water discharge from air compressors located on the first floor is subject to regulation by the Wisconsin Pollutant Discharge Elimination System (WPDES) rules, if the water is directly discharged to the City of Manitowoc storm sewer system. Employees in all active work areas are covered by applicable OSHA regulations.

Waste Disposal Practices

Wastewater

In the past, industrial wastewater was generated by draw-coat operations and parts washing in preparation for painting. Industrial wastewater was discharged to the City of Manitowoc Wastewater Treatment System. Wastewater discharges from the facility to the sanitary sewer are now unregulated by Federal Pretreatment Categorical Standards, but are subject to compliance with local ordinances. There is no record on non-compliance for the facility.

Air Emissions

During cookware production, the primary air emissions were particulates from buffing and, possibly, volatile organic compounds from the application of non-stick coatings. Buffing dust was collected by cyclone collectors and masonry silos, located in the center of the facility. Residual buffing dust has been removed from the silos and landfilled, in accordance with applicable regulations. There is no record of active air emissions violations.

Hazardous Waste

When plant 9 was a manufacturing facility, hazardous wastes could have been generated from several processes, including:

1. Waste mineral spirits and other waste solvents from parts cleaning.
2. Waste sludge (phosphatizing compounds) from automatic parts washers.
3. Waste machine oil.
4. Waste paint and waste paint solvents, including paints and coatings used for non-stick surfaces.
5. Waste boiler water treatment compounds.
6. Waste acids from anodizing.
7. Waste draw coat compounds (from molding or stamping)
8. Waste release agents (from molding or stamping).
9. Waste buffing compounds.
10. Waste maintenance and cleaning chemicals.

Although there is no record of improper hazardous waste management or hazardous material spills at the facility, there are remnants of hazardous wastes and unused hazardous materials on site. There are several containers of material, both labeled and unlabeled, that are classified as hazardous waste in storage at plant 9. There are also several containers that are suspect hazardous waste (laboratory analysis required for confirmation). Most of these containers are found on the first floor. Table 2 summarizes the number and size of containers, provides a description of the contents (with the information available), and gives the location in the facility for each group of waste materials.

The anodizing area, on the first floor, appears to be thoroughly clean with no evidence of residual acid accumulation or storage.

Underground Storage Tanks

According to existing Mirro/Foley Company records, there are presently four underground storage tanks (UST) at plant 9, each with a capacity of 4,000 gallons. The tanks are reportedly used for storing fuel oil, to be used as a backup fuel in the facility's boilers, in the event that natural gas is not available. The tanks are located beneath the concrete floor of building A, on the east side of the facility. The north side of the tank area is contained by a concrete block wall that is visible in a basement area off of the main boiler room. There is no record of past leak detection tests or inventory control for detection of product loss for these tanks.

Because the four 4,000-gallon tanks are used for the storage of fuel for heating purposes, to be used on the premises, the tanks are not regulated by the U.S. Environmental Protection Agency or the State of Wisconsin. New regulations, to be published by the State of Wisconsin Department of Industry, Labor, and Human Relations (DILHR) in 1990, are expected to specify control and monitoring procedures for this type of fuel oil storage tank.

In December 1988, the Mirro/Foley Company retained the U.S. Petroleum Equipment Company to remove seven underground storage tanks from the plant 9 site. Five of the seven storage tanks had been used to store mineral spirits and two were used to store diesel fuel. Based on results from testing by Miller Engineers of Sheboygan, Wisconsin, it was determined that there was soil contamination in and around the excavations from removal of the mineral spirits storage tanks.

Miller Engineers has prepared a remedial action plan to remove contamination from the affected areas. Because the contaminated soils are closely bounded by the plant 9 buildings and the adjacent roadways, Miller Engineers determined that soil removal was not a practical option. The engineers have recommended groundwater and vapor recovery systems as an effective method of removing soil contamination without disturbing building foundations, roadways, or underground utilities. The installation of groundwater monitoring wells will be necessary to confirm the extent of groundwater contamination and to document the effectiveness of the operation.

Appendix A contains a copy of Remedial Investigation Report, prepared by Miller Engineers and submitted to the Mirro/Foley Company on April 6, 1989. The report appears to be very complete and accurate.

In accordance with State regulations, the Mirro/Foley Company submitted a copy of Miller Engineers' remedial action plan to the Wisconsin Department of Natural Resources, Lake Michigan District Headquarters for review and approval. Appendix B is a copy of the Wisconsin Department of Natural Resources' approval letter, dated October 4, 1989.

The Mirro/Foley Company has selected Miller Engineers as the contractor to complete the remedial action and work is expected to begin in the near future.

Polychlorinated Biphenyl (PCB) Transformer Storage

The Mirro/Foley Company has completed a program to identify and remove the majority of the electrical transformers containing oil with PCB's from the plant 9 buildings. There are two large PCB transformers in use, located on the first and second floors. There are 11 small transformers suspected of containing PCB oil, located as follows:

1. One transformer located next to door labeled 525, on the fifth floor.
2. One transformer located in an electrical equipment closet labeled 515, on the fifth floor.
3. Three transformers in building K, fourth floor.
4. Three transformers located in the men's restroom, in building A, third floor.
5. Three transformers, apparently abandoned, located in the access to the tunnels beneath the first floor, off of stairwell number nine.

Radon Gas Testing

During the period December 4 through December 8, 1989, charcoal canisters for the measurement of airborne radon gas were placed in the tunnels beneath the first floor, at the base of three stairwells. Test results are as follows:

| <u>Sample Location</u> | <u>Radon Gas, picoCuries/liter</u> |
|------------------------|--|
| Base of Stairwell 3 | <1 |
| Base of Stairwell 6 | <1 |
| Base of Stairwell 9 | 4 |

The radon gas concentrations were measured to be at or below the U.S. Environmental Protection Agency advisory level of four picoCuries per liter.

Asbestos Inspection and Inventory

Asbestos-containing building materials are prevalent throughout the plant 9 facility. The majority of the asbestos is found in thermal insulation, in the form of pipe covering or tank covers (such as boiler blankets). This type of thermal insulation typically contains a high percentage of asbestos (up to 75 percent). In the entire facility, there is approximately 17,000 linear feet of asbestos-containing pipe insulation, 6,000 square feet of asbestos-containing tank cover, and 1,600 pipe joints and elbows that are covered with a mortar material that is assumed to contain asbestos. Asphalt floor tile, vinyl floor tile, and linoleum floor covering found in the buildings are also assumed to contain a small percentage (one to two percent) of asbestos. In addition, waste asbestos (pipe cover and other insulation) is found in drums, stored on the first floor and in the basement off of the main boiler room.

Appendix C contains a complete asbestos inspection report for plant 9 along with an estimate of damage for each floor. Table 3 provides a summary of asbestos-containing thermal insulation found in the facility.

Miscellaneous Environmental Concerns

1. In the abandoned portion of the sixth floor, there is a natural gas leak at the gas meter located next to the paint-drying ovens.
2. On the fifth floor, there are metal trays on the floor that contain a small amount of material that is assumed to be electroplating sludge. This material may be a hazardous waste.
3. On the second floor, there is a hard, dried "puddle" of paint-like or plastic material that measures approximately two feet in diameter and 2 inches thick. This material is deposited beneath a round, 24-inch diameter duct that contains a thick coating of the same material. The dried material may be hazardous.
4. On the first floor, building A, there is an accumulation of alkaline caustic soda that has been spilled on the floor in a storage area for plastic drums of the same material.
5. On the first floor, building B (northeast corner), the floor is covered with an oily sludge (oil/dirt mix), approximately one-half inch thick. The material on the floor may be a hazardous waste.
6. In the tunnel access in the room immediately north of the main boiler room (first floor), cooling water from air compressors is discharged to the tunnel floor, flooding this access area. It is assumed that the cooling water eventually drains to a sanitary sewer, which may be a violation of local wastewater treatment ordinances.

Photographs

This report is accompanied by photographs (color in original copy) that are representative or current environmental concerns at plant 9. The photographs and photograph log are in Appendix D.

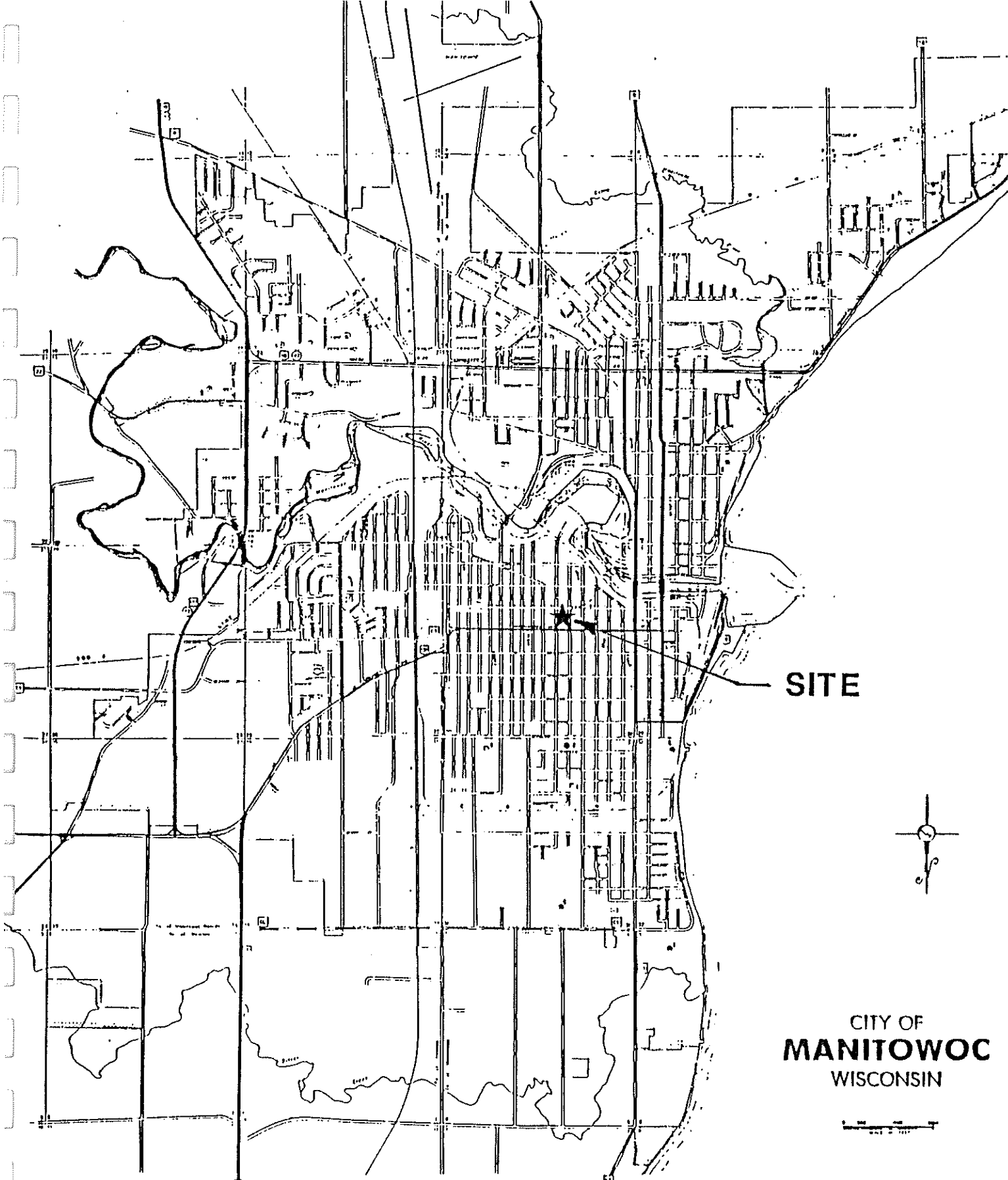


FIGURE 1
SITE LOCATION MAP

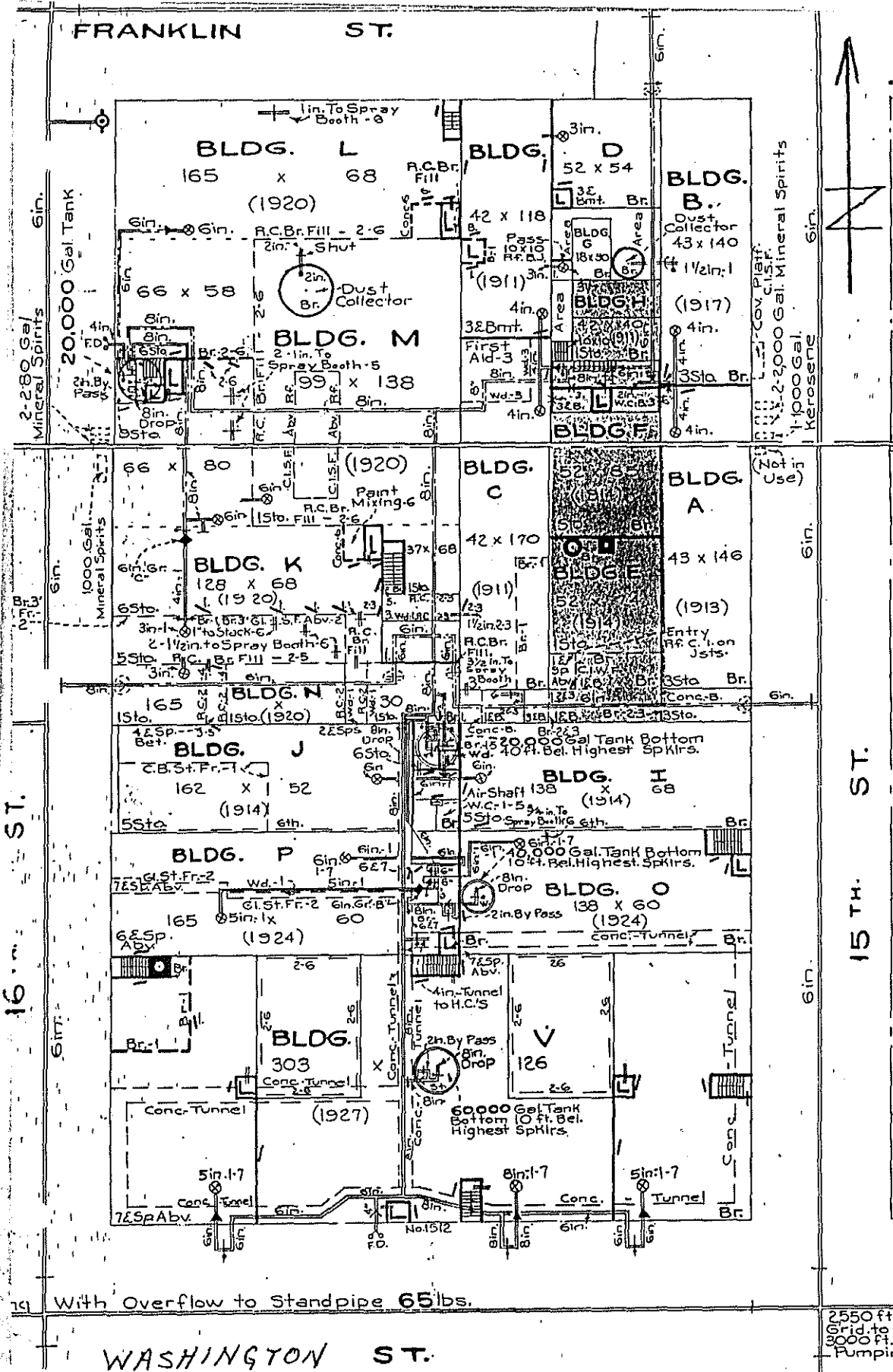


FIGURE 2

MIRRO CORP. -- PLOT 9

Table 1
 Mirro/Foley Company Plant 9
 1512 Washington Avenue
 Manitowoc, Wisconsin

| Bldg. | Construction | Use | Age (yrs.) | No. of Floors | Floor Material | Sq. Ft. |
|-------|---------------------------|-------------------------|------------|---------------|-----------------|---------|
| A | Brick & Steel | Mfg. | 53 | 3 | Maple on Plank | 22,808 |
| B | Brick & Steel | Mfg. | 49 | 3 | Maple on Plank | 20,937 |
| C | Brick & Steel | Mfg. | 55 | 3 | Maple on Plank | 22,721 |
| D | Brick & Steel | Mfg. | 55 | 3 | Maple on Plank | 29,332 |
| E | Brick & Steel | Boiler House | 52 | 1 | Concrete | 4,082 |
| F | Brick & Steel | Engine Room | 52 | 1 | Concrete | 3,085 |
| G | Brick & Steel | Mfg. | 49 | 1 | Concrete | 586 |
| H | Brick & Steel | (Lunch Room Showers) | 49 | 1 | Concrete | 1,640 |
| I | Brick & Steel | Mfg. Whse. | 52 | 5 | Maple on Plank | 36,010 |
| J | Brick & Steel | Mfg. Whse. | 52 | 5 | Maple on Plank | 41,860 |
| K | Ref'd Conc- Tile Steel | Mfg. | 46 | 6 | Maple on Conc. | 86,015 |
| L | Ref'd Conc- Tile Steel | Mfg. | 46 | 6 | Maple on Conc. | 94,665 |
| M | Ref'd Conc- Tile Steel | Mfg. | 46 | 1 | Maple on Conc. | 17,302 |
| N | Brick & Steel | Train Shed | 46 | 1 | ----- | 4,860 |
| O | Brick & Steel | Whse. | 42 | 7 | Maple on Plank | 57,204 |
| P | Brick & Steel | Whse. | 42 | 7 | Maple on Plank | 63,410 |
| Q | Brick & Steel | Boiler House | 42 | 1 | Concrete | 2,046 |
| T | Brick & Steel | Mfg. | 44 | 1 | Concrete | 51,504 |
| U | Brick & Steel | Mfg. | 44 | 1 | Concrete | 32,454 |
| V | Brick & Steel | Whse. | 39 | 7 | Maples on Plank | 263,702 |
| W | Brick & Steel | Mfg. | 19 | 1 | Concrete | 13,190 |
| V | Brick & Steel | Whse. | 20 | 1 | Concrete | 14,000 |

NewellMNine000080

TABLE 2

MIRRO/FOLEY COMPANY
Manitowoc, Wisconsin

File: Plant 9 Audit
Report: Haz materials locat

Page 1
12/12/89

| No. | Container | Description | Locat | Comment |
|-----|----------------|------------------------------|-------|--------------------|
| 4 | 30 gal plastic | caustic alkala | 1 A | spill on floor |
| 1 | 55 gal drum | Mineral Spirits UN1255 | 1 A | half full |
| 1 | 55 gal drum | R/C Wash Solvent | 1 C | |
| 5 | 5 gal plastic | Debron Brown 811-875 | 1 C | non-stick paint |
| 1 | 5 gal carboy | acid waste (?) | 1 C | bad label |
| 1 | 5 gal plastic | Micalon IV Brown Paint | 1 C | |
| 30 | Misc. small | paint, thinner, etc. | 1 C | 1 qt - 1 gal |
| 96 | 1 qt cans | Ren surface hardener | 1 C | 8 boxes |
| 1 | 5 gal pail | Hysol | 1 C | |
| 1 | 5 gal pail | black paint (?) | 1 C | unlabeled |
| 2 | 55 gal drum | oil/solvent waste (?) | 1 C | unlabeled |
| 1 | 5 gal plastic | Duraqua DK Gold Enamel | 1 C | |
| 8 | paper drums | asbestos waste | 1 C | |
| 1 | 200# drum | K514 Cleaner | 1 C | half full |
| 7 | 55 gal drum | oil waste | 1 C | leakers, unlabeled |
| 2 | paper drum | Globrite K539A | 1 C | |
| 1 | 30 gal drum | Exxon Lidox EPI 990-3749 | 1 C | |
| 4 | 55 gal drum | ash waste (?) | 1 C | asbestos? |
| 4 | 55 gal drum | oil-dry waste | 1 C | used material |
| 1 | 55 gal drum | Vapo-Solv | 1 I | North entryway |
| 1 | 55 gal drum | Quaker Draw 289-204 | 1 I | North entryway |
| 1 | 55 gal drum | SC Solvent 50 | 1 I | |
| 2 | 55 gal drum | Dowanol EB | 1 I | |
| 2 | 30 gal plastic | mortar waste (?) | 1 I | asbestos? |
| 1 | 55 gal drum | TowerKem W-2109 | 1 J | |
| 1 | 55 gal drum | LEA 8140 Scouring Compound | 1 J | |
| 12 | 50-lb bag | Dearborn 240 Boiler Treat | 1 K | torn bags |
| 1 | overpack drum | spill kit | 1 K | label by T.R. |
| 4 | paper drum | paint 456-236 T-782921 | 1 K | date 4/5/84 |
| 2 | 55 gal drum | butyl stearate | 1 K | |
| 1 | 5 gal pail | Hood die lube | 1 K | |
| 1 | 5 gal pail | Durachem Reducer 415 | 1 K | |
| 1 | 55 gal drum | Towersol G-9105 | 1 K | |
| 5 | 5 gal plastic | Debron 811-504 Dark Brown | 1 K | non-stick coating |
| 2 | 5 gal pail | ceramic paste | 1 K | |
| 1 | paper drum | used bar polish | 1 K | bad label |
| 1 | 55 gal drum | oil waste (?) | 1 K | no label |
| 2 | 30 gal plastic | Globrite 54 | 1 K | |
| 2 | 55 gal drum | Pydraul Hydraulic Fluid | 1 L | NW corner |
| 5 | 30 gal plastic | caustic alkala | 1 L | bad label |
| 1 | 55 gal drum | paint waste | 1 P | Haz label |
| 3 | 55 gal drum | roof coating | 1 P | bad label |
| 3 | 55 gal drum | Dearborn 726 water treatment | 1 P | |
| 1 | 55 gal drum | Nuto H48-1336 | 1 P | |
| 1 | 55 gal drum | LEA 8348 buffing compound | 1 P | |
| 5 | 55 gal drum | Globrite K 490 | 1 P | bad label |
| 1 | 55 gal drum | used lub. oil | 1 P | question |
| 3 | 5 gal pail | Sealant SE | 1 V | bad label |
| 1 | 5 gal pail | oil/solvent waste (?) | 2 A | |
| 19 | 5 gal pails | asphalt asbestos | 2 K | closet |

| No. | Container | Description | Locat | Comment |
|-----|----------------|--------------------------------|-------|-------------------|
| 3 | 50 lb bags | asbestos grout (dry) | 2 K | closet |
| 2 | 1 gal can | blue enamel | 2 K | closet |
| 3 | 1 gal can | silicone releasing agent | 3 V | |
| 2 | 55 gal drum | isopropyl alcohol | 5 K | half full |
| 4 | 5 gal pail | Johns-Manville concrete primer | 6 K | cumbustible label |
| 1 | 5 gal pail | asphalt primer | 6 K | attic |
| 2 | 3 gal can | fuel oil (?) | 6 K | attic, unlabeled |
| 3 | 5 gal plastic | Viscosine Type BA | B E | boiler room |
| 13 | 1 gal can | misc. paint | B E | boiler room |
| 1 | 30 gal plastic | asbestos waste | B E | boiler room |
| 1 | wood box | asbestos waste | B E | boiler room |
| 1 | garbage bag | asbestos waste | B E | boiler room |
| 1 | paper drum | asbestos waste | B E | boiler room |
| 1 | 55 gal drum | asbestos waste | B E | boiler room |

| Description | No. | Container | Locat | Comment |
|--------------------------------|-----|----------------|-------|--------------------|
| acid waste (?) | 1 | 5 gal carboy | 1 C | bad label |
| asbestos grout (dry) | 3 | 50 lb bags | 2 K | closet |
| asbestos waste | 8 | paper drums | 1 C | |
| asbestos waste | 1 | 30 gal plastic | B E | boiler room |
| asbestos waste | 1 | wood box | B E | boiler room |
| asbestos waste | 1 | garbage bag | B E | boiler room |
| asbestos waste | 1 | paper drum | B E | boiler room |
| asbestos waste | 1 | 55 gal drum | B E | boiler room |
| ash waste (?) | 4 | 55 gal drum | 1 C | asbestos? |
| asphalt asbestos | 19 | 5 gal pails | 2 K | closet |
| asphalt primer | 1 | 5 gal pail | 6 K | attic |
| black paint (?) | 1 | 5 gal pail | 1 C | unlabeled |
| blue enamel | 2 | 1 gal can | 2 K | closet |
| butyl stearate | 2 | 55 gal drum | 1 K | |
| caustic alkalai | 4 | 30 gal plastic | 1 A | spill on floor |
| caustic alkalai | 5 | 30 gal plastic | 1 L | bad label |
| ceramic paste | 2 | 5 gal pail | 1 K | |
| Dearborn 240 Boiler Treat | 12 | 50-lb bag | 1 K | torn bags |
| Dearborn 726 water treatment | 3 | 55 gal drum | 1 P | |
| Debron 811-504 Dark Brown | 5 | 5 gal plastic | 1 K | non-stick coating |
| Debron Brown 811-875 | 5 | 5 gal plastic | 1 C | non-stick paint |
| Dowanol EB | 2 | 55 gal drum | 1 I | |
| Durachem Reducer 415 | 1 | 5 gal pail | 1 K | |
| Duraqua DK Gold Enamel | 1 | 5 gal plastic | 1 C | |
| Exxon Lidox EPI 990-3749 | 1 | 30 gal drum | 1 C | |
| fuel oil (?) | 2 | 3 gal can | 6 K | attic, unlabeled |
| Globrite 54 | 2 | 30 gal plastic | 1 K | |
| Globrite K 490 | 5 | 55 gal drum | 1 P | bad label |
| Globrite K539A | 2 | paper drum | 1 C | |
| Hood die lube | 1 | 5 gal pail | 1 K | |
| Hysol | 1 | 5 gal pail | 1 C | |
| isopropyl alcohol | 2 | 55 gal drum | 5 K | half full |
| Johns-Manville concrete primer | 4 | 5 gal pail | 6 K | cumbustible label |
| K514 Cleaner | 1 | 200# drum | 1 C | half full |
| LEA 8140 Scouring Compound | 1 | 55 gal drum | 1 J | |
| LEA 8348 buffing compound | 1 | 55 gal drum | 1 P | |
| Micalon IV Brown Paint | 1 | 5 gal plastic | 1 C | |
| Mineral Spirits UN1255 | 1 | 55 gal drum | 1 A | half full |
| misc. paint | 13 | 1 gal can | B E | boiler room |
| mortar waste (?) | 2 | 30 gal plastic | 1 I | asbestos? |
| Nuto H48-1336 | 1 | 55 gal drum | 1 P | |
| oil waste | 7 | 55 gal drum | 1 C | leakers, unlabeled |
| oil waste (?) | 1 | 55 gal drum | 1 K | no label |
| oil-dry waste | 4 | 55 gal drum | 1 C | used material |
| oil/solvent waste (?) | 2 | 55 gal drum | 1 C | unlabeled |
| oil/solvent waste (?) | 1 | 5 gal pail | 2 A | |
| paint 456-236 T-782921 | 4 | paper drum | 1 K | date 4/5/84 |
| paint waste | 1 | 55 gal drum | 1 P | Haz label |
| paint, thinner, etc. | 30 | Misc. small | 1 C | 1 qt - 1 gal |
| Fydraul Hydraulic Fluid | 2 | 55 gal drum | 1 L | NW corner |

| Description | No. | Container | Locat | Comment |
|--------------------------|-----|---------------|-------|----------------|
| Quaker Draw 289-204 | 1 | 55 gal drum | 1 I | North entryway |
| R/C Wash Solvent | 1 | 55 gal drum | 1 C | |
| Ren surface hardener | 96 | 1 qt cans | 1 C | 8 boxes |
| roof coating | 3 | 55 gal drum | 1 P | bad label |
| SC Solvent 50 | 1 | 55 gal drum | 1 I | |
| Sealant SE | 3 | 5 gal pail | 1 V | bad label |
| silicone releasing agent | 3 | 1 gal can | 3 V | |
| spill kit | 1 | overpack drum | 1 K | label by T.R. |
| TowerKem W-2109 | 1 | 55 gal drum | 1 J | |
| Towersol G-9105 | 1 | 55 gal drum | 1 K | |
| used bar polish | 1 | paper drum | 1 K | bad label |
| used lub. oil | 1 | 55 gal drum | 1 P | question |
| Vapo-Solv | 1 | 55 gal drum | 1 I | North entryway |
| Viscosine Type BA | 3 | 5 gal plastic | B E | boiler room |

Table 3

Mirro/Foley Company - Plant 9
 Abandoned Manufacturing Area
 Manitowoc, Wisconsin

Summary of Asbestos-Containing Thermal Insulation
 December, 1989

| Location | Pipe Insulation, Linear feet | Tank Cover, Square feet | Pipe fittings with mortar |
|------------|---------------------------------|----------------------------|------------------------------|
| 6th floor | 2800 | 210 | 168 |
| 5th floor | 3760 | --- | 267 |
| 4th floor | 1750 | --- | 108 |
| 3rd floor | 3150 | --- | 140 |
| 2nd floor | 4528 | --- | 266 |
| 1st floor | 5950 | 4860 | 524 |
| Stairwells | 590 | --- | 47 |
| Tunnels | 500 (est.) | --- | 50 (est.) |

APPENDIX A

Underground Storage Tank
Remedial Investigation Report
by
Miller Engineers

MILLER ENGINEERS

5308 South Twelfth Street
Sheboygan, Wisconsin 53081
414-458-6164

April 6, 1989

#10146E

Mr. Tom Reed
Finishing and Environmental Engineer
Mirro Corporation-Foley Company
1512 Washington Street
P. O. Box 1330
Manitowoc, WI 54221-1330

Subject: Remedial Investigation Report
Mirro Plant No. 9
Manitowoc, Wisconsin

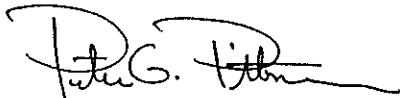
Dear Mr. Reed:

This report summarizes the results of soil exploration borings and analytical testing on soil and ground water samples obtained during the remedial investigation conducted on March 16, 21, 22 and 23, 1989. This work was performed in accordance with our proposal dated January 24, 1989, and was authorized by your P. O. #9-33241. This work was preceded by our Tank Abandonment Report dated January 23, 1989.

Conclusions and general recommendations for remedial action are also presented in this report. After your review, a copy of this report should be forwarded to Mr. Al Nass, WDNR-Green Bay.

Sincerely,

MILLER ENGINEERS



Peter G. Pittner
Environmental Scientist



Roger G. Miller, P.E.
Vice President-
Environmental Engineering

PGP/sj

Enclosures

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EXECUTIVE SUMMARY

Results of this investigation indicate that the extent of soil and ground water contamination resulting from past leakage from underground mineral spirit tanks at two locations on the property is quite localized in the source areas. Hydrocarbon concentrations in soil and ground water samples obtained from these areas exceed enforcement standards set by the State of Wisconsin Department of Natural Resources. It appears that significant contamination does not extend more than approximately 75 feet laterally from the abandoned tank locations and is limited to approximately 12 feet depth.

It is our opinion that the contamination does not present an imminent threat to public health but should be remediated to prevent the future spread of contamination in the shallow water table aquifer. It is likely that this can be accomplished with ground water recovery and vapor extraction from wells that we recommend be placed in the former tank locations. The following sections of this report provide additional detailed information.

BACKGROUND INFORMATION

Mirro Plant No. 9 is located at 1512 Washington Street, Manitowoc, Wisconsin. The plant occupies a one square block area: bordered on the north by Franklin Street, on the south by Washington Street, on the east by 15th Street and on the west by 16th Street. (Refer to the **Site Location Map** - Figure 1 in the Appendix). The facility has been in operation since 1911 and included seven underground storage tanks for diesel fuel and mineral spirits.

U. S. Petroleum Equipment Company, retained by Mirro Corporation, removed the seven underground storage tanks from the site on December 13 and 14, 1988. Miller Engineers provided on-site soil monitoring during excavation to document the removal. (Refer to the **Underground Tank Abandonment Documentation** in the Appendix.)

Five of the seven underground storage tanks had historically been used to store mineral spirits. The remaining two tanks were used to store diesel fuel. The tanks were located in three separate excavations adjacent to the manufacturing plant. Excavation No. 1, located on the west side of the building, contained three mineral spirit storage tanks. Excavation No. 2, located at the northwest building corner, contained two diesel fuel storage tanks. Excavation No. 3, located on the east side of the building, contained two mineral spirit storage tanks. The locations of the tank excavations are shown on the **Boring Location Plan - Figure 2** in the Appendix.

Based on the results of testing conducted by Miller Engineers during tank removal, it was evident that soil contamination occurred in and around Excavations No. 1 and 3. Excavation No. 2 showed no evidence of hydrocarbon contamination. In response to this, Mirro Corporation retained Miller Engineers to conduct a remedial investigation to determine the vertical and horizontal extent of soil contamination surrounding these excavations.

SCOPE OF INVESTIGATION

The purpose of this investigation was to determine the areas of soil contamination by mineral spirits to the extent possible by performing soil exploration borings. The soil borings also provided information on the site soil and ground water conditions. Based on this information, a plan for appropriate environmental protection action can be developed. General recommendations for remedial action are discussed in this report, but this does not constitute a detailed plan. With this objective, Miller Engineers performed the following tasks:

1. Soil Exploration Borings

Advanced 13 soil borings, ranging from 6.5 to 28.5 feet deep, on the site and adjacent properties. (Refer to the **Boring Location Plan** in the Appendix.) The locations of borings were selected based on the extent of contamination encountered in the field as well as the physical constraints of the site.

Soil samples were obtained from each soil boring and combustible vapor concentrations were monitored using an HNu meter (photoionization analyzer) in each soil boring. Soil samples were collected in a continuous vertical profile in areas of suspected contamination. A shallow ground water sample was also obtained from Boring 9. Soil borings were sealed with a mixture of bentonite and soil cuttings at the completion of the field work.

2. Laboratory Analysis of Soil and Ground Water

Visual classification as well as combustible vapor readings (HNu meter) by headspace analysis were performed on each soil sample in the laboratory. Selected soil samples were analyzed for Total Petroleum Hydrocarbons (TPHC). The ground water sample from Boring 9 was tested for benzene, ethylbenzene, xylene and toluene. These compounds pose a significant health risk, and are common water soluble constituents of petroleum hydrocarbons. These results are presented in the **Analytical Reports** in the Appendix.

3. Remedial Investigation and Feasibility Report

This report documents the details of the work performed and data collected. A Soil Boring Location Map that also indicates the apparent contaminated area is included. General recommendations are provided for soil and ground water remediation, and monitoring well locations are proposed.

NATURE OF CONTAMINANT

Mineral spirits is an aliphatic solvent consisting primarily of C₁₀-C₁₂ saturated hydrocarbons. It is generally a clear liquid and is miscible with most organic solvents.

Health hazards associated with mineral spirits include eye contact, skin contact, inhalation and ingestion. Reports have associated repeated and prolonged occupational overexposure to solvents with permanent brain and nervous system damage.

In the ground water environment, individual components of mineral spirits may dissolve. Four water soluble components of many fuels and solvents are benzene, toluene, ethylbenzene, and xylene (BETX). These compounds are classified as aromatic and have high vapor pressures in addition to being quite water soluble. Each of these compounds has associated health hazards, and criteria have been established to limit their presence in ground water. The State of Wisconsin Department of Natural Resources (WDNR) has set the following enforcement standards based on their risk to human health:

| <u>Substance</u> | <u>Enforcement Standard</u> |
|------------------|-----------------------------|
| Benzene | 0.67 parts per billion |
| Toluene | 343 parts per billion |
| Ethylbenzene | 1360 parts per billion |
| Xylene | 620 parts per billion |

REGIONAL GEOLOGIC CONDITIONS

On a regional scale, the study area is included as a part of the Lake Michigan Drainage Basin. The Lake Michigan Drainage Basin is a 3,600 square mile drainage area that lies along eastern Wisconsin and borders the western shore of Lake Michigan. The area is characterized by a rolling topography of moderate relief, which is the result of bedrock configuration and glacial deposition and erosion.

The surface geology in the Manitowoc region is a product of the late Wisconsin Ice Stage (glacier) which deposited approximately 100 feet of glacial drift material in the Manitowoc area. The occurrence of lake deposited organic material and stratified clay, silt and sand is common in the Manitowoc area.

The depth to ground water is typically less than 20 feet in the Manitowoc area. The regional ground water table tends to flow eastward towards Lake Michigan with a gradient of approximately 0.01 feet per foot. However, local variations in depths to ground water and flow patterns typically occur due to changes in soil stratigraphy, topography and man-made facilities.

SITE CONDITIONS

The Mirro plant is in a fully developed area of industrial buildings. The site is bounded by Franklin Street to the north, Washington Street to the south, 15th Street to the east and 16th Street to the west. Washington Street is a heavily traveled east-west arterial, and is an extension of S.T.H. "151". Surface grades at the site slope gently to the north at 1 to 2%, ranging between elevations 601 and 604 feet (U.S.G.S.) at the boring locations. A former stream bed, now a buried culvert, flows in a northeasterly direction under the northwest corner of the Mirro building, and is used to carry storm water runoff. The area is serviced by public water supply as well as sanitary and storm sewers.

The majority of the surrounding ground surface is asphalt or concrete paved, or is covered by buildings. There are presently small gravel areas at two of the former tank sites (Excavations No. 2 and 3). No grass or lawn areas are present in the immediate study area. The **Site Photographs** in the Appendix show the study area.

The surrounding topography is quite flat, sloping eastward toward Lake Michigan which is about 3/4 miles east of the site. The Manitowoc River is two blocks northeast of the site.

SOIL AND SHALLOW GROUND WATER CONDITIONS

All 13 soil borings performed revealed a similar soil profile that is consistent with the conditions revealed by the three former underground storage tank excavations at the site. Site soils ranged from silty sand to sandy silt in texture and are post-glacial lake and river deposits. Hydraulic conductivity of these soils is expected to range from 1×10^{-5} to 1×10^{-7} cm/sec. A layer of clayey silt was encountered below 25 feet depth in Boring 1.

Where noted in several of the soil borings, ground water was encountered at approximately 7 feet below grade.

Significant amounts of petroleum contamination, as indicated by HNu meter headspace analysis on samples, were encountered in the borings closest to the two former underground mineral spirit tank installations (B4, B5, B6 and B11). HNu meter headspace analysis on the remaining soil borings showed organic vapor concentrations well below the 10 ppm contamination criteria established by the Wisconsin Department of Natural Resources (WDNR). These conditions are shown in greater detail on the **Soil Boring Logs** in the Appendix.

Shallow ground water located immediately below Excavation No. 3 contains trace amounts (several parts per million) of soluble organic constituents. How directly the shallow ground water at this site feeds the usable bedrock aquifer in the area has not been determined in this investigation. However, we expect that clayey soils at increasing depth limit downward flow and that ground water flow on the site is predominantly horizontal, toward the river and lake.

CONCLUSIONS

Based on the results of this study and the findings presented in our Tank Abandonment Documentation Report dated January 23, 1989, it appears significant soil and ground water contamination is present in the area surrounding two of the underground tank excavations at the Mirro Plant No. 9 site. The concentration of mineral spirits remaining in the soil is a source of continuing ground water contamination that we recommend be controlled and removed. However, the results of this study indicate that the extent of soil contamination appears to be quite limited. The estimated area of soil and ground water contamination is indicated on the Boring Location Plan in the Appendix.

Because the contaminated soils are closely bounded by the existing Mirro building and the adjacent roadways, it is our opinion that removal by excavation is not a viable alternative for remediation at this site. Remediation using ground water and vapor recovery systems is expected to be effective and will not disturb building foundations, adjacent roadways or underground utilities.

The installation of ground water monitoring wells will be necessary to confirm the extent of ground water contamination and to document the effectiveness of the operation.

We also recommend that a ground water recovery well be placed in both contaminated excavations on the Mirro property. The excavation locations (No. 1 and 3) are shown on the Boring Location Plan - Figure 2 in the Appendix. Additional evaluation will be required to determine the size and depth of recovery wells needed to effectively control the flow of contaminated ground water off-site. Pumping rates, frequencies, and proper ground water disposal options will also need to be evaluated. Soil vapor extraction is recommended to remove residual contamination in soil above the ground water table.

RECOMMENDATIONS

We provide the following general recommendations for remediation at the site:

1. Vapor Recovery System

To prevent further contribution from mineral spirit contamination of soil into the shallow ground water, we recommend that a vapor recovery system be installed in the two contaminated excavations on the site. We recommend that these systems consist of slotted PVC pipe buried at appropriate depths. A vacuum pump connected to the buried pipes should draw vapor from the contaminated soil and discharge to the atmosphere. This may require an air quality discharge permit from WDNR.

The size, location and depth of slotted pipes, as well as the size and operation plan of vacuum pumps, should be determined by preliminary design and field performance verification. Work tasks which are not within the scope of this investigation. An effective vacuum system would be expected to remove residual product within the contaminated zones within several months (less than one year) of operation.

2. Ground Water Recovery Wells

To prevent further off-site migration of contaminants, and also control contaminated ground water, we recommend that ground water recovery wells be installed in the two contaminated excavations on the site. We recommend that the wells be constructed of slotted PVC pipe of 6 to 10-inch diameter to accommodate a variety of submersible pumps in the future.

The wells should be slotted or perforated from 5 feet below existing surface grades, down to the bottom of the well. The wells should be backfilled with pea gravel throughout the depth that is slotted or perforated. The surface area surrounding the wells should be asphalt or concrete paved after installation to prevent vapor short-circuit of the soil vacuum system.

The wells should be periodically pumped to withdraw any accumulated free product and also to depress the ground water table on the site. This will induce the flow of contaminated water toward the wells. Quantities of water pumped, and any recovered product, should be recorded. Proper disposal of recovered product and ground water will need to be arranged.

3. Ground Water Monitoring Wells

We recommend the installation of three ground water monitoring wells around the perimeter of each contaminated tank excavation. Information gained from these wells, and the recovery wells, can be used to evaluate the progress of remediation. The proposed locations of these monitoring wells is shown on the Boring Location Plan - Figure 2 in the Appendix. We recommend that wells be sampled monthly during the first quarter of remediation and quarterly thereafter.

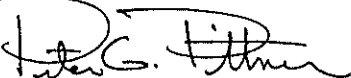
The following tests should be performed on each water sample:
benzene, toluene, ethylbenzene and total xylenes.

These recommendations provide a general plan to start remediation. Monitoring wells should not be installed until this plan is approved by the Wisconsin Department of Natural Resources. Modifications may be requested by the Department. After monitoring wells are installed and recovery wells are in operation, periodic sampling of ground water and interpretation of remediation progress will be required. Complete remediation and verification monitoring may take a year or more, but the risk to ground water and the spread of contamination will be reduced shortly after these recommendations are implemented. We are available to assist Mirro Corporation-Foley Company to implement these actions, if requested.

We have appreciated the opportunity to assist Mirro Corporation-Foley Company in this phase of the project. If you have any questions or comments concerning the contents of this report, please call Miller Engineers.

Prepared by,

MILLER ENGINEERS



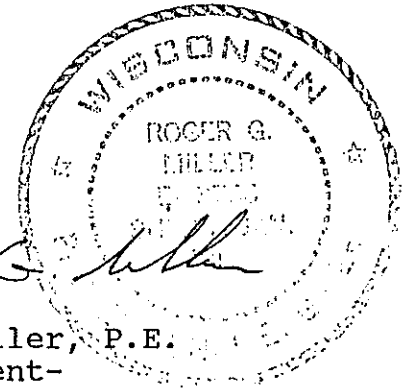
Peter G. Pittner
Environmental Scientist

PGP/sj

MIRROCOR.RIR



Roger G. Miller, P.E.
Vice President-
Environmental Engineering



APPENDIX

| | |
|---|-----------------|
| GENERAL CONDITIONS - SOIL REPORT | (WHITE SHEETS) |
| GENERAL CONDITIONS - DATA COLLECTION | (WHITE SHEETS) |
| SITE LOCATION MAP - Figure 1 | (WHITE SHEET) |
| UNDERGROUND TANK ABANDONMENT DOCUMENTATION (MILLER ENGINEERS 1-23-89 REPORT) | (BLUE SHEETS) |
| BORING LOCATION PLAN - Figure 2 | (WHITE SHEET) |
| ANALYTICAL REPORTS (SWANSON ENVIRONMENTAL, INC. 4/3/89) | (PINK SHEETS) |
| SITE PHOTOGRAPHS | (WHITE SHEETS) |
| CLASSIFICATION OF SOILS FOR ENGINEERING PURPOSES | (WHITE SHEET) |
| GENERAL NOTES & SYMBOLS | (WHITE SHEET) |
| SOIL BORING LOGS (B1 - B13) | (YELLOW SHEETS) |
| TYPICAL MONITOR WELL INSTALLATION DETAIL | (GREEN SHEET) |
| IMPORTANT INFORMATION ABOUT YOUR GEOTECHNICAL ENGINEERING REPORT | (WHITE SHEETS) |

GENERAL CONDITIONS — SOIL REPORT

This report has been prepared in order to aid in the evaluation of this property for the intended use described herein, and to assist in the design or planning of this project. In the event any changes in the design as outlined herein, or changes in the vertical position or horizontal location of the facility are planned, the conclusions and recommendations contained in this report shall not be considered valid unless such changes are reviewed and the conclusions of this report modified in writing by Miller Consulting Engineers, hereinafter referred to as "THE ENGINEER," who prepared this report.

The analysis and recommendations submitted in this report are our opinions based on the data obtained and subsurface conditions noted from the field investigation described at the locations indicated on the accompanying map and diagram. This report does not reflect any variations which may occur between, beyond or below the depths of these test pits or borings. The nature and extent of such variations may not become evident until excavation and construction begins. If variations then appear evident, it will be necessary for a re-evaluation of the recommendations of this report to be made after performing on-site observations during the construction period and noting the characteristics of any variations.

The soil and foundation engineering report has been prepared for this project by Miller Consulting Engineers. This report was for design purposes only and may not be sufficient to prepare an accurate bid. Contractors wishing copies of the report may secure them from Miller Consulting Engineers with the understanding that its scope is limited to design considerations, unless otherwise noted in the scope of this report.

The Engineer is responsible for the conclusions and opinions contained herein based on the supplied data relative only to the specific project and location outlined in this report. In the event conclusions or recommendations are made by others, such conclusions or recommendations are not the responsibility of the Engineer unless the Engineer has been given an opportunity to review and comment on such conclusions or recommendations in writing.

It is recommended that the Engineer be provided the opportunity to review final designs, plans and specifications using the conclusions of this report, in order to determine whether any change in concept may have any affect on the validity of the recommendations contained in this document. If the Engineer is not accorded the privilege of this review, he can assume no responsibility for misinterpretation or misapplication of these recommendations or for their validity in the event changes have been made in his understanding of the project and/or design content. Review of the final design, plans and specifications will be noted in writing by the Engineer upon client's request and will become a part of this report.

GENERAL CONDITIONS — SOIL REPORT (cont.)

There is the possibility that variations in soil conditions will be encountered during construction. In order to permit correlation between soil data in this report and the actual soil conditions encountered during construction, it is recommended that the soil and foundation engineer be retained to perform continuous construction review during construction of the excavation and foundation phases of the work. The soil and foundation engineer assumes no responsibility for construction compliance with the design concepts, specifications or recommendations unless he has been retained to perform on-site construction review during the course of construction.

As a part of the above review, it is recommended that the Engineer review all areas where fills are to be placed, test and approve each class of fill material to be used. The fills should be tested by performing grain-size analyses (ASTM D421, 422 or 1140) and by performing laboratory control-moisture density (proctor) tests (ASTM D698 or D1557) on representative samples prior to their delivery and placement in the field. The fills should be field tested for degree of compaction. Fills receiving foundation structures such as footings, slabs-on-grade, frost walls or piers should be tested for bearing capacity.

The presence of our field representative, if such services are requested by the client, will be for the sole purpose of providing record observations and field soils testing. Our work does not include supervision, management or direction of the actual work of the contractor, his employees or agents. The contractor for this project should be so advised. The contractor should also be informed that neither the presence of our field representative nor the observation and testing by our firm shall excuse him in any way for defects discovered in his work. It is understood that our firm will not be responsible for job or site safety on this project.

This report has been prepared in accordance with generally accepted soil and foundation engineering practices and makes no other warranties, either expressed or implied, as to the professional advice provided under the terms of the agreement between the Engineer and his client, included in this report. The report has not been prepared for other uses or parties other than those specifically named, or for uses or applications other than those enumerated herein. The report may contain insufficient or inaccurate information for other purposes, applications, building sites or other uses.

GENERAL CONDITIONS — DATA COLLECTION

Field-sampling techniques were employed in this investigation to obtain the data presented in the Final Boring Logs, and in the Report, in accordance with ASTM D420, D1452, D1586 (where applicable) and D1587 (where applicable).

The drilling method utilized in borings is a dry-process, machine rotary auger type, which advances hollow threaded steel pipe surrounded by attached steel auger flights in 5-foot lengths. This method creates a continuously cased test hole that prevents the boring from caving in above each level of substrata to be tested. Sampling tools are lowered inside the hollow shaft for testing in the relatively undisturbed soils below the lead auger.

Sampling in cohesionless (granular) soils was accomplished driving a standard split-barrel tool (split-spoon) with a 140 lb. weight falling 30 inches. The number of blows required to advance the tool in two 6-inch increments following 6 inches of seating were recorded on the FINAL BORING LOGS under "N" column, referring to the standard penetration test (ASTM D1586).

Sampling in cohesive soils was performed by hydraulically pushing steel sharpened-edge thin walled tube samplers at a uniform rate. Tubes were advanced below the tip of the lead auger at least 30 inches, to retrieve a sample, in accordance with ASTM D1587. The tubes are equipped with pressure-releasing ports to allow water to escape as the tube is advanced.

Samples were brought to the surface, examined by the drilling foreman and sealed in containers (or sealed in the tubes) to reduce loss of moisture. They were returned to our laboratory for final classification per ASTM D2487-69 methods. Some samples were subjected to tests as described in the text of the report.

A field log was prepared for each boring by the drilling foreman during on-site operations in order to record field occurrences, sampling intervals and groundwater observations. The field logs and laboratory test data sheets are available for inspection at the Engineer's office. They are not included in this report because they do not represent the Engineer's final opinions or interpretations.

A final log of each test pit or boring was prepared by the writer of the report or the Engineer's staff. Each final log contains the writer's interpretation of field conditions or changes in substrata between recovered samples based on the field data received along with the laboratory test data obtained following the field work or on subsequent site observations. The final logs were prepared by assembling

GENERAL CONDITIONS — DATA COLLECTION (cont.)

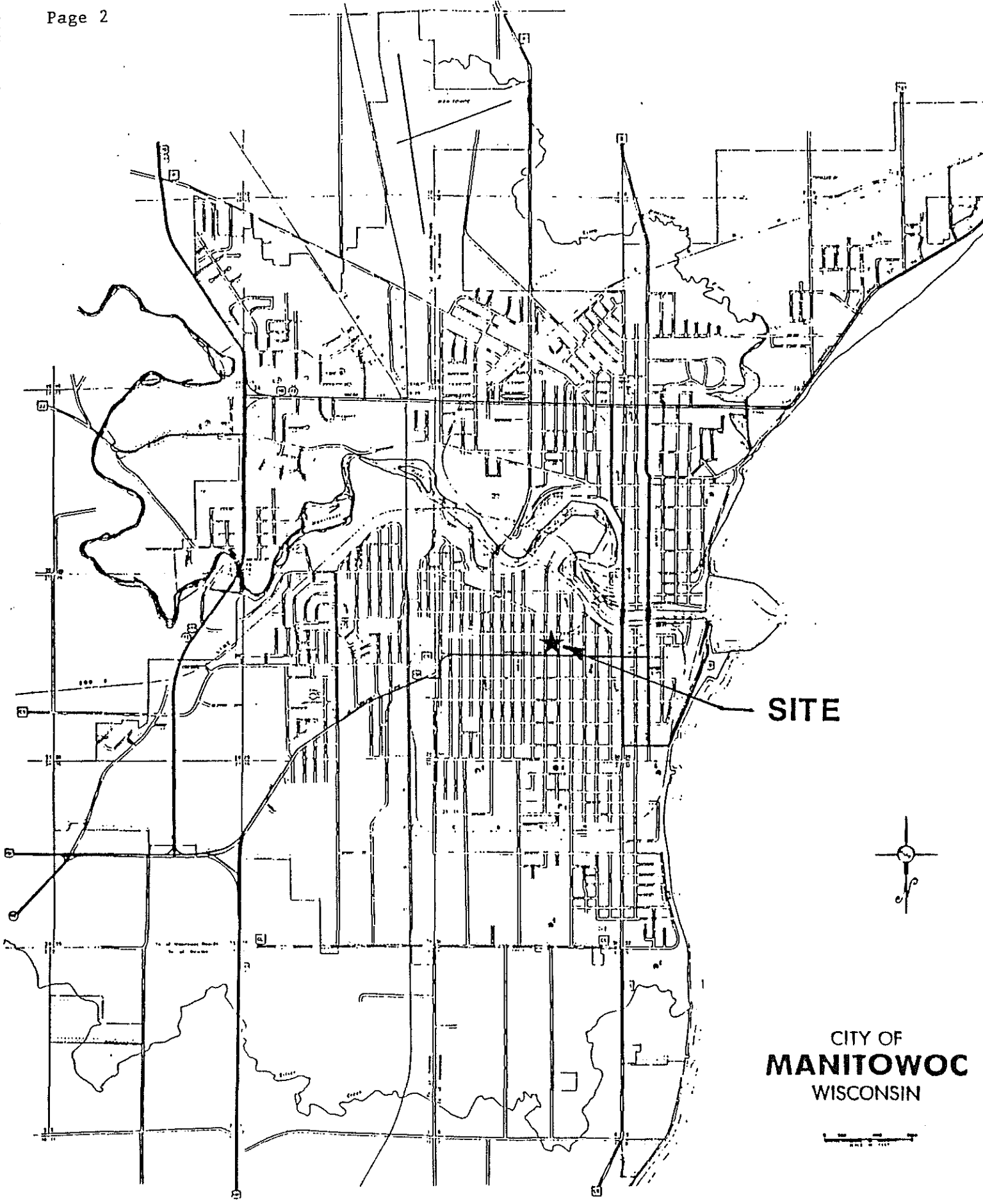
and analyzing field and laboratory data. Therefore, the final logs contain both factual and interpretive information. Our opinions are based on the final logs, not the field logs.

The final logs list boring methods, sampling methods, depths sampled, amounts of recovery in sampling tools, indications of the presence of subsoil types and groundwater level observations. Results of laboratory tests are arrayed on the final logs at the appropriate depths below grade. The horizontal lines on the final logs which designate the interface between successive layers represent approximate boundaries. The transition between strata was typically gradual.

We caution that the final boring logs alone do not constitute the report, and as such they should not be excerpted from the other appendix exhibits nor from any of the written text. Without the written report it is possible to misinterpret the meaning of the information reported on the final logs. If the reports are to be reproduced for bidding or reference purposes, the entire numbered report and appendix exhibits should be bound together as a separate document or as a section of a specification booklet, including all maps.

Pocket penetration tests taken in the field or on samples examined in the laboratory are listed on the final boring logs in a column marked "pp". These tests were performed only to indicate relative stiffness in consistency between successive layers of cohesive soil. It is not recommended that the listed values be used to determine allowable bearing capacities. Bearing capacities of soils are determined by the engineer using laboratory testing methods as described in the text of the report.

Groundwater observations were made with cloth-tape measurements in the open drill holes by field personnel at the times and dates stated on the final logs. It must be noted that fluctuations may occur in the groundwater level due to variations in rainfall, seasonal temperature, nearby site improvements, underdrainage, wells, severity of winter frosts, overburden weights and the permeability of the subsoils. Because variations may be expected, final designs and construction planning should allow for the need to temporarily or permanently dewater excavations or subsoils.



SITE

CITY OF
MANITOWOC
WISCONSIN

FIGURE 1
SITE LOCATION MAP

Newell 11/11/00 104

MILLER ENGINEERS

5308 South Twelfth Street
Sheboygan, Wisconsin 53081
414-458-6164

January 23, 1989

#2147-89

Mr. Tom Schumacher
U. S. Petroleum Equipment
P. O. Box 86
Combined Locks, WI 54113

Subject: Mirro Corporation - Foley Company, Inc. - Plant No. 9
Observation and Documentation of Tank Abandonment
Manitowoc, Wisconsin

Dear Mr. Schumacher:

Enclosed are two copies of the Underground Tank Abandonment Report for the above-referenced project. The work described in this report has been completed per our contract dated December 9, 1988.

Miller Engineers appreciates the opportunity to provide environmental engineering services to U. S. Petroleum Equipment. If you have any questions or comments, please call Miller Engineers.

Sincerely,

MILLER ENGINEERS

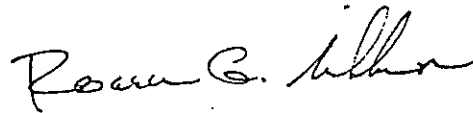


Peter G. Pittner
Environmental Scientist

PGP/sj

Enclosures

cc: Mr. Thomas Reed, P.E., Mirro Corporation - Foley Company



Roger G. Miller, P.E.
Vice President-Environmental Engineering

UNDERGROUND TANK ABANDONMENT DOCUMENTATION
MIRRO CORPORATION - FOLEY COMPANY - PLANT NO. 9

INTRODUCTION

Seven underground storage tanks have recently been abandoned by Mirro Corporation - Foley Company at its Plant No. 9 in Manitowoc, Wisconsin. The plant is located at 1512 Washington Street, as shown on the Site Location Map (Figure 1). The Mirro Corporation retained U. S. Petroleum Equipment to perform and administer the tank abandonment, which began December 13, 1988. Tank removal was completed on December 14, 1988. Miller Engineers provided on-site soil monitoring during excavation for possible hydrocarbon contamination.

Five of the seven underground storage tanks have historically been used to store mineral spirits. The remaining two tanks were used to store diesel fuel. The tanks were located in three separate excavations adjacent to the manufacturing plant. Excavation No. 1, located on the west side of the building, contained three mineral spirit storage tanks. Excavation No. 2, located at the northwest building corner, contained two diesel fuel storage tanks. Excavation No. 3, located on the east side of the building, contained two mineral spirit storage tanks. The locations of the tank excavations are shown on the Excavation Location Plan (Figure 2). Installation dates of the abandoned tanks are not known.

OBSERVATIONS

Excavation No. 1

Three underground storage tanks were removed from Excavation No. 1 on December 13, 1988. It was reported that these tanks had contained mineral spirits, but they contained no product at time of abandonment. The tanks were located beneath the sidewalk immediately west of the plant building, and east of 16th Street.

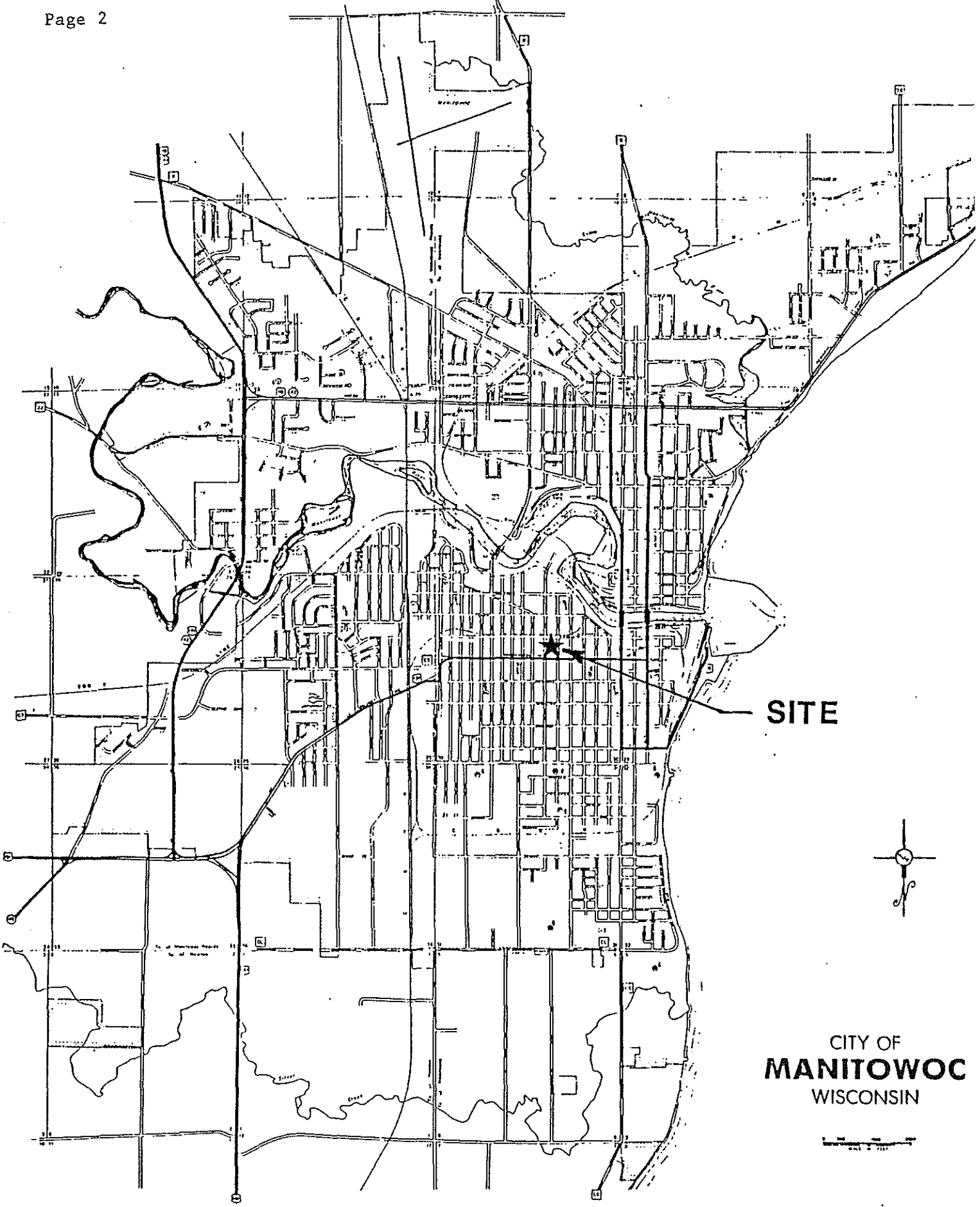
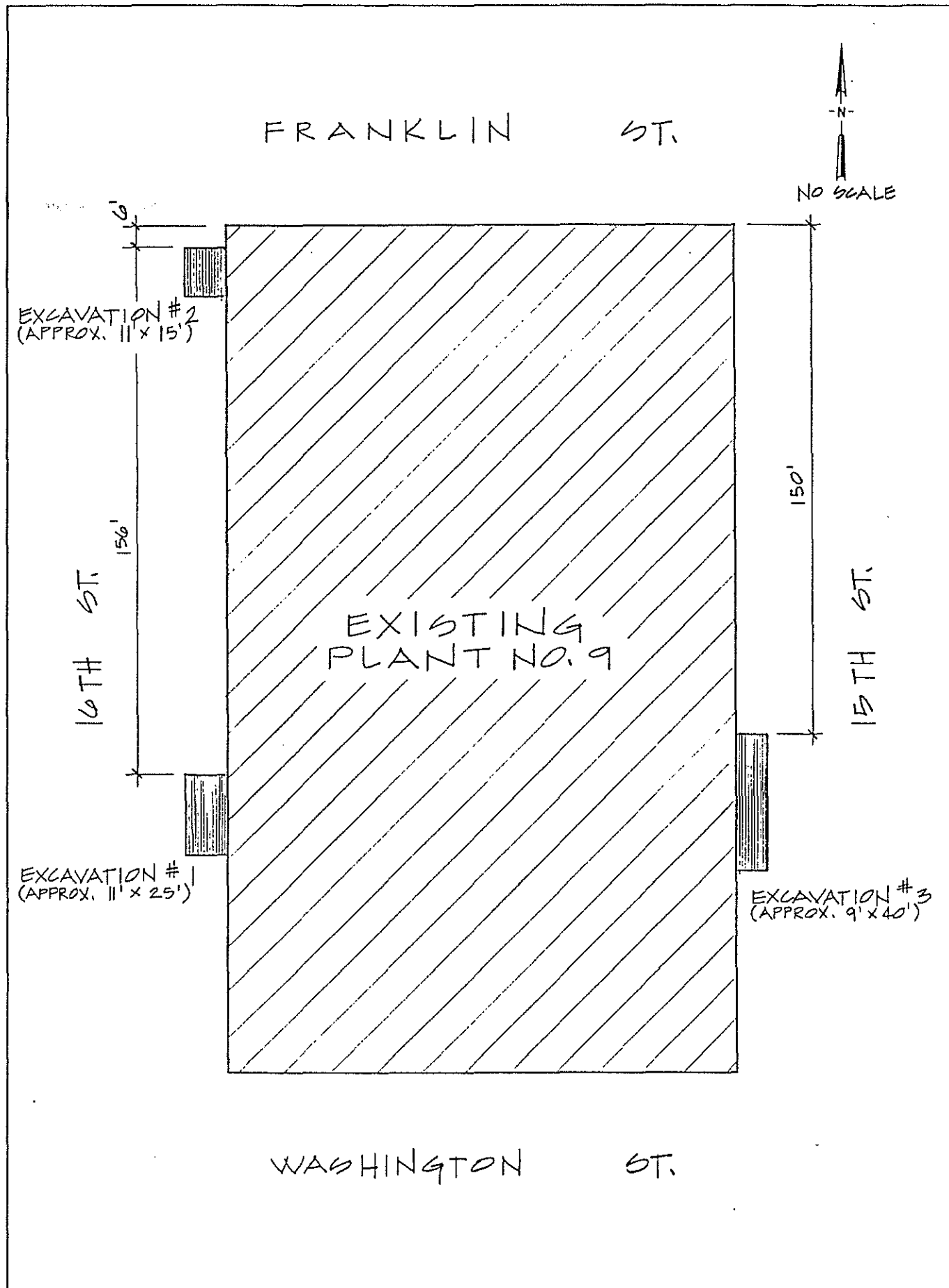


FIGURE 1
SITE LOCATION MAP



The removed tanks were of a riveted, bare steel construction with no cathodic protection. All three tanks revealed slight corrosion and soil encrustation, but had no obvious leaks.

A petroleum-like odor was noted in the ambient air surrounding the excavation after tank removal. Soil samples of the backfill material were tested for hydrocarbon contamination. This was accomplished by using a portable HNu meter (PI-101) to measure volatile organic vapor concentrations in a headspace analysis-type test. HNu readings of the removed backfill material revealed organic vapor concentrations between 10 and 200 ppm (as benzene using 10.2eV lamp). Vapor concentrations in the excavation ranged from 20 to 100 ppm.

Representatives of U. S. Petroleum, and Mr. Thomas E. Reed of Mirro Corporation were informed that the soil material removed from the tank excavation was contaminated and should not be used to fill the tank excavation, as had been planned. It was decided that the backfill material would be moved to a vacant lot in the City of Manitowoc, owned by Mirro Corporation. Miller Engineers recommended that polyethylene sheeting be laid on the storage area to avoid infiltration of contaminants into the storage area soils.

After additional contaminated soil was removed from the excavation, headspace vapor analysis was conducted on soil samples from the limits of the excavation. All such samples had considerable hydrocarbon concentrations in excess of 200 ppm (headspace analysis). Further excavation was prevented by the Mirro Aluminum plant foundation immediately east of the tank excavation and 16th Street immediately west of the excavation. It was apparent that it would not be practical to remove all of the contaminated soils at that time. Soil borings were advanced by hand in the excavation in an effort to determine the vertical and horizontal extent of contamination beyond the boundaries of the excavations.

An Oakfield probe was used to advance a soil boring 7 feet into the west wall of Excavation No. 1, approximately 5 feet below grade. Organic vapor concentrations in soil samples recovered 6 to 7 feet west of the west excavation wall indicated that organic vapor readings were still in excess of 100 ppm. A vertical soil boring advanced in the center of this excavation revealed organic vapor readings of 5 ppm on a soil sample collected from 4 to 5 feet below the base of the excavation.

This excavation was backfilled with pea gravel pending further investigation to determine the extent of contamination and development of an appropriate remediation plan.

Excavation No. 2

Two tanks were removed from Excavation No. 2 on December 14, 1988. It was reported that these tanks had been used to store diesel fuel. Both tanks were of riveted, bare steel construction with no cathodic protection. An inspection of the tanks revealed that both were totally covered by rust and encrusted soil. Headspace analysis conducted on soil samples from the limits of the excavation indicated hydrocarbon concentrations of 0 to 2 ppm. Exposed soils consisted of silty to sandy clay fill.

Miller Engineers reported to representatives of Mirro Corp. and the Manitowoc Fire Department, that, in our opinion, no contamination existed in this excavation. The excavation was backfilled with the material removed during tank excavation, and was topped with pea gravel.

Excavation No. 3

Two tanks were removed from Excavation No. 3 on December 14, 1988. Both of these tanks were reported to have contained mineral spirits. Both tanks were of bare, welded steel construction and had no cathodic protection. The top half of both tanks revealed some encrusted soil, while the bottom half appeared to be relatively clean. Both tanks appeared to be in good condition and had no visible leaks.

Soils removed from Excavation No. 3 had a strong petroleum odor. Removed soils were tested for hydrocarbon concentration using a headspace-type analysis with an HNu meter. Removed soils indicated hydrocarbon concentrations in excess of 200 ppm. The vapor concentrations taken at the bottom of the excavation and at the east wall of the excavation also revealed vapor concentration in excess of 200 ppm.

Workmen used hand tools to remove obviously contaminated soils (blackened) along the east building foundations. Contaminated soils were hauled to the above-mentioned Mirro site for temporary storage. This excavation was subsequently backfilled with pea gravel, awaiting the results of laboratory analysis.

LABORATORY TESTING

Quantitative laboratory analysis was conducted on composite samples from each of the three excavations and the soil stockpile area to determine the concentrations of total petroleum hydrocarbons occurring in the soil material (refer to attached Analytic Report). Excavations No. 1 and 3 both indicated significant total petroleum hydrocarbon concentrations, ranging from 990 mg/kg in Excavation No. 1 to 1,320 mg/kg in Excavation No. 3. Soils obtained from Excavation No. 2 contained no detectable total petroleum hydrocarbon concentrations above the detection limit of 10 mg/kg. A composite sample obtained from the stockpile area indicated total petroleum hydrocarbon concentrations of 330 ppm.

CONCLUSIONS

Analytic tests on soil samples confirmed conclusions from field monitoring.

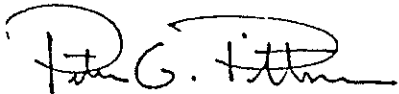
It is our opinion, based on this investigation, that soil contamination has occurred in and around Excavations No. 1 and 3. Excavation No. 2 showed no evidence of hydrocarbon contamination.

The extent of contamination around Excavations No. 1 and 3 is not known at this time; however, our field observations have indicated that contamination extends underneath 13th Street at Excavation No. 1 and underneath 12th Street at Excavation No. 3.

We understand that representatives of Mirro Corporation have informed the Wisconsin Department of Natural Resources of this situation. It is our recommendation that a remedial investigation be conducted on this site to determine the vertical and horizontal extent of soil contamination. Ground water samples should be obtained to determine if contamination is present in the ground water beneath the site. After receiving the results of the remedial investigation, an appropriate plan of action can be formulated to remediate the contaminated soils on this site.

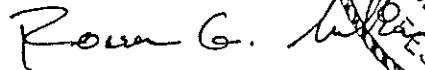
Prepared by,

MILLER ENGINEERS

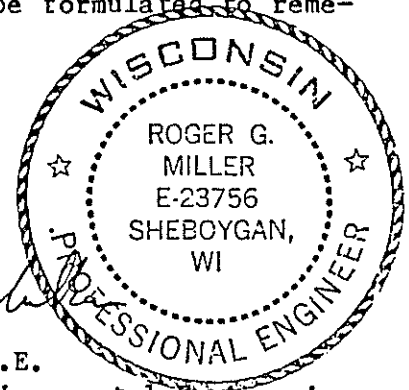


Peter G. Pittner
Environmental Scientist

PGP/sj



Roger G. Miller, P.E.
Vice President-Environmental Engineering





Laboratory Services Division
 3490 North 127th Street
 Brookfield, Wisconsin 53005
 telephone (414) 783-6111
 facsimile (414) 783-5752
 Laboratory Certification #268181760

REPORT NUMBER B7167

ANALYTICAL REPORT

SHIP TO

Miller Consulting Engineers
 5308 South 12th Street
 Sheboygan, WI 53081
 Attn: Mr. Pete Pittner

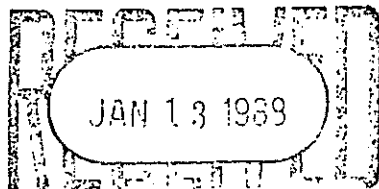
DATE: January 10, 1988
 PURCHASE ORDER NO:
 SEI JOB NO: WL8595
 DATE COLLECTED: 12/13-14/88
 DATE RECEIVED: 12/16/88

Soil Samples (MCE #2147)

Units: mg/kg (ppm)
 Detection Limit: Noted below in ()

| Parameter | SEI ID Sample ID | 8595-1 Excavation #1 | 8595-2 Excavation #2 | 8595-3 Excavation #3 | 8595-4 Stock Pile |
|--------------------------------------|---------------------|----------------------------|----------------------------|----------------------------|-------------------------|
| Benzene (0.1) | | -- | -- | -- | ND |
| Toluene (0.1) | | -- | -- | -- | 0.7 |
| Xylenes (0.1) | | -- | -- | -- | 33.3 |
| Total Petroleum Hydrocarbons (10) | | 990 | ND | 1,320 | 330 |
| % TS | | -- | -- | -- | 82.8 |
| pH | | -- | -- | -- | 7.11 |
| Color | | -- | -- | -- | Brown |
| Flashpoint, Degrees F | | -- | -- | -- | >140 |
| Physical State at 70 Degrees F | | -- | -- | -- | Solid |
| Free Liquids | | -- | -- | -- | None |
| Density, g/cm ³ | | -- | -- | -- | 2.30 |
| Odor | | -- | -- | -- | Fuel Oil/ Gasoline |

Physical Description for Sample 8595-4 (Stock Pile): Brown sandy soil with small pieces of rock.



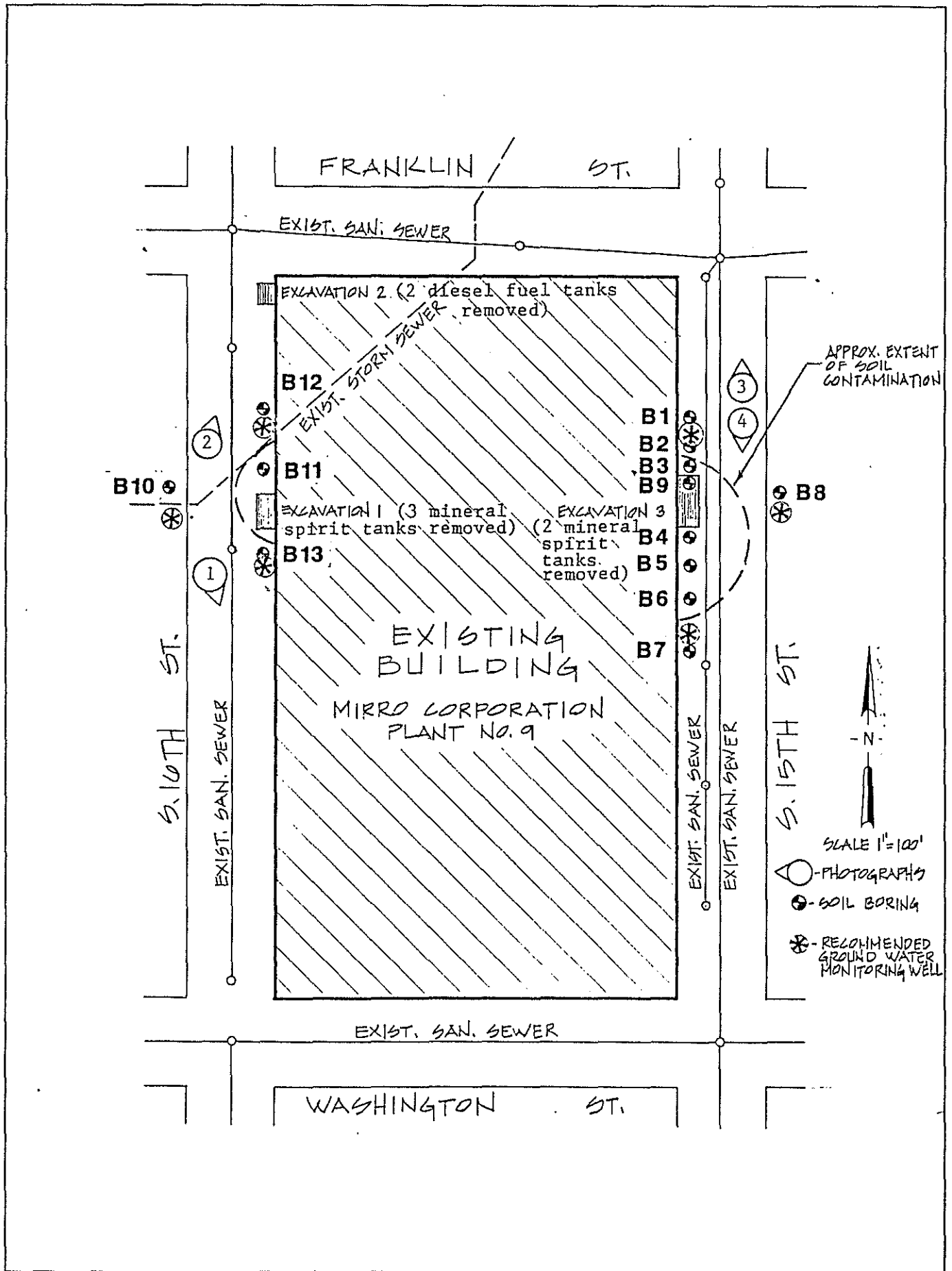
ND - Not detected

MILLER CONSULTING ENGINEERS
 SHEBOYGAN, WISCONSIN

Reviewed & Approved by:

Rosemary L. Dineen

Rosemary L. Dineen
 Laboratory Supervisor





3490 North 127th St.
Brookfield, Wisconsin 53005
telephone (414) 783-8111
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AIHA Accreditation #352
WDNR Certification #268181760

ANALYTICAL REPORT

REPORT NUMBER: B7716

Miller Consulting Engineers
5308 South 12th Street
Sheboygan, WI 53081

Attn: Mr. Pete Pittner

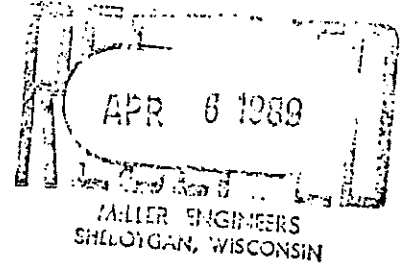
DATE: April 4, 1989
PURCHASE ORDER:
SEI JOB NO: WL9233
DATE COLLECTED: 03/23/89
DATE RECEIVED: 03/27/89

Soil Samples (MCE #10146E)

Units: mg/kg (ppm)
Detection Limit: 10

SOIL SAMPLES

| SEI ID | Sample ID | Total Petroleum Hydrocarbons |
|--------|-----------|------------------------------|
| 9233-1 | B2-3 | ND |
| 9233-2 | B6-3 | 1,020 |
| 9233-3 | B11-2 | 19,060 |
| 9233-4 | B13-2 | ND |



ND--Not Detected

Reviewed & Approved by:

Rosemary L. Dineen
Laboratory Supervisor



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Brookfield, Wisconsin 53005
telephone (414) 783-6111
facsimile (414) 783-5752

REPORT NUMBER: B7712

ANALYTICAL REPORT

Miller Consulting Engineers
5308 South 12th Street
Sheboygan, WI 53081

Attn: Mr. Pete Pittner

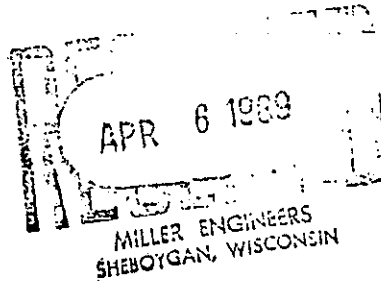
DATE: April 3, 1989
PURCHASE ORDER:
SEI JOB NO: WL9241
DATE COLLECTED: 03/21/89
DATE RECEIVED: 03/27/89

Groundwater Samples (MCE #10146E)

Units: ug/l (ppb)
Detection Limit: 1

GROUND WATER SAMPLE

| Parameter | SEI ID Sample ID | 9241-1 East Excavation |
|--------------|---------------------|---------------------------|
| Benzene | | 5 |
| Ethylbenzene | | 15 |
| Toluene | | 2 |
| Xylenes | | 125 |



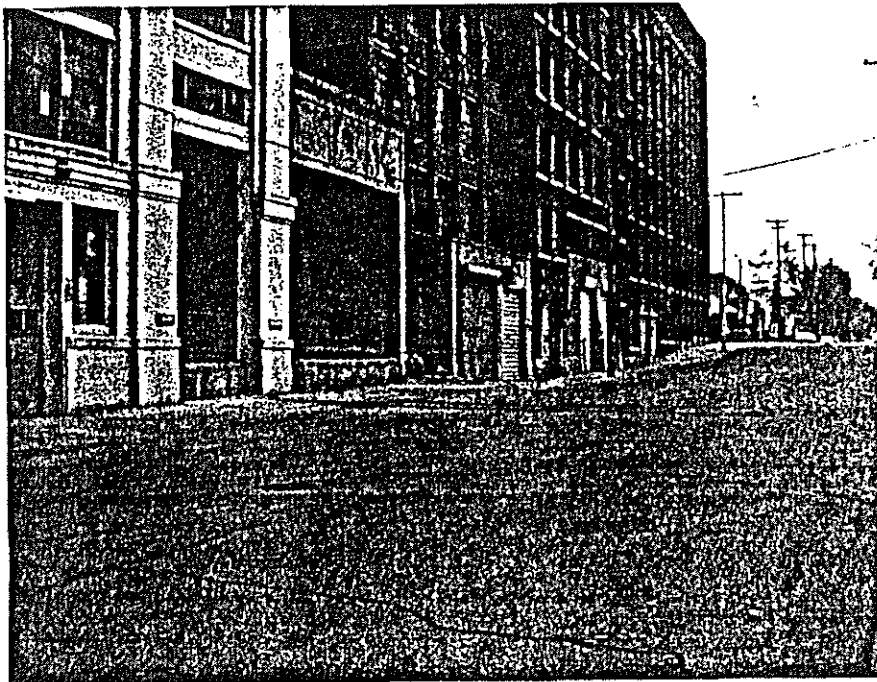
NOTE: Gas chromatograms of this sample did not yield peaks that could be calculated as TPH.

ND--Not Detected

Reviewed & Approved by:

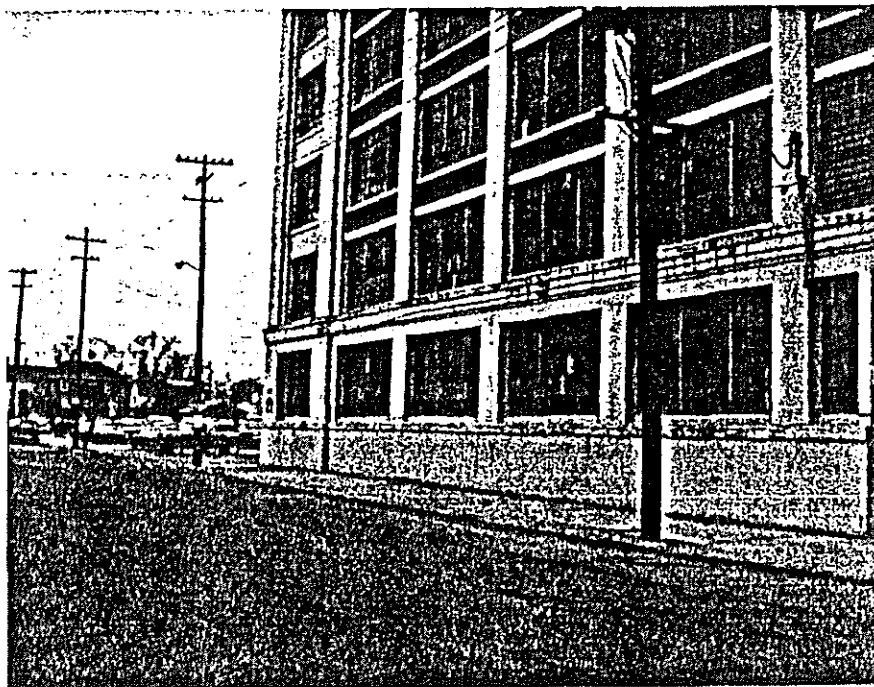
Rosemary L. Dineen
Rosemary L. Dineen
Laboratory Supervisor

#10146E
3/16/89



#1

Looking south along west side of plant (16th Street). Excavation #1 (contaminated) is located in sidewalk along building just to left of photo.



#2

Looking northeast toward excavation #2 (not contaminated) — just in front of stop sign at building corner. Excavation #1 is just to right of photo

#10146E
3/16/89



#3

Looking north along
15th Street from
excavation #3 (contam-
inated). Franklin
Street is in back-
ground.



#4

Looking south along
east side of building
from excavation #3.

CLASSIFICATION OF SOILS FOR ENGINEERING PURPOSES

ASTM Designation: D 2487 - 69 AND D 2488 - 69

(Unified Soil Classification System)

| Major divisions | | Group symbols | Typical names | Classification criteria | | | |
|--|---|--|---|--|--|---|--|
| Coarse-grained soils More than 50% retained on No. 200 sieve* | Gravels 50% or more of coarse fraction retained on No. 4 sieve | Clean gravels | GW | Well-graded gravels and gravel-sand mixtures, little or no fines | $C_u = \frac{D_{60}}{D_{10}}$ greater than 4; $C_z = \frac{(D_{30})^2}{D_{10} \times D_{60}}$ between 1 and 3 | | |
| | | Gravels with fines | GP | Poorly graded gravels and gravel-sand mixtures, little or no fines | | Not meeting both criteria for GW | |
| | | Sands More than 50% of coarse fraction passes No. 4 sieve | Clean sands | GM | Silty gravels, gravel-sand-silt mixtures | Atterberg limits below "A" line or P.I. less than 4 Atterberg limits above "A" line with P.I. greater than 7 Atterberg limits plotting in hatched area are <i>borderline</i> classifications requiring use of dual symbols | |
| | | | Sands with fines | GC | Clayey gravels, gravel-sand-clay mixtures | | |
| | | | Clean sands | SW | Well-graded sands and gravelly sands, little or no fines | | $C_u = \frac{D_{60}}{D_{10}}$ greater than 6; $C_z = \frac{(D_{30})^2}{D_{10} \times D_{60}}$ between 1 and 3 |
| | | | Sands with fines | SP | Poorly graded sands and gravelly sands, little or no fines | | |
| | Fine-grained soils 50% or more passes No. 200 sieve* | Silts and clays Liquid limit 50% or less | Sands with fines | SM | Silty sands, sand-silt mixtures | Atterberg limits below "A" line or P.I. less than 4 Atterberg limits above "A" line with P.I. greater than 7 Atterberg limits plotting in hatched area are <i>borderline</i> classifications requiring use of dual symbols | |
| | | | Sands with fines | SC | Clayey sands, sand-clay mixtures | | |
| | | | Silts and clays Liquid limit greater than 50% | ML | Inorganic silts, very fine sands, rock flour, silty or clayey fine sands | Plasticity Chart For classification of fine-grained soils and fine fraction of coarse-grained soils. Atterberg Limits plotting in hatched area are <i>borderline</i> classifications requiring use of dual symbols. Equation of A-line: $PI = 0.73 (LL - 20)$ | |
| | | | | CL | Inorganic clays of low to medium plasticity, gravelly clays, sandy clays, silty clays, lean clays | | |
| OH | | | | Organic clays of medium to high plasticity | | | |
| OH | | | | Organic clays of medium to high plasticity | | | |
| Silts and clays Liquid limit greater than 50% | | MH | Inorganic silts, micaceous or diatomaceous fine sands or silts, elastic silts | CH | Inorganic clays of high plasticity, fat clays | | |
| | | CH | Inorganic clays of high plasticity, fat clays | OH and MH | Organic clays of medium to high plasticity | | |
| | | OH | Organic clays of medium to high plasticity | ML and OL | Organic silts and organic silty clays of low plasticity | | |
| | | ML | Inorganic silts, very fine sands, rock flour, silty or clayey fine sands | CL - ML | Inorganic silts and organic silty clays of low plasticity | | |
| Highly organic soils | Pt | Peat, muck and other highly organic soils | *Based on the material passing the 3 in. (76 mm) sieve. | | | | |

LOG OF TEST BORING

Symbols

GENERAL NOTES

Descriptive Soil Classification

GRAIN SIZE TERMINOLOGY

| Soil Fraction | Particle Size | U.S. Standard Sieve Size |
|----------------|-----------------------|--------------------------|
| Boulders | Larger than 12" | Larger than 12" |
| Cobbles | 3" to 12" | 3" to 12" |
| Gravel: Coarse | ¾" to 3" | ¾" to 3" |
| Fine | 4.78 mm to ¾" | #4 to ¾" |
| Sand: Coarse | 2.00 mm to 4.78 mm | #10 to #4 |
| Medium | 0.42 mm to 2.00 mm | #40 to #10 |
| Fine | 0.074 mm to 0.42 mm | #200 to #40 |
| Silt | 0.005 mm to 0.074 mm | Smaller than #200 |
| Clay | Smaller than 0.005 mm | Smaller than #200 |

Plasticity characteristics differentiate between silt and clay.

GENERAL TERMINOLOGY

| | |
|---------------------------------|--|
| Physical Characteristics | Color, moisture, grain shape, fineness, etc. |
| Major Constituents | Clay, silt, sand, gravel |
| Structure | Laminated, varved, fibrous, stratified, cemented, fissured, etc. |
| Geologic Origin | Glacial, alluvial, eolian, residual, etc. |

RELATIVE PROPORTIONS OF COHESIONLESS SOILS

| Proportional Term | Defining Range By Percentage of Weight |
|-------------------|--|
| Trace | 0%- 5% |
| Little | 5%-12% |
| Some | 12%-35% |
| And | 35%-50% |

ORGANIC CONTENT BY COMBUSTION METHOD

| Soil Description | Loss on Ignition |
|------------------------|------------------|
| Non Organic | Less than 4% |
| Organic Silt/Clay | 4-12% |
| Sedimentary Peat | 12-50% |
| Fibrous and Woody Peat | More than 50% |

RELATIVE DENSITY

| Term | "N" Value |
|--------------|-----------|
| Very Loose | 0-4 |
| Loose | 4-10 |
| Medium Dense | 10-30 |
| Dense | 30-50 |
| Very Dense | Over 50 |

CONSISTENCY

| Term | q _v -tons/sq. ft. |
|------------|------------------------------|
| Very Soft | 0.0 to 0.25 |
| Soft | 0.25 to 0.50 |
| Medium | 0.50 to 1.0 |
| Stiff | 1.0 to 2.0 |
| Very Stiff | 2.0 to 4.0 |
| Hard | Over 4.0 |

PLASTICITY

| Term | Plastic Index |
|-------------------|---------------|
| None to Slight | 0-4 |
| Slight | 5-7 |
| Medium | 8-22 |
| High to Very High | Over 22 |

The penetration resistance, N, is the summation of the number of blows required to effect two successive 8" penetrations of the 2" split-barrel sampler. The sampler is driven with a 140 lb. weight falling 30" and is seated to a depth of 8" before commencing the standard penetration test.

DRILLING AND SAMPLING

| | |
|--------|-------------------------------------|
| CS | Continuous Sampling |
| RC | Rock Coring: Size AW, BW, NW, 2" W |
| RQD | Rock Quality Designator |
| RB | Rock Bit |
| FT | Fish Tail |
| DC | Drove Casing |
| C | Casing: Size 2½", NW, 4", HW |
| CW | Clear Water |
| DM | Drilling Mud |
| HSA | Hollow Stem Auger |
| FA | Flight Auger |
| HA | Hand Auger |
| COA | Clean-Out Auger |
| SS-2" | 2" Diameter Split-Barrel Sample |
| 2ST-2" | 2" Diameter Thin-Walled Tube Sample |
| 3ST-3" | 3" Diameter Thin-Walled Tube Sample |
| PT-3" | 3" Diameter Piston Tube Sample |
| AS | Auger Sample |
| WS | Wash Sample |
| PTS | Peat Sample |
| PS | Pitcher Sample |
| NR | No Recovery |
| S | Sounding |
| PMT | Borehole Pressuremeter Test |
| VS | Vane Shear Test |
| WPT | Water Pressure Test |

LABORATORY TESTS

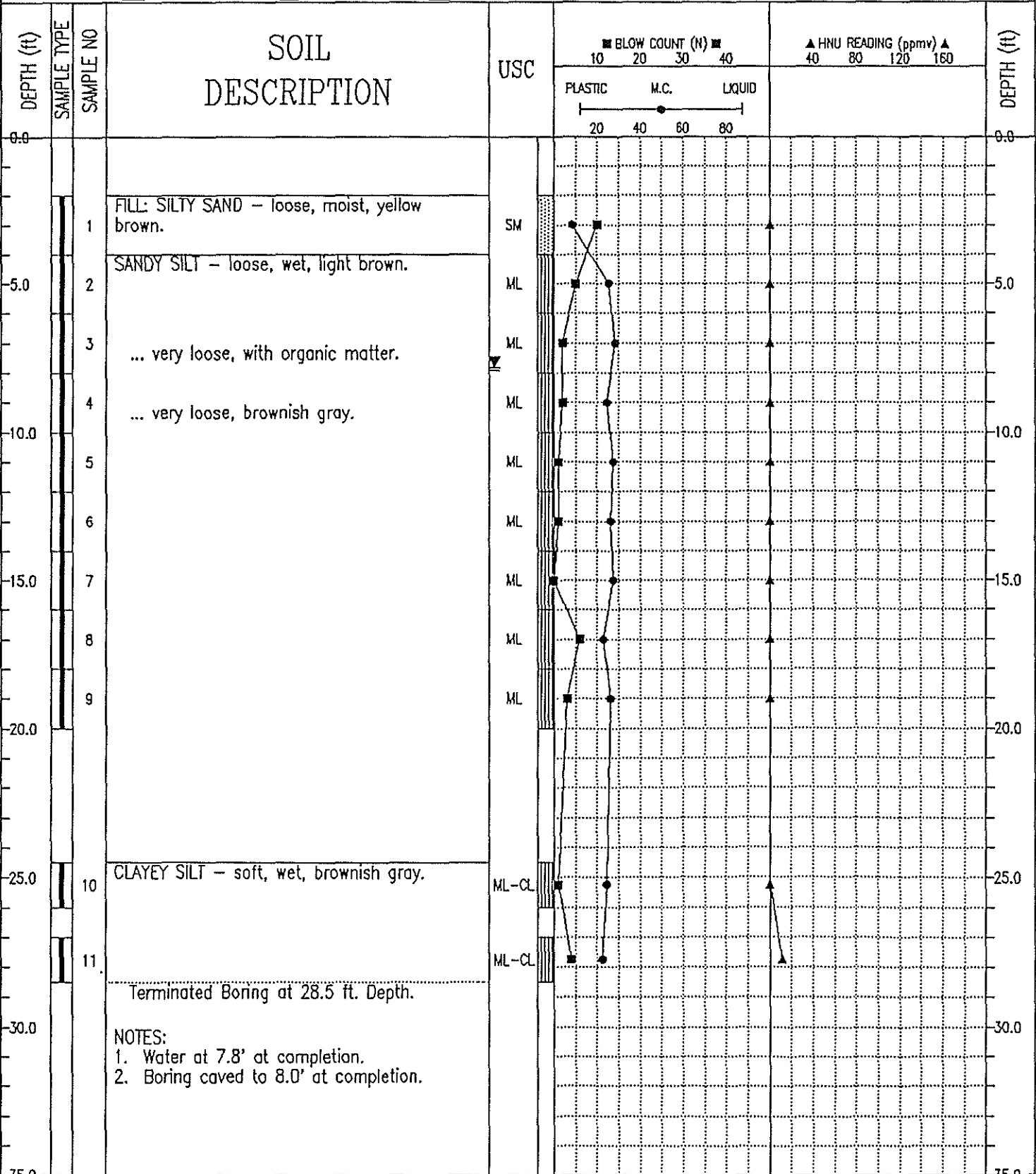
| | |
|----------------|---------------------------------------|
| q _v | Penetrometer Reading, tons/sq. ft. |
| q _u | Unconfined Strength, tons/sq. ft. |
| W | Moisture Content, % |
| LL | Liquid Limit, % |
| PL | Plastic Limit, % |
| SL | Shrinkage Limit, % |
| LI | Loss on Ignition, % |
| D | Dry Unit Weight, lbs./cu. ft. |
| pH | Measure of Soil Alkalinity or Acidity |
| FS | Free Swell, % |

WATER LEVEL MEASUREMENT

| | |
|-----|---------------------------|
| ▽ | Water Level at time shown |
| NW | No Water Encountered |
| WD | While Drilling |
| BCR | Before Casing Removal |
| ACR | After Casing Removal |
| CW | Caved and Wet |
| CM | Caved and Moist |

Note: Water level measurements shown on the boring logs represent conditions at the time indicated and may not reflect static levels, especially in cohesive soils.

| | | |
|---|------------------------------|------------------------|
| PROJECT: Plant # 9, Remedial Inv. | RIG: Acker AD-II | BOREHOLE No. 146E-B1 |
| CLIENT: Mirro Corp. - Foley Co. | CREW: McArdle, Pittner, Pope | Project No: 10146E |
| LOCATION: Manitowoc, WI | METHOD: HSA | ELEVATION 602.160 (ft) |
| SAMPLE TYPE <input checked="" type="checkbox"/> 3" Piston Sample <input checked="" type="checkbox"/> NO RECOVERY <input checked="" type="checkbox"/> 2.5" Cal. Sample <input type="checkbox"/> Auger Sample <input type="checkbox"/> 3" Shelby Tube <input type="checkbox"/> 2" Split Spoon | | |

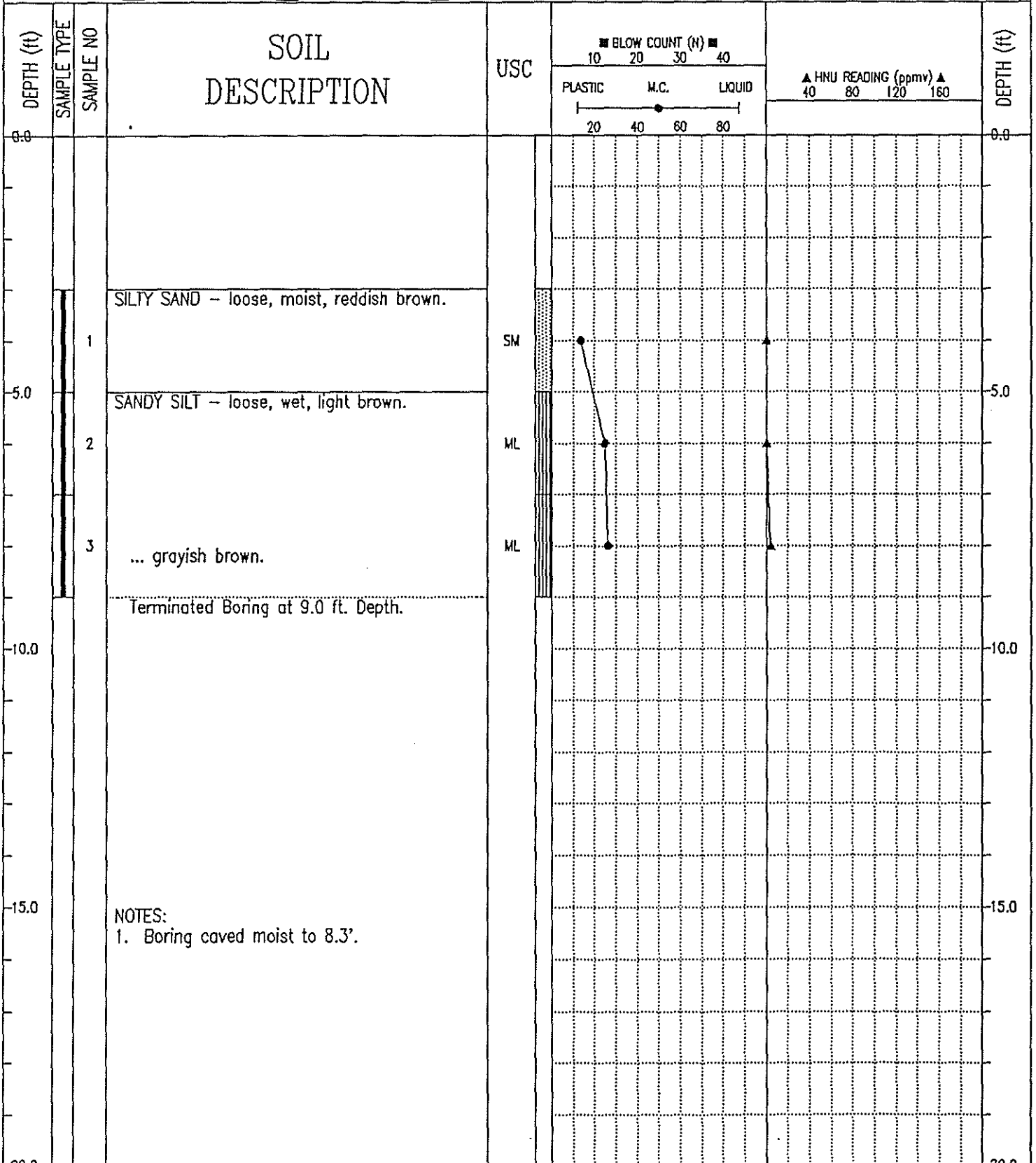


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 Sheboygan, Wisconsin

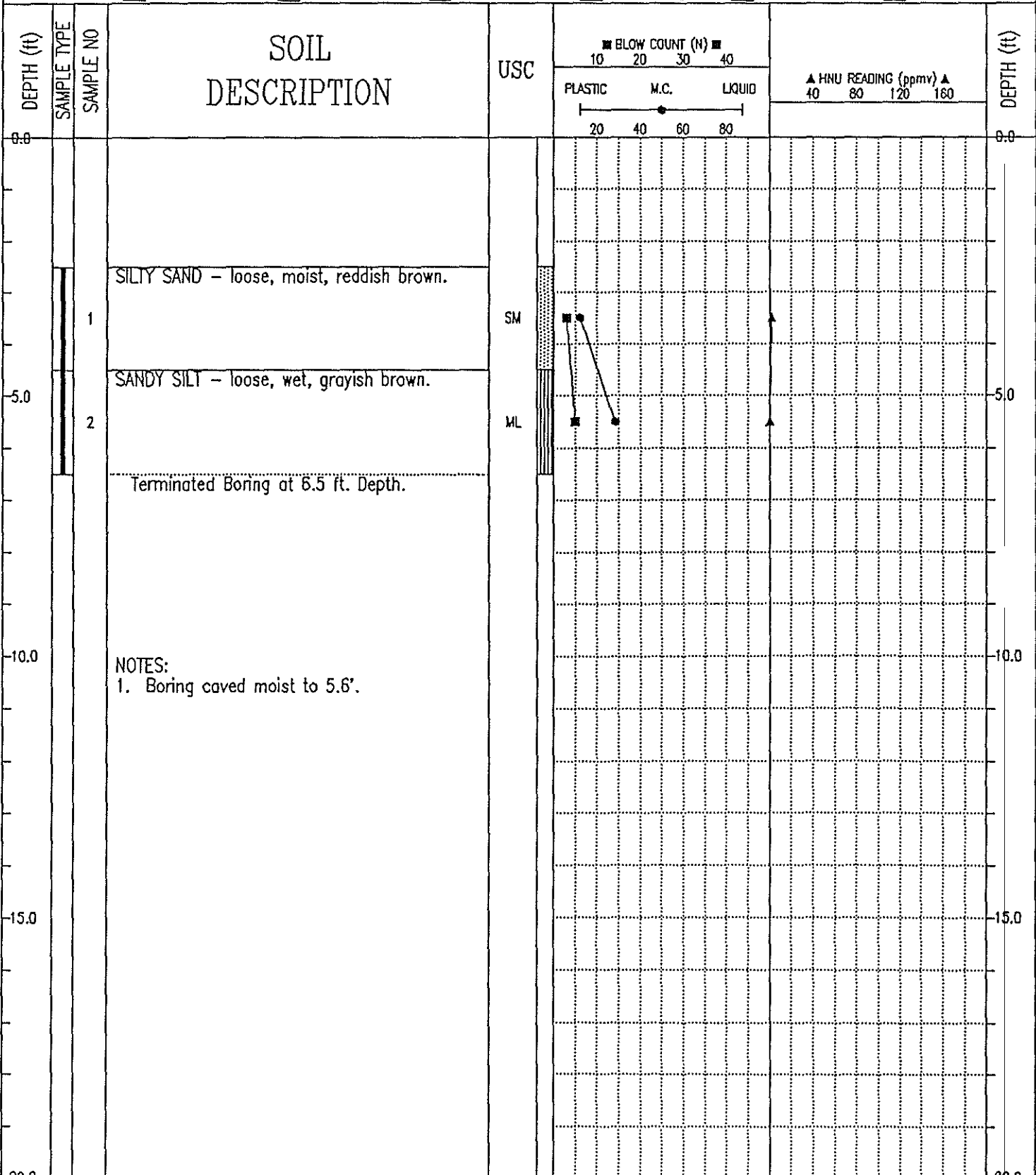
COMPLETION DEPTH 28.5 ft COMPLETE 3/16/89

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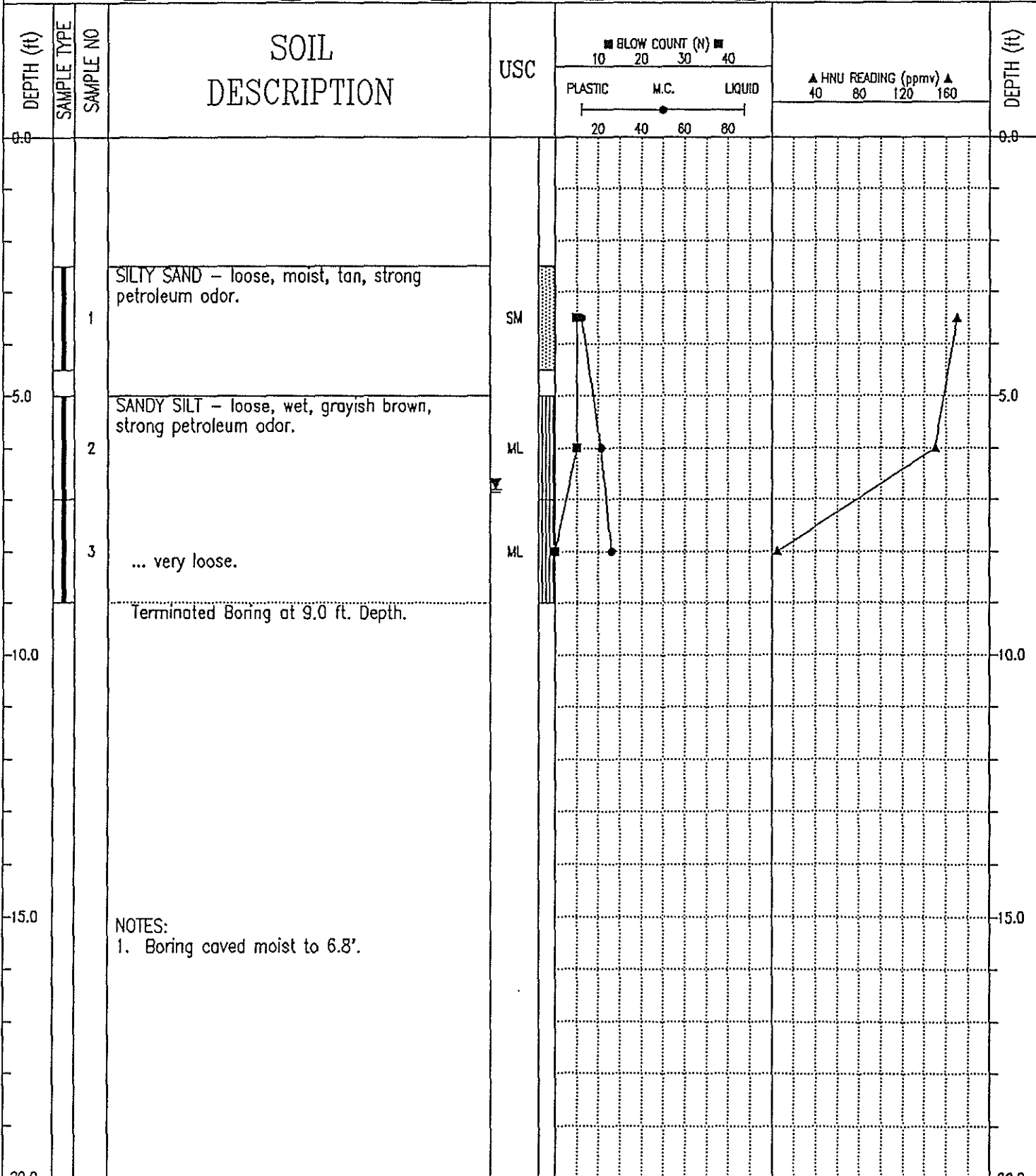
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| CLIENT: Mirro Corp. - Foley Co. | CREW: McArdle, Pittner, Pope | Project No: 10146E |
| LOCATION: Manitowoc, WI | METHOD: HSA | ELEVATION 602.650 (ft) |
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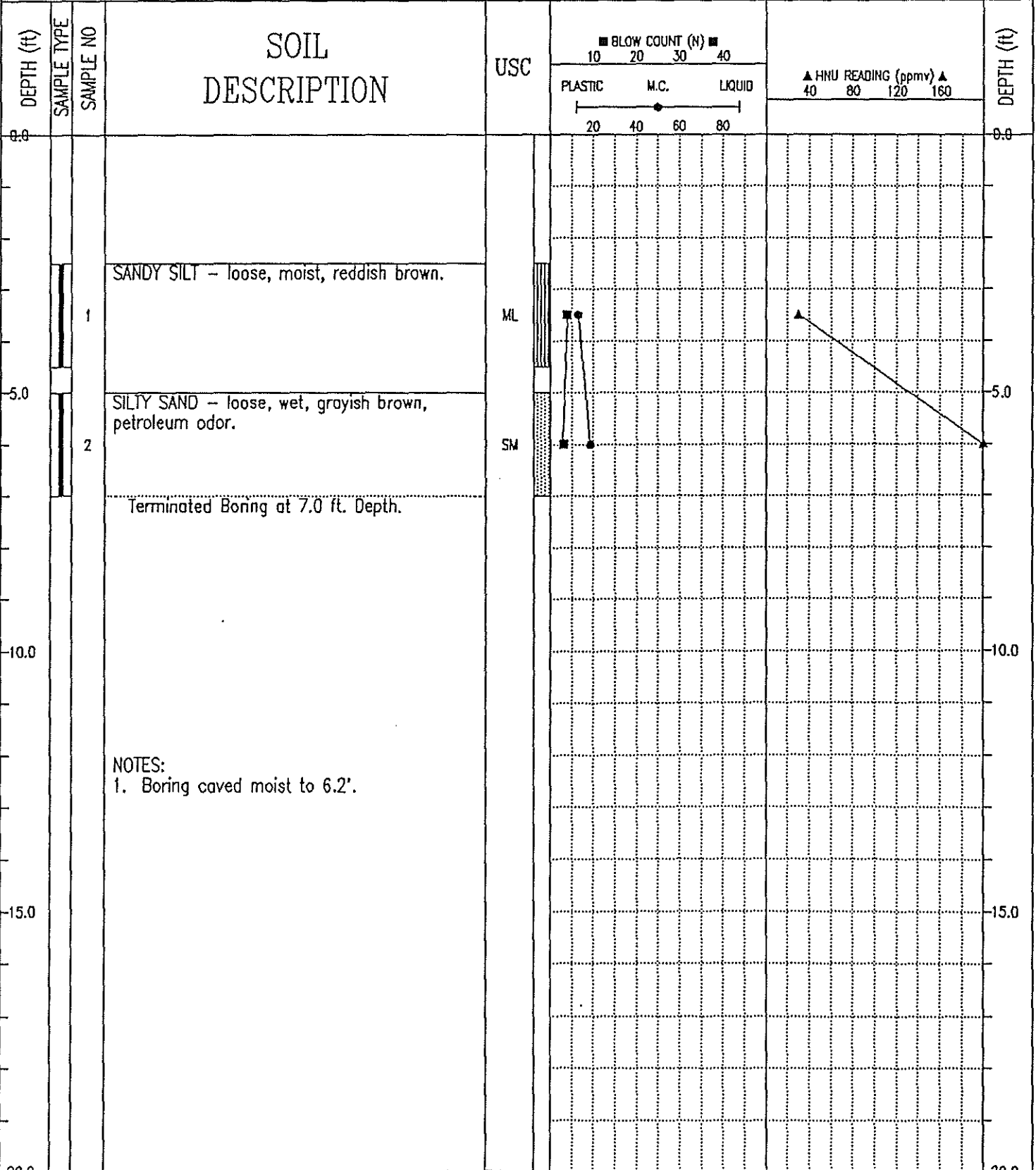
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| CLIENT: Mirro Corp. - Foley Co. | CREW: McArdle, Pittner, Pope | Project No: 10146E |
| LOCATION: Manitowoc, WI | METHOD: HSA | ELEVATION 602.860 (ft) |
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| | | |
|--|------------------------------|------------------------|
| PROJECT: Plant # 9, Remedial Inv. | RIG: Acker AD-II | BOREHOLE No. 146E-B4 |
| CLIENT: Mirro Corp. - Foley Co. | CREW: McArdle, Pittner, Pope | Project No: 10146E |
| LOCATION: Manitowoc, WI | METHOD: HSA | ELEVATION 603.940 (ft) |
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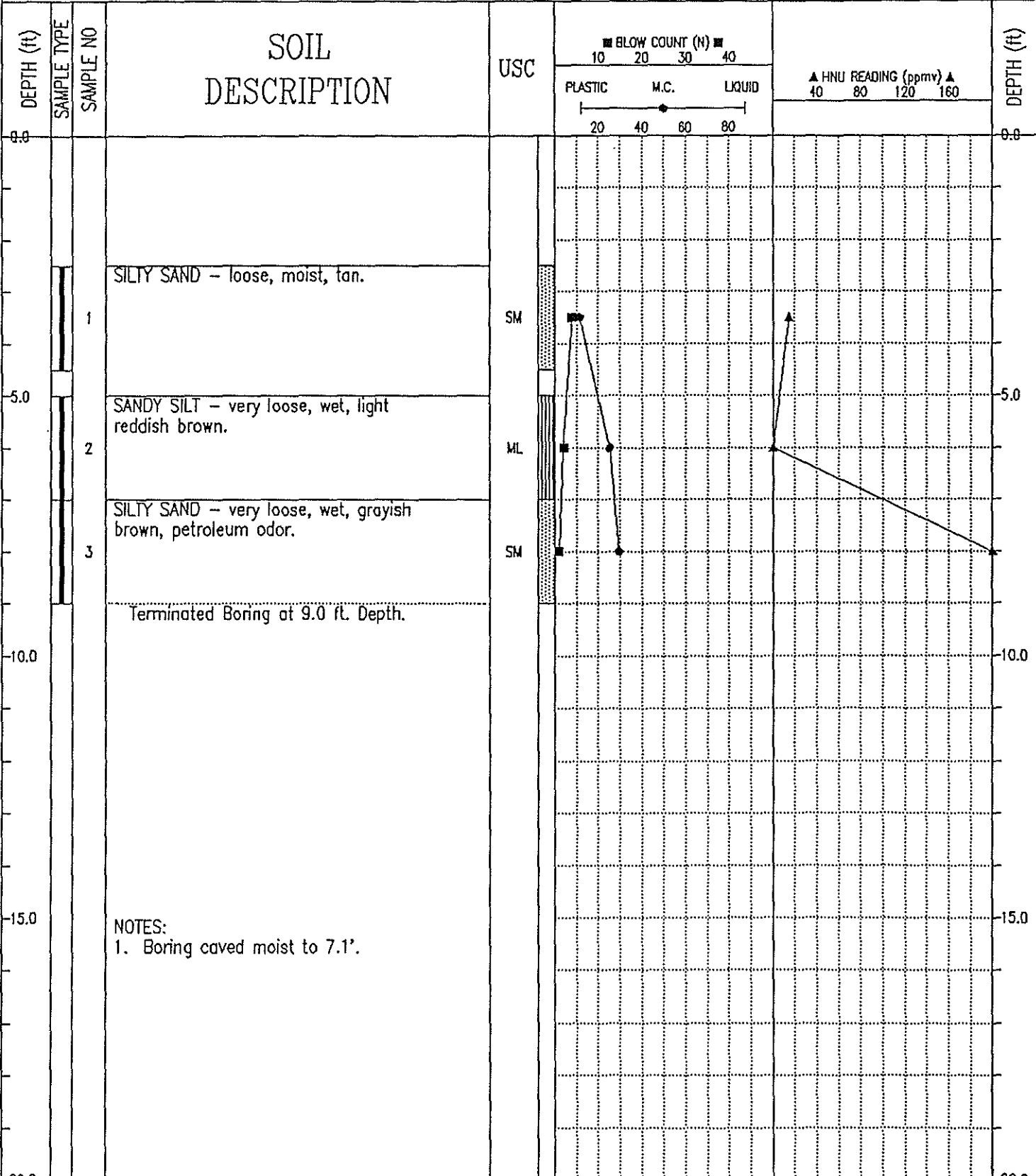


| | | |
|--|------------------------------|------------------------|
| PROJECT: Plant # 9, Remedial Inv. | RIG: Acker AD-II | BOREHOLE No. 146E-B5 |
| CLIENT: Mirro Corp. - Foley Co. | CREW: McArdle, Pittner, Pope | Project No: 10146E |
| LOCATION: Manitowoc, WI | METHOD: HSA | ELEVATION 602.870 (ft) |
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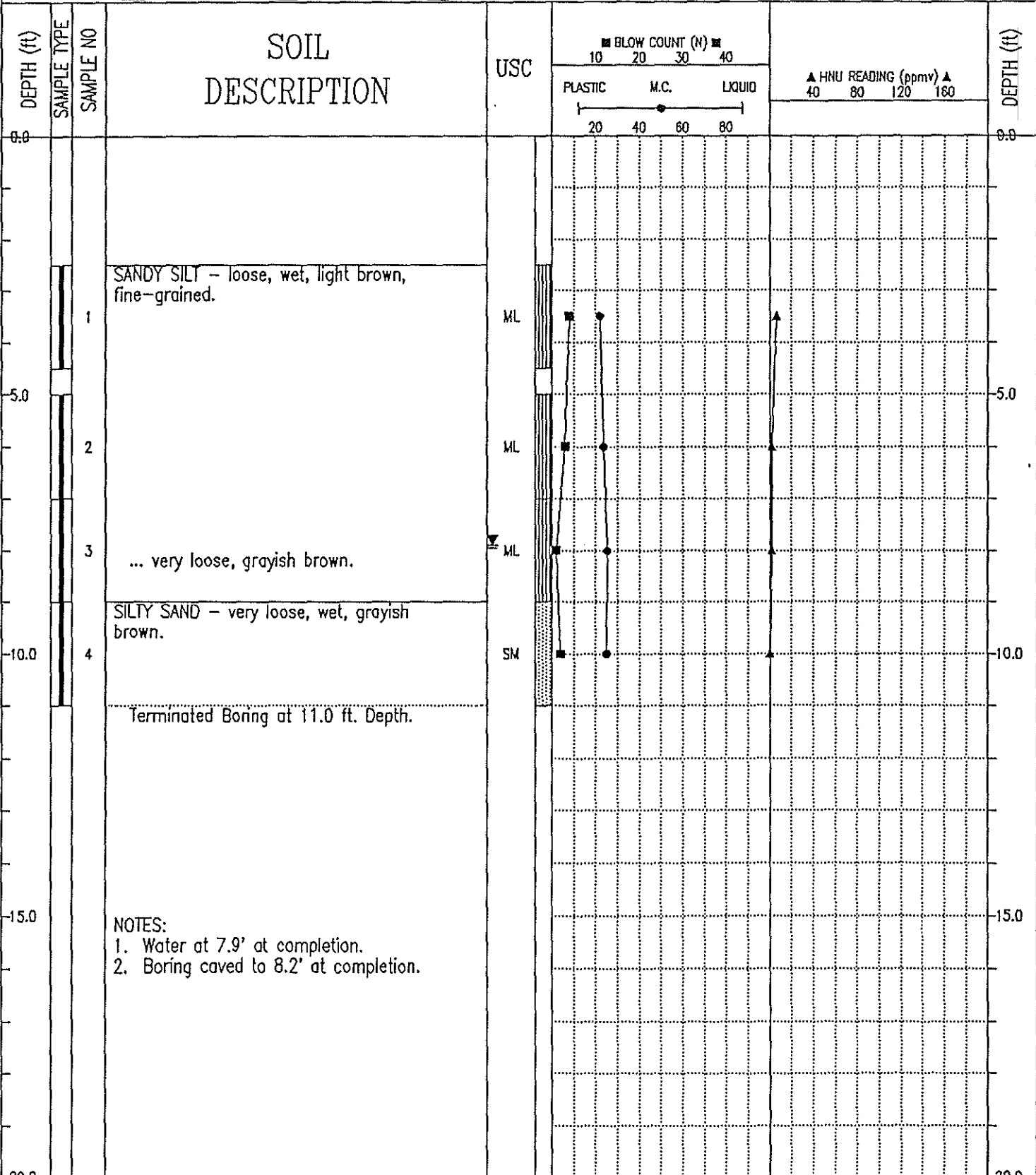


NOTES:
1. Boring caved moist to 6.2'.

| | | |
|---|------------------------------|------------------------|
| PROJECT: Plant # 9, Remedial Inv. | RIG: Acker AD-II | BOREHOLE No. 146E-B6 |
| CLIENT: Mirro Corp. - Foley Co. | CREW: McArdle, Pittner, Pope | Project No: 10146E |
| LOCATION: Manitowoc, WI | METHOD: HSA | ELEVATION 603.310 (ft) |
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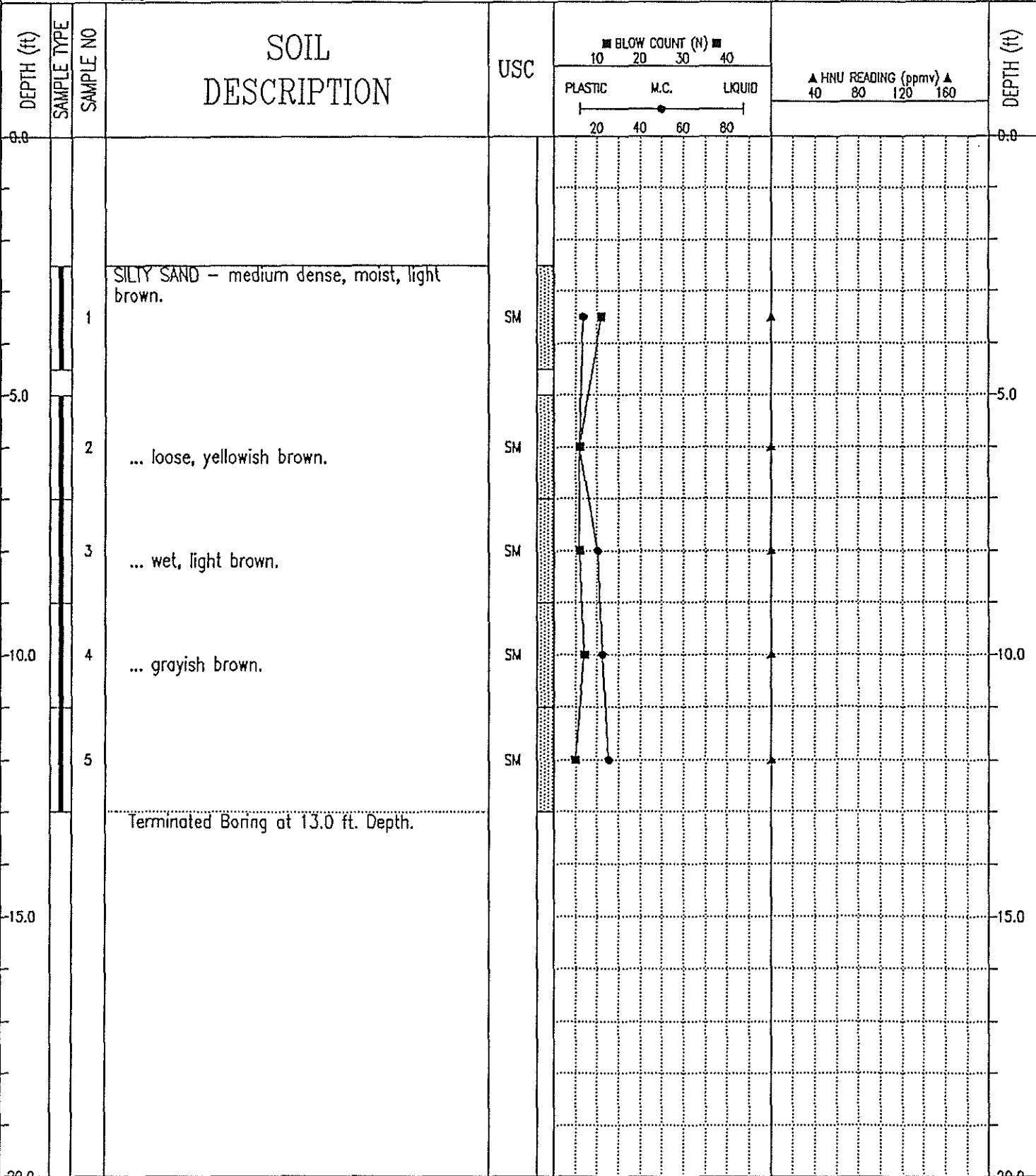
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| CLIENT: Mirro Corp. - Foley Corp. | CREW: McArdle, Pittner, Pope | Project No: 10146E |
| LOCATION: Manitowoc, WI | METHOD: HSA | ELEVATION 603.680 (ft) |
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COMPLETION DEPTH 11.0 ft COMPLETE 3/16/89
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| | | |
|--|------------------------------|------------------------|
| PROJECT: Plant # 9, Remedial Inv. | RIG: Acker AD-II | BOREHOLE No. 146E-B8 |
| CLIENT: Mirro Corp. - Foley Co. | CREW: McArdle, Pittner, Pope | Project No: 10146E |
| LOCATION: Manitowoc, WI | METHOD: HSA | ELEVATION 604.380 (ft) |
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Sheboygan, Wisconsin

COMPLETION DEPTH 13.0 ft

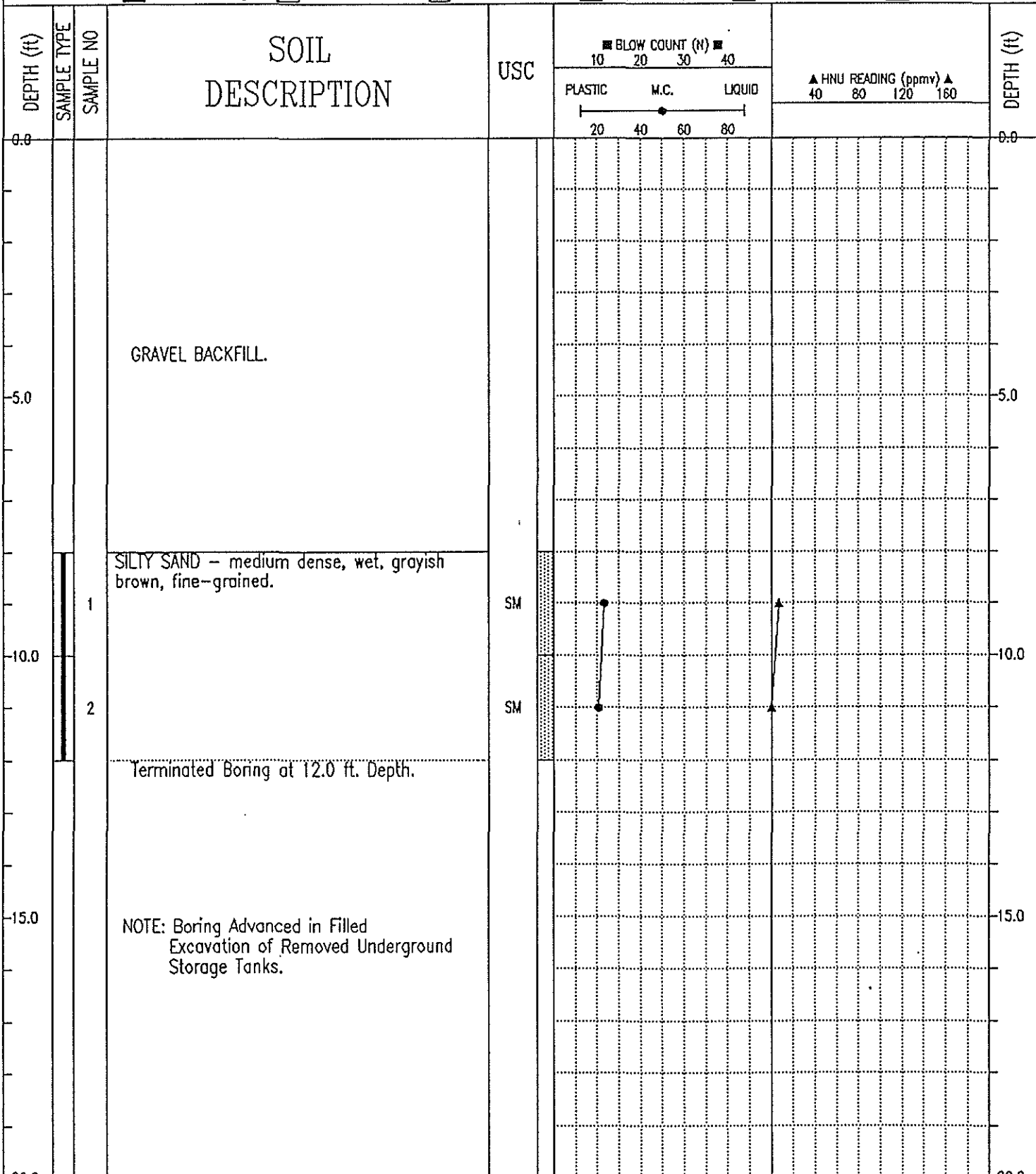
COMPLETE 3/16/89

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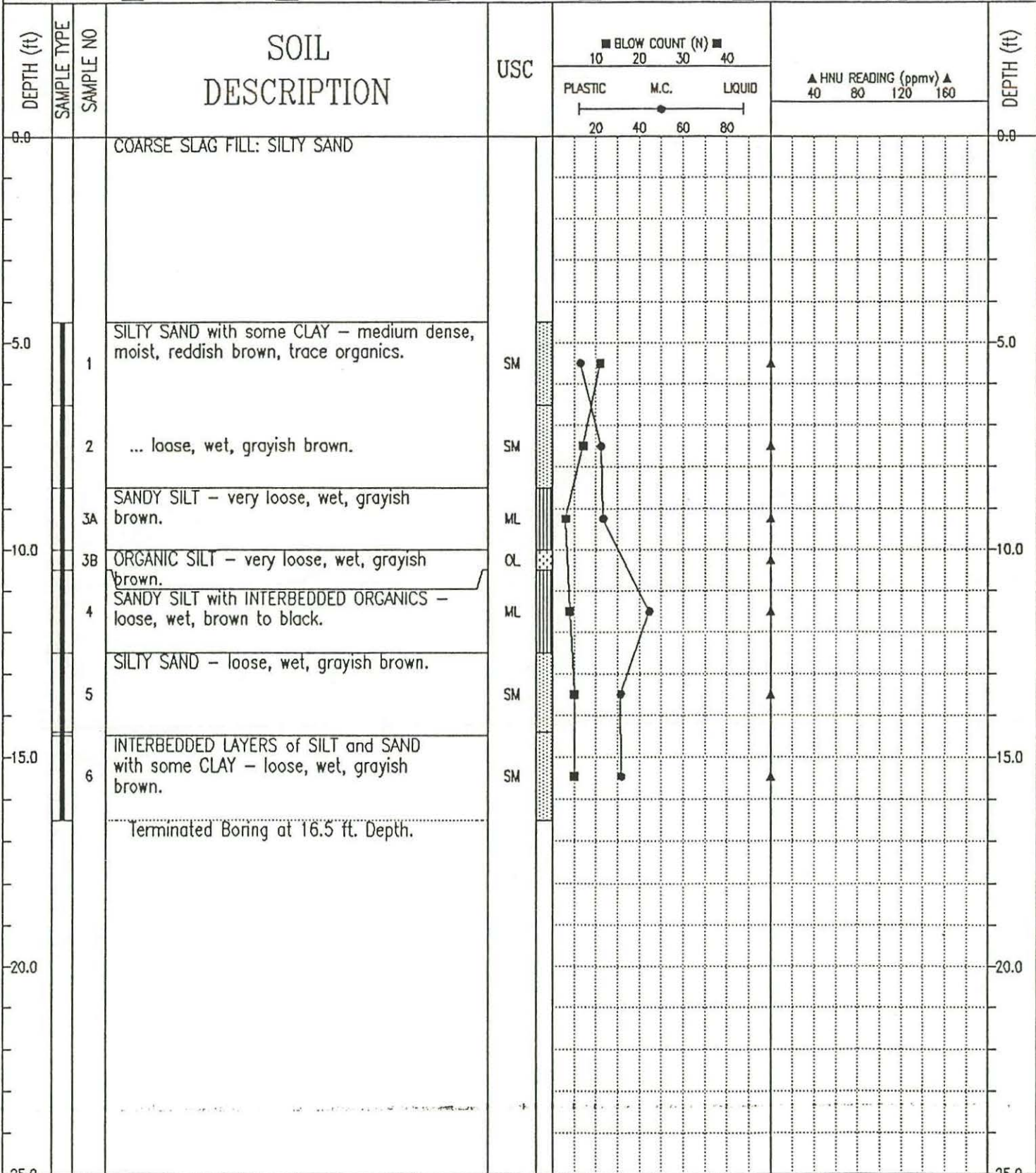
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Page 1 of 1

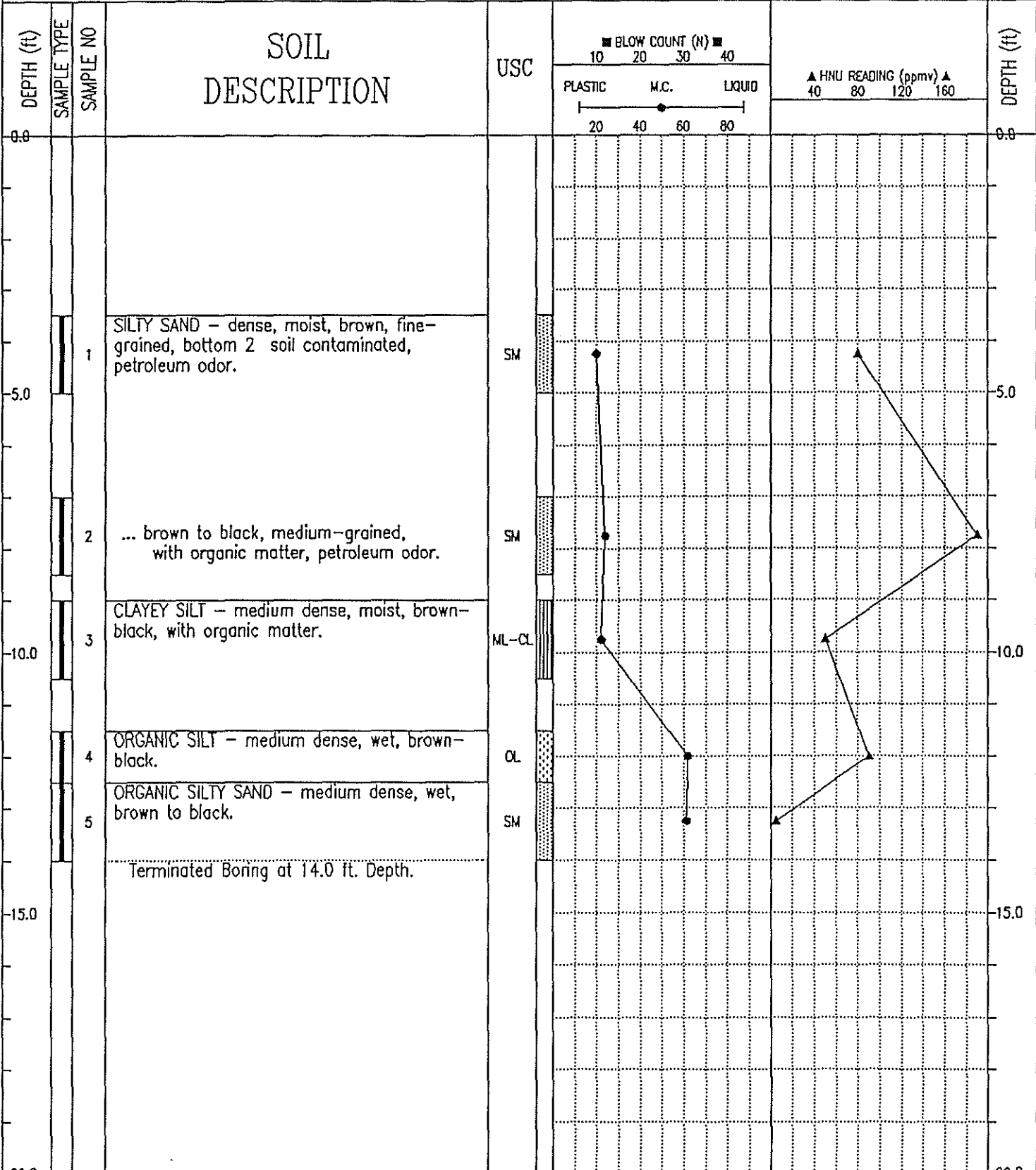
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| CLIENT: Mirro Corp. - Foley Co. | CREW: McArdle, Pittner, Pope | Project No: 10146E |
| LOCATION: Manitowoc, WI | METHOD: HSA | ELEVATION 604.380 (ft) |
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| | | |
|---|------------------------------|------------------------|
| PROJECT: Plant # 9, Remedial Inv. | RIG: Acker AD-II | BOREHOLE No. 146E-B10 |
| CLIENT: Mirro Corp. - Foley Co. | CREW: McArdle, Pittner, Pope | Project No: 10146E |
| LOCATION: Manitowoc, WI | METHOD: HSA | ELEVATION 601.710 (ft) |
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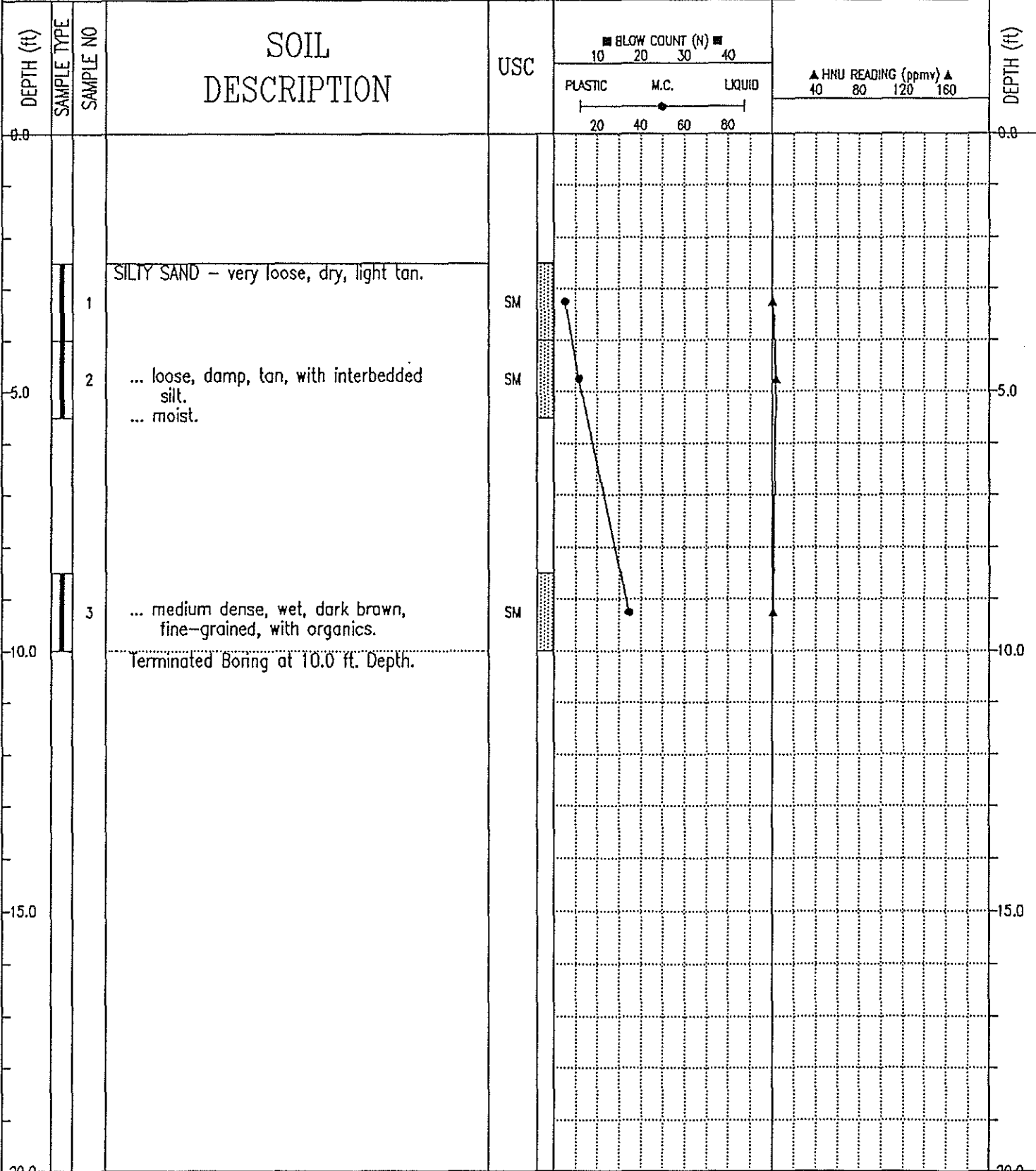


| | | |
|--|------------------------------|------------------------|
| PROJECT: Plant # 9, Remedial Inv. | RIG: Acker AD-II | BOREHOLE No. 146E-B11 |
| CLIENT: Mirro Corp. - Foley Co. | CREW: McArdle, Pittner, Pope | Project No: 10146E |
| LOCATION: Manitowoc, WI | METHOD: HSA | ELEVATION 601.590 (ft) |
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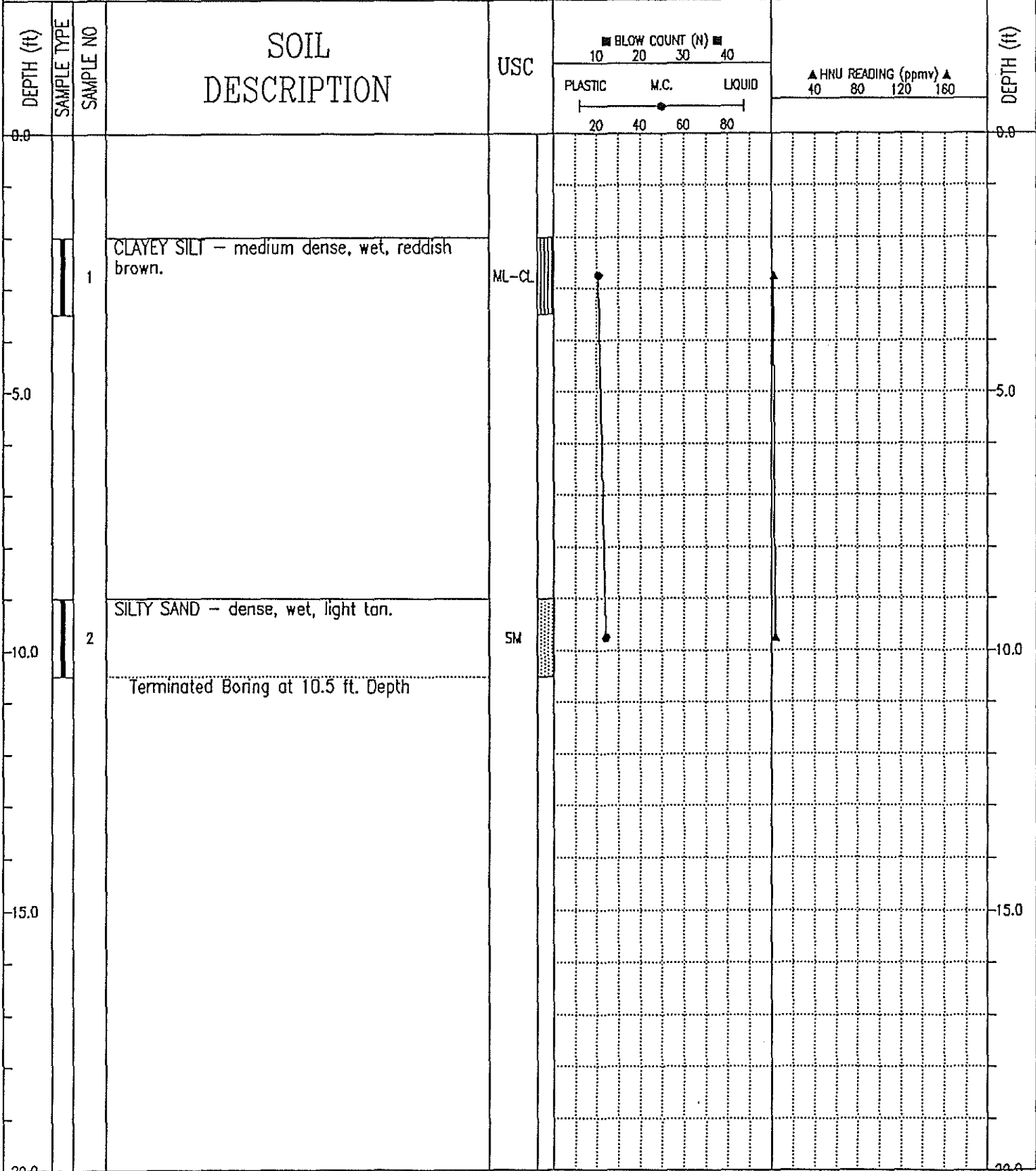


| | | |
|-----------------------------------|------------------------------|------------------------|
| PROJECT: Plant # 9, Remedial Inv. | RIG: Acker AD-II | BOREHOLE No. 146E-B12 |
| CLIENT: Mirro Corp. - Foley Co. | CREW: McArdle, Pittner, Pope | Project No: 10146E |
| LOCATION: Manitowoc, WI | METHOD: HSA | ELEVATION 601.720 (ft) |

SAMPLE TYPE 3" Piston Sample NO RECOVERY 2.5" Cal. Sample Auger Sample 3" Shelby Tube 2" Split Spoon



| | | |
|--|------------------------------|------------------------|
| PROJECT: Plant # 9, Remedial Inv. | RIG: Acker AD-II | BOREHOLE No. 146E-B13 |
| CLIENT: Mirro Corp. - Foley Co. | CREW: McArdle, Pittner, Pope | Project No: 10146E |
| LOCATION: Manitowoc, WI | METHOD: HSA | ELEVATION 602.520 (ft) |
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COMPLETION DEPTH 10.5 ft
 COMPLETE 3/23/89

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GROUNDWATER MONITORING WELL

Observation Well X Piezometer _____

WELL NO. TYPICAL
(FLUSH MOUNT)

Project _____ Client _____

Location _____ Job No. _____

Top of Pipe Elev. _____ (ft.) Ground Elev. _____ (ft.) Datum _____

N-S Coordinate _____ (ft.) E-W Coordinate _____ (ft.) Origin _____

INSTALLATION DATA Date _____

Well Pipe

Sched. _____ Material _____ Dia. _____ (in.)
Threaded _____ Flush _____ Length _____ (ft.)

WELL SCREEN

Sched. _____ Material _____ Dia. _____ (in.)
Length _____ (ft.) Slot Size _____ (in.)
Open Area _____ %

PROTECTIVE CASING

Lgth. _____ (ft.) Dia. _____ (in.) Type _____

FILTER PACK

Type _____
D90% _____ (mm) D60% _____ (mm) D10% _____ (mm)

SEAL

Material _____ Form _____

GROUT (% composition by weight)

Bentonite _____ Cement _____ Water _____

DRILLING NOTES

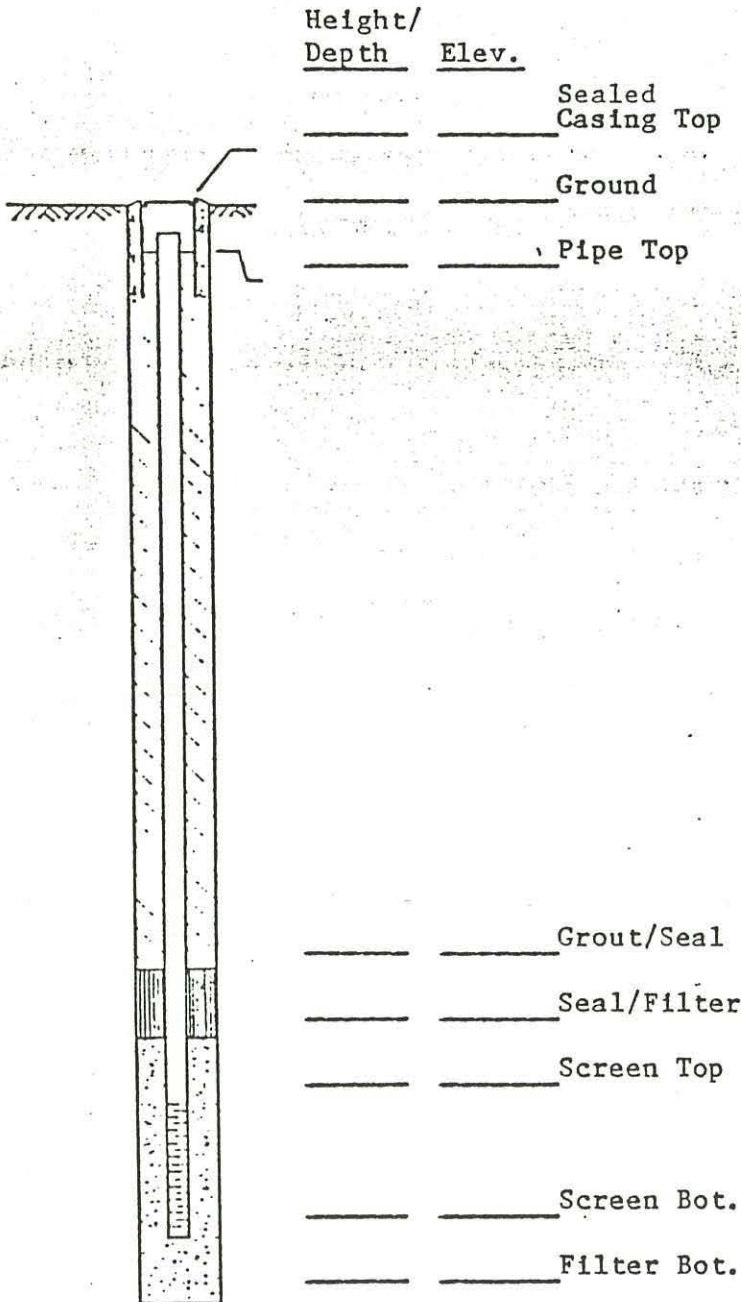
Drilling Method: HSA _____ Rotary Drill _____
Cased _____ Dia. _____ (in.)

Drilling Fluid: None _____ Water _____
Air _____ Bentonite _____

Water Source: _____

Remarks: _____

Well Installation Observed & Accepted by: _____



Note: Figure not to Scale

IMPORTANT INFORMATION ABOUT YOUR GEOTECHNICAL ENGINEERING REPORT

More construction problems are caused by site subsurface conditions than any other factor. As troublesome as subsurface problems can be, their frequency and extent have been lessened considerably in recent years, thanks to the Association of Soil and Foundation Engineers (ASFE).

When ASFE was founded in 1969, subsurface problems were frequently being resolved through lawsuits. In fact, the situation had grown to such alarming proportions that consulting geotechnical engineers had the worst professional liability record of all design professionals. By 1980, *ASFE-member consulting soil and foundation engineers had the best professional liability record.* This dramatic turn-about can be attributed directly to client acceptance of problem-solving programs and materials developed by ASFE for its members' application. *This acceptance was gained because clients perceived the ASFE approach to be in their own best interests.* Disputes benefit only those who earn their living from others' disagreements.

The following suggestions and observations are offered to help you reduce the geotechnical-related delays, cost-overruns and other costly headaches that can occur during a construction project.

A GEOTECHNICAL ENGINEERING REPORT IS BASED ON A UNIQUE SET OF PROJECT-SPECIFIC FACTORS

A geotechnical engineering report is based on a subsurface exploration plan designed to incorporate a unique set of project-specific factors. These typically include: the general nature of the structure involved, its size and configuration; the location of the structure on the site and its orientation; physical concomitants such as access roads, parking lots, and underground utilities, and the level of additional risk which the client assumed by virtue of limitations imposed upon the exploratory program. To help avoid costly problems, consult the geotechnical engineer to determine how any factors which change subsequent to the date of his report may affect his recommendations.

Unless your consulting geotechnical engineer indicates otherwise, *your geotechnical engineering report should not be used:*

- When the nature of the proposed structure is changed, for example, if an office building will be erected instead of a parking garage, or if a refrigerated warehouse will be built instead of an unrefrigerated one;
- when the size or configuration of the proposed structure is altered;
- when the location or orientation of the proposed structure is modified;
- when there is a change of ownership, or
- for application to an adjacent site.

A geotechnical engineer cannot accept responsibility for problems which may develop if he is not consulted after factors considered in his report's development have changed.

MOST GEOTECHNICAL "FINDINGS" ARE PROFESSIONAL ESTIMATES

Site exploration identifies actual subsurface conditions only at those points where samples are taken; when they are taken. Data derived through sampling and subsequent laboratory testing are extrapolated by the geotechnical engineer who then renders an opinion about overall subsurface conditions, their likely reaction to proposed construction activity, and appropriate foundation design. Even under optimal circumstances actual conditions may differ from those opined to exist, because no geotechnical engineer, no matter how qualified, and no subsurface exploration program, no matter how comprehensive, can reveal what is hidden by earth, rock and time. For example, the actual interface between materials may be far more gradual or abrupt than the report indicates, and actual conditions in areas not sampled may differ from predictions. *Nothing can be done to prevent the unanticipated, but steps can be taken to help minimize their impact.* For this reason, *most experienced owners retain their geotechnical consultant through the construction stage, to identify variances, conduct additional tests which may be needed, and to recommend solutions to problems encountered on site.*

SUBSURFACE CONDITIONS CAN CHANGE

Subsurface conditions may be modified by constantly-changing natural forces. Because a geotechnical engineering report is based on conditions which existed at the time of subsurface exploration, *construction decisions should not be based on a geotechnical engineering report whose adequacy may have been affected by time.* Speak with the geotechnical consultant to learn if additional tests are advisable before construction starts.

Construction operations at or adjacent to the site and natural events such as floods, earthquakes or groundwater fluctuations may also affect subsurface conditions and, thus, the continuing adequacy of a geotechnical report. The geotechnical engineer should be kept apprised of any such events, and should be consulted to determine if additional tests are necessary.

A GEOTECHNICAL ENGINEERING REPORT IS SUBJECT TO MISINTERPRETATION

Costly problems can occur when other design professionals develop their plans based on misinterpretations of a geotechnical engineering report. To help avoid these problems, the geotechnical engineer should be retained to work with other appropriate design professionals to explain relevant geotechnical findings and to review the adequacy

of their plans and specifications relative to geotechnical issues.

BORING LOGS SHOULD NOT BE SEPARATED FROM THE ENGINEERING REPORT

Final boring logs are developed by the geotechnical engineer based upon his interpretation of field logs (assembled by site personnel) and laboratory evaluation of field samples. Only final boring logs customarily are included in geotechnical engineering reports. *These logs should not under any circumstances be redrawn* for inclusion in architectural or other design drawings, because drafters may commit errors or omissions in the transfer process. Although photographic reproduction eliminates this problem, it does nothing to minimize the possibility of contractors misinterpreting the logs during bid preparation. When this occurs, delays, disputes and unanticipated costs are the all-too-frequent result.

To minimize the likelihood of boring log misinterpretation, *give contractors ready access to the complete geotechnical engineering report*. Those who do not provide such access may proceed under the *mistaken* impression that simply disclaiming responsibility for the accuracy of subsurface information always insulates them from attendant liability. Providing the best available information to contractors helps prevent costly construction problems and the adversarial attitudes which aggravate them to disproportionate scale.

READ RESPONSIBILITY CLAUSES CLOSELY

Because geotechnical engineering is based extensively on judgement and opinion, it is far less exact than other design disciplines. This situation has resulted in wholly unwarranted claims being lodged against geotechnical consultants. To help prevent this problem, geotechnical engineers have developed model clauses for use in written transmittals. These are *not* exculpatory clauses designed to foist the geotechnical engineer's liabilities onto someone else. Rather, they are definitive clauses which identify where the geotechnical engineer's responsibilities begin and end. Their use helps all parties involved recognize their individual responsibilities and take appropriate action. Some of these definitive clauses are likely to appear in your geotechnical engineering report, and you are encouraged to read them closely. Your geotechnical engineer will be pleased to give full and frank answers to your questions.

OTHER STEPS YOU CAN TAKE TO REDUCE RISK

Your consulting geotechnical engineer will be pleased to discuss other techniques which can be employed to mitigate risk. In addition, the Association of Soil and Foundation Engineers has developed a variety of materials which may be beneficial. Contact ASFE for a complimentary copy of its publications directory.

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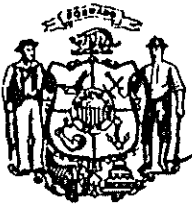
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APPENDIX B

Underground Storage Tank
Remedial Action Plan

Approval Letter from the
Wisconsin Department of Natural Resources



State of Wisconsin / DEPARTMENT OF NATURAL RESOURCES

Lake Michigan District Headquarters
1125 N. Military Avenue
P.O. Box 10448
Green Bay, WI 54307-0448

Carroll D. Besadny
Secretary

October 4, 1989

File Ref: 4440

Mr. Tom Reed
Finishing and Environmental Engineer
Mirro Corporation - Foley Company
1512 Washington Street
P.O. Box 1330
Manitowoc, WI 54221-1330

Subject: Remedial Investigation Report - Mirro Plant No. 9,
Manitowoc, Wisconsin

Dear Mr. Reed:

The Department has reviewed the above report by Miller Engineers. This report summarized the subsurface investigation of soil and groundwater contamination resulting from several underground storage tanks.

The Department is in general agreement with the report and its proposals. The vapor recovery systems would appear to be well suited for these site conditions. Approval for discharge from these systems to the atmosphere will be needed from the Department. I have enclosed the necessary forms with the Miller Engineers letter.

Relative to the groundwater recovery wells, a suitable pumping schedule, treatment and disposal method will need to be approved by the Department. Analysis of this water will also be needed initially upon start-up and thereafter on a schedule determined by the Department.

The monitoring wells should be sampled initially after installation, thereafter monthly for the first quarter, followed by quarterly sampling. Termination of sampling will be at the determination of the Department.

Please proceed with the proposal as presented by Miller Engineers. If you have any questions, please contact my office at 414-497-3569.

Thank you for your continued patience and cooperation in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Alan Thomas Nass".

Alan Thomas Nass
LUST Coordinator

ATN:lvp
Enc.

cc: Peter Pittner, Environmental Scientist
Miller Engineers, 5308 South Twelfth Street, Sheboygan, WI 53081

NewellMNine000138

APPENDIX C

Asbestos Inspection Report

Mirro/Foley Company
Plant 9
Manitowoc, Wisconsin

Inspection Report for
Asbestos-Containing Building Materials

December, 1989

The Mirro/Foley Company plant number 9 is located at 1512 Washington Avenue, Manitowoc, Wisconsin. The facility consists of 22 separate buildings, now covering an entire city block. At its tallest point, the main building has seven full stories and a partial eighth floor. Although the entire facility was not constructed at the same time, it is believed that the oldest sections are approximately 100 years old and the newer sections are 50 to 75 years old. Exterior construction is primarily brick with many large sections of glass windows.

Although most of the facility is now vacant, the entire seventh floor and a portion of the sixth floor are occupied by Mirro/Foley Company offices. These areas of the facility have been extensively remodeled. During March, 1989, Yanko Environmental Services completed an asbestos inspection and report for the office areas. A copy of the narrative from that inspection is attached as part of this report.

The unoccupied section of the sixth floor has a concrete ceiling, concrete walls and a wood floor. At the south end, there is a system of large blowers and duct work that are covered with 100 square feet of asbestos-containing insulation, in a damaged condition. There is also a set of two paint-drying ovens that are covered with a blanket of approximately 110 square feet of asbestos-containing insulation. Insulation on the paint-drying ovens is also damaged. This section of the sixth floor has approximately 2,800 linear feet of asbestos-containing pipe insulation and 168 pipe joints and pipe elbows that are covered with a mortar material that is assumed to contain asbestos. It is estimated that 25 percent of the asbestos pipe insulation is damaged.

The fifth floor has a wood ceiling, brick walls and a wood floor. On this floor, there is approximately 3,760 linear feet of asbestos-containing pipe cover and 267 pipe joints and pipe elbows that are covered with a mortar material that is assumed to contain asbestos. It is estimated that 15 percent of the asbestos pipe insulation is damaged.

The fourth floor has a wood ceiling, brick walls and a wood floor. On this floor, there is approximately 1,750 linear

feet of asbestos-containing pipe cover and 108 pipe joints and pipe elbows that are covered with a mortar material that is assumed to contain asbestos. Pipe insulation damage is estimated to be 10 percent. A sample of 2-foot by 4-foot, white ceiling tile was collected from the office area on the fourth floor and was found to be a non-asbestos containing material. In the office area, there is approximately 250 square feet of linoleum floor covering that is assumed to contain asbestos. The floor covering is in good condition.

The third floor has a wood ceiling, brick walls and a wood floor. On this floor, there is approximately 3,150 linear feet of asbestos-containing pipe cover and 140 pipe joints and pipe elbows that are covered with a mortar material that is assumed to contain asbestos. Pipe insulation damage is estimated to be 20 percent. In the middle of the third floor, there are two large pipes that are covered with asbestos insulation in a significantly damaged (greater than 50 percent) and friable condition. Large patches of the pipe insulation have fallen from the pipes and are now laying on the floor. On the third floor, there is approximately 150 square feet of 1-foot by 1-foot vinyl asbestos floor tile and approximately 300 square feet of 9-inch by 9-inch asphalt asbestos floor tile. The floor tiles are in good condition.

The second floor has a wood ceiling, brick walls and a wood floor. There is approximately 4,530 linear feet of asbestos-containing pipe cover and 266 pipe joints and pipe elbows that are covered with a mortar material that is assumed to contain asbestos. It is estimated that 10 percent of the asbestos-containing pipe insulation is damaged. On the second floor, there is approximately 1,660 square feet of 1-foot by 1-foot vinyl asbestos floor tile and approximately 504 square feet of linoleum floor covering that is assumed to contain asbestos. Floor coverings on the second floor are in good condition.

The first floor has a ceiling constructed of wood, poured concrete and glass. The walls are brick and the floor is wood. On the first floor and in the boiler rooms adjacent to the first floor, there is approximately 5,950 linear feet of asbestos-containing pipe cover and 524 pipe joints and pipe elbows that are covered with a mortar material that is assumed to contain asbestos. It is estimated that approximately 20 percent of the asbestos-containing pipe insulation is damaged.

On the first floor, there are three cylindrical tanks that are covered with asbestos blankets. The asbestos cover on these three tanks totals 540 square feet, and is in a damaged condition.

In the office areas located at the northwest corner of the first floor, there is 480 square feet of asphalt asbestos floor tile in good condition. On the south side, there is approximately 140 square feet of 1-foot by 1-foot vinyl asbestos floor tile, in good condition.

On the west side of the first floor, there are two ovens that are lined with asbestos insulation. The insulation in the ovens is inaccessible, but is estimated to total 2,180 square feet. The oven insulation appears to be in good condition.

In the main boiler room, there is a steam generation or auxillary boiler vessel that is covered with an asbestos-containing, insulating blanket. The covering totals approximately 150 square feet and is in a significantly-damaged condition.

Adjacent to main boiler room near the center of the facility, there is a room where two, large tanks have been removed. Abandoned pipes are hanging from the ceiling and laying on the floor. The pipes are covered with a white, solid insulation that is assumed to contain asbestos. Pipe covering is significantly damaged, in a friable condition, with several pieces laying on the floor. On the east wall of this room, there is a rectangular, verticle air duct that is covered with mortar that is assumed to contain asbestos. The mortar covering totals approximately 90 square feet and is in a significantly-damaged, friable condition.

The abandoned boiler room, located on the west side of the facility, has approximately 1,900 square feet of asbestos-containing boiler cover and asbestos pipe insulation. The asbestos-containing insulation in this boiler room is significantly damaged (greater than 50 percent) and is in a friable condition. Pieces of loose asbestos insulation are laying on the boiler room floor.

On the first floor, there are paper drums, metal drums, plastic garbage bags, and a wood box that contain Johns-Manville "aircell" asbestos pipe insulation and other asbestos insulation that has been removed and placed in these containers for temporary storage. This asbestos-containing material is loose and in a friable condition (refer to report on waste storage).

There are 10 stairwells in the facility. These stairwells contain approximately 590 linear feet of asbestos-containing pipe cover and 47 pipe joints and pipe elbows that are covered with a mortar material that is assumed to contain asbestos. It is estimated that 10 percent of the asbestos-containing pipe insulation in the stairwells is damaged.

Beneath the first floor, there is a network of tunnels that contain steam lines, water supply pipes, drain pipes, and electrical conduit pipes. In the tunnel system, it is estimated that there is 500 linear feet of asbestos-containing pipe cover and approximately 50 pipe fittings, joints, and elbows that are covered with mortar that is assumed to contain asbestos. There are several areas in the tunnel system where the asbestos containing pipe cover is damaged. Damage is estimated to be 50 percent.

March 9, 1989

Mirro/Foley Company
Plant #9
Manitowoc, Wisconsin

The Mirro/Foley Company Plant #9 is located on Washington Avenue in Manitowoc, Wisconsin. Although the building is approximately 75 years old, the sixth and seventh floors have been extensively remodeled. Exterior construction is brick.

The main entrance to the sixth floor is from a stairwell located at the south side of the print shop. The east half of the print shop has a 2' x 4' suspended acoustical tile ceiling. The ceiling above is wood, the walls are brick and wood paneling, and the floor is wood. In the space above the suspended ceiling, there is a network of pipes covered with aircell asbestos insulation. There is approximately 25 linear feet of 10-inch diameter aircell, 115 linear feet of 6-inch diameter aircell, 150 linear feet of 4-inch diameter aircell, and 70 linear feet of 3-inch diameter aircell. The pipe insulation above the suspended ceiling is in good condition. At the south end of the room near the elevator shaft, there is a 9-foot vertical run of 5-inch diameter aircell asbestos pipe insulation in a significantly damaged condition. The pipe cover has been damaged by materials that are stored in the corner. At the east side of the room, there is a 9-foot vertical run of 6-inch diameter aircell asbestos pipe insulation that is now covered with a protective metal guard and in good condition.

The telephone room has a 2' x 4' acoustical tile ceiling. The ceiling above is wood and the walls are plywood. The floor is partially wood and partially covered with carpeting. In the space above the suspended ceiling, there is 10 linear feet of 6-inch diameter aircell asbestos pipe insulation in good condition. Vertical pipes in this room are insulated with fiberglass.

The conference room located immediately south of the telephone room has a 2' x 4' suspended acoustical tile ceiling. The ceiling above is wood, the walls are wood paneling, and the floor is carpeted. In the space above the suspended ceiling, there is 12 linear feet of 6-inch diameter aircell asbestos pipe insulation and 4 linear feet of 4-inch diameter aircell. Pipe insulation above the suspended ceiling is in good condition.

The short hallway located immediately south of the conference room has a 2' x 4' acoustical tile ceiling. The ceiling above is wood. The walls are wood paneling and glass and the floor is wood. In the space above the suspended ceiling, there is approximately 12 linear feet of 4-inch diameter aircell asbestos pipe insulation and 12 linear feet of 8-inch diameter aircell. Pipe insulation above the suspended ceiling has been damaged by water (note damaged ceiling tile).

The two offices located immediately north of the elevator shaft have 2' x 4' suspended acoustical tile ceilings with wood ceilings above. The walls of these offices are wood paneling and glass and the floors are carpeted. Pipes located above the suspended ceiling that serve heating units in these offices are covered with aircell asbestos pipe insulation. In this area, there is approximately 45 linear feet of 2-inch diameter aircell and 45 linear feet of 3-inch diameter aircell. Pipe insulation above the suspended ceilings is in good condition.

The west side of the print room has a 2' x 4' acoustical tile ceiling with a wood ceiling above. The walls are brick and the floor is wood. There is a network of pipes above the suspended ceiling covered with aircell asbestos insulation. There is approximately 70 linear feet of 8-inch diameter aircell, 16 linear feet of 6-inch diameter aircell, 70 linear feet of 4-inch diameter aircell, and 140 linear feet of 3-inch diameter aircell. At the north side of the room near the center, there is a section of aircell asbestos pipe insulation above the suspended ceiling that has been significantly damaged by plumbing repairs (damaged and missing ceiling tiles). There are loose pieces of asbestos pipe insulation hanging from the pipes. At the southeast corner of the room, there is a short section of 4-inch diameter aircell asbestos pipe insulation located immediately beneath the suspended ceiling. Pipe joints and pipe elbows in this area are covered with a mortar that is assumed to contain asbestos and is damaged. Also in this area, there is approximately 20 linear feet of 5-inch diameter aircell asbestos pipe insulation in good condition. There are three 9-foot vertical runs of 5-inch diameter aircell asbestos pipe insulation at the southeast corner. Insulation on these pipes has been damaged by physical abrasion. At the west side of the room near the men's bathroom, there is a 9-foot vertical run of 6-inch diameter aircell asbestos pipe insulation that has been significantly damaged by physical abrasion.

The men's and women's bathrooms located off the west side of the print room have concrete ceilings, brick walls, and terrazzo floors. Near the ceiling in the women's bathroom, there is a network of pipes covered with aircell asbestos pipe insulation. There is approximately 12 linear feet of 10-inch diameter aircell, 16 linear feet of 4-inch diameter aircell, and 30 linear feet of 3-inch diameter aircell. In the southwest corner of the women's bathroom, there are vertical pipes (totaling approximately 24 linear feet) of 6-inch diameter aircell. Near the ceiling, the aircell asbestos has been damaged by water. In the men's bathroom, there is also a network of pipes near the ceiling covered with aircell asbestos pipe insulation. There is approximately 30 linear feet of 4-inch diameter aircell and 60 linear feet of 3-inch diameter aircell. A 6-foot section of 3-inch diameter aircell is damaged and has been partially repaired with fiberglass insulation.

West of the print room, at the southwest corner of the building, there is a room that has metal shelves for storing packages of paper. This room has a 2' x 4' suspended acoustical tile ceiling with a wood ceiling above. Above the suspended ceiling, there is approximately 50 linear feet of 8-inch diameter aircell asbestos pipe insulation and 60 linear feet of 6-inch diameter aircell. Above the suspended ceiling at the northeast corner of the room, there is an area where mortar on pipe joints and pipe elbows is damaged. This mortar is assumed to contain asbestos. On the north wall of the room, there is a vertical pipe where the aircell asbestos has been partially removed and replaced with fiberglass. The remaining aircell is in good condition. The other vertical pipes in the room are insulated with fiberglass.

Immediately north, there is a paper storage room. This room has a wood ceiling, brick and fiberboard walls and a wood floor. Near the ceiling, there is approximately 70 linear feet of 10-inch diameter aircell asbestos pipe insulation, 55 linear feet of 4-inch diameter aircell, and 45 linear feet of 3-inch diameter aircell. Pipe insulation near the ceiling is in good condition. There is a vertical pipe in this room covered with fiberglass insulation.

The small vault on the east side of the room has a poured concrete ceiling, brick walls, and a metal floor. Near the vault ceiling, there is a 3-foot section of 10-inch diameter aircell asbestos pipe insulation in good condition. On the outside of the west wall of the vault, the 10-inch diameter aircell asbestos pipe insulation has a damaged end.

North of the paper storage area there is a storage room with metal shelves and files. This room contains the new H.V.A.C. unit. The room has a wood ceiling, brick and wood walls, and a wood floor. Near the ceiling, there is a network of pipes covered with aircell asbestos pipe insulation. There is approximately 65 linear feet of 10-inch diameter aircell, 70 linear feet of 6-inch diameter aircell, 40 linear feet of 4-inch diameter aircell, and 80 linear feet of 3-inch diameter aircell. Pipe insulation near the ceiling is in good condition. Some of the insulation has been removed and replaced with fiberglass. The west end of the room has been converted into a conference area. The conference area has a 2' x 4' acoustical panel ceiling with a wood ceiling above. The walls are wood paneling and brick and the floor is carpeted. In the space above the suspended ceiling, there is approximately 25 linear feet of 10-inch diameter aircell asbestos pipe insulation, 34 linear feet of 6-inch diameter aircell, and 12 linear feet of 3-inch diameter aircell. Pipe insulation above the suspended ceiling is in good condition.

North of the conference area, there is a hallway and stairwell. The stairwell has a wood ceiling, brick walls, and a wood floor. The steps are wood. Pipes in this stairwell are uninsulated.

The northwest corner of the sixth floor has a 2' x 4' suspended acoustical tile ceiling with a wood ceiling above. The walls are wood paneling and the floors are carpeted. Pipes in the space above the suspended ceiling are uninsulated.

The men's and women's bathrooms located east of the office area have poured concrete ceilings, brick walls, and terrazzo floors. Pipes in these bathrooms are uninsulated.

The hallway outside of the bathrooms has a wood ceiling, brick walls, and a wood floor. Pipes in the hallway are uninsulated. The elevator shaft off of this hallway is constructed of brick. There are no insulated pipes.

The chemistry laboratory has a wood ceiling, brick and glass walls, and a wood floor. Near the ceiling, on the west side of the laboratory, there is approximately 20 linear feet of 4-inch diameter aircell asbestos pipe insulation that is damaged. Near the sink on the west wall, there is a 3-foot section of 5-inch diameter aircell asbestos pipe insulation on a vertical pipe. Insulation on the vertical pipe is damaged. There is also a mortar covering pipe joints and pipe elbows on this vertical pipe.

The mortar material, which is in good condition, is assumed to contain asbestos. Behind the drying ovens on the north wall of the laboratory, there is approximately 20 linear feet of 6-inch diameter aircell asbestos pipe insulation in good condition. The laboratory office has a wood ceiling, wood walls, and a wood floor. There are no insulated pipes in the office.

The hallway outside of the laboratory has a 2' x 4' suspended acoustical tile ceiling with a wood ceiling above. The walls are wood and the floor is wood. In the space above the suspended ceiling, there is approximately 70 linear feet of 4-inch diameter aircell asbestos pipe insulation in good condition.

The office on the south side of the hallway has a wood ceiling, wood walls, and a wood floor. There are no insulated pipes in this office.

The product testing kitchen has a 2' x 2' suspended acoustical tile ceiling with a wood ceiling above. The walls are wood paneling and the floor is 12" x 12" vinyl tile. Pipes in the space above the suspended ceiling are uninsulated.

The office area located at the northeast corner of the sixth floor has a 2' x 4' suspended acoustical tile ceiling with a wood ceiling above. The walls are brick and wood paneling and the floor is carpeting. In the space above the suspended ceiling, there is approximately 80 linear feet of 4-inch diameter aircell asbestos pipe insulation and 100 linear feet of 6-inch diameter aircell. Near the center of the room, a portion of the 4-inch diameter aircell is damaged.

The pattern or model shop has a wood ceiling, brick walls, and a wood floor. Near the ceiling, there is a network of pipes covered with aircell asbestos pipe insulation. There is approximately 300 linear feet of 6-inch diameter aircell, 400 linear feet of 4-inch diameter aircell, and 100 linear feet of 2-inch diameter aircell. On the east side of the room, pipe insulation near the ceiling is significantly damaged from materials that are stored on tall shelves. In the center of the room, the 4-inch diameter aircell is also damaged from material stored on tall shelves. In the center of the room, the pipe insulation has been partially repaired with tape. On the west side of the room, 6-inch diameter aircell near the ceiling is damaged from vibration and physical abrasion.

The hallway between the pattern shop and sample storage room has a wood ceiling, brick walls, and a wood floor. Near the ceiling in the hallway, there is approximately 15 linear feet of 8-inch diameter aircell asbestos pipe insulation that is damaged. There is also approximately 30 linear feet of 4-inch diameter aircell asbestos pipe insulation in good condition. In the center of the hallway, there is a 12-foot vertical run of 6-inch diameter aircell that is significantly damaged from carts that are used to move materials through the halls.

The sample storage room has a wood ceiling, brick walls, and a wood floor. Near the ceiling, there is a network of pipes covered with aircell asbestos pipe insulation. There is approximately 4 linear feet of 10-inch diameter aircell, 18 linear feet of 8-inch diameter aircell, 170 linear feet of 6-inch diameter aircell, and 180 linear feet of 4-inch diameter aircell. On the south side of the room, there is significantly damaged 6-inch diameter aircell near the ceiling. The insulation has been damaged from materials that are stored on tall shelves. At the northwest corner of the room, there is a nest of 4-inch diameter aircell that has been damaged by water and physical abrasion.

In the center of the sixth floor, there are three storage areas that have wood ceilings, brick walls, and wood floors. Near the ceilings of these storage areas, there is approximately 8 linear feet of 8-inch diameter aircell, 220 linear feet of 6-inch diameter aircell, 130 linear feet of 5-inch diameter aircell, 350 linear feet of 4-inch diameter aircell, and 80 linear feet of 3-inch diameter aircell. Near the west wall in the west storage room, pipe insulation near the ceiling has been damaged by water. In the center storage room, there is a vertical run of 6-inch diameter aircell that is significantly damaged by physical abrasion. Near the ceiling at the southeast corner of the middle storage area, there is 4-inch and 6-inch diameter aircell asbestos insulation that has been damaged by water. There are several spots in the storage areas where the aircell asbestos has exposed ends.

There is a stairway off of the center storage area that has a wood ceiling, brick walls, and a wood floor. The steps are wood. In the stairway, there is a vertical run of 6-inch diameter aircell asbestos pipe insulation in good condition.

On the east side of the print shop, there is a paper and printing plate storage room. This room has a 2' x 4' suspended acoustical ceiling with a wood ceiling above. The walls are brick and the floor is wood. In the space above the suspended ceiling, there is approximately 80 linear feet of 4-inch diameter aircell asbestos pipe insulation and approximately 10 linear feet of 8-inch diameter aircell. Pipe insulation in this area is in good condition.

The dark room has a poured concrete ceiling, brick walls, and a terrazzo floor. Near the ceiling, there are several pipes covered with aircell asbestos insulation. There is approximately 16 linear feet of 8-inch diameter aircell, 20 linear feet of 4-inch diameter aircell, and 12 linear feet of 3-inch diameter aircell. Pipe insulation near the ceiling is in good condition. At the southeast corner of the darkroom, there is a 12-foot vertical run of 6-inch diameter aircell in good condition.

South of the darkroom, there is a photographic laboratory with a poured concrete ceiling, brick walls, and a terrazzo floor. Near the ceiling, there are several pipes covered with aircell asbestos pipe insulation. There is approximately 30 linear feet of 4-inch diameter aircell and 30 linear feet of 3-inch diameter aircell. Pipe insulation in this room is in good condition.

On the south side of the printing room, there is a stairway leading to the seventh floor. The stairwell has a wood ceiling, brick walls, and a wood floor. The steps are wood. In the stairwell, there is approximately 12 linear feet of 8-inch diameter aircell asbestos pipe insulation and 30 linear feet of 6-inch diameter aircell. Pipe insulation in the stairwell is in good condition.

March 14, 1989
Mirro/Foley Company
Plant #9
Seventh Floor

The main entrance to the seventh floor is from an elevator in the lobby and reception area. The reception area has a 2' x 2' suspended acoustical tile ceiling with a plaster ceiling above. The walls are plaster and wood paneling, and the floor is carpeted. Pipes in the space above the suspended ceiling are uninsulated.

The two bathrooms off of the reception area have plaster ceilings, plaster walls, and terrazzo floors. Pipes in the bathrooms are uninsulated.

The hallway north of the reception area has an acoustical ceiling constructed with 2' x 4' fiberglass panels. The ceiling above is fiberboard. The walls are wood paneling and the floor is carpeted. Pipes in the space above the suspended ceiling are uninsulated. The two offices located immediately west of elevator #14 are of the same construction.

The conference room located east of the vault on the south side of the building has a 2' x 4' suspended acoustical tile ceiling. The ceiling above is fiberglass panels and plaster. The walls are fabric-covered panels, and the floor is carpeted. Pipes in the space above the suspended ceiling are uninsulated.

The office area located at the southwest corner of the building has an acoustical suspended ceiling constructed of fiberglass panels. The ceiling above is plaster. The walls are fiberboard paneling and brick. The floor is carpeted. Pipes in the space above the suspended ceiling are uninsulated.

The custodian's closet off of this office area has a wood ceiling, brick walls, and a terrazzo floor. Pipes are uninsulated.

The office area located on the west side of the building near the center has an acoustical ceiling constructed of 2' x 4' fiberglass panels. The ceiling above is fiberboard. The walls are wood and brick and the floor is carpeted. Pipes in the space above the suspended ceiling are uninsulated.

The small storage area located south of the computer room has a suspended ceiling constructed with fiberglass panels and a fiberboard ceiling above. The walls are brick, wood, and 2' x 4' acoustical panels. The floor is linoleum. Pipes above the suspended ceiling are uninsulated.

The computer room is of the same construction except that there is a false floor constructed with 2' x 2' vinyl panels.

In the office south of the computer room, there is a vertical pipe covered with 8-inch diameter aircell asbestos insulation. This pipe runs from the floor to the upper ceiling for a distance of approximately 16 linear feet. Near the floor, the asbestos pipe insulation has been significantly damaged by physical abrasion.

The file room, located at the northwest corner of the building, is of the same construction as the offices on the west side of the building. Pipes above the suspended ceiling are uninsulated.

Stairway #1 is located at the southwest corner of the file room. The stairway has a wood ceiling, brick walls, and a wood floor. The steps are wood. Pipes in the stairwell are uninsulated.

At the southeast corner of the file room there is an HVAC unit. Pipes serving this unit are partially uninsulated, partially covered with fiberglass, and partially covered with aircell asbestos. There is approximately 12 linear feet of 4-inch diameter aircell in good condition. Near the floor, pipe joints and pipe elbows around the HVAC unit are covered with a mortar material that is assumed to contain asbestos. There are several points where the mortar has been damaged by physical abrasion and is now crumbling and falling from the pipes. Asbestos in this area is in a friable condition.

The office area and lunch room located east of the file room has a suspended ceiling constructed with 2' x 4' fiberglass panels. The ceiling above is fiberboard, the walls are brick, and the floor is carpeted. Pipes in the space above the suspended ceiling are uninsulated. At the east end of the room, there is a 10-foot vertical run of 8-inch diameter aircell asbestos pipe insulation in good condition.

At the southeast corner of the room, there is a custodian's storage room. This storage room has a glass tile ceiling, glass tile walls, and a 6" x 6" asphalt tile floor. Pipes are uninsulated.

The vending machine area has a ceiling constructed with 2' x 4' acoustical fiberglass panels with a fiberboard ceiling above. The walls are wood paneling and the floor is linoleum. Pipes in space above the suspended ceiling are uninsulated.

The two bathrooms located north of the vending area have wood ceilings, brick walls, and terrazzo floors. Pipes in these bathrooms are uninsulated.

The elevator shaft located south of the vending area has a wood ceiling and brick walls. There are no insulated pipes in the elevator shaft.

Conference room #111, located on the north side of the building, has a ceiling constructed of 2' x 4' acoustical fiberglass panels. The ceiling above is fiberboard. The walls are wood paneling and the floor is carpeted. Pipes in the space above the suspended ceiling are uninsulated.

The open office area located on the north side of the building near the northwest corner has a suspended ceiling constructed of 2' x 4' fiberglass panels. The ceiling above is fiberboard, the walls are fiberboard and brick, and the floor is carpeted. Pipes in the space above the suspended ceiling are uninsulated. In this office area, there are two 10-foot vertical runs of 8-inch diameter aircell asbestos pipe insulation in good condition.

On the south side of this office area, there is a furnace room that has a fiberboard ceiling with walls that are partially brick and partially covered with fiberglass batting. The floor is carpeted. Pipes serving this furnace are covered with approximately 10 linear feet of 4-inch diameter aircell asbestos insulation. Near the floor, the aircell asbestos has been damaged and repaired with tape. There are also several exposed insulation ends.

Stairwell #5 is located at the northeast corner of the building. The stairwell has a wood ceiling, brick walls, and a wood floor. The steps are wood. Pipes in the stairwell are uninsulated.

There is a row of offices extending along the east side of the building to the southeast corner, and then extending west along the south side of the building to the center of the building. These offices have suspended ceilings constructed of 2' x 4' acoustical fiberglass panels. The ceilings above are fiberboard. The walls are brick, glass, and wood. The floors are carpeted. Pipes in the space above the suspended ceilings are uninsulated. The hallways outside of these offices are of the same construction.

Stairway #6 located on the east side of the building is of the same construction of stairway #5. Pipes are uninsulated.

There is a women's bathroom located near the southwest corner of the building (immediately north of the custodian's closet). The bathroom has a wood ceiling, brick walls, and a terrazzo floor. Pipes in the bathroom are uninsulated.

March 20, 1989

The center office area on the seventh floor is divided approximately in the middle by a north/south wall constructed of wood and glass. The west section of the center office area has a suspended ceiling constructed of 2' x 4' fiberglass panels. The ceiling above is fiberboard, the walls are brick and fabric-covered panels, and the floor is carpeted. In the west section, there are several vertical pipes covered with aircell asbestos pipe insulation.

On these vertical pipes, there is a total of approximately 10 linear feet of 10-inch diameter aircell, 40 linear feet of 8-inch diameter aircell, and 10 linear feet of 6-inch diameter aircell. There is minor damage from physical abrasion. HVAC units in this office area are served with pipes that are covered with fiberglass and are partially covered with aircell asbestos insulation. On the HVAC units, there is approximately 20 linear feet of 4-inch diameter aircell in good condition. Pipes joints and pipe elbows at the HVAC units are covered with a mortar material that is assumed to contain asbestos. There are several places where the mortar is damaged.

Stairway #8, which is located off of the office area, has a wood ceiling, brick walls, and a wood floor. The steps are wood. The seventh floor landing has a radiator that is served with a pipe covered with 4-inch diameter aircell asbestos pipe insulation. The aircell has exposed ends.

The east half of the central office area is of the same construction as the west half. Near the center of the main, open office area, there is a 10-foot vertical pipe covered with 8-inch diameter aircell asbestos pipe insulation in good condition. On the east side of the room, near the women's bathroom, there is an HVAC unit that is served with pipes covered with aircell asbestos pipe insulation. There is approximately 10 linear feet of 4-inch diameter aircell that has been slightly damaged by vibration and physical abrasion. Pipe joints and pipe elbows are covered with a mortar material that is assumed to contain asbestos. The mortar on some of the pipe elbows is damaged.

On the north side of the room, there is an HVAC unit in a small partitioned area. This area has a suspended ceiling constructed of 2' x 4' fiberglass panels, walls that are covered with fiberglass batting, and a carpeted floor. On the east side of the HVAC unit, there are several short sections of 4-inch diameter aircell asbestos pipe insulation in a damaged condition. Pipe joints and pipe elbows are covered with mortar which assumed to contain asbestos. Mortar on the pipe joints and pipe elbows is also damaged.

The kitchen area off of the center office area has a 2' x 2' suspended acoustical tile ceiling with a fiberboard ceiling above. The walls are plaster. The floor is partially covered with 9" x 9" asphalt tile and partially carpeted. Pipes and HVAC ducts above the suspended ceiling are uninsulated. Other pipes in the kitchen are uninsulated.

The two bathrooms located on the east side of the central office area have wood ceilings, brick walls, and terrazzo floors. Pipes are uninsulated.

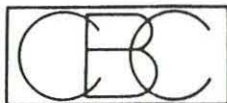
The product showroom has a suspended ceiling constructed of 2' x 4' fiberglass panels. The ceiling above is fiberboard, the walls are wood paneling, and the floors are carpeted. HVAC ducts in the space above the suspended ceiling are uninsulated.

The HVAC room off of the product showroom has a fiberboard ceiling, brick and paneled walls, and a linoleum floor. Pipes serving the HVAC units are partially covered with fiberglass and partially covered with 4-inch diameter aircell asbestos pipe insulation. There is approximately 12 linear feet of 4-inch diameter aircell in good condition.

The restroom off of the product showroom area has a plaster ceiling, plaster walls, and a terrazzo floor. Pipes are uninsulated.

The HVAC room located south of the restroom has a plaster ceiling, brick and wood paneled walls, and a floor that is partially covered with 9" x 9" asphalt tile and partially carpeted. Pipes serving this HVAC unit are uninsulated.

This report is accompanied by Facility Inspection Information forms.



ENVIRONMENTAL SERVICES

CHEM-BIO CORPORATION

140 EAST RYAN ROAD OAK CREEK, WI 53154-4599 (414) 764-7005

12/06/89

INDUSTRIAL HYGIENE
LABORATORY REPORT

PAGE 1

Y001 8443250 W81

YANKO ENVIRONMENTAL
3303 PAINE AVE
SHEBOYGAN ,WI 53081
ATTN: JIM BIRD

SAMPLE NUMBER - 89334-Y00090
CLIENT SAMPLE - 3600
CEILING TILE
LOCATION/PERSONNEL - PLANT 9

*4th Floor
Plant 9*

ASBESTOS IDENTIFICATION

SAMPLE DESCRIPTION :
TAN HOMOGENEOUS COMPRESSED FIBERS

NO ASBESTOS DETECTED
GLASS/MINERAL WOOL 10 %
CELLULOSE 80 %
AMORPHOUS MATERIAL 10 %

DATE COLLECTED - 11/28/89 DATE RECEIVED - 11/30/89
SAMPLED BY - YANKO ENVIRONMENTAL
JAMES C. BIRD
QUANTITATION METHOD - EQUIVALENT ESTIMATION

PRETREATMENT/COMMENTS-QUALITY CONTROL SAMPLE.

ANALYTICAL METHOD - POLARIZED LIGHT MICROSCOPY WITH DISPERSION STAINING
ANALYST - J. BROZOWSKI
DATE OF ANALYSIS - 12/06/89

TEST RESULTS HEREIN RELATE ONLY TO THE SAMPLE ANALYZED ABOVE. REPORT MAY NOT BE REPRODUCED OR USED TO CLAIM PRODUCT ENDORSEMENT OR PRODUCT IDENTIFICATION BY CBC OR ANY OTHER AGENCY.

NIOSH MANUAL OF ANALYTICAL METHODS, 3RD EDITION. EPA 40 CFR PART 763; 'INTERIM METHOD FOR THE DETERMINATION OF ASBESTOS IN BULK SAMPLES' TEST METHOD.

AMERICAN INDUSTRIAL HYGIENE ASSOCIATION CERTIFICATE # 325. NVLAP # 1028.

SAMPLES WILL BE STORED FOR 6 WEEKS BEFORE DISPOSAL UNLESS OTHERWISE SPECIFIED.

IF YOU HAVE ANY QUESTIONS PLEASE CONTACT OUR CLIENT SERVICE DEPARTMENT. APPROVAL

APPENDIX D

Photographs
and
Photograph Log

Mirro/Foley Company
Plant 9

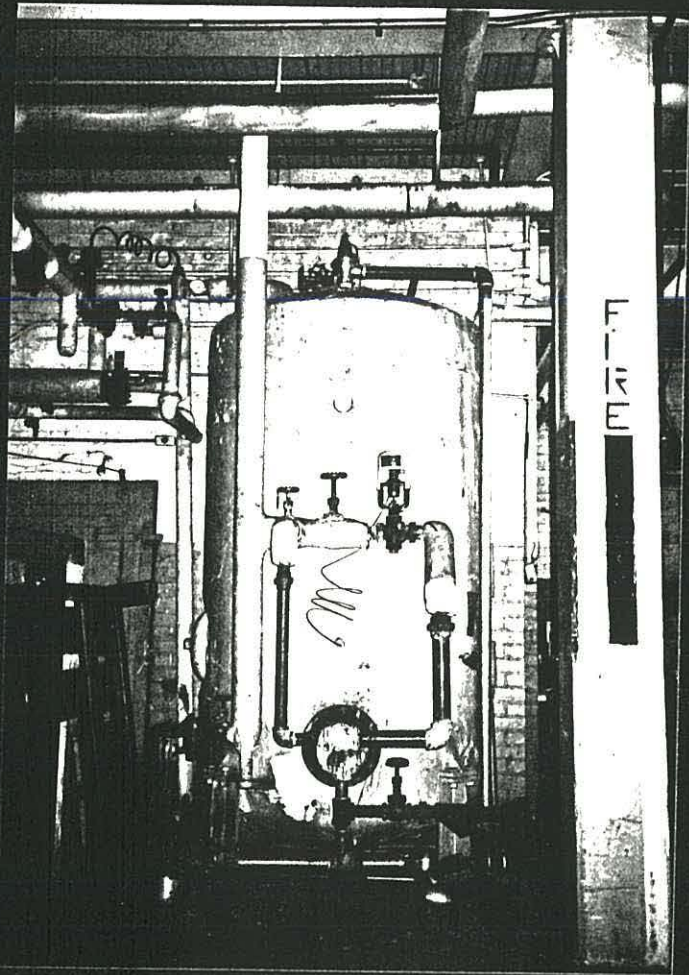
Environmental Audit - December, 1989

Photograph Log

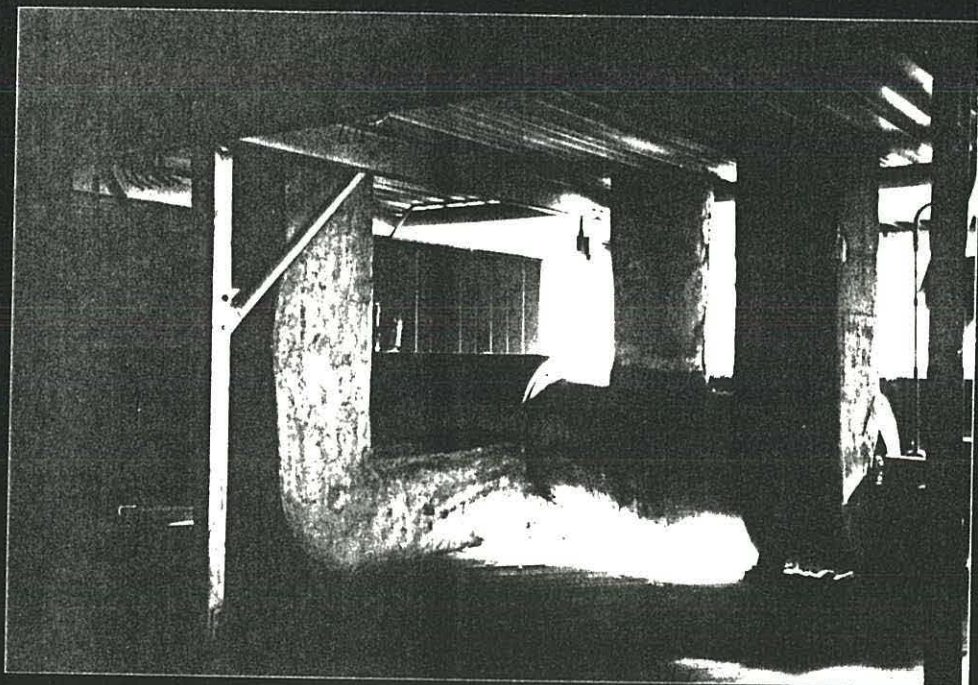
| <u>Picture Number</u> | <u>Description</u> |
|-----------------------|---|
| 1 | 1st floor, bldg V, hot water tank, asbestos insulation |
| 2 | 6th floor, blower and ducts, asbestos insulation |
| 3 | 6th floor, paint-drying oven, asbestos insulation |
| 4 | 6th floor, pipe chase, asbestos insulation |
| 5 | 5th floor, trays with dried sludge, from electroplating (?) |
| 6 | 4th floor, dried sludge in tank |
| 7 | 4th floor, acid wash tank |
| 8 | 3rd floor center, large pipes with asbestos insulation |
| 9 | 1st floor, water tank, asbestos insulation |
| 10 | 1st floor, bldg C, misc. containers and drums |
| 11 | 1st floor, bldg C, drums filled with waste asbestos |
| 12 | 1st floor, bldg C, leaking waste oil drums |
| 13 | 1st floor, water tank, asbestos insulation |
| 14 | 1st floor, bldg C, leaking waste oil and solvent drums |
| 15 | 1st floor, hot water tank, north, asbestos insulation |

Photograph Log
Page Two

- 16 1st floor, room adjacent to main boiler room where large tanks have been removed, asbestos insulation
- 17 1st floor, room adjacent to main boiler room where large tanks have been removed, cooling water discharge to tunnel floor
- 18 Main boiler room, pressure vessel, asbestos insulation
- 19 Basement off of main boiler room, box of asbestos insulation
- 20 Basement off of main boiler room, underground storage tank access
- 21 Abandoned boiler room, west side of first floor, loose asbestos boiler insulation
- 22 Abandoned boiler room, west side of first floor, asbestos rope used for boiler door seal
- 23 Abandoned boiler room, west side of first floor, abandoned fire extinguishers
- 24 1st floor, restroom
asbestos pipe insulation



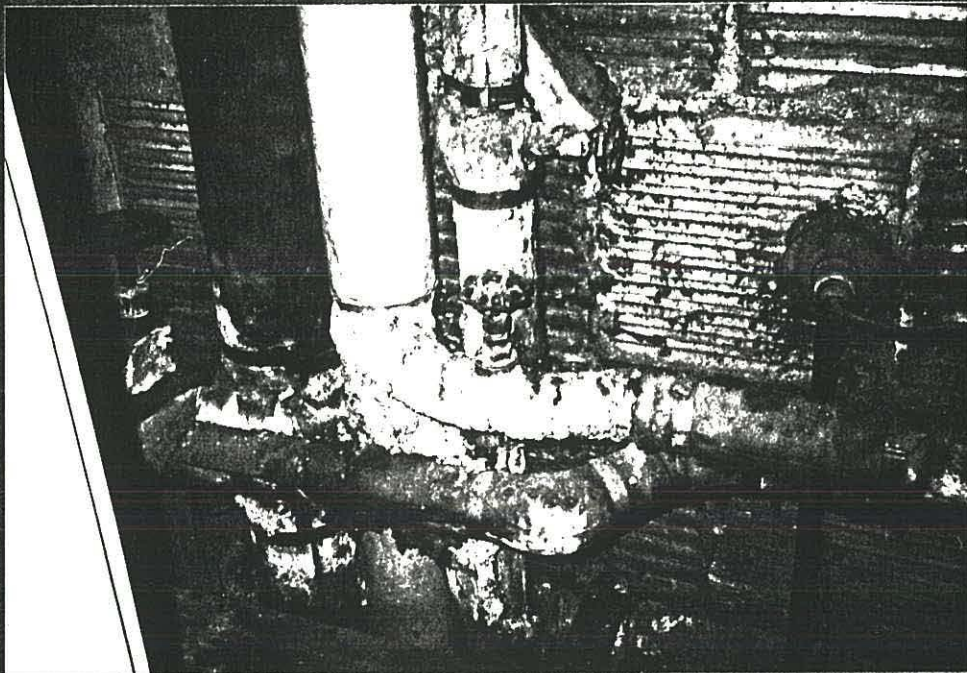
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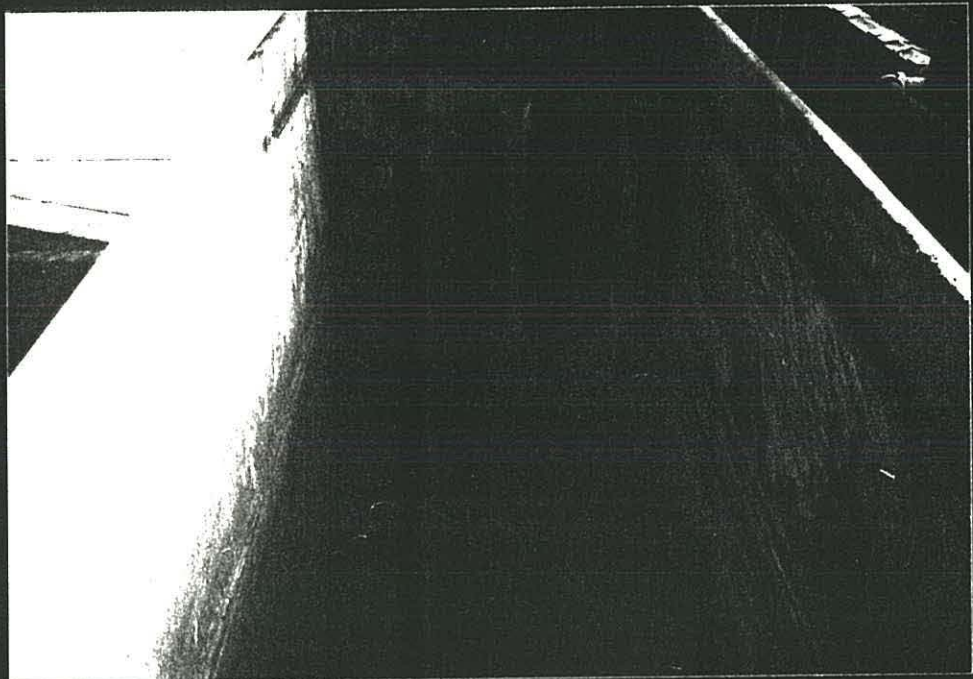
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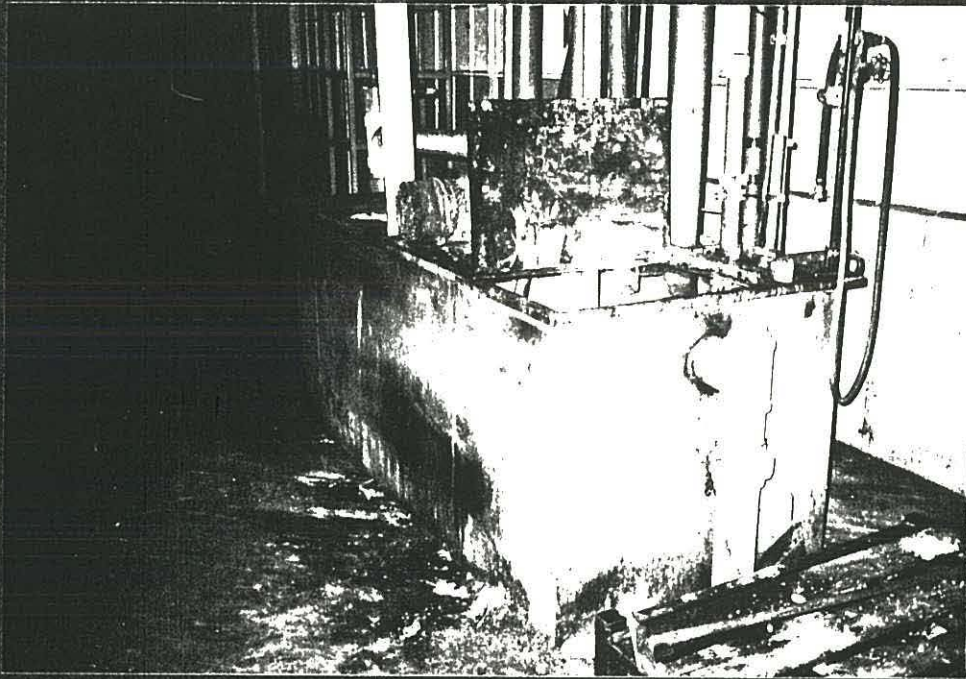
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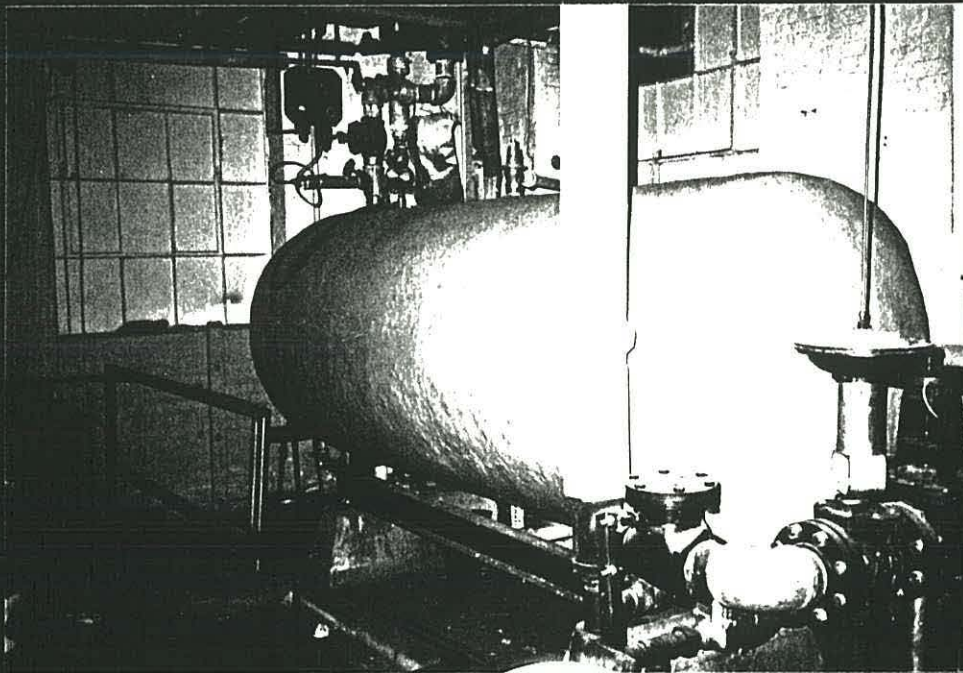
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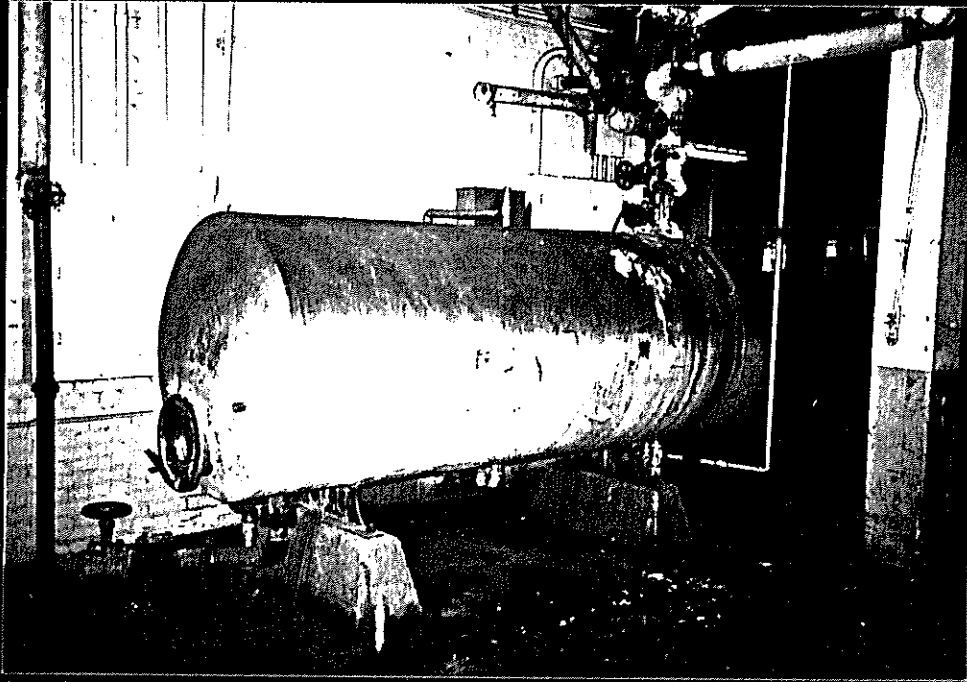
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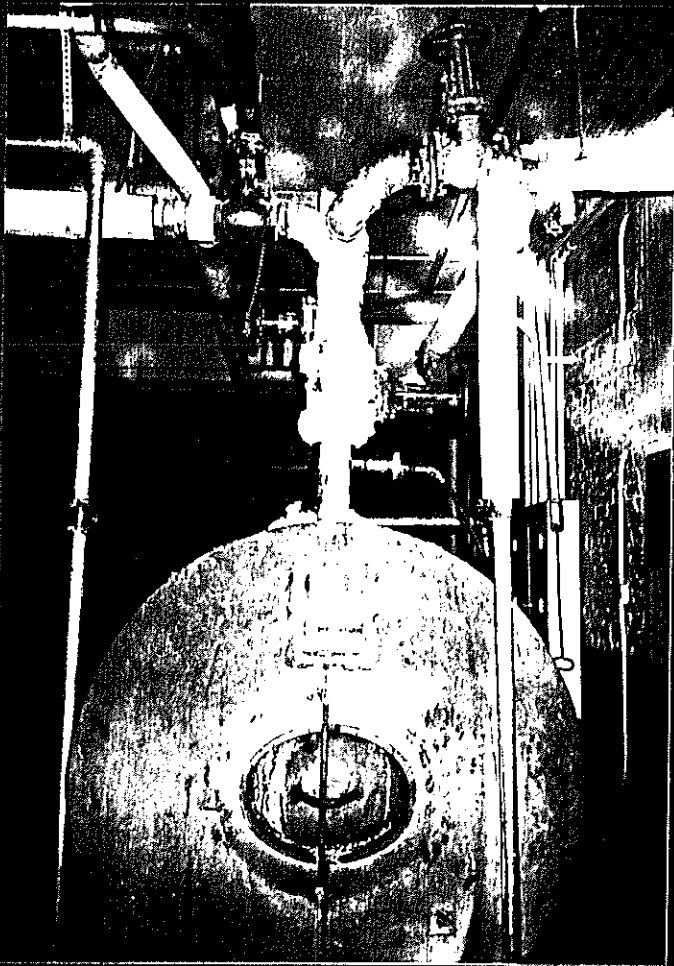
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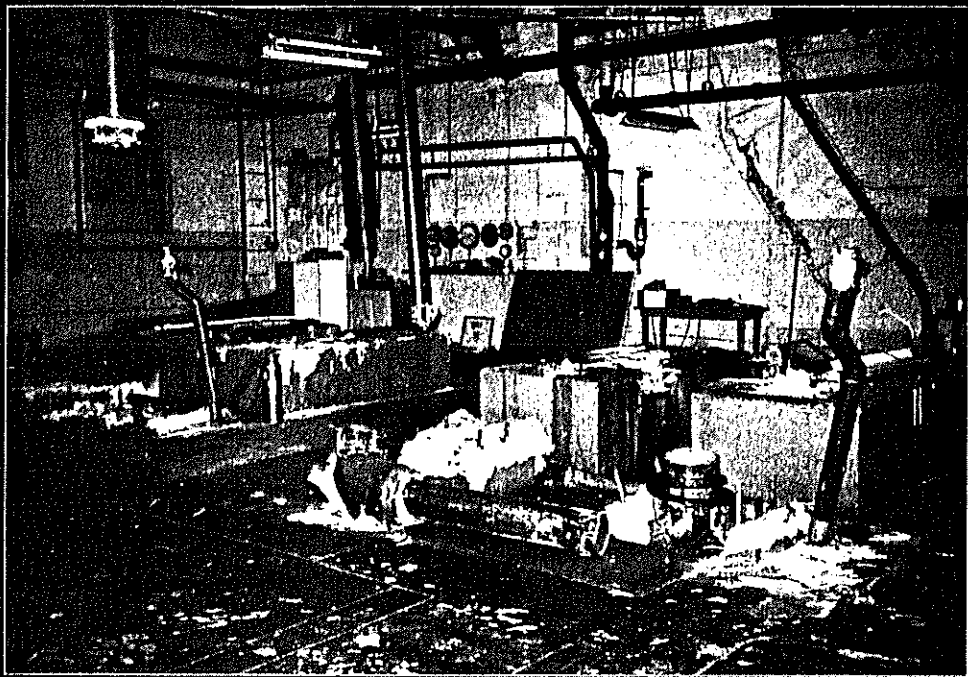
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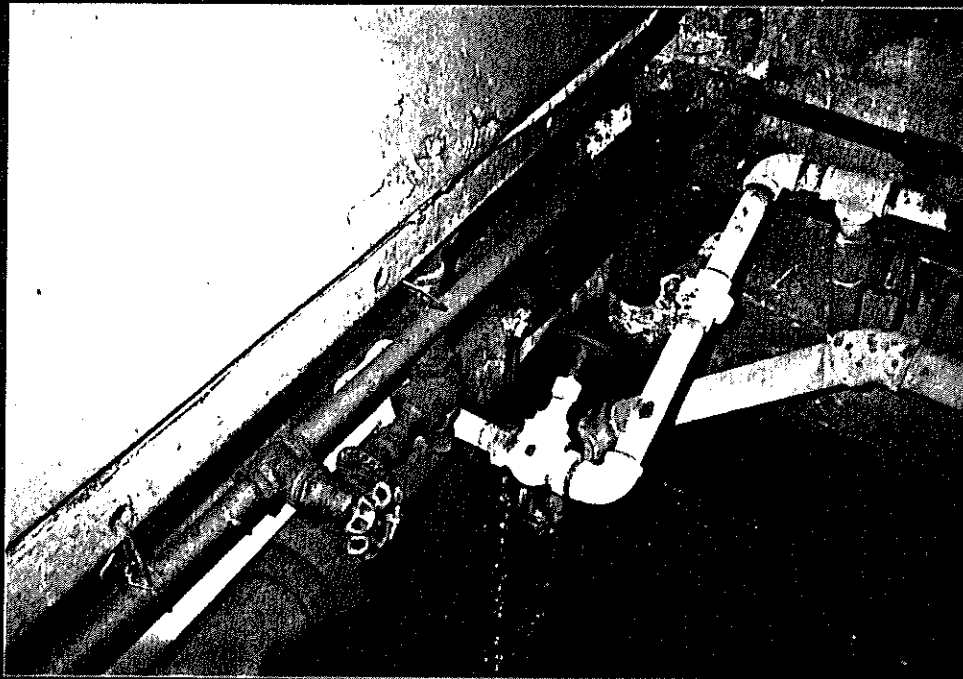
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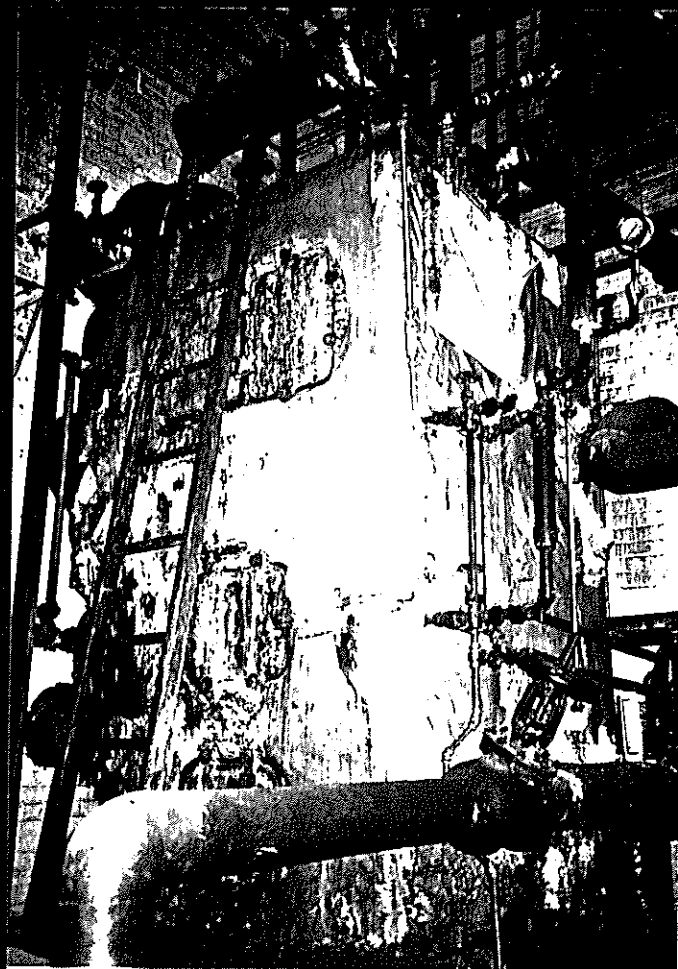
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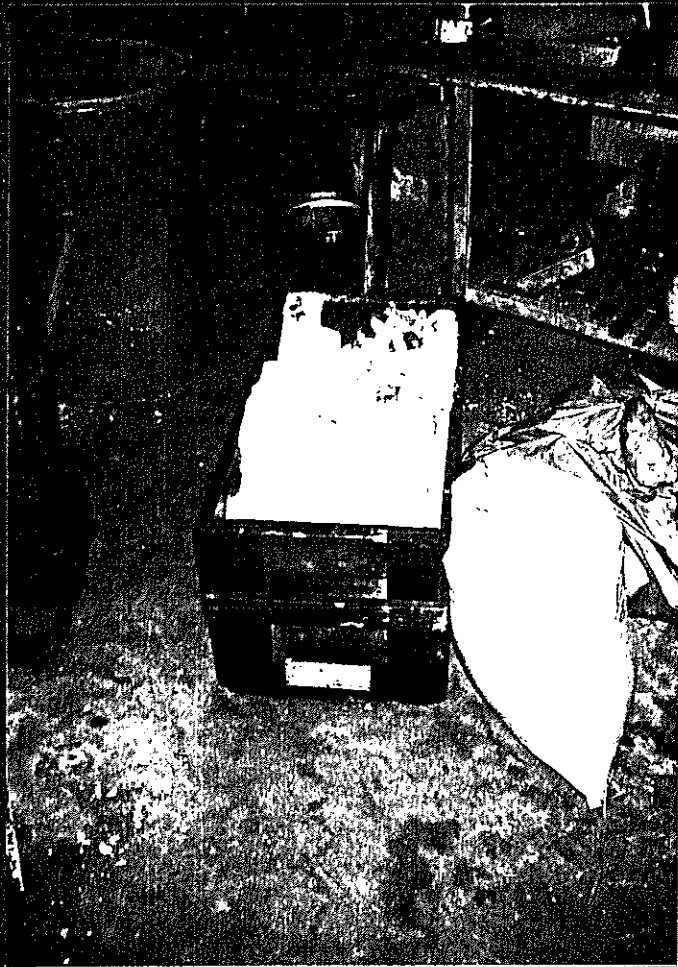


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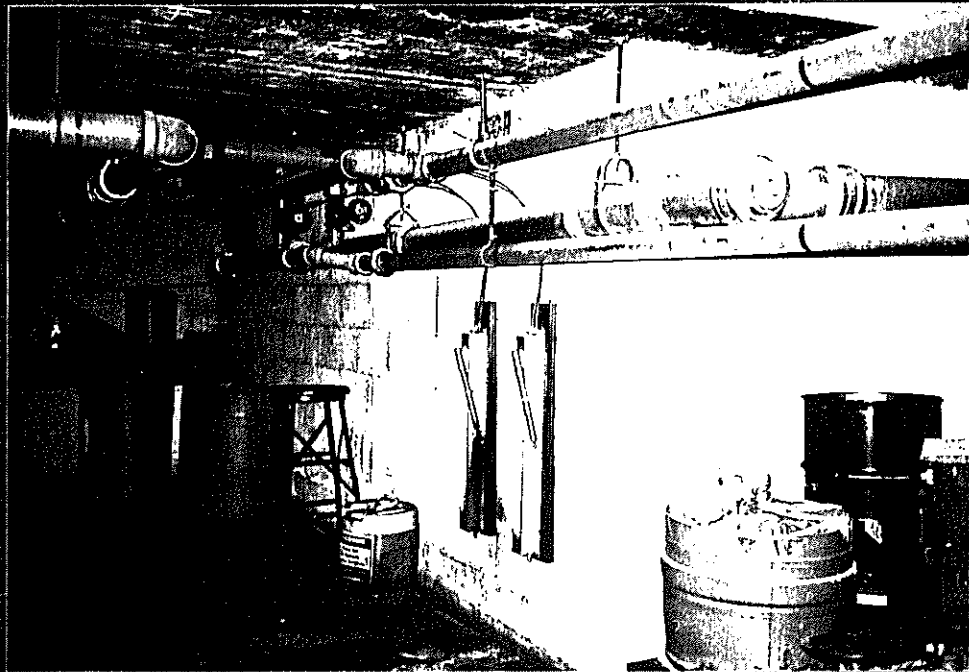


NewJIMNine000168

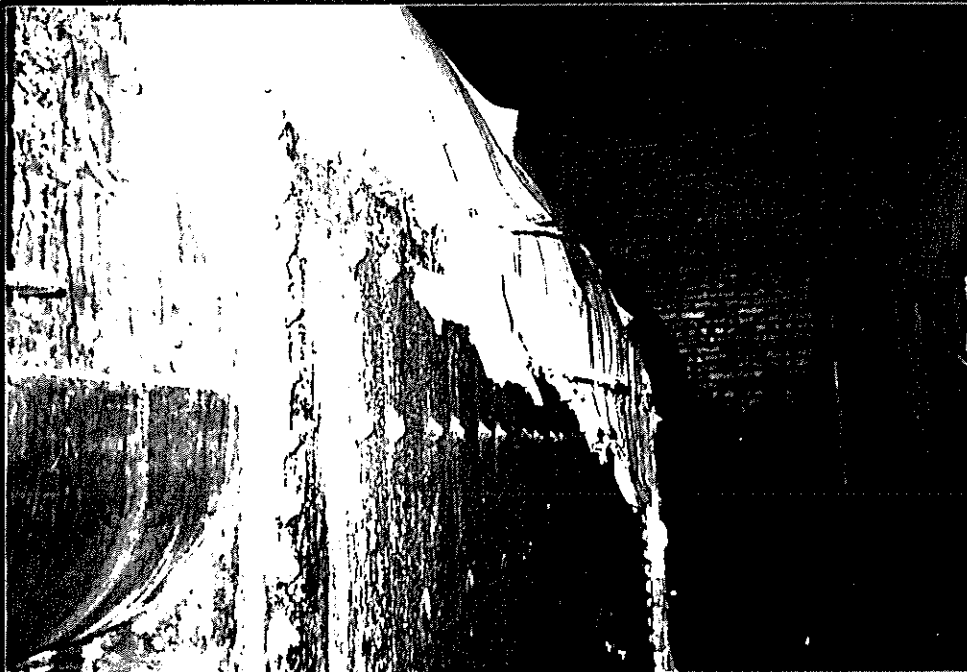
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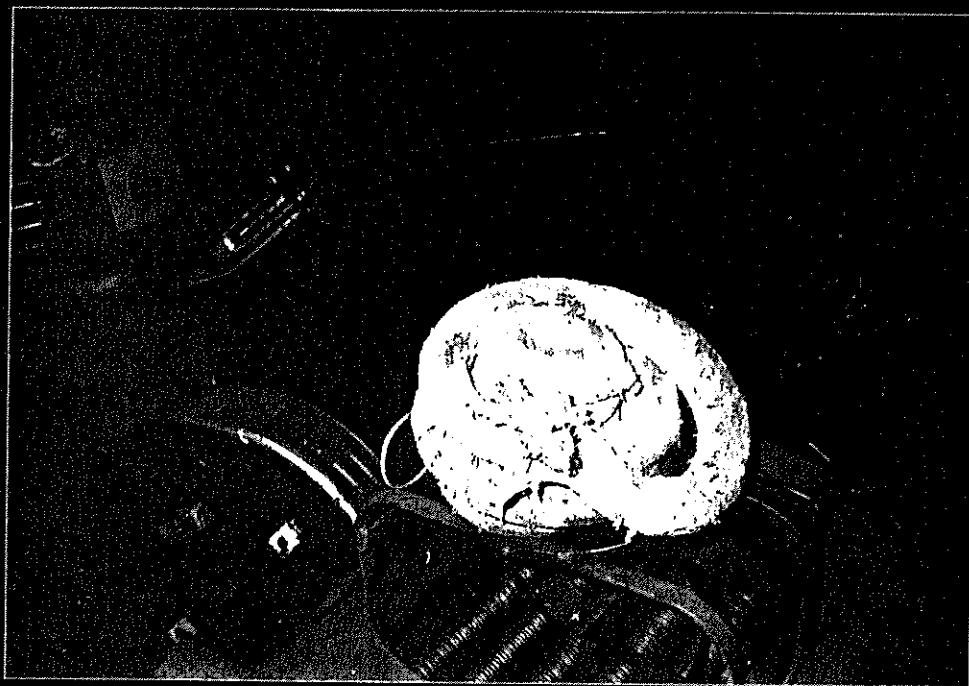
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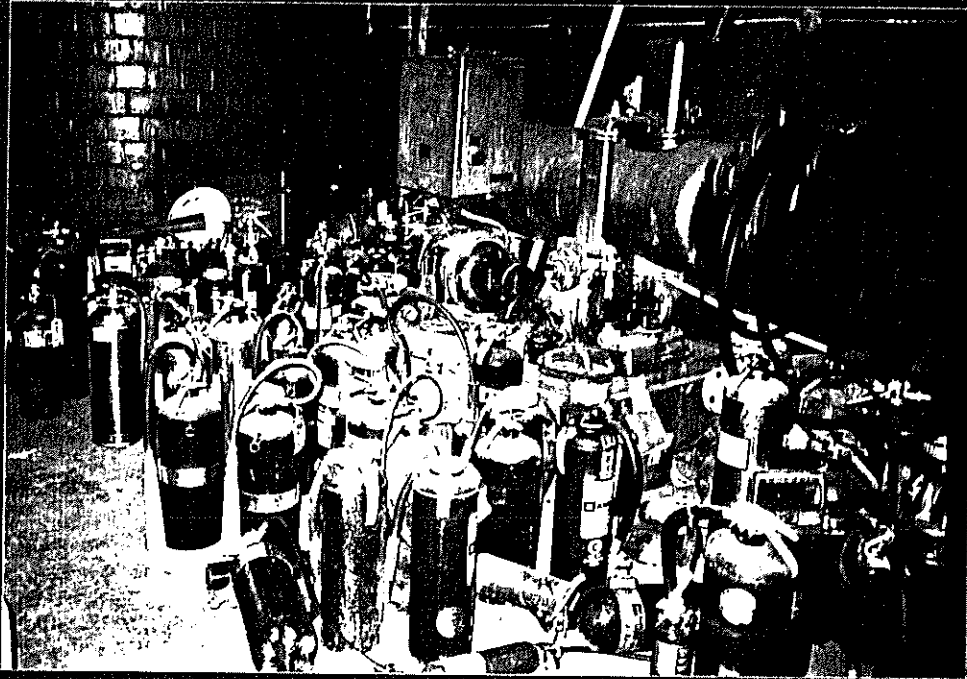
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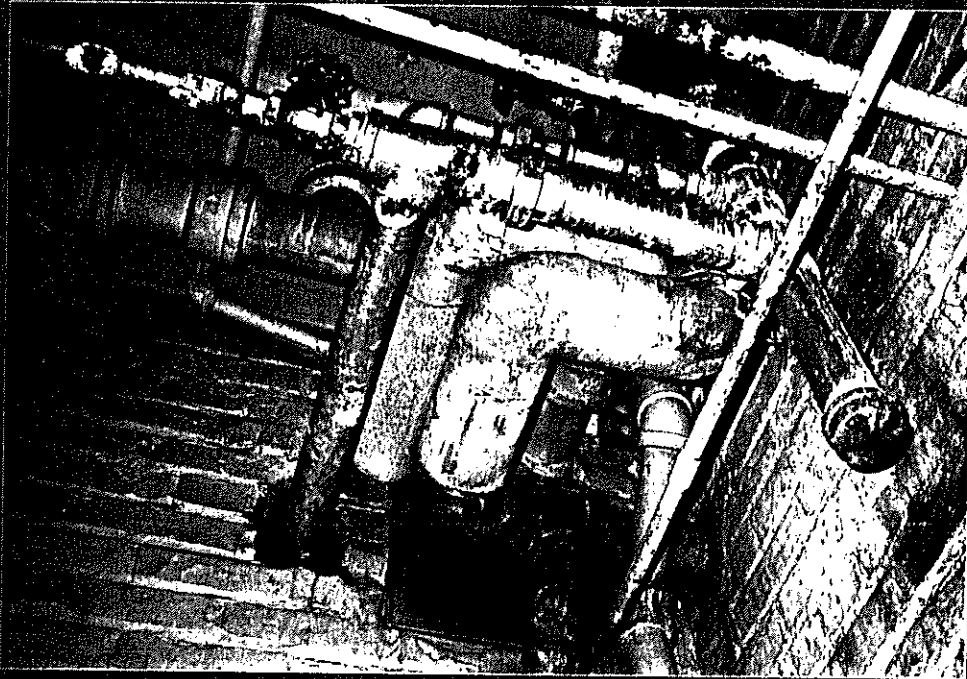
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