GIS REGISTRY INFORMATION

SITE NAME:	Mirro Plant #10 naphtha release					
BRRTS #:	02-36-506563					
COMMERCE # (if appropriate**):**						
CLOSURE DATE:	30-Oct-2006					
STREET ADDRESS:	1616 Wolmer Street					
CITY:	Manitowoc					
SOURCE PROPERTY GPS COORDINATES (meters in WTM91 projection)**:**		**X=**	706466	**Y=**	405034	
CONTAMINATED MEDIA:	Groundwater		Soil	x	Both	
OFF-SOURCE GW CONTAMINATION >ES:			**Yes**	x	**No**	
IF YES, STREET ADDRESS 1:						
GPS COORDINATES (meters in WTM91 projection)**:**		**X=**		**Y=**		
OFF-SOURCE SOIL CONTAMINATION >Generic or Site-Specific RCL (SSRCL):			**Yes**	x	**No**	
IF YES, STREET ADDRESS 1:						
GPS COORDINATES (meters in WTM91 projection)**:**		**X=**		**Y=**		
CONTAMINATION IN RIGHT OF WAY:			**Yes**	x	**No**	

DOCUMENTS NEEDED:	
Closure Letter, and any conditional closure letter or denial letter issued	x
Copy of any maintenance plan referenced in the final closure letter.	x
Copy of (soil or land use) deed notice *if any required as a condition of closure*	n/a
Copy of most recent deed, including legal description, for all affected properties	x
Certified survey map or relevant portion of the recorded plat map (*if referenced in the legal description*) for all affected properties	x
County Parcel ID number, *if used for county*, for all affected properties **#052 000 144 000.0(**	x
Location Map which outlines all properties within contaminated site boundaries on USGS topographic map or plat map in sufficient detail to permit the parcels to be located easily (8.5x14" if paper copy). If groundwater standards are exceeded, the map must also include the location of all municipal and potable wells within 1200' of the site.	x
Detailed Site Map(s) for all affected properties, showing buildings, roads, property boundaries, contaminant sources, utility lines, monitoring wells and potable wells. (8.5x14", if paper copy) This map shall also show the location of all contaminated public streets, 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 ESs and soil contamination exceeding ch. NR 720 generic or SSRCLs.	x
Tables of Latest Groundwater Analytical Results (no shading or cross-hatching)	n/a
Tables of Latest Soil Analytical Results (no shading or cross-hatching)	x
Isoconcentration map(s), *if required for site investigation (SI) (*8.5x14" if paper copy*)*.* The isoconcentration map should have flow direction and extent of groundwater contamination defined. **If not available, include the latest extent of contaminant plume map.**	n/a
GW: Table of water level elevations, with sampling dates, and free product noted if present	n/a
GW: Latest groundwater flow direction/monitoring well location map (should be 2 maps if maximum variation in flow direction is greater than 20 degrees)	n/a
SOIL: Latest horizontal extent of contamination exceeding generic or SSRCLs, with one contour	x
Geologic cross-sections, *if required for SI.* (8.5x14' if paper copy**)**	x
RP certified statement that legal descriptions are complete and accurate	x
Copies of off-source notification letters (if applicable)	n/a
Letter informing ROW owner of residual contamination (if applicable)(public, highway or railroad ROW)	n/a

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Ronald W. Kazmierczak, Regional Director

Northeast Region Headquarters
2984 Shawano Ave., P.O. Box 10448
Green Bay, Wisconsin 54307-0448
Telephone 920-662-5100
FAX 920-662-5413
TTY Access via relay - 711

October 30, 2006

Chris Allie
BFM LLC
100 Maritime Drive, Suite 3C
Manitowoc WI 54220

SUBJECT: Final Case Closure with Land Use Limitations or Conditions
Naphtha Parts Washer, Former Mirro Plant #10, 1616 Wollmer Street, Wisconsin
WDNR BRRTS Activity #: 02-36-506563

Dear Mr. Allie:

As per your telephone conversation with Annette Weissbach on October 24, 2006, this letter serves as your final closure letter. On June 3, 2006, Act 418 took effect to aid in promoting the cleanup and reuse of contaminated properties. This legislation allows the Department of Natural Resources (Department) to conditionally close sites with land use type restrictions using a site specific closure letter rather than a deed restriction. The land use condition under s. 292.12(2)(c), Wis. Stats., will be incorporated into this closure letter with conditions placed on any change in land use associated with the property (e.g., from industrial closure levels to residential use).

On September 2, 2003, the Northeast Region Closure Committee reviewed the above referenced case for closure. This committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. Based on the correspondence and data provided, it appears that your case has been remediated to Department standards in accordance with s. NR 726.05, Wisconsin Administrative Code. The Department considers this case closed and no further investigation or remediation is required at this time.

On October 27, 2006, copies of the well abandonment forms for wells MW-1, MW-2, and EW-2 were received. Well MW-3 was not abandoned as required. However, SEH, Inc., the consulting company continuing work on the TCE contamination at the property (BRRTS 02-36-000620) has stated that it may be used for monitoring.

Please be aware that pursuant to s. 292.12 Wisconsin Statutes, compliance with the requirements of this letter is a responsibility to which you, the current property owner, and any subsequent property owners must adhere. If these requirements are not followed or if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, welfare, or the environment, the Department may take enforcement action under s. 292.11 Wisconsin Statutes to ensure compliance with the specified requirements, limitations or other conditions related to the property or this case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code. It is the Department's intent to conduct inspections in the future to ensure that the conditions included in this letter including compliance with referenced maintenance plans are met.

Residual soil contamination

Information regarding residual soil contamination, (ethylbenzene, toluene, 1,2,4-Trimethylbenzene,1,3,5-trimethyl benzene) as evidenced at soil boring locations GP-1 and GP-11 near the former 1000 gallon underground storage tank (UST) and naphtha sump (see Figure 1), was provided in information submitted to

the Department of Natural Resources. If soil in the specific locations described above is excavated in the future, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material would be considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

Pursuant to s. 292.12(2)(a), Wis. Stats., the building, grading, and landscaping that currently exists in the vicinity of the former UST shall be maintained in compliance with the attached **Building and Foundation Maintenance Plan** in order to minimize the infiltration of water and prevent additional groundwater contamination that would violate the groundwater quality standards in ch. NR 140, Wis. Adm. Code, and to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health. If soil in the specific locations described above is excavated in the future, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material would be considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to humans.

The following activities are prohibited on any portion of the property where pavement and the building foundation is required to remain in place as shown on the attached map, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources: 1) removal of the existing barrier; 2) replacement with another barrier; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; or 6) construction or placement of a building or other structure.

In addition, depending on site-specific conditions, construction over contaminated materials may result in vapor migration into enclosed structures or migration along newly placed underground utility lines. The potential for vapor inhalation and mitigation should be evaluated when planning any future redevelopment, and measures should be taken to ensure the continued protection of public health, safety, welfare and the environment at the site.

Your site will be listed on the DNR Remediation and Redevelopment GIS Registry of Closed Remediation Sites. Information that was submitted with your closure request application will be included on the GIS Registry. To review the sites on the GIS Registry web page, visit http://dnr.wi.gov/org/aw/rr/gis/index.htm. If your property is listed on the GIS Registry because of remaining contamination and you intend to construct or reconstruct a well, you will need prior Department approval in accordance with s. NR 812.09(4)(w), Wis. Adm. Code. To obtain approval, Form 3300-254 needs to be completed and submitted to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line http://www.dnr.state.wi.us/org/water/dwg/3300254.pdf or at the web address listed above for the GIS Registry.

PAL Exemption

Groundwater monitoring data at this site indicates exceedances of the NR 140 preventive action limit (PAL) for ethylbenzene, 1,2,4 trimethylbenzene and xylene at MW-21 and ethylbenzene and xylene at EW-2, but compliance with the NR 140 enforcement standard. The Department may grant an exemption to a PAL for a substance of public health concern, other than nitrate, pursuant to s. NR 140.28(2)(b), Wis. Adm. Code, if all of the following criteria are met:

1. The measured or anticipated increase in the concentration of the substance will be minimized to the extent technically and economically feasible.

2. Compliance with the PAL is either not technically or economically feasible.

3. The enforcement standard for the substance will not be attained or exceeded at the point of standards application.

4. Any existing or projected increase in the concentration of the substance above the background concentration does not present a threat to public health or welfare.

Based on the information you provided, the Department believes that the above criteria have been or will be met because the underground storage tank containing the naphtha has been removed and natural attenuation will likely continue to degrade the remaining soil contamination. Furthermore, the Mirro Plant #10 building covers a portion of the contaminated soil and prevents infiltration of precipitation. Therefore, pursuant to s. NR 140.28(2)(b), Wis. Adm. Code, an exemption to the PAL is granted for the above referenced contaminants at monitoring points MW-21 and EW-2. This letter serves as your exemption.

The Department appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Annette Weissbach at 920-662-5165 or annette.weissbach@wisconsin.gov.

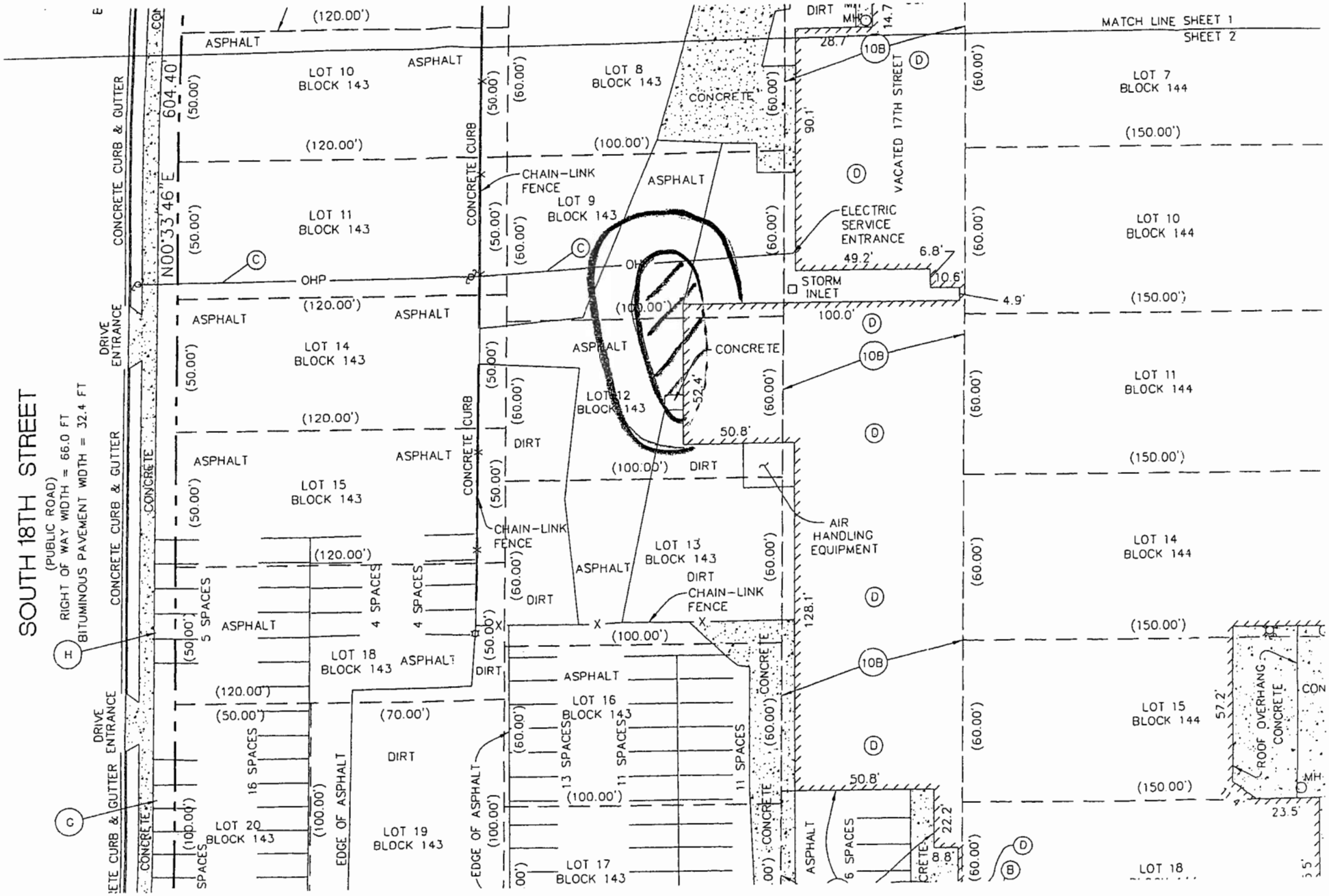
Sincerely,

Bruce G. Urben
Northeast Remediation & Redevelopment Team Supervisor

Attach:
Figure 1 Site Map
Building and Foundation Maintenance Plan

cc: Jason Martin – SEH, 809 North 8th Street, Suite 205, Sheboygan, WI 53081-4032
Lou Meschede – Newell Rubbermaid, 2707 Butterfield Rd, Suite 100, Oak Brook IL 60523

Figure 1 BRRTS 02-36-506563
Final Closure Letter October 30, 2006



APPROXIMATE AREA OF HIGHLY IMPACTED SOIL ABOVE THE WATER-TABLE

APPROXIMATE EXTENT OF MARGINALLY IMPACTED SOIL ABOVE THE WATER-TABLE

Building and Foundation Maintenance Plan

Mirro Company Plant #10
1616 Wollmer Street, Manitowoc, WI 54221

Contaminated soil exists in the area of a former naphtha sump and former UST at the Mirro Company Plant #10 (Mirro) facility. Due to the location of the contaminated soil in proximity to the Mirro facility and foundation, the contaminated soil was not removed. The Wisconsin Department of Natural Resources (WDNR) has approved conditional closure of the Naphtha Washers and Former UST Release case (WDNR BRRTS #02-36-506563). As a condition of closure, the WDNR has required the facility be listed on the WDNR GIS Registry of Closed Remediation sites. This building and foundation maintenance plan was prepared to fulfill the requirements of the GIS registry submittal and to document the activities required to minimize infiltration of water in the area of impacted soil.

At a minimum, the room extending from the western edge of the Mirro facility building and foundation will be inspected on an annual basis. Additional inspections may be performed following events that may alter the building and foundation's ability to prevent surface water infiltration (ie. Storms, fire, remodeling, etc.) Inspections will be performed by competent representatives of the owner and or operator to identify areas of cracks or degraded concrete which may allow water to penetrate the floor and infiltrate. Windows and roofing materials will be inspected to confirm they are sufficient to prevent leaks. Any short comings of the facility building and foundation to prevent water infiltration will be promptly documented and rectified.

Stormwater discharges (gutter down spouts and roof drains) will be diverted to minimize or prevent surface discharge of stormwater near the facility foundation in the area of the former naphtha sump and former UST basin. Landscaping or surface grading in this area will be maintained to prevent the collection and ponding of surface water.

Documentation of the facility inspections and maintenance activities will be maintained by the owner and/or operator of the facility. This information will be provided to the WDNR upon their request. It is the responsibility of the owner and/or operator of the building to perform and document ongoing maintenance requirements.

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Ronald W. Kazmierczak, Regional Director

Northeast Region Headquarters
1125 N. Military Ave., P.O. Box 10448
Green Bay, Wisconsin 54307-0448
Telephone 920-492-5916
FAX 920-492-5859
TTY 920-492-5912

September 30, 2003

Lou Meschede
Director, Environmental Affairs
Newell Rubbermaid Inc.
6833 Stalter Drive
Rockford IL 61108

Subject: Conditional Case Closure NR 140 Exemption, Soil GIS registry
Mirro Company Plant #10 (also known as Mirro Company Plant #1)
Naphtha Washers and Former UST Release
1616 Wollmer Street, Manitowoc, Wisconsin
WDNR BRRTS # 02-36-506563

Dear Mr. Meschede:

On September 2, 2003, the Northeast Region Closure Committee reviewed your request for closure of the case described above. The Closure Committee reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. After careful review of the closure request, the NER Closure Committee has determined that the contamination from the naphtha parts washer at the Mirro Company Plant #10 appears to have been investigated and remediated to the extent practicable under site conditions.

The naphtha release at Mirro Company Plant #10 has been remediated to Department standards in accordance with s. NR 726.05, Wis. Adm. Code and will be closed if the following conditions are satisfied:

MONITORING WELL ABANDONMENT

The monitoring wells (MW1, MW2, MW3, and EW-2) near the naphtha release site must be properly abandoned in compliance with ch. NR 141, Wis. Adm. Code. Documentation of well abandonment must be submitted to me on Form 3300-5B. If you decide that any of these wells are to remain in use for the continued monitoring of the chlorinated solvents release at Mirro Company Plant #10, please let me know in writing.

SOIL GIS REGISTRY

Due to the presence of impacted soils at depth at sample # GP-11, your site will be listed on the DNR Remediation and Redevelopment GIS Registry of Closed Remediation Sites. Information that was submitted with your closure request application will be included on the registry. However, there are a few remaining items needed and I have attached a copy of a GIS Checklist highlighting what else is required to complete the entry. You will also need to submit a check for $200 to cover costs for maintenance of the GIS registry. To review the sites on the GIS Registry web page, visit http://gomapout.dnr.state.wi.us/org/at/et/geo/gwur/index.htm

PAL EXEMPTION FOR A SUBSTANCE OF PUBLIC HEALTH CONCERN

Monitoring data indicates the exceedances of the NR 140 preventive action limit (PAL) for groundwater at the following monitoring points at the Mirro Company Plant #10 site:

MW-21	ethyl benzene; 1,2,4 tri-methylbenzene; and xylene
EW-2	ethyl benzene and xylene

However, data indicates there is compliance with the NR 140 enforcement standard (ES). The Department may grant an exemption to a PAL for a substance of public health concern, other than nitrate, pursuant to s. NR 140.28(2)(b), Wis. Adm. Code, if all of the following criteria are met:

1. The measured or anticipated increase in the concentration of the substance will be minimized to the extent technically and economically feasible.
2. Compliance with the PAL is either not technically or economically feasible.
3. The enforcement standard for the substance will not be attained or exceeded at the point of standards application.
4. Any existing or projected increase in the concentration of the substance above the background concentration does not present a threat to public health or welfare.

Based on the information you provided, the Department believes that the above criteria have been or will be met because the underground storage tank containing the naphtha has been removed and natural attenuation will likely continue to degrade the remaining soil contamination. Furthermore, the Mirro Company Plant #10 building covers a portion of the contaminated soil and prevents infiltration of precipitation. Therefore, pursuant to s. NR 140.28(2)(b), Wis. Adm. Code, an exemption to the PAL is granted for the above reference contaminants at monitoring points MW-21 and EW-2. This letter serves as your exemption.

Please be aware that the case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code, if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, or welfare or to the environment.

Please send me the checklist information and fee as soon as possible so that I may continue the closure process. We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at 920-492-5865 or email at Annette.Weissbach@dnr.state.wi.us.

Sincerely,

Annette Weissbach

Annette Weissbach
Hydrogeologist
Remediation & Redevelopment Program

Enclosure: highlighted GIS checklist

cc: Bill Phelps, DG/2
Kevin Hedinger – Shaw Environmental, PO Box 90 Pewaukee, WI 53072-0090

STATE BAR OF WISCONSIN FORM 6 – 2000

SPECIAL WARRANTY DEED

Document Number

This Deed, made between Newell Operating Company, a Delaware corporation, Grantor, and BFM, LLC, a Wisconsin limited liability company, Grantee.

Grantor, for a valuable consideration, conveys and warrants to Grantee the following described real estate in Manitowoc County, State of Wisconsin (the "Property") (if more space is needed, please attach addendum):

PLEASE SEE ATTACHED ADDENDUM AT "A".

Commonly known as 1616 Wollmer St., Manitowoc, Wisconsin.

Together with all appurtenant rights, title and interests.

Grantor warrants that the title to the Property is good, indefeasible in fee simple and free and clear of encumbrances, arising by, through or under Grantor, except

PLEASE SEE ATTACHED ADDENDUM AT "B".

Recording Area

Name and Return Address

Terence P. Fox, Esq.
Kummer, Lambert & Fox
927 S. 8th Street, #304
Manitowoc, WI 54221-1180

052-000-144-000.00
Parcel Identification Number (PIN)
This is not homestead property.

Dated as of this 30th day of December, 2003.

NEWELL OPERATING COMPANY

By: D Matschullat

* Dale L. Matschullat
Its: Vice President and General Counsel

*_____

AUTHENTICATION

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

*_____

TITLE: MEMBER STATE BAR OF WISCONSIN
(If not, _____ authorized by § 706.06, Wis. Stats.)

THIS INSTRUMENT WAS DRAFTED BY
Schiff Hardin & Waite
One Westminster Place
Lake Forest, IL 60045
Attn: Nathan A. Engel

"OFFICIAL SEAL"
DONNA J. YEAGER
Notary Public, State of Illinois
My Commission Expires 7/23/2007

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

ACKNOWLEDGMENT

STATE OF ILLINOIS)
) ss.
Stephenson County)

Personally came before me this 30th day of December, 2003, the above named Vice President and General Counsel to me known to be the person who executed the foregoing instrument and acknowledged the same.

Donna J. Yeager

* Donna J. Yeager
Notary Public, State of Illinois
My Commission is permanent. (If not, state expiration date:_____.)
7-23-2007

*Names of persons signing in any capacity must be typed or printed below their signature.

ADDENDUM TO SPECIAL WARRANTY DEED

A. Legal Description

All of Block 143 and 144 including the vacated South 17th Street which lies between Blocks 143 and 144 in the original Plat of the City of Manitowoc, Manitowoc County, Wisconsin. Also, a tract of land which lies South of a straight line (not extended) drawn between 2 points as follows:

Point A - a point on the East boundary of South 18th Street in the City of Manitowoc extended Northerly, which point is 42 feet North of the North boundary line of the vacated alley formerly lying North of Blocks 143 and 144 in the City of Manitowoc.

Point B - a point on a line drawn parallel to and 158 feet Southwesterly from the center line of South Water Street extended Northwesterly, which point is 27 feet North of the North boundary line of said vacated alley, the Western and Eastern boundaries of the tract shall be straight lines drawn South from Points A & B, above described respectively, to the North boundary lines of said Blocks 143 and 144, being a part of Government Lot 6 in the Southeast 1/4 of Section 19 and a part of the Northwest 1/4 Northeast 1/4, Section 30, all in Township 19 North, Range 24 East, in the City of Manitowoc, Manitowoc County, Wisconsin. Subject to all easements, agreements, covenants and restrictions of record or established by statute; easement granted rights and easements, if any, in and to any and all railroad switches, sidetracks, spur tracks and rights of way located upon or appurtenant to the subject premises; right to the maintenance and use of a 6 inch water line which is installed below the surface of vacated South 17th Street lying between Lots 5 through 17, Block 143 and Lots 6 through 18, Block 144 and continuing in a Westerly direction through Lots 5 and 7, Block 143, and also an 8 inch storm sewer installed under the surface of vacated South 17th Street from the Northerly edge of Wollmer Street to the building located on the real estate described in this paragraph 3.

B. Title Exceptions

1. Special taxes or assessments, if any, payable with the taxes levied or to be levied for the current and subsequent years.

2. Liens, hook-up charges or fees, deferred charges, reserve capacity assessments, impact fees, or other charges or fees due payable on the development or improvement of the Property, whether assessed or charged before or after the date hereof.

3. Public or private rights, if any, of such portion of the Property as may be presently used, laid out or dedicated in any manner whatsoever for street, highway and/or alley purposes

4. Encroachments, overlaps, boundary line disputes, and any other matters which would be disclosed by an accurate survey and inspection of the Property.

5. Easements or claims of easements not shown by the public records.

6. Any claim of adverse possession or prescriptive easement.

7. General taxes for the year 2003 and subsequent years.

8. Easements recorded in the office of the Register of Deeds for Manitowoc County, Wisconsin on January 16, 1981, in Volume 660, at Page 523, as Document No. 562823.

* * *

APPLE ATTACHMENTS HERE

Wisconsin
Real Estate Transfer Return – Confidential

To complete see ***Instructions for Real Estate Transfer Return PE-500A***.
Submit original form to Register of Deeds with document(s) to be recorded. Completely fill in all appropriate areas. **TYPE or PRINT clearly in BLACK INK, and use ALL UPPERCASE LETTERS**. If typing form, type through vertical character lines.

I. GRANTOR (Seller)

If more than ONE (1) grantor, check box at left and list on attached addendum. Note: Lines 67-72 must be completed with grantor's address.

1. Your Last Name or Company Name — **Note:** For this purpose a married couple is one grantor if same last name (see line 2).

NEWELL OPERATING COMPANY

2. Your First Name(s) and Middle Initial(s) – If a married couple, show both first names and middle initials.

3. Social Security Number or FEIN

361953130

II. GRANTEE (Buyer)

If more than ONE (1) grantee, check box at left and list on attached addendum.

4. Your Last Name or Company Name — **Note:** For this purpose a married couple is one grantee if same last name (see line 5).

BFM, LLC, a Wisconsin limited liability company

5. Your First Name(s) and Middle Initial(s) – If a married couple, show both first names and middle initials.

6. Social Security Number or FEIN

391791692

7. Street or Fire Number, if any

808

7a. Street Name, PO Box, or Other Address (enter "PO Box" and Box Number)

WINNETKA COURT

8. City

MANITOWOC

9. State

W I

10. Zip Code

54220

TO RECEIVE TAX BILL AT ANOTHER ADDRESS, check here and complete Section X, page 2.

III. PROPERTY TRANSFERRED

11. Indicate: X City Village Town → Check if additional parcels and list on attached addendum.

12. Name of the City/Village/Town

MANITOWOC

13. County Name

MANITOWOC

14. Physical Property Address or Road Address (description)

1616 WOLLMER STREET

15. Tax Parcel Number as it appears on Property Tax bill (see instructions)

052 000 144 000.00

16. Property Description: lot – block – plat, Certified Survey Map (CSM), or other designation; if description will not fit here, add attachment (see instructions)

SEE ADDENDUM

17a. Section (primary): 19

17b. Township (primary): 19 N

17c. Range (primary): 24 E

X Check here if more than one lot and block, or if legal description is metes and bounds or certified survey map; attach legal description as an addendum (see instructions).

IV. COMPUTATION OF FEE OR STATEMENT OF EXEMPTION

18. Total value of REAL ESTATE transferred (round up to the nearest $100) $ 390 500 0 IN WHOLE DOLLARS

19. Transfer fee due (line 18 X .003) $ DOLLARS 1 171 CENTS 50

20. Transfer Exemption Number, SEC 77.25

20a. If you enter "003" or "017," it is mandatory to provide your previous document number.

20b. Date of Original Land Contract — MONTH DAY YEAR

21. Value of personal property transferred but EXCLUDED from line 18. $ IN WHOLE DOLLARS

22. Value of property exempt from local property tax INCLUDED on line 18. $ IN WHOLE DOLLARS

V. TO BE COMPLETED BY AUTHORIZED COUNTY/LOCAL OFFICIAL

23. Document Number

24. Volume/Jacket

25. Page/Image

26. Date Recorded — MONTH DAY YEAR

27. Date of Conveyance — MONTH DAY YEAR

28. Conveyance Code: Warranty/Condo Deed; Land Contract; Quit Claim Deed; Other (explain) →

29. County (1)

30. Municipality (1)

31. County (2)

32. Municipality (2)

Check if more than two (2) municipalities; if so, refer to instructions →

33. Is this a split parcel? (see instructions) Yes No

34. Enter number of acres for each parcel classification and check a preceding box to show predominant classification. 1 (Residential) 1; 2 (Commercial) 2; 3 (Manufacturing) 3; 4 (Agricultural) 4; 5 (Swamp&Waste) 5; 6 (Forest) 6; 7 (Other) 7

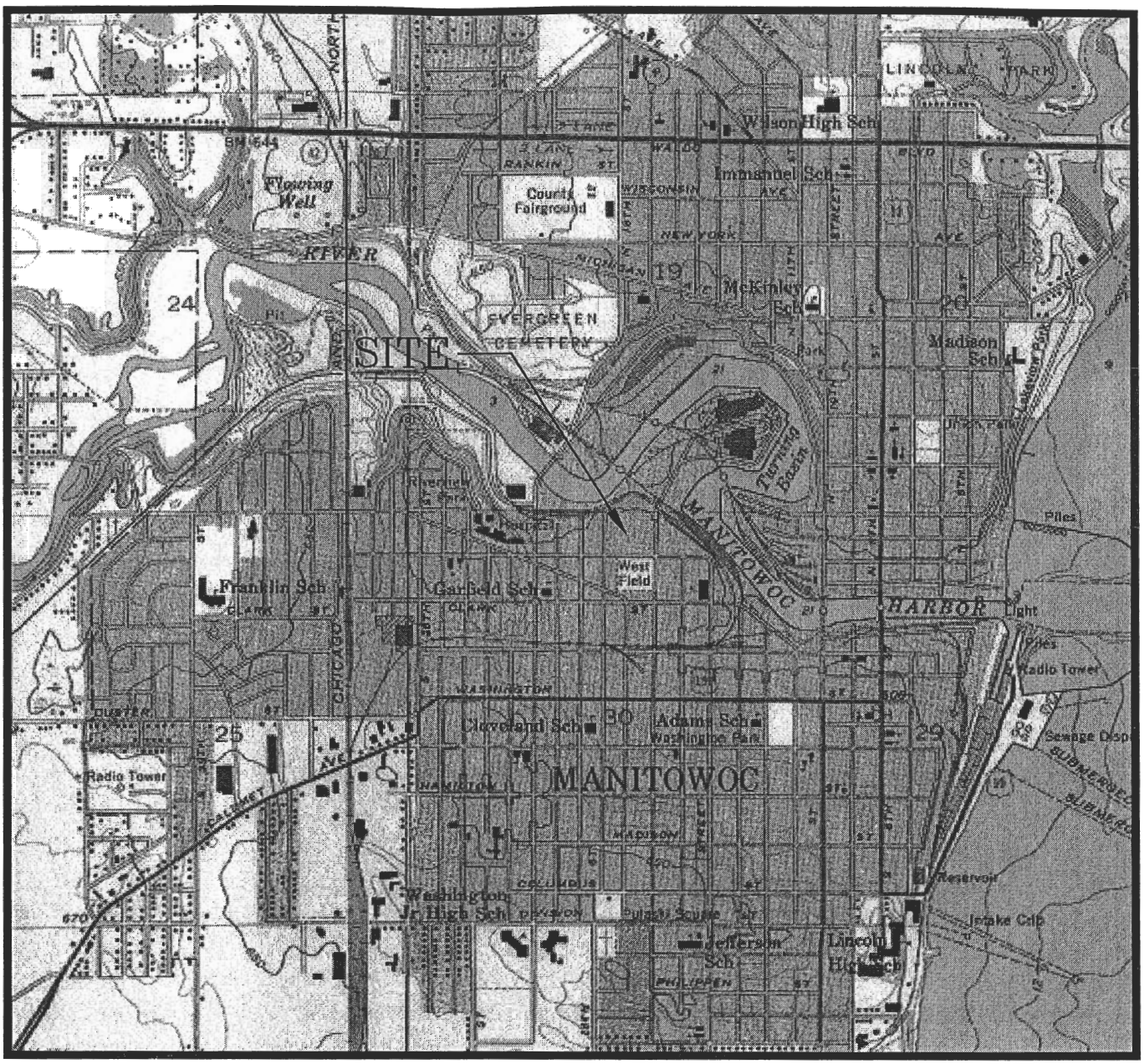
35. Assessment Year

36. Land $

37. Improvements $

38. Total Assessment $

Continued →



(USGS 1954 [1973])
MANITOWOC QUADRANGLE

LOCATION

SCALE
1:24000

1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

CONTOUR INTERVAL 10 FEET

N

REV	DATE	BY	CHK'D	APR'VD	DESCRIPTION/ISSUE

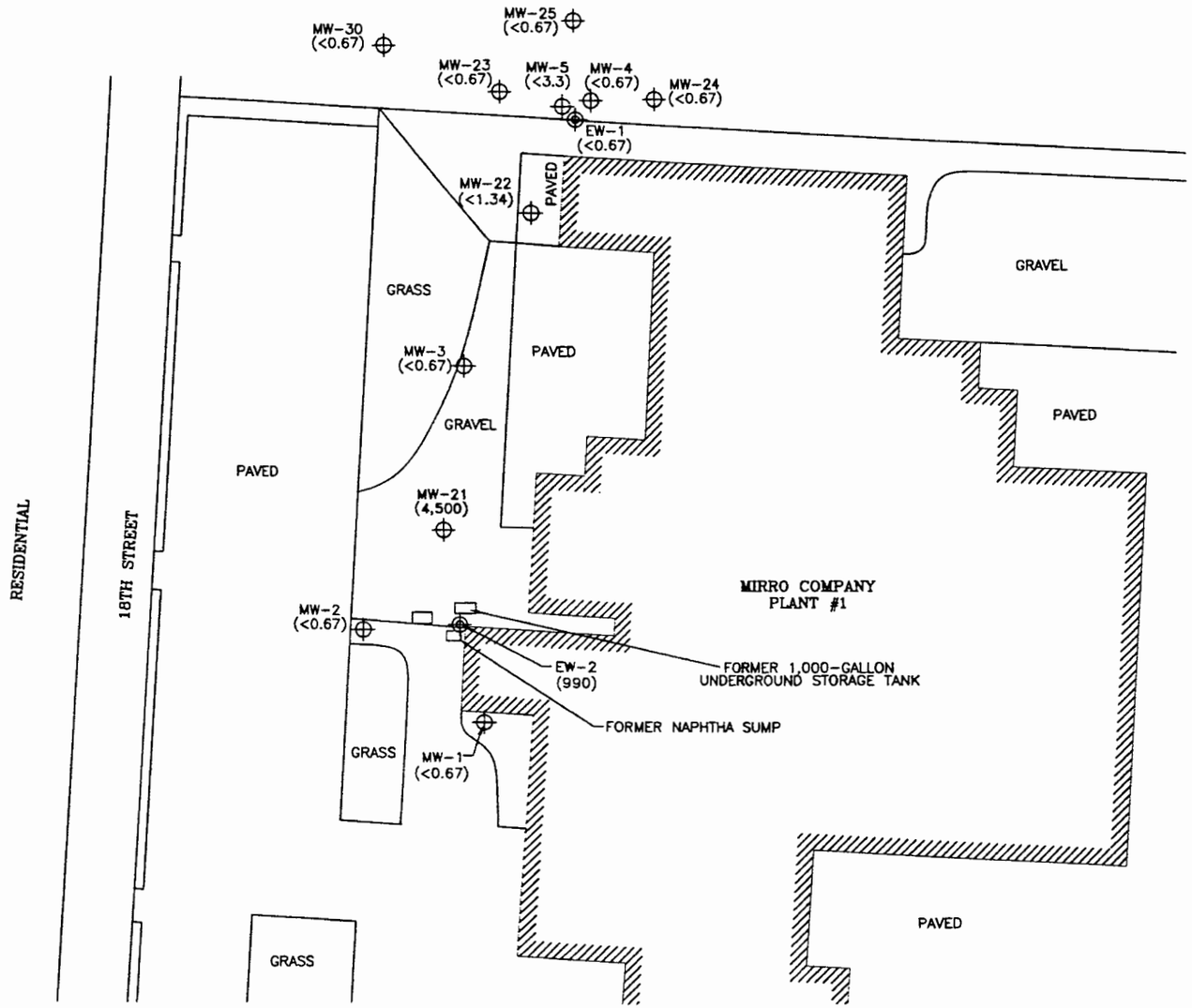
Shaw
Shaw E & I, Inc.

SITE LOCATION MAP

MIRRO COMPANY PLANT #10
MANITOWOC, WISCONSIN

DESIGNED BY	KMH	06/16/03	CHECKED BY		
DRAWN BY	KMH	06/16/03	APPROVED BY		

SIZE:	SCALE:	DRAWING NO.	FIGURE NO.	REVISION NO.
A	AS SHOWN	CAR 01	1	0



LEGEND

FENCE LINE

MONITORING WELL

EXTRACTION WELL

( ) CONCENTRATION XYLENE

NOTE:

GROUNDWATER XYLENE ENFORCEMENT STANDARD IS 10,000 ug/L.

0 80 160
SCALE FEET

N

Shaw
Shaw Environmental & Infrastructure, Inc.

2835 North Grandview Blvd.
PEWAUKEE, WI 53072
(262) 549-6898

REV. NO.:	DRAWING DATE: 06/16/03	ACAD FILE: CAR 08

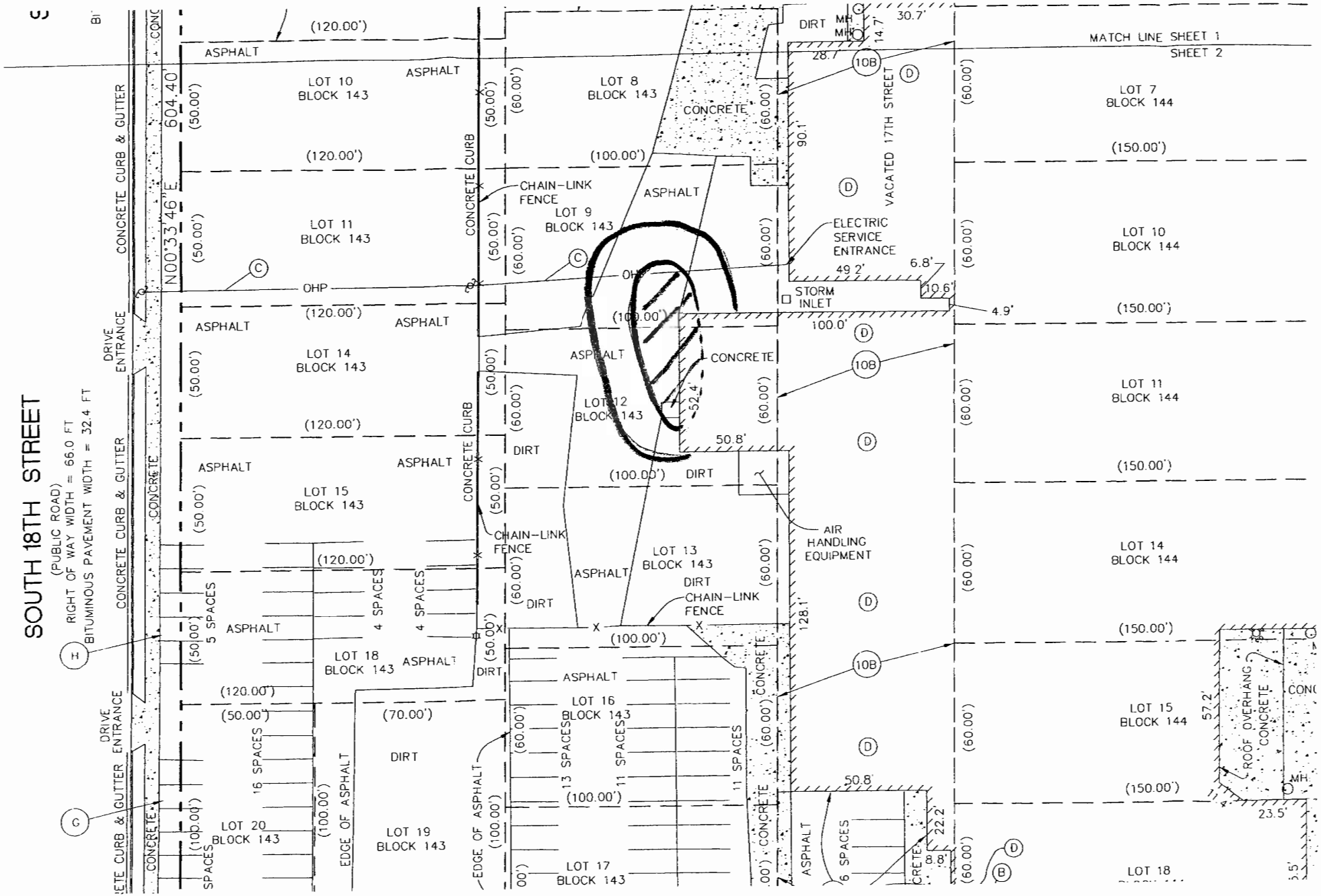
GROUNDWATER XYLENE DISTRIBUTION
(12/09 & 14/99)

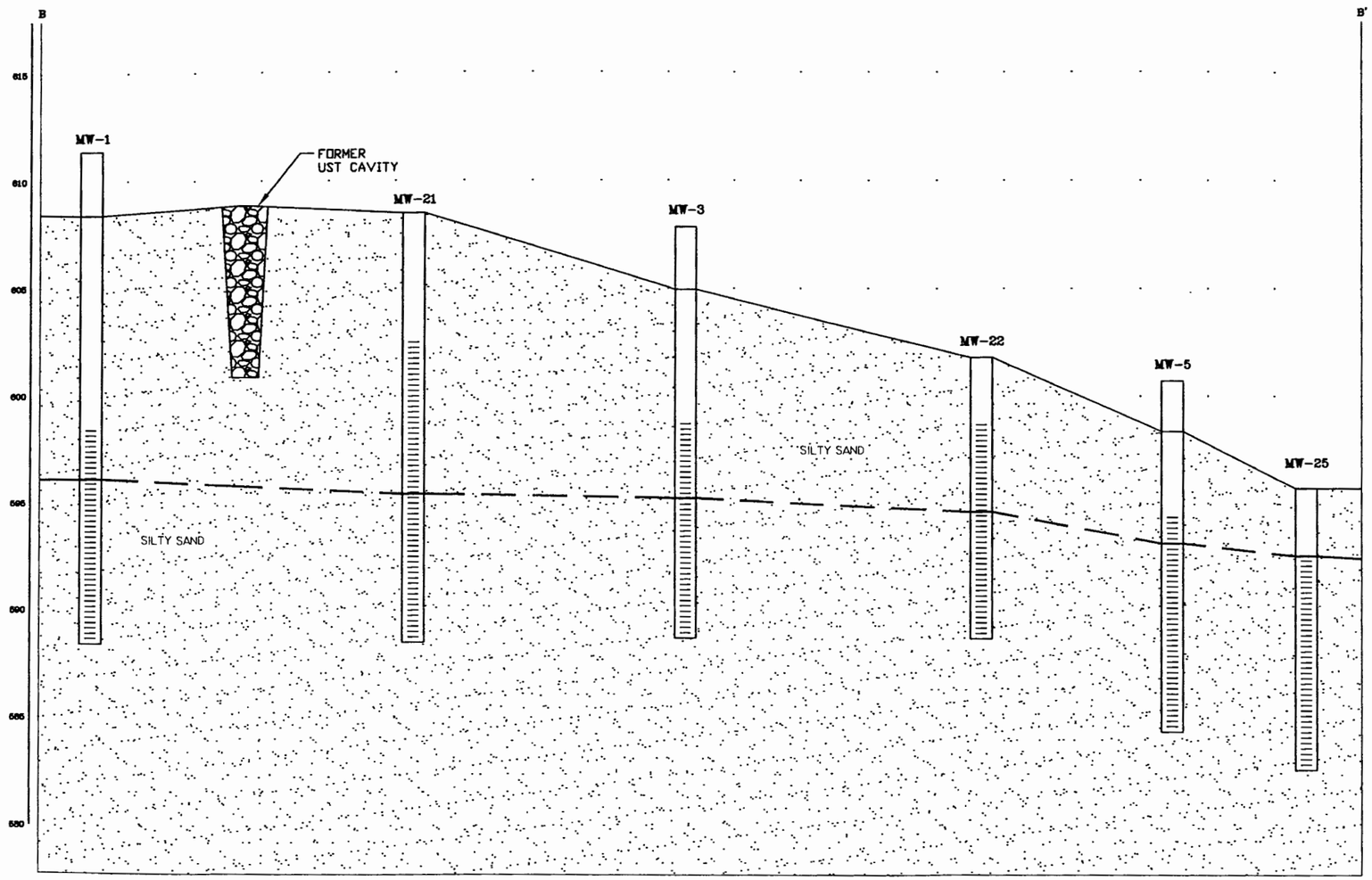
CLIENT: MIRRO COMPANY			PM:
LOCATION: MIRRO COMPANY PLANT #10 MANITOWOC, WISCONSIN			PE/RG:
DESIGNED:	DETAILED: KMH	PROJECT NO.: 000172	FIGURE: 8

Table 2
Soil Analytical Results Summary
Mirro Company Plant #10
Manitowoc, Wisconsin

Boring& Sample	Sample Date	Depth (ft bgs)	PID (ppm eq)	DRO (ppm)	GRO (ppm)	Benzene	Ethylbenzene	MTBE	Toluene	1,2,4-TMB	1,3,5-TMB	Xylenes (total)	Naphthalene
GP-1	05/12/95	2-4	<10	NA	<0.05	<0.5	<0.1	NA	<0.2	NA	NA	<0.2	NA
GP-1	05/12/95	12-14	361	**2,760**	**7,650**	**100**	**32,700**	NA	300	**102,800**	**40,000**	**428,400**	900
GP-1	05/12/95	18.5-19	<10	NA	2.6	3	1,216	NA	5	NA	NA	10	NA
GP-1	05/12/95	19-21	<10	NA	<0.05	<0.5	<0.1	NA	<0.2	NA	NA	2	NA
GP-2	05/12/95	2-4	<10	NA	0.117	0.3	1.0	NA	6.0	NA	NA	0.7	NA
GP-3	05/12/95	2-4	<10	NA	<0.05	<0.5	<0.1	NA	0.1	NA	NA	0.4	NA
GP-3	05/12/95	4-6	<10	NA	0.126	<0.5	<0.1	NA	33	NA	NA	0.2	NA
GP-3	05/12/95	7-9	<10	NA	<0.05	<0.5	<0.1	NA	3.0	NA	NA	0.6	NA
GP-3A	05/12/95	4-6	<10	<5.0	<5.0	<1.0	<1.0	NA	<1.0	<1.0	<1.0	<2.0	<1.0
GP-4	05/12/95	2-4	<10	NA	<0.05	<0.5	<0.1	NA	<0.2	NA	NA	<0.2	NA
GP-4	05/12/95	7-9	<10	NA	<0.05	<0.5	0.2	NA	0.4	NA	NA	1.1	NA
GP-4	05/12/95	12-14	52.4	NA	3.5	<0.5	100	NA	3.0	NA	NA	2.0	NA
GP-5	05/12/95	4-6	<10	NA	<0.05	<0.5	<0.1	NA	<0.2	NA	NA	<0.2	NA
GP-5	05/12/95	8-10	<10	NA	<0.05	<0.5	<0.1	NA	<0.2	NA	NA	1.0	NA
GP-6	05/12/95	2-4	288	NA	14	<0.5	109	NA	<0.2	NA	NA	440	NA
GP-6	05/12/95	7-9	78.5	NA	20	<0.5	482	NA	768	NA	NA	1,101	NA
GP-7	05/12/95	2-4	<10	NA	<0.05	<0.5	<0.1	NA	<0.2	NA	NA	<0.2	NA
GP-7	05/12/95	7-9	<10	NA	<5.0	<2.0	<2.0	<5.0	<2.0	<2.0	<2.0	<4.0	<2.0
GP-7	05/12/95	12-14	<10	NA	<0.05	<0.05	<0.1	NA	<0.2	NA	NA	<0.2	NA
GP-8	05/12/95	2/4/2003	<10	NA	<0.05	<0.5	<0.1	NA	0.5	NA	NA	1.5	NA
GP-8	05/12/95	7/9/2003	<10	NA	<0.05	<1.0	<0.1	<5.0	<1.0	<1.0	<1.0	<1.0	<1.0
GP-8	05/12/95	12/14/2003	<10	NA	<5.0	<0.5	<0.1	NA	<1.0	NA	NA	3.0	NA
GP-10	04/02/96	1.3-2	NA	NA	0.06	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	NA
GP-10	04/02/96	3/5/2003	NA	NA	<0.05	<1.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	NA
GP-10	04/02/96	5/7/2003	NA	NA	<0.05	<1.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	NA
GP-10	04/02/96	7-8	NA	NA	<0.05	<1.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	NA
GP-10	04/02/96	9-10	NA	NA	<0.05	<1.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	NA
GP-11	04/02/96	1-3	NA	NA	<0.05	<1.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	NA
GP-11	04/02/96	3-5	NA	NA	<0.05	<1.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	NA
GP-11	04/02/96	6.4-7	NA	NA	**211**	<1.0	**12,000**	<5.0	**8,000**	4,300	5,000	**83,000**	NA
GP-11	04/02/96	12-13	NA	NA	**336**	<1.0	**19,000**	<5.0	**9,000**	21,000	5,000	**55,000**	NA
GP-12	04/02/96	6-6.4	NA	NA	**130**	<1.0	700	<5.0	**9,500**	5,000	1,400	**13,000**	NA
GP-12	04/02/96	8-9	NA	NA	**106**	<1.0	**6,400**	<5.0	**4,800**	7,400	4,200	**13,000**	NA
GP-13	04/02/96	20.5-22	NA	NA	<0.05	<1.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	NA
MW-1	07/24/95	8-10	<10	<6.0	<6.0	<2.4	<2.4	NA	<2.4	<2.4	<2.4	<4.8	<2.4
MW-2	07/24/95	4-6	<10	<6.0	<6.0	<2.4	<2.4	NA	<2.4	<2.4	<2.4	<4.8	<2.4
MW-3	07/24/95	2-4	<10	<6.0	<6.0	<2.4	<2.4	NA	<2.4	<2.4	<2.4	<4.8	<2.4
MW-21	07/20/98	3-5	<10	NA	NA	<30	<30	<30	<30	<30	<30	<42	<30
MW-22	07/20/98	4-6	<10	NA	NA	<30	<30	<30	<30	<30	<30	<42	<30
MW-23	07/20/98	3-5	<10	NA	NA	<29	<29	<29	<29	<29	<29	<40	<29
MW-24	07/20/98	2-4	<10	NA	NA	<31	<31	<31	<31	<31	<31	<43	<31
MW-30	06/28/99	1-3	<10	n	n	<25	<25	<25	<25	<25	<25	<25	<25
NR 720.09 RCLs				100	100	5.5	2900	NS	1500	NS	NS	4100	NS
NR 746.06 Table 1 (free product indicator)				NS	NS	8500	4600	42000	38000	83000	11000	42000	2700
NR 746.06 Table 2 (direct contact standard)				NS	NS	1100	NS	NS	NS	NS	NS	NS	NS

Note: ft bgs= feet below ground surface; ppm eq= part per million equivalent; DRO= diesel range organics; GRO= gasoline range organics
MTBE= Methyl t-butyl ether; TMB=Trimethylbenzene; NA= Not Analyzed; **Bold**= exceedence of the above listed standards.
Only analytes detected in samples were included in table. Concentrations in ppb unless otherwise noted.


SOUTH 18TH STREET
(PUBLIC ROAD)
RIGHT OF WAY WIDTH = 66.0 FT
BITUMINOUS PAVEMENT WIDTH = 32.4 FT
N00°33'46"E
604.40'
MATCH LINE SHEET 1
SHEET 2
LOT 10 BLOCK 143
LOT 11 BLOCK 143
LOT 14 BLOCK 143
LOT 15 BLOCK 143
LOT 18 BLOCK 143
LOT 20 BLOCK 143
LOT 19 BLOCK 143
LOT 8 BLOCK 143
LOT 9 BLOCK 143
LOT 12 BLOCK 143
LOT 13 BLOCK 143
LOT 16 BLOCK 143
LOT 17 BLOCK 143
LOT 7 BLOCK 144
LOT 10 BLOCK 144
LOT 11 BLOCK 144
LOT 14 BLOCK 144
LOT 15 BLOCK 144
LOT 18
VACATED 17TH STREET
CONCRETE CURB & GUTTER
DRIVE ENTRANCE
CONCRETE CURB
CHAIN-LINK FENCE
ELECTRIC SERVICE ENTRANCE
STORM INLET
AIR HANDLING EQUIPMENT
ROOF OVERHANG
EDGE OF ASPHALT
ASPHALT
CONCRETE
DIRT
OHP
MH
5 SPACES
4 SPACES
16 SPACES
13 SPACES
11 SPACES
6 SPACES
(120.00')
(100.00')
(150.00')
(70.00')
(50.00')
(60.00')
30.7'
14.7'
28.7'
90.1'
49.2'
6.8'
10.6'
4.9'
100.0'
52.4'
50.8'
128.1'
57.2'
23.5'
22.2'
8.8'
APPROXIMATE AREA OF HIGHLY IMPACTED SOIL ABOVE THE WATER-TABLE
APPROXIMATE EXTENT OF MARGINALLY IMPACTED SOIL ABOVE THE WATER-TABLE



LEGEND

SCREENED INTERVAL

GROUNDWATER POTENTIOMETRIC SURFACE, 12/9/99

N

0 50 100

SCALE FEET

Shaw™
Shaw Environmental & Infrastructure, Inc.
2835 North Grandview Blvd.
PEWAUKEE, WI 53072
(262) 549-6898

REV. NO.:	DRAWING DATE: 06/13/03	ACAD FILE: CAR 06

CROSS-SECTION VIEW B-B'

CLIENT: MIRRO COMPANY			PM:
LOCATION: MIRRO COMPANY PLANT #10 MANITOWOC, WISCONSIN			PE/RG:
DESIGNED:	DETAILED: KMH	PROJECT NO.: 000172	FIGURE: 6

Newell Rubbermaid™

April 30, 2004

Ms. Annette Weissbach
Hydrogeologist/Project Manager
Remediation & Redevelopment Program - Northeast Region
Department of Natural Resources
PO Box 19448 1125 N. Military Avenue
Green Bay WI 54307-0448

Subject: ***Former Mirro Facility on Wollmer Street – Manitowoc, WI***

Dear Ms. Weissbach:

This letter is to confirm that the legal description provided by Shaw Environmental for the captioned property accurately and completely describes the manufacturing plant formerly owned by a Newell Rubbermaid subsidiary and operated as a Mirro manufacturing plant.

Thank you for your assistance in this matter. If you have any questions, please feel free to call me at (815) 233-8059.

Sincerely,

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

Cc: Messrs.	Louis Meschede	-	Newell Rubbermaid Environmental Affairs
	Kevin Hedinger	-	Shaw Group Environmental