

**MICHAEL D. HAYES**  
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July 19, 2011

**VIA REGISTERED U.S. MAIL**  
**RETURN RECEIPT REQUESTED**

Madison-Kipp Corporation  
201 Waubesa Street  
Madison, Wisconsin 53704

Re: Notice of Intent to File Suit Pursuant to Section 7002(a)(1) and Notice of Endangerment Pursuant to Section 7002(b)(2)(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6972(b) and 40 CFR 254

Dear Sir or Madam:

We represent the persons listed on Attachment A to this letter (the "Madison Families") and are writing on their behalf. This letter is to notify you that the Madison Families, individually and on behalf of other similarly situated families in Madison, Wisconsin, plan to file one or more claims pursuant to Section 7002(a)(1) of the Resource Conservation and Recovery Act ("RCRA"), among other claims, against Madison-Kipp Corporation ("MKC"). The Madison Families' RCRA claims arise from releases of hazardous and other harmful substances, including but not limited to perchloroethene and other volatile organic compounds (collectively, "the Hazardous Substances"), from MKC's manufacturing facility located at 201 Waubesa in Madison, Wisconsin (the "Facility").

The Madison Families own homes in Madison, Wisconsin located near the Facility. The Madison Families' properties, their neighbors' properties, and the surrounding environment, as well as the health of persons who live near the Facility, have been and continue to be damaged and threatened as a result of releases of the Hazardous Substances from the Facility. Specifically, as a result of releases from the Facility, the Hazardous Substances are present in unsafe levels within and beneath their homes (in vapor form) and on (in soil, vapor and groundwater contamination) the Madison Families' properties and many other properties in the area.

Based on information presently available to the Madison Families, the Hazardous Substances were used by MKC in its operations at the Facility and released into the environment there via venting, spills, leaks and other disposal activities. The Hazardous Substances have

migrated off of the Facility property, contaminating the surrounding environment, including the groundwater and soil on the Madison Families' properties, the air inside and under the Madison Families' homes, and have similarly impacted or threatened other properties in the area. MKC is responsible for the subject contamination, by failing to contain the Hazardous Substances at the Facility, and by failing to adequately investigate and abate the contamination that has migrated from the Facility onto adjacent properties. The current soil, groundwater and vapor migration of Hazardous Substances from the Facility presents an imminent and substantial endangerment to health and the environment as defined in RCRA.

MKC has contributed and is contributing to the past or present handling, storage and disposal of solid wastes which may present an imminent and substantial endangerment to health or the environment. Specifically, MKC's handling and storage of the Hazardous Substances, and the spilling and leaking of such substances into the environment, constituting the improper disposal of solid wastes, has and continues to create an imminent hazard to health and the environment by polluting the soil, groundwater, and air on properties adjacent to the Facility. Also, MKC's failure to adequately investigate and remediate the contamination and prevent migration of contaminants from the Facility has contributed to the imminent and substantial endangerment posed to human health and the environment. As a "contributor" to this hazardous condition, MKC is subject to suit pursuant to Section 7002(a)(1)(B) of RCRA.

MKC has failed to adequately investigate the nature and extent of the contamination emanating from its Facility, and the Madison Families will be seeking injunctive relief under RCRA which requires MKC to perform a comprehensive environmental investigation which characterizes the aerial extent of the contamination and identifies the residences and other properties in the area which are impacted or threatened by MKC's contamination. The Madison Families will also be seeking injunctive relief under RCRA to compel MKC to perform such remediation in the areas that are determined to be impacted or threatened as is warranted to comprehensively abate this contamination and protect the public from exposure to MKC's contamination.

Please take notice that, unless the matters referenced herein are resolved to the Madison Families' satisfaction within ninety (90) days after the date this notice is served, the Madison Families will assert claims under RCRA against MKC in the United States District Court for the Western District of Wisconsin. In such proceeding, the Madison Families will seek injunctive relief, appropriate civil penalties, and costs of litigation, including reasonable attorneys' and expert witness fees, as well as any other appropriate relief available under RCRA.

This notice is provided on behalf of each of the Madison Families, individually and on behalf of all others similarly situated. The Madison Families own properties adjacent to the Facility at the addresses listed on Attachment A.

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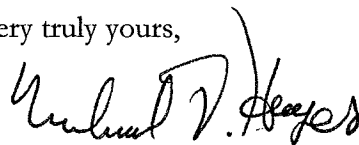
The names, addresses and telephone numbers of legal counsel representing the Madison Families are:

Shawn Collins  
Edward J. Manzke  
Aaron W. Rapier  
The Collins Law Firm  
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(630) 527-1595

Norman B. Berger  
Michael D. Hayes  
Varga Berger Ledsky Hayes & Casey  
125 South Wacker Drive, Suite 2150  
Chicago, Illinois 60606  
(312) 341-9400

All further communication concerning this matter should be with Shawn Collins, Norman Berger or the undersigned.

Very truly yours,



Michael D. Hayes

cc: Shawn M. Collins  
Norman B. Berger

Lisa Jackson  
Administrator  
United States Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

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Secretary  
Wisconsin Department of Natural Resources  
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United States Department of Justice  
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Mark D. Daniel  
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ATTACHMENT A

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