



October 21, 2021

Mr. Chris Saari
State of Wisconsin
Department of Natural Resources
2501 Golf Course Rd
Ashland, WI 54806-3505

VIA U.S. MAIL AND ELECTRONIC MAIL

Re: DNR BRRTS 02-64-000068 C M CHRISTIANSEN #1 - POLE DIP

Dear Mr. Saari:

This letter is written in response to your correspondence to Eric Christiansen in his capacity as President of C.M. Christiansen Co., Inc.

Your letter correctly states that C.M. Christiansen Co., a Wisconsin company (“CMC Co”), operated a pole dipping facility at the site (“Site”) (p. 2). Your letter incorrectly states, however, that in 1987 the DNR determined that C.M. Christiansen Co., Inc., a Michigan company (“CMC INC”), was the responsible party associated with the environmental conditions at the Site (p.2). CMC INC did not exist in 1987. The entity that the DNR identified as the responsible party was CMC Co — not CMC INC. Further, it should once again be noted that CMC Co has neither agreed nor disagreed with this identification. Rather, in the interests of expediency and of a good faith commitment to the welfare of the environment, both CMC Co and CMC INC have continued to work with DNR to resolve mutual concerns in respect of the environmental conditions on the Site.

Thus, the DNR’s January 18, 2019 correspondence referenced in your letter incorrectly identified the responsible party as CMC INC. Your letter of September 1 incorrectly

Chris Saari
October 21, 2021
Page 2

states that CMC INC caused discharges at the Site (p. 3). CMC INC did not exist at the time the alleged discharges occurred.

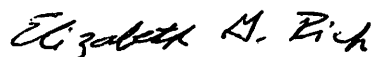
As the owner of the Site in 1998, CMC INC entered into a Spill Response Agreement (“Agreement”) with the DNR. The Agreement was extensively negotiated, and included obligations relating only to specified provisions of NR 700—not to all of them. CMC INC is not the responsible party and never agreed to implement any procedures pursuant to NR 718, 726, or 727. CMC INC has fully complied with the Agreement and will not agree to further work in respect of the referenced sections of NR 700.

As all parties are aware, CMC INC stopped property tax payments on the Site some time ago. With the concurrence of DNR, The Town of Phelps foreclosed on the property that includes the Site. CMC INC is now a former owner of the Site who did not cause or contribute to any contamination which may exist at the Site. CMC INC has no current obligations to do any further work regarding any alleged existing soil or groundwater contamination on the Site. No further work will be done. Thus, the requested soil cover maintenance plan will not be submitted.

You may contact me with any questions.

Very truly yours,

RICH LAW SC



Elizabeth Gamsky Rich

cc: Eric R. Christiansen
Laurie Parsons
John Hunt