



June 19, 2012

LANXESS Corp  
Attn: Mr. John Scrabis  
111 RIDC Park West Dr  
Pittsburgh PA 15275-1112

Subject: Case Closure Denial for Additional Site Work  
Specialty Chem Products Corp., 2 Stanton St., Marinette, Wisconsin  
WDNR BRRTS Activity # 02-38-000186

Dear Mr. Scrabis:

On June 8 2012, the Department of Natural Resources Regional Closure Committee reviewed your request for closure of the case described above. The Regional 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 your closure request, the closure committee has denied closure because additional requirements must be met. The purpose of this letter is to inform you of the remaining requirements for obtaining closure.

Additional site work is necessary at the above described site in order to meet the requirements for site closure. Your site was denied closure because further groundwater monitoring is needed to determine the trend and extent of contamination. A Cap Maintenance Plan is needed to address the remaining soil and groundwater contamination. Also, an Appendix A letter must be issued to the property owner to address the soil and groundwater contamination, Cap Maintenance Plan, Maintain Industrial Zoning and Missing Monitoring Well (TW-2) - See DNR publication RR919 found at: <http://dnr.wi.gov/files/PDF/pubs/rr/RR919.pdf> for Appendix A requirements.

**Requesting:**

A Minimum of one additional round of groundwater monitoring for VOC's at TW-1, MW-11, MW-41S, MW-45 S, MW-45M & MW-50 to document the groundwater trends. If the groundwater VOC trends are increasing, additional monitoring or remedy may be needed. If methylene chloride is confirmed at MW-50, the degree and extent of the methylene chloride will need to be defined.

A Cap Maintenance Plan that maintains the existing impervious cap site wide for soil to groundwater protection and at Areas H & I for direct contact to soil, Maintains Industrial Zoning and includes the missing monitoring well TW-2. The cover is to be maintained in accordance with a plan prepared and submitted to the Department pursuant to s. NR 724.13(2), Wis. Adm. Code. The Maintenance Plan should be submitted to the Department for review and approval.

Section NR 726.05(2)(b)4, Wis. Adm. Code, requires you to provide written notice of the presence of residual groundwater contamination to the owner of any properties that you do not own within this site if they are affected by groundwater contamination. This same section of the code requires proof that

these letters were received at least 30 days prior to the date on which the agency completes its review of the closure report, and that they be included in the GIS Registry attachment to the closure report.

Note: All letters sent to landowners whose property has groundwater contamination exceeding ch. NR 140 enforcement standards at the time case closure is requested must use the template letter found in Appendix A in ch. NR 726. <http://dnr.wi.gov/files/PDF/pubs/rr/RR919.pdf>. The Appendix A letter should be submitted to the Department for review and approval.

When all the above requirements have been satisfied, please submit a letter, together with any required documentation, to let me know that applicable requirements have been met. Your site will be listed on the DNR Remediation and Redevelopment GIS Registry. 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 RR Sites Map page at <http://dnr.wi.gov/org/aw/rr/gis/index.htm>.

Note: case closure will be approved only if all the above requirements have been satisfied, including submitting the required documentation to the Department. If these requirements have not been met your site will remain "open" and additional remedial actions may be necessary by you to eliminate the need for these requirements.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at (920)662-5492.

Sincerely,



Jason Moeller  
Hydrogeologist/Spills Coordinator  
Remediation & Redevelopment Program

cc: James Wedekind – TRC Environmental – 708 Heartland Trail, Madison WI 53717  
John Perkins – Tyco Fire Protection Products – 1501 Yamato Rd., Boca Raton, FL 33431