

Schmenk, Colin R - DNR

From: DuFresne, Kristin I - DNR
Sent: Wednesday, December 21, 2016 11:03 AM
To: jwedekind@trcsolutions.com
Cc: john.scrabis@lanxess.com; Chronert, Roxanne N - DNR; DuFresne, Kristin I - DNR
Subject: RE: Specialty Chem Products Corp (BRRTS #02-38-000186)

James – Thank you for discussing the status of the Specialty Chem Corp (BRRTS # 02-38-000186) case with me earlier today. This email serves as a summary of our conversation.

- On November 17, 2014 the DNR responded to TRC's October 16, 2014 submittal titled *Status Update of Closure Request*. The DNR informed TRC that a no further action determination could not be provided and that the Specialty Chem Corp case would need to go through the NR 700 closure process.
 - Rule revisions and changes to the Case Closure – GIS Registry Form 4400-202 have occurred since the 2012 closure request was prepared/reviewed. Please submit future closure requests to the DNR on the most recent version of the Case Closure – GIS Registry Form. Currently, the most recent version of the form can be found at: <http://dnr.wi.gov/files/PDF/forms/4400/4400-202.pdf>. (Note: This form is periodically updated. It is Lanxess'/TRC's responsibility to ensure the most recent version of the form is completed and submitted.)
 - Information submitted to the DNR thus far does not provide an overall picture of the degree and extent of contamination associated with the Specialty Chem Corp case (i.e. historical spills). Please compile available data from the Specialty Chem Corp and Ansul/Tyco (BRRTS # 02-38-000011) investigations as a means to show:
 - the degree and extent of the contamination associated with the Specialty Chem Corp historic spills has been defined.
 - adequate groundwater monitoring has been conducted to establish stable/decreasing trends.
 - an overall picture of the non-arsenic related contamination that exists as a result of the Specialty Chem Corp and Ansul/Tyco activities.
 - any correlations within the data to show that contamination is/is not related to the Specialty Chem Corp case.
- Note: DNR records for the Ansul/Tyco case contain information related to sampling efforts and monitoring well installation/abandonment activities. This information can be reviewed upon request.
- As part of the closure process a new notification letter will need to be issued to the property owner. Please consult the Tyco and/or the DNR to aid in determining the correct contact person prior to sending the letter.

The DNR recognizes the uniqueness of the Specialty Chem Corp case and the previous actions that have been taken to address the contamination associated with the historic spills.

The DNR looks forward to continuing to work with Lanxess/TRC to move the Specialty Chem Corp site through the NR 700 process and ultimately to case closure.

Please feel free to contact me if you have any questions.

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Kristin DuFresne

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From: DuFresne, Kristin I - DNR
Sent: Monday, June 20, 2016 7:19 AM
To: Wedekind, James
Cc: john.scrabis@lanxess.com; Frederick, Sarah E - DNR; DuFresne, Kristin I - DNR
Subject: RE: Specialty Chem Products Corp PM Transfer (BRRTS #02-38-000186)

James – Thank you for your response. Based on the information you just provided the DNR will need to take a closer look at the case file. I will contact you as soon as I have more information.

Thank you for your patience.

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Kristin DuFresne
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From: Wedekind, James [<mailto:JWedekind@trcsolutions.com>]
Sent: Friday, June 17, 2016 11:05 AM
To: DuFresne, Kristin I - DNR
Cc: john.scrabis@lanxess.com; Frederick, Sarah E - DNR
Subject: RE: Specialty Chem Products Corp PM Transfer (BRRTS #02-38-000186)

Good morning Kristin,

Thank you for contacting me. To clarify, we submitted a closure request to Jason Moeller dated May 10, 2012. If you recall, you and I discussed the site when I visited with Mr. Moeller prior to submitting that request. The closure request was denied by WDNR in a letter dated June 19, 2012 requesting further action. We took those actions and responded to Mr. Klauk via letter dated October 16, 2014 with documentation that the actions had been completed. In that letter, we requested a NFA determination instead of closure as that had been recommended by WDNR as an alternative to closure since these were historic spills and not a standard “RR Site”. When I spoke with Mr. Klauk on November 17, 2014 he told me he had not had reviewed all the information, but he was confused by the NFA request since we had asked for closure originally. I explained to him our rationale, and it was our understanding that he was going to look into the information and get back with us.

I understand this project has a complicated site history as it was first discussed with Mr. Jim Walden of WDNR in 2005 and many of the decisions that were made at that time have been lost due to turnover of all parties. Suffice it to say, the Ansul facility is now fully controlling groundwater issues at the site and LANXESS has worked closely with WDNR for many years to achieve a resolution to these historic spills – which were for the most part were cleaned up at the time and did not impact groundwater. We look forward to working with you to gain closure or a finding of no further action whichever is most appropriate.

I welcome any questions you may have. Please contact me if you would like to discuss this further.

Most sincerely,
James

James Wedekind, P.G.*
Senior Hydrogeologist
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From: DuFresne, Kristin I - DNR [<mailto:Kristin.DuFresne@wisconsin.gov>]
Sent: Friday, June 17, 2016 9:41 AM
To: Wedekind, James <JWedekind@trcsolutions.com>; john.scrabis@lanxess.com
Cc: Frederick, Sarah E - DNR <Sarah.Frederick@wisconsin.gov>; DuFresne, Kristin I - DNR <Kristin.DuFresne@wisconsin.gov>
Subject: RE: Specialty Chem Products Corp PM Transfer (BRRTS #02-38-000186)

James – As you are aware, I am the new DNR project manager assigned to the Specialty Chem (BRRTS # 02-38-000186) case. Per your May 24, 2016 email it appears there may be some confusion regarding the status of the Specialty Chem case.

According to DNR records Bob Klauk, former DNR project manager for the Specialty Chem case, spoke with you on November 17, 2014. During this conversation TRC was informed that a no further action determination could not be assigned to the Specialty Chem case. Lanxess/TRC was asked to prepare and submit a case closure request to the DNR. Please refer to the attached email for additional information.

To date, the DNR has not received a closure request for the Specialty Chem site.

Please feel free to contact me if you have any questions.

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