

Mr. Dave Neste
Wisconsin Department of Natural Resources
Remediation & Redevelopment Program
2984 Shawano Avenue
Green Bay, WI 54313-6727

Subject: Change of Project Manager and Request for Site Update
Specialty Chem Products Corp., Marinette, WI
BRRTS Activity # 02-38-000186

June 18, 2018

Dear Mr. Neste:

Thank you for your letter dated May 25, 2018 in which you provided notice that you have assumed the direct oversight role for the above-referenced spill case. You also requested that LANXESS Corporation (LANXESS) respond within 30 days and provide an update on the status of the referenced project.

The site in Marinette, WI is a large, active chemical manufacturing plant owned/operated by Tyco or related entity. The site has been in operation since the late 1920s. LANXESS has never owned or operated the site. Our understanding is that the site has undergone or is undergoing RCRA corrective action by Tyco or related entity that includes site-wide containment and control of groundwater.

The above-referenced spill case is associated with various spill reports issued for small, localized spills that occurred in the late 1980s/early 1990s within an area of the site that was leased by Specialty Chem. Since then, LANXESS and its predecessors have completed various investigations over the years which culminated in a 2014 submittal to WDNR requesting closure of the case. Details regarding the work completed for the Specialty Chem spill case are provided in the various reports and submittals in the WDNR's case file.

The limited area associated with the referenced spill case is within the larger area where groundwater is controlled/contained as part the site's RCRA corrective action program. Thus, residual contamination, if any, associated with the Specialty Chem spill case has been addressed by the RCRA corrective action process at the site. Any further investigation by LANXESS would be unnecessary and yield results that would be difficult to interpret given the changed groundwater flow regime associated with the RCRA cutoff wall remedy and uncertain history of spills/releases over the many decades of site use by Tyco and related entities.

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For the reasons cited herein, LANXESS believes that the information submitted to date to the Department should be sufficient to grant closure for the referenced case.

Sincerely,



John M. Scrabis
Environmental Manager