

From: Rodriguez, Gabriel M. <grodriguez@schiffhardin.com>
Sent: Wednesday, October 14, 2020 4:08 PM
To: Gruen, Andrea M - DNR
Cc: Beggs, Tauren R - DNR; Nelson, William J - DNR; Witte, Edward
Subject: Oct 14, 2020 Letter Regarding Manitowoc Sites
Attachments: 2020 10 14 Ltr to A Gruen re Manitowoc Sites.PDF.PDF

Please see the attached.

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October 14, 2020

VIA EMAIL

Andrea Gruen
Environmental Enforcement Specialist
State of Wisconsin
Department of Natural Resources
2984 Shawano Ave.
Green Bay, WI 54313-6727

Re: Former Newton Gravel Pit and Mirro 9 Sites

Dear Andrea:

I write on behalf of Newell Operating Company (“NOC”) in response to your August 14, 2020 letters summarizing the enforcement conferences held for the Former Newton Gravel Pit site (BRRTS # 02-36-000268) and the Mirro 9 site (BRTTS # 01-36-545108) on June 29, 2020.¹ In those letters, you requested that NOC prepare a Site Investigation Work Plan (“SIWP”) for both sites by September 14, 2020. The WDNR subsequently granted an extension to and including October 14, 2020 for submission of the SIWPs.

With respect to the Mirro 9 site, NOC’s consultant Ramboll has prepared an SIWP that summarizes prior investigations of the site, identifies data gaps, proposes a work plan for further investigation, and sets forth a proposed schedule. That SIWP was uploaded to the BRRTS portal earlier today. A hard copy also is being submitted to WDNR under separate cover.

With respect to the Former Newton Gravel Pit site, NOC continues to work with the City of Manitowoc (the “City”), which is leading the investigation and clean-up efforts at that site. NOC and the City recently concluded an agreement fully resolving the sharing of costs for all investigation and remediation performed by the City in connection with the site through the end of 2019. Further, NOC and the City are currently in discussions regarding cost-sharing going forward. Given that the City and NOC

¹ Though your August 14 letters were addressed to Newell Brands Inc., NOC is the company that formerly owned, and subsequently sold, the Mirro business.



Andrea Gruen
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continue working towards a cooperative approach to addressing the Former Newton Gravel Pit site, NOC will not be submitting a separate SIWP for that site.

Please feel free to call me with any questions.

Sincerely,

A handwritten signature in black ink that reads "Gabriel M. Rodriguez". The signature is written in a cursive style with a large, stylized 'G'.

Gabriel M. Rodriguez

cc: Kristin Holloway Jones (NBI)
Tauren Beggs (WDNR)