



October 07, 2020

Newell Operating Company
Kristin Holloway Jones (Kristin.Jones@newellco.com)
6655 Peachtree Dunwoody Rd
Atlanta GA 30328

Subject: Site Investigation Review for VPLE – Not Approved
Mirro Plt #20 (Former), 44 Walnut Street, Chilton, WI
BRRTS #s 02-08-520157 (ERP) & 06-08-426946 (VPLE)

Dear Ms. Jones:

On September 17, 2020, the Department of Natural Resources (DNR) reviewed the site investigation performed at this site for compliance with Wis. Admin. Code ch. NR 716. DNR review and approval of the site investigation is required for sites enrolled in the Voluntary Party Liability Exemption (VPLE) program. After review, the DNR has determined that the site investigation does not meet the requirements of Wis. Admin. Code ch. NR 716 so is NOT APPROVED. The degree and extent of contamination identified at the site has not been adequately characterized or documented.

This review was based on review of the following documents:

- Phase I Environmental Site Assessment (Stantec, 2020),
- Phase II Environmental Site Assessment (Stantec, 2020),
- Comprehensive Site Investigation Report (SEH, 2020), and
- PFOA/PFOS Groundwater Sample Results (SEH, 2018).

The DNR identified the following items as needing additional work to complete the site investigation:

1. The property boundaries need to be confirmed and site figures updated.
 - It appears that well nests MW-5/PZ-5 and MW-9/PZ-9 are located on neighboring properties. Additionally, sample locations B-1 to B-3 and SB-1 and SB-2 appear to be located on neighboring properties.
 - It appears that the area between the former Mirro Plt #20 building and the railroad is not part of the former Mirro Plt #20 property.
 - The creation of a certified survey map of the parcel including monitoring well locations is recommended
 - Responsible Party (RP) letters may need to be issued to neighboring property owners for the contamination identified on their property.
2. Additional soil sampling is necessary to define the degree and extent of soil contamination on-site. Soil sampling performed by Stantec in 2020 identified contamination on the undeveloped northern portion of the site. A soil sampling plan to fill in sampling gaps to the north and south of the building is needed for contaminants of concern. This work is partly dependent on the property boundaries determination.
3. PCBs were detected in soil at B-10 above groundwater pathway RCL. Clarify why sample was collected and identify source(s). Additional sampling should be evaluated.
4. Additional groundwater monitoring well locations are needed to define the degree and extent of contamination.
 - A piezometer north of PZ-10.

- A piezometer side gradient (east) of PZ-5.
 - A groundwater monitoring well and piezometer side gradient (east) of MW-8 near property line.
5. A standalone off-site exemption request for chlorinated volatile organic compounds (CVOCs) in groundwater will be required. This request is contingent on select piezometers being on the former Mirro #20 property. An offsite exemption requires showing contaminant impact on property owned by requester. Assumed contamination is not eligible for an exemption.
 6. The perfluoroalkyl and polyfluoroalkyl substances (PFAS) investigation is not complete. Additional information regarding site plating process and use of PFAS is needed.
 7. A sediment investigation in the Manitowoc River is warranted for contaminants of concern based on sludge sample results collected from the wastewater/sump system which discharges to the river.
 8. A surface water investigation/evaluation is warranted for contaminants of concern based on site investigation data. There is a likelihood of a PFAS discharge to the Manitowoc River via groundwater and the sump system.
 9. The identified sludge in the wastewater/sump system requires immediate attention due to potential surface water discharge. The sludge should be removed, and the wastewater/sump system evaluated and modified to minimize the sludge/groundwater contaminant discharge.
 10. A vapor intrusion investigation is required.
 11. Tables need to be updated with current industrial, non-industrial and groundwater protection residual contaminant levels (RCLs) and groundwater standards.
 12. Location of former transformer pad(s) and sample locations should be added to site figures.
 13. The data provided in the two Stantec reports should be added to future submittals.

A site investigation work plan in accordance with Wis. Admin. Code § NR 716.09 should be submitted to the DNR within 60 days to address the issues identified above.

If you have questions regarding this letter please contact me a 920-808-0170 or via email at kevin.mcknight@wisconsin.gov.

Sincerely,



Kevin D. McKnight
Hydrogeologist
Remediation and Redevelopment Program

cc: Tom Nordgren (tom.nordgren@ki.com)
Hudson Green, Patriot Environmental Management, LLC (hgreen@patriotenviro.com)
Bruce Olson, SEH (bruce.olson@seh.com)
John Guhl, SEH (john.guhl@seh.com)