



May 03, 2021

Newell Operating Company  
Kristin Holloway Jones  
6655 Peachtree Dunwoody Rd  
Atlanta GA 30328

Subject: Site Investigation Work Plan – Approved with Notice to Proceed  
Mirro Plt #20 (Former), 44 Walnut Street, Chilton, WI  
BRRTS #s 02-08-520157 (ERP) & 06-08-426946 (VPLE)

Dear Ms. Jones:

On April 29, 2021, Wisconsin Department of Natural Resources (DNR) reviewed the March 15, 2021 “*NR716 Site Investigation Work Plan and Response to WDNR Comments*” (SIWP) submitted by your consultant RAMBOLL. This SIWP was submitted to address the outstanding issues noted by DNR in the October 7, 2020 site investigation review response letter for this site. The DNR approves the work as outlined in the March 15, 2021, SIWP and this letter serves as your Notice to Proceed provided the following comments are also incorporated.

The DNR concurs with the following recommendations in the SIWP.

- Postpone installation of a piezometer side-gradient of PZ-5, pending submittal and review of the proposed off-site liability exemption request. Installation of this piezometer may be requested after additional review.
- Proposal for additional on-site investigation prior to determining the need to perform a surface water and sediment investigations.
- Proposal for additional investigation prior to sludge removal.
- The abandonment of damaged monitoring wells MW-4, MW-6, and MW-7.

The DNR requests the following items are incorporated into the SIWP.

- The DNR Soil Investigation:
  - Analysis for Polycyclic Aromatic Hydrocarbons (PAHs) should be included for soil samples at the proposed MW-11 and PZ-12 locations.
  - Lead is a sitewide soil contaminant.
  - Volatile Organic Compounds (VOCs), PAHs and other metals will require discrete delineation on future reports.
- Regarding the (PFAS) investigation:
  - Soil sampling for PFAS is not discussed in the SIWP. The necessity of soil sampling will need to be evaluated as part of the site investigation.
  - Proposed 15-day quality assurance review time, prior to issuing the required notification of PFAS results. You are also required to inform the property owner of this extension.
- Regarding the Vapor Intrusion (VI) investigation:

May 03, 2021

Page 2 of 2

Kristin Holloway Jones - Newell Operating Company  
Site Investigation Work - Plan Review for VPLE -Approved with Notice To Proceed  
Mirro Plt #20 (Former), BRRTS #s 02-08-520157 (ERP) & 06-08-426946 (VPLE)

- DNR does not recommend indoor air sampling for VI evaluation.
- DNR recommends sealing the sumps and collecting VI samples from the sealed sumps.
- Chlorinated VOCs and Petroleum VOCs should be analyzed for specifically. DNR does not recommend analyzing VI for the full suite of VOCs.
- A minimum of two rounds of sump sampling is required. One sampling event to take place during heating and cooling seasons.
- An evaluation of the potential for VI migration along underground utilities is required.

Please know that additional investigation may be required based on the results of the proposed work in order to meet the requirements of Wis. Admin. Code § NR 716.

If you have questions regarding this letter please contact me at 920-808-0170, or via email at [kevin.mcknight@wisconsin.gov](mailto:kevin.mcknight@wisconsin.gov).

Sincerely,



Kevin D. McKnight  
Hydrogeologist  
Remediation and Redevelopment Program

cc: Tom Nordgren ([tom.nordgren@ki.com](mailto:tom.nordgren@ki.com))  
Hudson Green, Patriot Environmental Management, LLC ([hgreen@patriotenviro.com](mailto:hgreen@patriotenviro.com))  
Susan Petrofske, RAMBOLL ([SPETROFSKE@ramobll.com](mailto:SPETROFSKE@ramobll.com))  
Jeanne Tarvin, RAMBOLL ([jtarvin@ramboll.com](mailto:jtarvin@ramboll.com))