



May 1, 2024

Newell Operating Company
Kristin Holloway Jones
6655 Peachtree Dunwoody Rd
Atlanta GA 30328
Sent via email only to
Kristin.Jones@newellco.com

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 April 4, 2024, the Department of Natural Resources (DNR) reviewed the NR 716 Site Investigation Report Addendum submitted on January 11, 2024, 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.

Determination:

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

- A sediment investigation in the Manitowoc River is warranted for Resource Conservation and Recovery Act (RCRA) metals based on sludge sample results collected from the wastewater/sump system and soil on the north side of the site. The DNR's concern is related to releases of RCRA metals for operations prior to the implementation of wastewater permitting.

The DNR identified the following items as meeting the requirements of Wis. Admin. Code ch. NR 716:

- The soil investigation is complete for Volatile Organic Compounds (VOCs), Polycyclic Aromatic Hydrocarbons (PAHs), RCRA metals, and Polychlorinated biphenyls (PCBs).
- The groundwater investigation is complete for VOCs, PAHs, RCRA metals, and PCBs.
- The vapor intrusion investigation is complete. Vapor mitigation is required in the basement area of the building prior to case closure consideration.
- Additional sampling for per- and polyfluoroalkyl substances (PFAS) is not needed at this time.

Future Actions:

- A sediment investigation work plan in accordance with Wis. Admin. Code § NR 716.09 should be submitted to the DNR within 60 days of the date of this letter.

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Page 2 of 2

- A vapor mitigation work plan in accordance with Wis. Admin. Code chs. NR 722 & NR 724 should be submitted within 60 days of the date of this letter.

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

Sincerely,



Kevin McKnight

Hydrogeologist

Remediation and Redevelopment Program

cc: Sean Fraser, Fraser Properties, LLC (fraserpropertiesllc@gmail.com)

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