

From: Jeanne Tarvin <jtarvin@ramboll.com>
Sent: Monday, March 15, 2021 6:49 PM
To: Beggs, Tauren R - DNR
Cc: Kristin Jones (Kristin.Jones@newellco.com); Kathleen McDaniel; Rodriguez, Gabriel M.; Walton, Katherine S.; Witte, Edward; Byers, Harris; Susan Petrofske; Adam Tegen; Paul Lindquist
Subject: RE: 0236545108: RTC Site Investigation Work Plan Mirro Plant No. 9 (Former)

Tauren,

Thank you for your timely review of our *Responses to WDNR's Comments on the Site Investigation Work Plan* letter. Given the extensive amount of investigation we have currently planned in our Work Plan (e.g., 36 soil borings, 23 additional monitoring wells, two groundwater sampling events, additional utility inspection and investigation, etc.) as well as the prior data collected by others to date, we would like to complete the scope of work planned for implementation in the Spring/Summer of 2021 prior to adding additional borings and wells at this time. It is our intent to utilize the data collected during the proposed investigation in the Spring/Summer of 2021 (supplemented by the data previously collected by others) to develop a conceptual site model and comprehensive figures depicting the magnitude and extent of soil and groundwater impacts to better direct future investigation. This approach will provide the data necessary to determine the scope necessary to fill any potential data gaps, including those described in your e-mail.

Please let us know if you have any questions. Thank you.
Regards, Jeanne

Jeanne Tarvin, PG, CPG
Principal
D +1 (262) 901-0085
M +1 (414) 326-5365
jtarkin@ramboll.com

From: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>
Sent: Friday, March 5, 2021 10:26 AM
To: Paul Lindquist <PLINDQUIST@ramboll.com>
Cc: Kristin Jones (<Kristin.Jones@newellco.com>) <Kristin.Jones@newellco.com>; Kathleen McDaniel <kmcdaniel@manitowoc.org>; Rodriguez, Gabriel M. <grodriguez@schiffhardin.com>; Walton, Katherine S. <KWalton@schiffhardin.com>; Witte, Edward <nwitte@gklaw.com>; Byers, Harris <Harris.Byers@stantec.com>; Jeanne Tarvin <jtarkin@ramboll.com>; Susan Petrofske <SPETROFSKE@ramboll.com>; Adam Tegen <ategen@manitowoc.org>
Subject: RE: 0236545108: RTC Site Investigation Work Plan Mirro Plant No. 9 (Former)

Good morning Paul,

The DNR has looked at the *Responses to WDNR's Comments on the Site Investigation Work Plan* submitted on February 16, 2021. The DNR concurs with most of the response to comments; however, the DNR does not concur with the response to comments for AMEC_MW-16A, GP-2, and the data gap areas. To provide further clarification, PCBs, PAHs, and/or VOCs have already been detected in these areas, so the intent of the additional investigation in these areas is to either to try to confirm if the

known contamination is still present above standards and/or to define degree and extent of the known contamination, not to determine if other source areas are present. Therefore, these areas will continue to be a concern for adequately defining degree and extent as is required by Wis. Admin. Code ch. NR 716.

If you have any questions, please feel free to contact me.

Regards,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Phone: (920) 510-3472

Tauren.Beggs@wisconsin.gov (preferred contact method during work at home)

From: Beggs, Tauren R - DNR

Sent: Thursday, February 18, 2021 8:50 AM

To: Paul Lindquist <PLINDQUIST@ramboll.com>

Cc: Kristin Jones (Kristin.Jones@newellco.com) <Kristin.Jones@newellco.com>; Kathleen McDaniel <kmcdaniel@manitowoc.org>; Rodriguez, Gabriel M. <grodriguez@schiffhardin.com>; Walton, Katherine S. <KWalton@schiffhardin.com>; Witte, Edward <nwitte@gklaw.com>; Byers, Harris <Harris.Byers@stantec.com>; Jeanne Tarvin <jtarvin@ramboll.com>; Susan Petrofske <SPETROFSKE@ramboll.com>; Adam Tegen <ategen@manitowoc.org>

Subject: RE: 0236545108: RTC Site Investigation Work Plan Mirro Plant No. 9 (Former)

Good morning Paul,

This email is to acknowledge that I received your submittal.

Thanks,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Phone: (920) 510-3472

Tauren.Beggs@wisconsin.gov (preferred contact method during work at home)

From: Paul Lindquist <PLINDQUIST@ramboll.com>

Sent: Tuesday, February 16, 2021 10:52 AM

To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>; Adam Tegen <ategen@manitowoc.org>

Cc: Kristin Jones (Kristin.Jones@newellco.com) <Kristin.Jones@newellco.com>; Kathleen McDaniel <kmcdaniel@manitowoc.org>; Rodriguez, Gabriel M. <grodriguez@schiffhardin.com>; Walton, Katherine S. <KWalton@schiffhardin.com>; Witte, Edward <nwitte@gklaw.com>; Byers, Harris <Harris.Byers@stantec.com>; Jeanne Tarvin <jtarvin@ramboll.com>; Susan Petrofske <SPETROFSKE@ramboll.com>

Subject: FW: 0236545108: RTC Site Investigation Work Plan Mirro Plant No. 9 (Former)

Good morning Tauren and Adam,

I hope you both are doing well and staying warm and healthy.

Ramboll, on behalf of Newell Operating Company (NOC), has prepared a response to comment letter (attached) for the Mirro Plant No. 9 (Former) (BRRTS: 02-36545108) facility to address comments made by the Wisconsin Department of Natural Resources (WDNR) in the *Review of Site Investigation Work Plan* letter received by NOC on November 17, 2020. The WDNR comments were evaluated prior to- and post-baseline groundwater sampling activities in order to effectively address potential work planned for the spring.

The response to comment letter has been uploaded to the WDNR portal and the confirmation e-mail of the upload is provided below.

Please let us know if you have any questions.

Paul Lindquist
Senior Consultant

D 262-901-3510
M 612-209-8676
plindquist@ramboll.com

From: Kelly Otis <kotis@ramboll.com>
Sent: Tuesday, February 16, 2021 10:36 AM
To: Paul Lindquist <PLINDQUIST@ramboll.com>
Subject: FW: 0236545108: Other

From: no-reply@wisconsin.gov <no-reply@wisconsin.gov>
Sent: Tuesday, February 16, 2021 10:36 AM
To: Kelly Otis <kotis@ramboll.com>
Subject: 0236545108: Other

Please do not reply to this email.

Dear Kelly Otis

Thank you for your submittal.

Confirmation Number: 33808
BRRTS #: 0236545108
Site Name: MIRRO PLT 9 (FORMER) - LGU
Type of Report: Other
Other document comments: Response to comments on SI Work Plan
Fee Amount:\$0
Name: Kelly Otis
Company: Ramboll US Corporation

Other DNR RR Contact:

This submittal contains:

- A workplan proposing or discussing a field investigation or sampling of PFAS.

Additional Information:

Please send the paper copy of your submittal to TAUREN BEGGS. Please see the [DNR staff directory](#) to look up the address.

A submittal is not considered complete until the fee (if applicable), paper and electronic copy of the document or report are received, per Wis. Admin. Code § NR 749.04 (1) and § NR 700.11 (3g) respectively.

For more information please see the [Guidance for submitting Documents to the Remediation and Redevelopment Program \(RR-690\)](#).

If you have questions please contact:

DENISE DANELSKI

denise.danelski@wisconsin.gov

(920) 510-4537

Be reminded that site investigations shall include an evaluation of hazardous substance discharges and environmental pollution including emerging contaminants in accordance with Wis. Admin. Code §NR 716.07, and evaluations shall be submitted as part of scoping to the Department in accordance with Wis. Admin. Code §NR. 716.09(2)(d).