

February 15, 2021

Jennifer Pelczar
Environmental Enforcement Specialist – Bureau of Law Enforcement
Wisconsin Department of Natural Resources
625 E County Road Y, Suite 700
Oshkosh, WI 54901

Re: ChemDesign Products, Inc.

Dear Ms. Pelczar:

ChemDesign Products, Inc. (ChemDesign) requests an amendment to our request for an extension to prepare a work plan submitted on February 12, 2021. We understand that DNR has discussed the work plan with Tyco Fire Products LP (Tyco) and that Tyco has again committed to WDNR to address the ChemDesign leased property. As we have previously communicated, ChemDesign is a tenant on the Tyco property. Under the terms of the lease, the site owner, Tyco, has taken the responsibility for completing the activities required by the DNR, and will continue to work with the DNR as part of Tyco's ongoing activities at the property.

Tyco is presently addressing PFAS compounds at the entire Tyco complex. We understand that Tyco submitted a workplan to the DNR on September 21, 2020, and that the DNR has not yet responded to that workplan. These issues will be addressed comprehensively by Tyco, and there is no basis for the DNR to require that two different parties address the same issue with the DNR on a single property, using different consultants.

Because Tyco is identified by the DNR as the "responsible party" for this address, is the site owner, and has submitted a workplan to the DNR to address the PFAS compounds, we request an extension of time until the DNR responds to Tyco's proposed workplan and to then provide ChemDesign the same amount of time to respond to DNR's response as given Tyco. At that time, we expect that Tyco will work with the DNR to address any issues in the workplan, and that it will continue to be unnecessarily disruptive and duplicative to require that ChemDesign also provide a workplan.

If you need any additional information, please give me a call at (715) 735-8267.

Sincerely,



David Mielke,
President and CEO