

From: Schultz, Josie M - DNR
Sent: Wednesday, September 9, 2020 11:24 AM
To: 'Mitch Hubert'
Cc: Pamela Havelka-Rivard; Beth Erdman
Subject: RE: [External] PFAS/PFOA/PFOS usage - The Solberg Co, BRRTS # 03-05584180

Hi Mitch,

Thank you for your e-mail on 8-27-2020. After review of the information provided, the department requests that you submit a site investigation workplan according to Wis. Admin. Code § NR 716.09 that includes an assessment of PFAS.

Per Wis. Admin. Code § NR 716.07(4), all environmental media affected or potentially affected by the contamination must be evaluated. Your workplan should include an assessment of all 36 PFAS compounds ([list can be found starting on Page 13](#)). Sampling results must be sent to the DNR within 10 days of receipt from the laboratory (Wis. Admin. Code § NR 716.14). Please keep in mind that depending upon the results of the sampling, it may be necessary to expand the sampling to define the degree and extent of the potential contamination. Included for your reference is a list of certified [laboratories](#).

Please let me know if you have any questions or concerns with the above information, and feel free to give me a call at 920-366-5685 if you would like to discuss.

Thank you,
Josie

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Josie M. Schultz

Hydrogeologist – Northeast Region Remediation and Redevelopment Team
Wisconsin Department of Natural Resources
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Josie.Schultz@Wisconsin.gov



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From: Mitch Hubert <mitch.hubert@perimeter-solutions.com>

Sent: Thursday, August 27, 2020 2:08 PM

To: Schultz, Josie M - DNR <josie.schultz@wisconsin.gov>

Cc: Pamela Havelka-Rivard <Pamela.Havelka-Rivard@perimeter-solutions.com>; Beth Erdman <berdman@generalengineering.net>

Subject: RE: [External] PFAS/PFOA/PFOS usage - The Solberg Co, BRRTS # 03-05584180

Hi Josie,

Thanks for sending that information over to us. It is good to have an idea of what analytes are important to WI DNR. We have been in contact with Pace Analytical here in the Green Bay area and they tell us they are working to get set up and certified to do the testing in their lab here rather than sending it out to their facility in NC.

Anyway, We use fluorochemicals from Dynax Corporation, Chemours (formerly DuPont), and Chemguard (part of Tyco/JCI). I have attached SDS's of the products we use as well as some technical information on the products.

Not all of the products that we produce contain all of the fluorochemicals in the attachments from above. The amount of total fluorine that is in our concentrates varies from about 0.30% to about 1.2% total fluorine depending on the type of foam concentrate and the intended mix ration of that concentrate with water.

I'd be happy to sit down with you and whomever from your office to explain more about how firefighting foams are formulated and produced and how an end user selects one type of foam over another. I'm also happy to explain anything you might like about firefighting foams in general.

All of the fluorinated foam concentrates that we use in our formulations are C6 based chemistry and all of these fluorochemicals are produced using the telomer process in contrast to the Electrofluorination process that 3M utilized in their Lightwater brand AFFF products. As such, we do not expect any PFOS or other Sulfonic Acids. We would expect to find PFHxA and, perhaps PFOA. PFHxA would be the primary analyte found and PFOA, if found at all, would be in very low levels (PPT).

I hope this helps.

I've included Beth Erdman from General Engineering in this email because, as you are aware, we have contracted with her to handle most of the leg work and report writing for the spill response and remediation.

Thanks and best regards,
Mitch Hubert
Technology Fellow
Perimeter Solutions

From: Schultz, Josie M - DNR <josie.schultz@wisconsin.gov>

Sent: Tuesday, August 25, 2020 1:07 PM

To: Mitch Hubert <mitch.hubert@perimeter-solutions.com>

Subject: [External] PFAS/PFOA/PFOS usage - The Solberg Co, BRRTS # 03-05584180

Hi Mitch,

I'm following up to the phone conversation we had a couple weeks ago regarding the Solberg Co. site located at 1520 Brookfield Ave, Howard, WI, and the chemicals used for fire suppression. As mentioned

during our conversation, please forward me the SDSs for any chemicals that may have been contained in the underground storage tank (UST) that overflowed and caused a release of petroleum product.

I also wanted to provide you with the PFAS compound list recommended by Wisconsin DNR, which includes 36 compounds and is included on page 15 and 16 of the document at this link:

<https://dnr.wi.gov/topic/LabCert/documents/EA-19-0001-C.pdf>

Please let me know if you have any questions or concerns moving forward.

Thank you,
Josie

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Josie M. Schultz

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