



May 1, 2025

Perimeter Solutions LP
Attn: Ms. Pamela Havelka-Rivard
1520 Brookfield Ave
Green Bay, WI 54313
Via Electric Mail Only to Pamela.havelka-rivard@perimeter-solutions.com

Subject: Review of Technical Assistance Request
The Solberg Co – Site 2, 1520 Brookfield Avenue, Village of Howard, Wisconsin
BRRTS #: 02-05-587486, FID #: 405227020

Dear Ms. Havelka-Rivard

This letter is written in response to a request for Technical Assistance (TA) submitted on your behalf by Carow Land Surveying & Environmental (CLSE). The TA request was received on April 14, 2025, by the Wisconsin Department of Natural Resources (DNR) with the \$700 review fee as required by Wisconsin Administrative Code § NR 749.04(1).

The property is an approximately 10-acre parcel that was historically used as agricultural land prior to the current facility's construction in May of 2011. The property currently has two buildings; the main building includes an office, laboratory, and production plant located on the western portion, and a fire-fighting testing building with a small contiguous mechanical building is located on the eastern portion of the property. The discharge of perfluoroalkyl and polyfluoroalkyl substances (PFAS) was discovered after DNR requested that groundwater be sampled and analyzed for PFAS in association with the closed The Solberg Co Site, BRRTS # 03-05-584180. DNR was notified of the PFAS contamination on March 3, 2021, and a new site, The Solberg Co – Site 2, BRRTS # 02-05-587486, was opened to investigate the PFAS contamination. To date, the site investigation has consisted of on-site and off-site groundwater monitoring and soil sampling.

The TA Request seeks DNR response and concurrence with the installation of two to three additional monitoring wells to further delineate contamination. The TA request also requests concurrence that the nearby residential potable wells do not require sampling as municipal water is planned to be installed, but the potable wells will not require abandonment.

Perimeter Solutions LP and CLSE also plan to evaluate the operations and/or construction of the production and fire testing buildings and how they may be contributing to groundwater contamination and whether remedial options are required.

DNR Response to TA Request

DNR has reviewed the current soil and groundwater data and concurs with the plan to evaluate additional sources, and concurs that potable well sampling is not required at this time, with the following comments:

- Recommend also installing piezometer(s) in the downgradient direction(s), to the north/northeast for deep groundwater sampling.
- Keep DNR updated on the planning and construction timeline for the municipal water line installation.

- Include locations of closest potable wells on future maps.
- Recently, the default direct contact soil RCLs for certain PFAS compounds were lowered based on updated toxicity data. Existing soil data for this site should be re-evaluated and compared to the current RCLs.
 - Refer to DNR's RCL Spreadsheet, RR-0151 for the current RCLs. The RCL Spreadsheet can also be used to calculate the Hazard Index and the Cumulative Cancer Risk, which can both be used as additional lines of evidence for evaluating potential human health risk from direct contact with PFAS-contaminated soil.

A site investigation workplan should be submitted to DNR including proposed monitoring well and piezometer locations. Depending on future analytical results or other findings, additional investigative or remedial activities may be required.

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at 920-366-5685 or josie.schultz@wisconsin.gov.

Sincerely,



Josie Schultz
Project Manager – Hydrogeologist
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

cc: Wally Moore, Perimeter Solutions d/b/a The Solberg Co (wally.moore@perimeter-solutions.com)
Brian Youngwirth, Carow Land Surveying & Environmental (brian@clse.pro)