

From: Paul Lindquist <PLINDQUIST@ramboll.com>
Sent: Friday, March 25, 2022 10:18 AM
To: Beggs, Tauren R - DNR
Cc: Kristin Jones (Kristin.Jones@newellco.com); Jeanne Tarvin; Susan Petrofske
Subject: BRRTS #: 02-36-588656 (MIRRO CO PLT 2 [Former])
Attachments: 02-36-588656_Env Consult Retention-Extention Request.pdf

Good morning Tauren,

Attached is a *Verification of Environmental Consultant Retention and Extension Request* letter prepared in response to WDNR's *Reported Contamination at Mirro Co. Plt2 (Former) – Responsibilities of Newell Brands, Inc.* letter dated February 25, 2022. This letter has also been uploaded to the WDNR RR Program Submittal Portal.

Please let us know if you have any questions.

Paul Lindquist

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Sent Via E-Mail

Mr. Tauren Beggs
Wisconsin Department of Natural Resources
2984 Shawano Avenue
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**VERIFICATION OF ENVIRONMENTAL CONSULTANT RETENTION
AND EXTENSION REQUEST FOR FORMER MIRRO PLANT NO. 2
2009 MIRRO DRIVE, MANITOWOC, WISCONSIN
WDNR BRRTS NO. 02-36-588656**

Dear Mr. Beggs:

Ramboll US Consulting, Inc. (Ramboll), on behalf of Newell Operating Company (NOC), is providing the Wisconsin Department of Natural Resources (WDNR) with this letter prepared in response to the *Reported Contamination at Mirro Co Plt 2 (Former) – Responsibilities of Newell Brands Inc.* letter issued to NOC on February 25, 2022¹. The purpose of this letter is to formally document NOC's retention of an environmental consultant, summarize NOC's planned immediate action activities, and formally request an extension associated with submission of an Wisconsin Administrative Code (WAC) NR 716 Site Investigation Work Plan (SI Work Plan).

March 25, 2022

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Verification of Environmental Consultant Retention

Ramboll has been retained as NOC's environmental consultant for assistance addressing the concerns identified in the WDNR's February 25, 2022 letter. Ramboll is in the process of reviewing available historic and recent documents pertaining to environmental investigations completed at the former Mirro Plant No. 2 property. As part of this effort, Ramboll anticipates requesting copies of WDNR files relating to the closed Bureau for Remediation and Redevelopment Tracking System (BRRTS) cases on the property and other information from the current property owner that is pertinent to properly scoping the WAC NR 716 site investigation for identified per- and polyfluoroalkyl substances (PFAS) impacts (e.g., soil boring logs, potentiometric surface maps, and historic site information).

Ref. P2722-22066

Immediate Action Activities

Ramboll will develop and submit an Immediate Action Work Plan (IA Work Plan) for performance of additional potable well sampling to evaluate the potential risk to nearby receptors. The IA Work Plan will outline the steps that NOC will take to secure access to the seven residences initially identified by the WDNR for sampling and will include resampling of the four homes sampled by the WDNR in December 2021 to verify the initial results. The IA Work Plan will be submitted to the WDNR

¹ A Responsible Party Letter was submitted to Tramontina U.S. Cookware, Inc. on February 25, 2022, outlining the same recommendations.



with the required review fees on or before April 11, 2022. WDNR's approval of the IA Work Plan will be requested prior to NOC contacting the homeowners for site access. The information gathered during implementation of the IA Work Plan will be utilized to determine next steps and also aid in development of the WAC NR 716 site investigation.

WAC NR 716 Site Investigation Work Plan

Following review of available historic documents and potable well sampling results, the SI Work Plan will be prepared and submitted to the WDNR. The scope of work will focus on the investigation of PFAS impacts to soil and groundwater that may be related to former Mirro operations at the property. Ramboll is formally requesting WDNR's approval to submit the SI Work Plan within 60 days after receipt of the results from the IA Work Plan or, if access is not secured to a majority of the seven residences, no later than June 25, 2022.

We appreciate your consideration of this request. If you have any questions, please feel free to contact us at the numbers or electronic mail addresses listed below.

Yours sincerely,

Paul D. Lindquist
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cc: Kristin Jones, NOC