

26 April 2022

Via email at [Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)

Tauren R. Beggs  
Project Manager  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources  
2984 Shawano Avenue  
Green Bay, WI 54313

**Subject: Reported Contamination at Mirro Co Plt 2 (Former) – Responsibilities of  
Tramontina U.S. Cookware, Inc. at 2009 Mirro Drive, Manitowoc, WI  
DNR BRRTS Activity # 02-36-588656  
DNR FID # 436106110**

Dear Mr. Beggs:

Geosyntec Consultants, Inc. (“Geosyntec”) on behalf of Akerman LLP (“Akerman”) and its client Tramontina U.S. Cookware, Inc. (“Tramontina”) is submitting this response to the Wisconsin Department of Natural Resources’ (“WDNR”) Responsible Party Letter, dated 25 February 2022, for the above-referenced site. The WDNR provided Tramontina with approval for a 30-day extension on 14 March 2022 extending the response deadline to 26 April 2022.

1. **Access to Information – Wis. Stat. § 292.31(1)(d):** *Within 30 days of this notification, by March 27, 2022, Tramontina shall provide the DNR with any information in its possession or control regarding any person who generated, transported, treated, stored or disposed of solid or hazardous waste, including hazardous substances or environmental pollution, which may have been disposed of at the site under investigation which relate to:*
  - *The type and quantity of waste generated, transported, treated or stored which was disposed of at the site or facility and the dates of these activities.*
  - *The identity of persons who generated, transported, treated or stored waste which was disposed of at the site or facility.*

- *The identity of subsidiary or parent corporations, as defined in Wis. Stat. § 292.31(8)(a)(3), of persons who generated, transported, treated or stored waste which was disposed of at the site or facility.*

**Tramontina’s Response:**

Geosyntec has performed a document review of site-specific operation and environmental reports provided by Tramontina and publicly available documents from the WDNR, with specific focus on documents that relate to operations that may have involved per- and polyfluoroalkyl substances (“PFAS”). The records that Geosyntec reviewed in preparing this response generally consisted of the following:

- Public documents for the property at 2009 Mirro Drive in Manitowoc, Wisconsin, that were accessible through the WDNR BRRTS database.
- Documents provided by Tramontina including:
  - Waste disposal records including non-hazardous, hazardous and universal waste profiles, manifests, waste stream classification, and disposal logs;
  - Wastewater permits, discharge monitoring reports, facility and process diagrams;
  - Spill Prevention Control and Countermeasure (“SPCC”) documents;
  - SARA 313 Reports; and
  - Other internal operational and environmental documents.

The records Geosyntec reviewed indicated that while manufacturing operations within the multiple buildings at the Property have been underway since at least 1956, Tramontina U.S. Cookware’s (parent corporation) operations have been limited to the relatively short and recent period of 2006 to 2019 and only within a leased portion of Plant 5—no Tramontina manufacturing operations appear to have occurred within Plant 2 or other areas of the site. In addition, the reviewed documents indicate that raw materials used by Tramontina were stored and managed properly and waste from the manufacturing processes during Tramontina’s operations was properly handled, treated or disposed of at off-site facilities including the Manitowoc Wastewater Treatment Plant (“WWTP”), commercial landfills, and recycling facilities. The available documents did not indicate that Tramontina disposed of PFAS-containing material in the areas they operated within

Plant 5. Overall, Tramontina's operations do not appear to be a significant source of the PFAS releases that have been detected at the site.

- 2. **Immediate Actions – NR 708.09:** The law requires you to take any immediate actions, including sampling and addressing potable water sources, needed to halt and minimize harmful effects, unless you are otherwise directed by the DNR, and to submit documentation describing immediate actions and outcomes within 45 days after the initial hazardous substance discharge notification is given to the DNR. A final immediate action report should be submitted in accordance with Wis. Admin. Code § NR 708.09.*

**Tramontina's Response:**

On 7 April 2022, Ramboll US Consulting, Inc. ("Ramboll") on behalf of Newell Operating Company ("Newell"), submitted an Immediate Action Work Plan ("Work Plan") for the former Mirror Plant 2 Facility to the WDNR. The Work Plan details the sampling of seven potable water wells in the vicinity of the site; four of the proposed wells were previously sampled by the WDNR and three wells are new. At this time, Tramontina concurs with Newell's Immediate Action Plan and does not believe it is necessary to duplicate Newell's efforts. Tramontina will evaluate data collected by Newell to inform scoping and Work Plan submittal.

- 3. **Scoping and Work Plan Submittal – NR 716.07 and 716.09:** The law requires that you appropriately scope your site investigation and submit a work plan within 60 days of this notification, by April 26, 2022, for completing a site investigation. The work plan must comply with the requirements in Wis. Admin. Code, chs. NR 700-799. For additional assistance, the DNR has extensive guidance on its website at [dnr.wi.gov](http://dnr.wi.gov), search "site investigation scoping."*

**Tramontina's Response:**

In accordance with the WDNR approved 30-day extension, Tramontina will assess the need for a Work Plan that complies with the requirements of the Wis. Admin. Code, chs. NR 700-799 by 26 May 2022.

- 4. **Steps 4 through 10: Field Investigation – NR 716.11; Sample Results Notification Requirements – NR 716.14; Site Investigation Report – NR 716.15; Remedial Actions***

Tauren R. Beggs  
26 April 2022  
Page 4

**Options Report – NR 722; Remedial and Interim Action Design, Implementation, Operation, Maintenance and Monitoring Reports – NR 724; Notification of Residual Contamination or Continuing Obligations – NR 725; and Semi-Annual Reporting – NR 700.11.**

**Tramontina’s Response:**

Tramontina will comply with the requirements of the applicable sections of Wisconsin Administrative Code Chapters NR 700, NR 716, NR 722, NR 724 and NR 725 with regard to investigation and remediation activities that may need to be completed at the property. Tramontina will comply with the schedules and scope items, where applicable, described in the WDNR’s 25 February 2022, letter.

Please contact Emma MacAlister ([emacalister@geosyntec.com](mailto:emacalister@geosyntec.com), 414.918.7483) if you have questions regarding this response or if you would like to request further information regarding Tramontina’s operations at the site.

Sincerely,



Emma MacAlister, RG (Missouri)  
Project Geologist



Jeff Tracy, PG (Wisconsin)  
Principal Geologist

**Copies:**

Marcelo Borges, Tramontina U.S. Cookware  
Sarah Campbell Smith, Akerman  
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