

From: Beggs, Tauren R - DNR
Sent: Friday, May 13, 2022 12:09 PM
To: Kristin Jones (Kristin.Jones@newellco.com)
Cc: Jeanne Tarvin; Paul Lindquist; Rodriguez, Gabriel M.; tom.testwuide@skanaaluminum.com
Subject: Immediate Action Work Plan Response Letter for Mirro Co Plt 2 (Former), BRRTS # 02-36-588656
Attachments: 20220513_36_SIWP_Appr.pdf

Good afternoon Kristin,

Attached is the electronic version of the Immediate Action Work Plan Response Letter for the above referenced site. Please let me know if you would like a paper copy.

If you have any questions, please feel free to contact me.

Regards,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Hydrogeologist & Northeast Region Land Recycling Expert

Remediation and Redevelopment Program

Wisconsin Department of Natural Resources

2984 Shawano Ave

Green Bay, WI 54313

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Tauren.Beggs@wisconsin.gov (preferred contact method during work at home)

dnr.wi.gov



May 13, 2022

Newell Operating Company
Attn: Kristin Jones
6655 Peachtree Dunwoody Road
Atlanta, GA 30328
Via electronic mail to Kristin.Jones@newellco.com

Subject: Review of Immediate Action Work Plan
Mirro Co Plt 2 (Former), 2009 Mirro Drive, Manitowoc, WI
BRRTS #: 02-36-588656, FID #: 436106110

Dear Ms. Jones:

On April 11, 2022, the Wisconsin Department of Natural Resources (DNR) received the *Immediate Action Work Plan* (IA Work Plan) prepared by Ramboll US Consulting, Inc. (Ramboll), on behalf of Newell Operating Company (Newell). The IA Work Plan was submitted with a fee for DNR review and response. The submittal of this IA Work Plan is required per Wis. Admin. Code § NR 716.09, as this site is subject to regulation under Wis. Stat. ch. 292. The DNR reviewed the IA Work Plan for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and has determined that the general code requirements have been met with additional comments as provided in this response letter.

IA Work Plan Summary

Ramboll submitted this IA Work Plan to conduct off-site potable well sampling for per- and polyfluoroalkyl substances (PFAS) at seven properties. Four of the seven properties had their potable wells previously sampled by the DNR. Ramboll will prepare a brief data transmittal letter with sampling results to both DNR and private potable well owners. Following completion of the IA Work Plan, an Immediate Action Documentation Letter Report will be prepared and submitted to the DNR.

DNR Review of the IA Work Plan

The DNR has reviewed and concurs with the IA Work Plan with the following comments:

- The DNR concurs with your alternative sampling results notification from 10 days to 15 days, which is approvable on a case-by-case basis under Wis. Admin. Code § NR 716.14(3).
- DNR recommends that the results be compared to Department of Health Services (DHS) Cycle 10 and 11 recommended health advisory levels and property owners with PFAS results from their potable well above those levels be provided an alternative clean water source.

Depending on the results of the potable well sampling, additional sampling may be needed.

Schedule

The submitted IA Work Plan included a schedule that access requests will be initiated no later than 15 days following DNR's approval of the IA Work Plan. Once access is granted, sampling will occur based on the property owner's availability. Laboratory data will be provided to the DNR within 15 business days of receipt of the analytical reports by the laboratory. The Immediate Action Documentation Letter Report will be submitted to the DNR within 60 days following the substantial completion of potable well sampling activities and receipt of laboratory analytical data. A NR 716 Site Investigation Work Plan will be submitted within 60 days after receipt of the laboratory analytical results from the IA Work Plan or, if access is not secured to a majority of the seven properties, no later than June 25, 2022.

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) 510-3472 or at Tauren.Beggs@wisconsin.gov.

Sincerely,



Tauren R. Beggs
Northeast Region Project Manager
Remediation and Redevelopment Program
Department of Natural Resources

cc: Jeanne Tarvin, Ramboll (jtarkin@ramboll.com)
Paul Lindquist, Ramboll (plindquist@ramboll.com)
Gabriel Rodriguez, ArentFox Schiff, LLP (grodriguez@afslaw.com)
Tom Testwuide, Skana Aluminum (tom.testwuide@skanaaluminum.com)