

From: Beggs, Tauren R - DNR
Sent: Friday, November 3, 2023 2:38 PM
To: marcelo.borges@tramontina.com
Cc: Jeff Tracy; sarah.campbellsmith@akerman.com;
otavio.carneiro@akerman.com; kate.quelch@akerman.com; Kristin Holloway
Jones (kristin.jones@newellco.com); Paul Lindquist;
tom.testwuide@skanaaluminum.com
Subject: Review of Site Investigation Work Plan Addendum with Comments for Mirro
Co Plt 2 (Former), BRRTS # 02-36-588656
Attachments: 20231103_36_SIWP_Appr.pdf

Good afternoon Mr. Borges,

Attached is the Review of Site Investigation Work Plan Addendum letter with comments for the above referenced site. If you have any questions, please let me know.

Regards,

We are committed to service excellence.

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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



November 3, 2023

Tramontina U.S. Cookware, Inc.
Attn: Marcelo Borges
12955 West Airport Blvd
Sugar Land, TX 77478
Via Electronic Mail Only to marcelo.borges@tramontina.com

Subject: Review of Site Investigation Work Plan Addendum
Mirro Co Plt 2 (Former), 2009 Mirro Drive, Manitowoc, Wisconsin 54220
BRRTS #: 02-36-588656; FID #: 436106110

Dear Mr. Borges:

On September 27, 2023, the Wisconsin Department of Natural Resources (DNR) received the Site Investigation Work Plan Addendum (SIWP) prepared by Geosyntec Consultants (Geosyntec) on behalf of Tramontina U.S. Cookware, Inc. (Tramontina). The SIWP was submitted with a fee for DNR review and response. The submittal of a Site Investigation Work Plan (SIWP) is required per Wisconsin Administrative (Wis. Admin.) Code § NR 716.09, as this site is subject to regulation under Wisconsin Statute (Wis. Stat.) ch. 292. The DNR reviewed the SIWP 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.

Background

After notification of perfluoroalkyl and polyfluoroalkyl substances (PFAS) contamination found in soil and groundwater at the site in October 2021 due to the manufacturing of aluminum cookware products, site investigation activities have been ongoing both on and off-site. To date, Tramontina and Geosyntec have been completing on-site investigation activities to supplement previous sampling completed by TRC and AECOM. PFAS contamination was detected in soil and groundwater on-site. PFAS concentrations were above the Wisconsin Department of Health Services (DHS) recommended Wis. Admin. Code ch. NR 140 enforcement standard (ES) for perfluorooctanoic acid (PFOA) at nearly every groundwater sampling location on-site. Newell Operating Company and their consultant Ramboll US Consulting, Inc. have been completing off-site sampling of potable wells at surrounding properties. Based on the site investigation completed to date by both companies and their consultants, off-site investigation was warranted.

SIWP Summary

The objective of the SIWP is to assess the degree and extent of PFAS impacts to groundwater off-site and evaluate potential off-site migration. The scope of the SIWP includes:

- Installation of five borings to approximately 15 feet below ground surface to install permanent monitoring wells. No soil samples are planned to be collected.
- Describe lithology at each boring location based on the soil borings.
- Depth to water measurements will be completed prior to sampling each monitoring well.
- Collect and analyze one groundwater sample from each monitoring well for 33 PFAS compounds.
- The site investigation findings and conclusions will be documented in a Site Investigation Report.

DNR Review of the SIWP

Following the DNR's review of the SIWP, the DNR requests that you proceed with the proposed work, while incorporating the following comments to further evaluate potential impacts to all applicable environmental media and potential receptors per Wis. Admin. Code § NR 716.07:

- Add a monitoring well location to the southeast of the site since south-southeast is the primary groundwater flow direction.
- Add a monitoring well location upgradient off-site to the west of temporary well TW-22 due to PFOA detections in groundwater of 2,220 ng/L.
- Move the proposed northern monitoring well location further east to better align with a potential more eastern groundwater flow direction and the 2722 Woodland Drive property.
- Provide utilities and utility laterals on future figures.
- Provide locations of any sumps inside the facility and consider sampling those.
- Recommend an evaluation of the potential need for piezometers to define degree and extent of groundwater contamination.
- Surface water in the pond may need to be evaluated as part of the investigation.
- Recommend providing scoping for any other emerging contaminants (e.g. 1,4-dioxane) that may be applicable.

Other DNR Comments

1. The site investigation is an iterative process and depending upon the sampling results, it may be necessary to expand the sampling to define the degree and extent of the contamination. A comprehensive site investigation report needs to be submitted when the investigation is complete.
2. As indicated in the SIWP, sampling results must be sent to the DNR and property owners, including owners of off-site properties, from which samples have been collected, within 10 days of receipt (Wis. Admin. Code § NR 716.14).
3. All Wis. Admin. Code ch. NR 700 series submittals must be submitted in an electronic version.
4. Wis. Admin. Code ch. NR 700 semi-annual progress reports are required until the case is closed.

Schedule

The submitted SIWP includes a schedule that field activities will be conducted in the fourth quarter of 2023 with a Site Investigation Report submitted to DNR within 60 days after receipt of the groundwater sampling laboratory results.

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

cc: Jeff Tracy, Geosyntec Consultants (JTracy@Geosyntec.com)
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