

From: Rodriguez, Gabriel M. <gabriel.rodriguez@afslaw.com>
Sent: Friday, April 22, 2022 3:52 PM
To: Beggs, Tauren R - DNR
Subject: Bright Horizons Properties LLC - Two Rivers
Attachments: 4 22 2022 Letter to DNR.pdf

Please see the attached letter.



Gabriel M. Rodriguez

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NEW EMAIL ADDRESS

My new email address is gabriel.rodriguez@afslaw.com

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April 22, 2022

VIA E-MAIL

Tauren Beggs
Remediation and Development Program
Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313

Re: Reported Contamination at Bright Horizons Properties LLC (Former) - Responsibilities of Newell Operating Co. at 1621 14th Street (formerly 1702 13th Street), Two Rivers, WI
DNR BRRTS Activity # 02-36-589295
DNR FID # 436010300

Dear Mr. Beggs:

We are the attorneys for Newell Operating Co. (“the Company”) regarding the above-referenced matter. This is the Company’s response to the DNR’s March 25, 2022 letter.

The letter indicates that DNR is in possession of information indicating that the Company is responsible for “the discharge of a hazardous substance or other pollution” at the site referenced above. The letter goes on to state that “Newell purchase and operated” the facility, and that contaminants found on the site “are associated with the operations of aluminum cookware manufacturing.” Based on this information, the letter concludes that the Company is a “causer.”

We have not been provided with the information referenced in the March 25, 2022 letter. We have reviewed documents on the BRRTS site for this facility and did not find information supporting the conclusion that the Company caused a discharge at the facility. We note that the documents appear to suggest releases by Eggers Industries.

We have searched the Company’s records for documents responsive to the information request set forth in the March 25, 2022 letter. We have found none.



Tauren Beggs
Page 2
April 22, 2022

Please let us know if DNR has any information it can share with us regarding its conclusion that the Company caused a discharge of hazardous substances at this facility.

Sincerely,

A handwritten signature in black ink that reads "Gabriel M. Rodriguez".

Gabriel M. Rodriguez

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