

Sent Via E-Mail

Mr. Tauren Beggs
Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313-67270

**VERIFICATION OF ENVIRONMENTAL CONSULTANT RETENTION
AND FOCUSED WAC NR 716 SITE INVESTIGATION WORK PLAN
SUBMISSION SCHEDULE
1621 14TH STREET (FORMERLY 1702 13TH STREET), TWO RIVERS, WI
WDNR BRRTS NO. 02-36-589295**

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 Bright Horizon Properties LLC (Former) – Responsibilities of Newell Operating Co.* letter (the "RP letter") issued to NOC on March 25, 2022¹. The purpose of this letter is to formally document NOC's retention of an environmental consultant, request environmental investigation documentation or data collected to date by the current property owner, and communicate the anticipated delivery date of a Wisconsin Administrative Code (WAC) Focused NR 716 Site Investigation Work Plan (Focused SI Work Plan).

June 14, 2022

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Verification of Environmental Consultant Retention

Ramboll has been retained as NOC's environmental consultant for assistance in connection with the WDNR's March 25, 2022 letter. NOC, through its legal counsel, ArentFox Schiff LLP (AFS), responded to the RP letter on April 22, 2022. The response specifies that NOC is not aware of a documented discharge at the facility nor had it located records indicating a discharge occurred. It is Ramboll's understanding that two follow-up telephone discussions between AFS and WDNR were completed on May 4, 2022 and June 3, 2022, during which WDNR requested that NOC investigate solely polychlorinated biphenyls (PCBs) and volatile organic compounds (VOCs). Ramboll is in the process of gathering information and reviewing available historic and recent documents pertaining to environmental investigations completed at the former Bright Horizon Properties LLC property.

Ref. 1690026868

Environmental Information Request

As a follow-up to our June 7, 2022 telephone conversation, Ramboll would like to request WDNR's assistance in securing files not currently available on Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW) relating to the continuing investigation activities completed on the property by Fehr Graham on behalf of the current property owner that may be pertinent to properly scoping the WAC NR 716 site investigation (e.g., additional groundwater analytical

¹ A Responsible Party Letter was also submitted to West River Lofts, LLC on March 4, 2022, outlining the same recommendations.

data, potentiometric surface maps, and test pit documentation). We appreciate your assistance regarding this matter.

WAC Focused NR 716 Site Investigation Work Plan Submittal Schedule

Following review of pertinent documents made available to Ramboll of environmental activities completed at the former Bright Horizon Properties, LLC site, the Focused SI Work Plan will be prepared and submitted to the WDNR. Based on prior discussions between NOC's legal team and the WDNR, the scope of work will be limited to further delineating VOCs and PCBs impacts previously identified at the site by others, although it is unclear at this time whether the identified VOC and PCB impacts are related to former Mirro operations at the property, which was sold to Eggers Industries (now VT Industries) in 1984. As agreed upon during our call on June 7, 2022, Ramboll intends to submit the Focused SI Work Plan on or before July 15, 2022.

If you have any questions, please feel free to contact us at the numbers or electronic mail addresses listed below.

Yours sincerely,



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