

From: Beggs, Tauren R - DNR
Sent: Friday, December 1, 2023 2:24 PM
To: Kristin Holloway Jones (kristin.jones@newellco.com)
Cc: Paul Lindquist; Susan Petrofske; Rodriguez, Gabriel M.; Sawula, Andrew N.
Subject: Status Update Request Letter for Bright Horizon Properties LLC (Former),
BRRTS # 02-36-589295 (Former Mirro Plant 4)
Attachments: 20231201_99_Status_Update_Req_Ltr.pdf

Good afternoon Kristin,

Attached is a letter for the above referenced site requesting that Newell provide a status update outlining next steps and scheduling for submittal of a work plan by January 30, 2024.

If you have any questions, please let me know.

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

Phone: (920) 510-3472

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

dnr.wi.gov



December 1, 2023

Newell Operating Company
Attn: Kristin Holloway Jones
Director of Environmental Affairs
6655 Peachtree Dunwoody Road
Atlanta, GA 30328
Via Electronic Mail Only to kristin.jones@newellco.com

Subject: **Status Update Request**
Bright Horizon Properties LLC (Former), 1621 14th Street (Formerly 1702 13th
Street), Two Rivers, WI
DNR BRRTS Activity # 02-36-589295
DNR FID # 436010300

Dear Ms. Holloway Jones:

On March 25, 2022, the Wisconsin Department of Natural Resources (DNR) notified Newell Operating Company (NOC) of their legal responsibilities as a causer under Wisconsin Statute (Wis. Stat.) § 292.11 to investigate the degree and extent of the hazardous substance discharge(s) on the above-referenced site. Site investigation activities have been ongoing throughout 2022 and 2023 to meet requirements of Wisconsin Administrative (Wis. Admin.) Code NR 700 to 799 and as preparation for redevelopment primarily by the property owner West River Lofts, LLC, who is also a responsible party due to possession or control of the contamination as the current owner.

For redevelopment and remedial action at the site, a remedial action/materials management plan and subsequent addendum (RAP/MMP), and a sub-slab vapor mitigation system design, vapor port design, and vapor sampling technical assistance request and subsequent addendums (technical assistance request) were submitted by Fehr Graham, on behalf of West River Lofts, LLC, in March 2022 and June 2023. The DNR issued an approval letter for the RAP/MMP on June 29, 2023, and a response letter to the technical assistance request on July 14, 2023, to move forward with the proposed vapor work.

On October 30, 2023, DNR received notification of perfluoroalkyl and polyfluoroalkyl substances (PFAS) contamination in groundwater from Fehr Graham, on behalf of West River Lofts, LLC. The DNR indicated in the RAP/MMP approval letter that additional investigation is still needed under Wis. Admin. Code ch. NR 716 and additional remedial action may be needed under Wis. Admin. Code chs. NR 722 and/or NR 724.

The DNR requests that you work with the other responsible party, West River Lofts, LLC, to provide a written status update outlining the next steps planned to be taken in the Wis. Admin. Code ch. NR 700 process and schedule for submittal of a work plan by **January 30, 2024**.

As a causer responsible party for the hazardous substance discharge(s), NOC has the legal responsibility under Wis. Stat. § 292.11 to investigate and clean up contamination resulting from the hazardous substance discharges. The DNR will work with NOC and West River Lofts, LLC, to move this site towards closure.

The DNR appreciates your cooperation and looks forward to an update regarding this site. If NOC has any questions regarding the site or this letter, please contact me at (920) 510-3472 or at Tauren.Beggs@wisconsin.gov.

Sincerely,



Tauren R. Beggs
Hydrogeologist
Remediation & Redevelopment Program
Northeast Region

cc: Paul Lindquist, Ramboll (plindquist@ramboll.com)
Susan Petrofske, Ramboll (spetrofske@ramboll.com)
Andrew Sawula, Arent Fox Schiff (andrew.sawula@afslaw.com)
Gabriel Rodriguez, Arent Fox Schiff (gabriel.rodriguez@afslaw.com)