

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Tony Evers, Governor

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Toll Free 1-888-936-7463
TTY Access via relay - 711



April 24, 2024

Wausau Paper Corp.
Wausau Paper Mills, LLC
Essity North America, Inc.

c/o Corporation Service Company
33 E. Main St., Ste 610
Madison, WI 53703

c/o Legal Counsel
2929 Arch Street, Ste 2600
Philadelphia, PA 19104

To Whom It May Concern:

The Wisconsin Department of Natural Resources (DNR) is investigating per- and polyfluoroalkyl substances (PFAS) contamination in and around the Town of Stella in Oneida County, Wisconsin. The DNR seeks to better understand where PFAS-containing solid waste may be located or has been discharged and therefore is requesting information related to the generation, transportation, treatment, storage and/or disposal of PFAS at sites or facilities within a three mile radius of the Village of Starks, located in the Town of Stella (“Sites or Facilities”). PFAS contamination has been found in various areas in and around the Town of Stella and appears to be most concentrated in the areas to the north, south, and west of the Village of Starks. As of April 2024, 56 private wells have reported concentrations of PFAS that are greater than the 2019 Department of Health Services recommended health guidelines. To ensure that the DNR has as much information as possible regarding the PFAS contamination, the DNR requests the information specified below from Wausau Paper Corp. and Wausau Paper Mills, LLC (collectively, “Wausau Paper”), pursuant to Wis. Stat. § 292.31(1)(d).

For the purposes of this information request, “PFAS-containing solid waste” means solid waste containing or potentially containing PFAS that was generated, produced, handled, processed, transported, treated, stored, or disposed of by Wausau Paper or its parents or subsidiaries, as defined in Wis. Stat. § 292.31(8)(a)3., including but not limited to Essity North America, Inc. “PFAS-containing solid waste” includes containers which at any time contained PFAS or PFAS-containing solid waste and industrial sludges. “Dispose” or “disposal” is defined in Wis. Admin. Code § NR 700.03(14) to mean “the discharge, deposit, injection, dumping, spilling, leaking or placing of any solid or hazardous waste into or on any land or water in a manner which may permit the waste to be emitted into the air, to be discharged into any waters of the state or otherwise to enter the environment.” A discharge includes landspreading activities of PFAS-containing industrial sludges or other materials.

Please provide any information, records or documents regarding Sites or Facilities within three miles of the Village of Starks in the custody, possession or control of Wausau Paper and/or Essity North America, Inc., as follows:

1. The type and quantity of PFAS-containing solid waste that Wausau Paper generated, transported, treated, stored, or disposed of at the Sites or Facilities and the dates of these activities, and related documents including, but not limited to, PFAS technical reports, PFAS sampling data, PFAS data and analyses, PFAS emissions estimates or calculations as well as emissions modeling data, PFAS usage estimates per

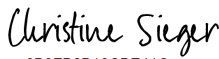
year for any process or function at any of these locations, and any hazardous waste manifests or other waste documents which list PFAS-containing solid waste.

2. The identity of all persons, as defined in Wis. Stat. § 292.01(13), who generated, transported, treated or stored waste which was disposed of at the Sites or Facilities.
3. The identity of subsidiary or parent corporations, as defined in Wis. Stat. § 292.31(8)(a)3., of persons who generated, transported, treated, stored, or disposed of PFAS-containing solid waste at the Sites or Facilities.

Within 60 days of receipt of this notice, please provide Meg Schaeffer-Utter at 101 S. Webster St., Box 7921, Madison, WI 53707-7921 (mege.schaefferutter@wisconsin.gov) with all information, records and documents responsive to the above requests. Documents are to be provided in electronic form in USB storage drives, per Wis. Admin. Code § NR 700.11(3g). Please also include the name and contact information for the Wausau Paper designated point of contact(s) for this matter so DNR staff can follow up with the appropriate person(s). If you have any questions, please contact Attorney Audra Felix at 608-640-6395 or by email at audra.felix@wisconsin.gov.

Sincerely,

DocuSigned by:



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Christine Sieger

Remediation and Redevelopment Program Director
Wisconsin Department of Natural Resources

4/25/2024 | 7:55 AM CDT