

June 28, 2024

VIA EMAIL AND U.S. MAIL

Meg Schaeffer-Utter
Audra Felix
101 South Webster St. Box 7921
Madison, Wisconsin 53707-7921
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Re: Response to April 24, 2024 Request for Information to
Wausau Paper Corp. and Others Pursuant to Wis. Stat. § 292.31(1)(d) (“Request”)

Dear Ms. Schaeffer-Utter and Ms. Felix:

Fredrikson & Byron P. A. represents Wausau Paper Corp. and Wausau Paper Mills, LLC (together “Wausau Paper”) as well as Essity North America Inc. (“Essity,” and together with Wausau Paper, “Respondents”), and we write to provide a response to the Wisconsin Department of Natural Resources’ (“DNR”) Request regarding PFAS-containing solid waste at and near a paper mill in Rhinelander, Wisconsin (the “Mill”).

DNR seeks “any information, records or documents regarding Sites or Facilities within three miles of the Village of Starks in the possession or control of Wausau Paper and/or Essity North America, Inc.” regarding the three topics below. Upon receipt of the Request, we worked with Respondents to perform a reasonably diligent inquiry, including a reasonably diligent search for documents, to identify responsive information and materials. These responses are based on the information reasonably available at this time and do not include documents and information that DNR provided in response to public records requests. Respondents reserve the right to supplement these responses if new information becomes available that DNR does not otherwise have.

By way of background, Wausau Paper historically owned and operated the Mill, and from time-to-time paper sludge was land applied pursuant to DNR approval and permitting. In 2013, Wausau Paper sold the Mill to a predecessor company of the Mill’s current operator, Ahlstrom Rhinelander LLC (“Ahlstrom”). In 2016, Essity (previously known as SCA Americas Inc.) acquired Wausau Paper at a time when Wausau Paper no longer owned or operated the Mill and thus no longer generated, transported, treated, stored, or disposed of any waste at the Sites or Facilities per the Request. As such, Essity at no point generated, transported, treated, or stored waste at the Sites or Facilities.

Respondents further respond to the Request 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.

Based on a reasonably diligent inquiry, which is ongoing, Wausau Paper has not located responsive, non-privileged documents or information in response to this Request. Since selling the Mill, Wausau Paper no longer has access to records located at the Mill that may address subjects in this Request. Nor does Wausau Paper possess records or information demonstrating that any solid waste it may have historically generated, transported, treated, or stored at Sites or Facilities contained any PFAS. Respondents reserve the right to supplement this response.

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.

Based on a reasonably diligent inquiry, which is ongoing, Wausau Paper refers to itself and the following other persons whose identities may be responsive to this Request, including persons who were involved in the historic operations of the Mill: St. Regis Paper Company; Monarch Paper Corporation; Rhinelander Paper Company; Lake States Yeast LLC; Specialty Papers Acquisition, LLC; Expera Rhinelander, LLC; Ahlstrom-Munksjo Rhinelander LLC; and Ahlstrom. Respondents reserve the right to supplement this response.

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.

Based on a reasonably diligent inquiry, which is ongoing, Wausau Paper has not located responsive, non-privileged materials in response to this Request. Wausau Paper has not located records or information indicating the solid waste it generated, transported, treated, stored, or disposed of at the Sites or Facilities contained PFAS. Respondents reserve the right to supplement this response.

Should DNR have additional questions, please contact the undersigned.

Sincerely,



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