ENVIRONMENT
& HEALTH

Mr. Kevin McKnight
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
625 E. County Road Y, Suite 700
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**SEDIMENT INVESTIGATION WORK PLAN ADDENDUM**
**FORMER MIRRO PLANT NO. 20 SITE**
**44 WALNUT STREET, CHILTON, WISCONSIN**
**BRRTS NOS. 02-08-520157 (ERP) AND 06-08-426946 (VPLE)**

December 1, 2025

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Ref. 1690019558

Dear Mr. McKnight:

Ramboll Americas Engineering Solutions, Inc. (Ramboll), on behalf of Newell Operating Company (NOC), has prepared this *Sediment Investigation Work Plan Addendum* ("Work Plan Addendum") for the former Mirro Plant No. 20 facility located at 44 Walnut Street in Chilton, Wisconsin (the "facility" or "site"). The objective of the Work Plan Addendum is to further delineate the lead concentration detected in sample SED-04 during the October 2025 sampling event. The results of the October 2025 sampling were provided to the Wisconsin Department of Natural Resources (WDNR) in an NR 716.14 data transmittal on November 4, 2025, and further discussed during a November 19, 2025, telephone call. During this call, the WDNR requested that an additional sample be collected downstream of sample SED-04 to delineate the lead detection collected near the north outfall.

The following describes the proposed additional sampling activities. The sampling will be performed following the same procedures outlined in the May 2025 *Sediment Investigation Work Plan* as approved by the WDNR in their letter dated July 25, 2025. Proposed sample locations referenced herein are shown on the attached Figure 1.

- Visually inspect and check for the presence of soft sediment using a poling rod at two points along Transects 04A through 04D. The location of each transect point will be surveyed with a real time kinematic global positioning system (RTK-GPS). Sample locations may be adjusted in the field based on the observations made.
- Select one location along each transect for sample collection. The location with a greater accumulation of soft sediment/finer material present at each transect will be selected for collection of a discrete sediment sample.
- Submit one sediment sample (SED-04A) collected downstream of existing SED-04 location. The sample will be collected from the 0 to 0.25 feet below the top of sediment along Transect-04A and submitted to a Wisconsin-certified laboratory for total lead analysis.
- Collect three additional contingent sediment samples (SED-04B, SED-04C, and SED-04D) further downstream of SED-04A for potential analysis. All contingent sediment samples will be held at the laboratory. If SED-04A has a concentration

of total lead above the Consensus-Based Sediment Quality Guidelines (CBSQGs) Midpoint Effect Concentration (MEC), then SED-04B will be analyzed. This iterative process will be utilized to determine the need for subsequent sample analysis.

- Document the additional sediment investigation results in a letter report to the WDNR.

As detailed in the May 2025 *Sediment Investigation Work Plan*, physical characteristics of each sediment sample will be classified in the field based on visual observations. Grain size analysis samples are proposed to be collected only if field conditions are observed to be substantially different than conditions observed during the October 2025 sampling event.

The additional sediment sampling has been tentatively scheduled for December 10 or 11, 2025. Should field conditions not be favorable for sediment sample collection (i.e., ice present), the sampling may need to be delayed until Spring/Summer 2026.

Please let us know if you have any questions regarding this Work Plan Addendum. We appreciate your continued assistance in achieving regulatory case closure under the VPLE Program.

Yours sincerely,

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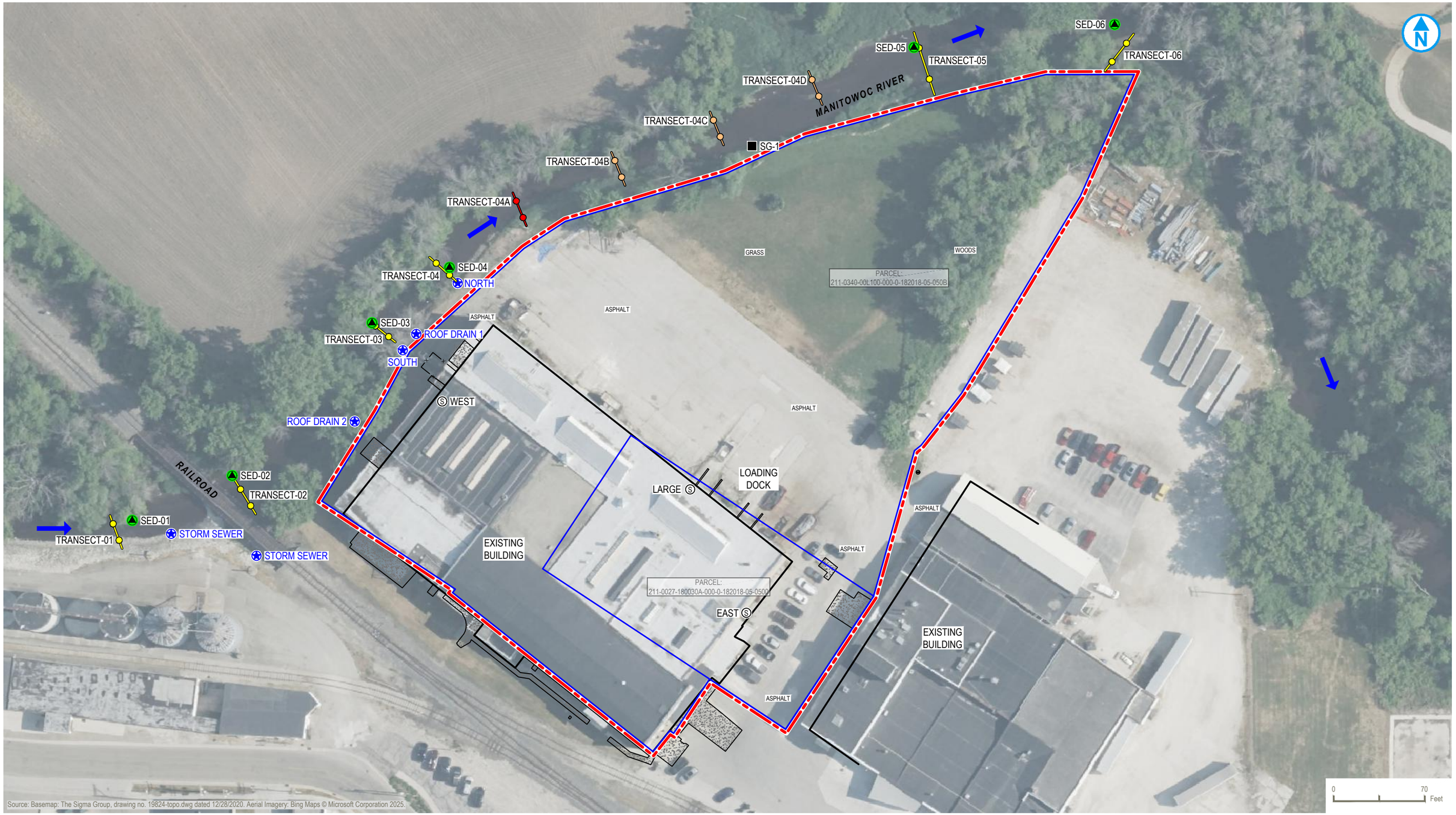
cc: Kristin Jones, Newell (electronic copy)
Hudson Green, Patriot (electronic copy)
Sean Fraser, Fraser Properties, LLC (electronic copy)
Sarah Krueger, WDNR (electronic copy)

**Attachment**

Figure 1 – Proposed Additional Sediment Sampling Locations

# ATTACHMENT

## FIGURE 1 – PROPOSED ADDITIONAL SEDIMENT SAMPLING LOCATIONS




Source: Basemap: The Sigma Group, drawing no. 19824-topo.dwg dated 12/28/2020. Aerial Imagery: Bing Maps © Microsoft Corporation 2025.

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DESIGNER: HJW/CKLAI

DATED: 11/25/2025

PROJECT: 1690019558-001

LEGEND

- PROPERTY BOUNDARY
- PARCEL BOUNDARY
- SUMP PIT
- STAFF GAUGE
- OUTFALL
- CHAIN LINK FENCE
- CONCRETE AREA
- SEDIMENT MEASUREMENT LOCATION (OCTOBER 2025)
- SEDIMENT TRANSECT PROPOSED SAMPLE LOCATION (OCTOBER 2025)
- MANITOWOC RIVER FLOW DIRECTION
- SEDIMENT SAMPLE AND MEASUREMENT LOCATION (OCTOBER 2025)
- PROPOSED SEDIMENT SAMPLE TRANSECT LOCATION (COLLECT AND ANALYZE)
- PROPOSED CONTINGENT SEDIMENT SAMPLE TRANSECT LOCATION (COLLECT AND HOLD)

NOTES:

- SEDIMENT SAMPLE LOCATIONS MAY BE MODIFIED BASED ON SITE CONDITIONS
- ONE SEDIMENT SAMPLE WILL BE COLLECTED FROM EACH TRANSECT LOCATION

## PROPOSED ADDITIONAL SEDIMENT SAMPLING LOCATIONS

NEWELL OPERATING COMPANY
FORMER MIRRO PLANT NO. 20
44 WALNUT STREET
CHILTON, WISCONSIN

## FIGURE 1

RAMBOLL AMERICAS ENGINEERING SOLUTIONS, INC.
A RAMBOLL COMPANY
RAMBOLL