SunChemical®
a member of the DIC group

Gary M Andrzejewski
Corporate Vice President
Environmental Affairs

Sun Chemical Corporation
135 West Lake Street
Northlake IL 60164

T +1 708 236 3713
F +1 708 236 3904

gary.andrzejewski@sunchemical.com
www.sunchemical.com

November 3, 2017

Mr. Saji Villoth
Environmental Enforcement Specialist
State of Wisconsin
Department of Natural Resources
2300 N. Dr. Martin Luther King Drive
Milwaukee, WI 53212-3128

Re: Reichhold Chemical Site, 7300 S. 10th Street, Oak Creek, WI
FID #: 241332080
BRRTS #: 02-41-000244

Dear Mr. Villoth,

Sun Chemical Corporation (Sun Chemical) is in receipt of Wisconsin Department of Natural Resources (WDNR) letters to Sun Chemical and Oak Creek Real Estate, LLC (OCREL) dated October 31, 2017, regarding the above-referenced site (the "Site"). Sun Chemical has prepared this response letter to clarify information included in the letters that does not match the discussions held during our meeting on October 17, 2017.

Information presented during the meeting supports Sun Chemical's conclusion that Sun Chemical and its parent companies, Dainippon Imagining Products USA, LLC (DIP) and Dainippon Ink and Chemicals (DIC), do not have responsibility under the Spills Act (Wis. Stats. Chapter 292) for the environmental impacts at the Site. As we discussed and demonstrated, Sun Chemical's records indicate that Sun Chemical has never owned the Site and began operations at the Site in 1996 under a lease with the then owner – Reichhold. Sun Chemical's lease operations began five years after the identified sources of the release (former underground storage tanks) were removed in 1991 and the solvent release was reported to the WDNR by Reichhold. Sun Chemical did not cause and has not been in possession or control of the release at the Site.

SunChemical®
a member of the DIC group DIC Color & Comfort

Regarding the October 31, 2017 WDNR letter to Sun Chemical, we provide the following clarifications to the quoted text shown below.

1. *(Mr.) Andrzejewski stated that DIP had been a passive shareholder between 1987 and 1991 and owned Reichhold stock, but had no operational control or management of the business. In 2004 Reichhold had bought back its shares from DIP.* DIC, not DIP, was a passive shareholder of Reichhold.

2. *(Mr.) Villoth asked about the potential for Sun and Oak Creek Real Estate, LLC to collaborate on clean up. (Mr.) Andrzejewski stated that it would be possible, but depends on the cost of the clean up.* The question is hypothetical. Sun Chemical emphasized throughout the meeting and continues to maintain that Sun Chemical and its parent companies are not responsible for the release at the Site. Sun Chemical did not commit to conducting a cleanup, alone or with the current Site owner. As an example for discussion, Sun Chemical indicated that if the anticipated cost to obtain Site closure is low, Sun Chemical could evaluate the costs needed to conduct the work in comparison to the costs needed to continue to demonstrate its absence of responsibility to the WDNR. However, it is our current understanding that the level of effort needed to close the Site is not minimal. Therefore, the hypothetical question posed by the WDNR is not currently relevant.

3. *(Ms. Michele) Norman recommended that Sun perform an indoor air sampling at DIP, to assess potential risks to DIP employees. (Mr.) Andrzejewski stated that they would have no problem with the indoor air sampling/testing within the building. (Ms.) Norman stated that the indoor air sampling would be an interim assessment, conducted before the site's environmental investigation is completed.* As the current tenant at the Site, Sun Chemical will take appropriate steps to ensure the safety and health of its workers. Sun Chemical will first attempt to contact Reichhold's consultant to obtain the results of previously conducted vapor intrusion sampling (not yet provided to the WDNR). Absent existing data that demonstrate no unacceptable risk to its workers, Sun Chemical will evaluate indoor air quality in accordance with its corporate industrial hygiene program. Sun Chemical does not agree that the evaluation will be conducted as part of the remediation work, as Sun Chemical is not responsible for the release. Sun Chemical will provide the WDNR a letter of the results of its data review and/or testing when completed, for informational purposes.

Regarding the October 31, 2017 WDNR letter to OCREL, we provide the following clarifications to the quoted text shown below.

4. *She (Ms. Norman) stated that OCREL and Sun Chemical Corporation had a shared responsibility under the Spills Law.* As described above, our records indicate that Sun Chemical and its parent companies are not responsible for the releases at the Site.

5. *(Mr.) Amadi will try to contact CH2M-Hill to request copies of the VI (vapor intrusion) assessment and groundwater data from 2016. Mr. Sexson stated that OCREL may have*

SunChemical®
a member of the DIC group
Color & Comfort

some leverage under their lease agreement to help make DIP release any data they may have previously collected. DIP has not independently generated environmental data associated with the Site. The last sentence in this quote may more appropriately reference Reichhold, rather than DIP.

Sun Chemical appreciates your continued assistance in resolving this matter. If you would like to discuss this response, please contact me at 708-236-3713.

Sincerely,

Gary M. Andrzejewski
Corporate Vice President, Environmental Affairs

cc: Warren Faure, Esq. (Sun Chemical Corporation)
Mary Jo Anzia, P.E. (Quantum Management Group, Inc.)