



WDC Acquisition LLC

July 10, 2025

Patricia Murrow, Project Manager
Permitting and State Partnership Section
Corrective Action Branch
Land, Chemical, and Redevelopment Division
U. S. Environmental Protection Agency, Region 7
11201 Renner Blvd.
Lenexa, KS 66219

**SUBJECT: Quarterly Progress Report – Second Quarter 2025
WDC Acquisition LLC
RCRA Facility Identification No. IAD065218737
Administrative Order on Consent (AOC)
EPA Docket No. RCRA-07-2003-0167**

Dear Ms. Murrow:

We are submitting this quarterly progress report in accordance with the Administrative Order on Consent (AOC) (paragraph XIV). This is the eighty-fifth (85th) progress report following the effective date of the Order (January 23, 2004), covering the period from April 1, 2025, through June 30, 2025. Information in this quarterly progress report is itemized below following the requirements of the Order.

1. Description of RFI activities completed during reporting period:

Monthly installment payments, as required by the Environmental Settlement Agreement (ESA), to the Wellman Corrective Action Trust continue. Value of the Trust as of this report date is \$2,693,792.

2. Summary of contacts:

During the reporting period, the following contacts were made with local, state, or federal government concerning RFI activities at the WDC Acquisition LLC facility:

4/3/2025	Matt Thelen (WDC) provided an email update on the Environmental Settlement Agreement financial assurance status.
4/11/2025	Matt Thelen emailed Pat Murrow (USEPA) the April 2025 RCRA Corrective Action Trust monthly deposit information.
6/3/2025	Matt Thelen emailed Pat Murrow the May 2025 RCRA Corrective Action Trust monthly deposit information.
6/12/2025	Matt Thelen emailed Pat Murrow the June 2025 RCRA Corrective Action Trust monthly deposit information.
6/16/2025	Matt Thelen emailed a Draft Environmental Covenant, as required by the Environmental Settlement Agreement, for Agency review and comment. The Draft was provided to; IDNR, IHHS, and USEPA.

3. Summary of problems:

No problems were encountered during this reporting period.

4. Actions taken to rectify problems:

No actions were required or taken.

5. Changes in project personnel:

There were no changes in project personnel during this reporting period.

6. Projected work for next reporting period:

EPA to review the WDC response to EPA comments and Revision 1 of the RFI Report, submitted on 10/25/2021.

WDC to update Table 3 of the SAP/QAPP to reflect current VOC testing methods available for each compound, and then send update to EPA for review and approval.

Review and finalize the Draft Environmental Covenant.

7. Data generated during reporting period:

No new data has been generated for the RFI during this reporting period.

If you have any questions regarding this submittal or any other aspect of the project, please contact me.

Sincerely,



Matt Thelen
Environmental Engineer
Phone: (641) 782-0283
Email: matt.thelen@wellmandynamics.com

Cc: Brian Rath, Iowa Department of Natural Resources
Brad Davison, Iowa Department of Natural Resources
Ronald Doumont, Penn E&R, Inc.
Robert Roach, Penn E&R, Inc.
Ralph Clendenin, WDC Acquisition LLC

CERTIFICATION

The following certification is provided in accordance with the requirements of Section XIV of the Administrative Order on Consent, WDC Acquisition LLC, EPA ID IAD065218737, EPA Docket No. RCRA-07-2003-0167.

Document: Progress Report, Second Quarter 2025

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete to the best of my knowledge. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based in my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Ralph Clendenin

Title: _____

Chief Operating Officer

Date: _____

7/10/2025