

WELLMAN

WDC Acquisition LLC

December 15, 2025

VIA ELECTRONIC MAIL

Richard M. Gladstein, Senior Counsel
Environmental Enforcement Section
Environment and Natural Resources Division
United States Department of Justice
P.O. Box 7611
Washington, D.C. 20044
Richard.Gladstein@usdoj.gov

DeAndre Singletary
U.S. Environmental Protection Agency — Region 7
Director, Land, Chemical and Redevelopment Division
11201 Renner Blvd.
Lenexa, Kansas 66219
singletary.deandre@epa.gov

Iowa Department of Natural Resources
Contaminated Sites Section Supervisor
Wallace State Office Building
502 E 9th Street
Des Moines, Iowa 50319
(via Regular Mail)

Iowa Department of Health and Human Services
Patty Riesberg, Bureau Chief
Bureau of Radiological Health
patty.riesberg@hhs.iowa.gov

**Re: Courtesy Notice of Equity Sale Involving Parent Company
of WDC Acquisition, LLC**

Dear Environmental Agencies,

WDC Acquisition, LLC (WDC) is writing to inform you that its parent company is involved in an equity sale transaction where there will be an equity ownership change in the parent company in the near future. No change in the WDC facility real estate title or ownership of the physical assets, including property or equipment, will occur by this transaction. There will also be no change in the regulated operations of the WDC facility as

December 15, 2025

Page 2

a result of this shareholding change at the parent company level as WDC will continue to be the operator.

WDC is notifying you of the TRM Equity equity sale because the WDC facility, located at 1746 Commerce Road in Creston, Iowa, maintains permits, licenses, agreements, and authorizations administered by your agencies, including the following:

- *In Re: Fansteel Foundry Corp. f/k/a Wellman Dynamics Corp.*, Case No 16-01825, “Consent Order Granting Joint Motion for Entry of Order Approving Amended and Restated Environmental Settlement Agreement” (June 9, 2020)
- RCRA Part A Permit Interim Closure (EPA ID Number IAD065218737)
- Administrative Order on Consent (Docket No. RCRA-07-2003-0167)
- IHHS Materials License (No. 0103-1-88-SM1)
- IDNR Sanitary Disposal Project Closure Permit (No. 88-SDP-04-86)
- IDNR Stormwater NPDES Permit (No. 88-22-1-01)
- IDNR Title V Operating Permit (No. 99-TV-018R4-M001)
- IHHS Certificate of Annual Registration (5108-1-88-IRX)

WDC has conducted a thorough analysis of the permitting rules applicable to its facility and has concluded that a transfer notice or amendment of the above-referenced permits, licenses, agreements, and authorizations is not required. Nonetheless, in the interest of transparency and open dialogue, WDC is providing this courtesy notice to inform regulators of TRM Equity’s equity sale transaction. If you have any questions regarding this matter, please do not hesitate to contact us.

Thank you,



Ralph Clendenin
Chief Operating Officer
WDC Acquisition LLC
1746 Commerce Road, Creston, Iowa 50801
(641) 782-0350
ralph.clendenin@wellmandynamics.com

cc: Matt Thelen, WDC, (matt.thelen@wellmandynamics.com)
Pat Murrow, EPA, (murrow.patricia@epa.gov)
Brad Davison, IDNR, (brad.davison@dnr.iowa.gov)
Jacob Larson, IDNR/IHHS, (jacoblarson@ag.iowa.gov)
Amanda Hughes, IHHS, (amanda.hughes@hhs.iowa.gov)
Charlie Denton, Barnes & Thornburg LLP, (charles.denton@btlaw.com)