



June 4, 2021

Tyco Fire Protection Products LP
Jeffery Danko
5757 N Green Bay Avenue
Milwaukee WI 53209

Via email and regular mail

Subject: Review of Site Investigation Work Plan
JCI/Tyco Stanton (VOCs), 1 Stanton Street, City of Marinette, Wisconsin
BRRTS #: 02-38-559214
FID #: 438039470

Dear Mr. Danko:

On April 19, 2021, the Wisconsin Department of Natural Resources (DNR) received the *Work Plan for Site Investigation Services* (Report) prepared for Tyco Fire Products LP (Tyco) by Endpoint Solutions Corp. (Endpoint). The Report was submitted with a fee for DNR review and response. The submittal of a Site Investigation Work Plan (SIWP) is required per Wis. Admin. Code § NR 716.09, as this site is subject to regulation under Wis. Stat. § 292. The DNR reviewed the Report for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and has determined that the general code requirements have been met with additional comments as provided in this response letter.

Background

During subsurface utility work conducted in 2012 a black oily substance with a petroleum odor was observed in an excavation. Additional subsurface utility work in 2014 and 2015 revealed additional locations with observed black soils with petroleum odors. Subsequent site investigation activities were conducted to determine the degree and extent of the contaminants discovered, as well as media impacted. Soil and groundwater analytical results indicate residual volatile organic compounds (VOCs) and polycyclic aromatic hydrocarbons (PAHs) are present in soil and/or groundwater at the property.

SIWP Summary

Per the February 22, 2021 DNR letter *Case Closure under Wis. Admin. Code ch. NR 726 Not Recommended*, the Report proposes:

- Limited groundwater monitoring, including collection of samples from monitoring wells MW-3, MW-3, and MW-7. Collected groundwater samples will be submitted for laboratory analysis for PAHs;
- Advancement of three (3) soil borings in the area of B-2, B-5, and B-7 to an approximately depth of 8 feet below ground surface (bgs). Collected soil samples will be screened for VOCs with one (1) sample from the zero (0) to four (4) foot bgs interval from each boring submitted for laboratory analysis for PAHs.

DNR Review of the SIWP

Following the DNR's review of the Report, the DNR requests that you proceed with the proposed work, while incorporating the following comments:

- The soil borings should be located in such a manner as to establish the presence of historic fill-impacted soils across the property. The August 7, 2020 Closure Request stipulates contaminants are derived from the presence of historic fill and included a cover maintenance plan indicating the existing vegetative and asphalt as a barrier to protect against infiltration and direct contact. The DNR requires data establishing the presence of fill-impacted soils on the southern portion of the property to concur; therefore, the proposed borings should be located in that area;
- If the existing surface cover is to be used as a protective cover for closure, please justify it will serve as an adequate protective barrier (i.e. depth, composition, etc.);
- If available, the DNR suggests incorporating relevant data from the other active BRRTS cases open on the property (BRRTS #s 02-38-000011 & 02-38-581955).

Please note that additional investigation may be required based on the results of the proposed work in order to meet the requirements of Wis. Admin. Code § NR 716.

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me at (920) 362-2072 or david.neste@wisconsin.gov.

Sincerely,



David Neste
Project Manager - Hydrogeologist
Northeast Region
Remediation & Redevelopment Program

cc: Kirk Kapfhammer, Endpoint Solutions Corp. (via email: kirk@endpointcorporation.com)