

Sellwood, Alyssa A - DNR

From: Denice Nelson <denice.karen.nelson@jci.com>
Sent: Friday, May 3, 2024 4:00 PM
To: Sellwood, Alyssa A - DNR
Cc: May, Wesley; TerBeek, Emma
Subject: Re: Tyco GETS Material Management Plan - Request for Approval for Soil Reuse- WDNR BRRS Number 02-38-580694
Attachments: Figure 1.pdf; Attachment 1_Photolog.pdf

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Alyssa,

Per our discussions, construction activities were conducted to install two additional extraction wells (EX-1S and EX-2S) as part of the Groundwater Extraction and Treatment System (GETS) Optimization activities. The work consisted of the directional drilling to install new conveyance lines and conduit from the GETS building to the new wells, including excavation of receiving pits for the directional borings. The construction activities and associated soil management activities were conducted between January and March, 2024. Soil was managed in accordance with the Oct. 6, 2021 WDNR letter approving Tyco to manage contaminated soil under Wisconsin Administrative (Wis. Admin.) Code § NR 718.12.

The work associated with the MMP consisted of the following activities:

- Stockpiling of some of the soils within the Fire Training Center (FTC) soil containment pad
- Stockpiling of the remainder of the soils on plastic sheeting to the east of the GETS building
- Covering the soils stockpiled to the east of the GETS building with plastic sheeting
- Sampling and analysis of all stockpiled soils
- Submittal of the analytical results to the WDNR for approval of on-site reuse on February 22, 2024
- Approval for reuse of soil on February 26, 2024
- Placement of excavated soils northwest of the GETS building on March 14 and 15, 2024.

A photolog of the above activities as included as Attachment 1. The locations of the soil stockpiles are shown on Figure 1. Approximately 160 cubic yards were stockpiled between the two areas. The stockpiled soil at the FTC Containment Pad and the GETS Temporary Stockpile Area were removed on March 14 and 15, 2024, and placed northwest of the GETS building (Attachment 1). The area used for temporary stockpiling near the GETS Building was restored to previous conditions. Aerial site photos of the restored GETS Building area are also included in Attachment 1.

Please let me know if you have any questions regarding the above.

Sincerely,

Denice Nelson
Senior Director, Remediation and Strategy
[Johnson Controls](#)

+1 651 280 7259 cell

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From: Sellwood, Alyssa A - DNR <alyssa.sellwood@wisconsin.gov>
Sent: Monday, February 26, 2024 9:32 AM
To: Denice Nelson <denice.karen.nelson@jci.com>

Cc: May, Wesley <Wesley.May@arcadis.com>; TerBeek, Emma <Emma.TerBeek@arcadis.com>

Subject: RE: Tyco GETS Material Management Plan - Request for Approval for Soil Reuse- WDNR BRRTS Number 02-38-580694

Denice –

Thank you for notifying the Wisconsin Department of Natural Resources (DNR) of the approximately 160 cubic yards (cy) of excess soil generated from Johnson Controls, Inc. and Tyco Fire Products LP (JCI/Tyco's) recent construction of additional vaults and trench lines for the Groundwater Extraction and Treatment System (GETS), and for providing the two attached laboratory reports for samples JCI/Tyco collected on Feb. 1, 2024, to characterize this soil for contaminants of concern at the Fire Technology Center (FTC).

Previously, on Oct. 6, 2021, the DNR granted approval for JCI/Tyco to manage contaminated soil under Wisconsin Administrative (Wis. Admin.) Code § NR 718.12. (A copy of that letter is attached to this email for reference). This approval was granted only for the specific activities described within JCI/Tyco's Sept. 10, 2021, GETS Material Management Plan, which included JCI/Tyco's plans to take excess soil generated during construction of trenches and vaults for the GETS and to manage that soil on the FTC property in a berm near the GETS building. This management of soil on the FTC property was allowed under the condition that characterization of the soil showed that the concentrations of perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA) in the soil were below site-specific residual contaminant levels.

The two samples JCI/Tyco collected for analysis from the recently generated 160 cy of excess soil satisfies the requirements for characterization set forth in Wis. Admin. Code § NR 718.12(1)(e). The concentrations of PFOA and PFOS in these two samples were below the site-specific screening levels of 0.9 µg/kg PFOS and 5.0 µg/kg PFOA.

The DNR concurs that the approximately 160 cy of soil generated during recent construction activities for the GETS falls within the conditions of approval in DNR's Oct. 6, 2021 letter and that JCI/Tyco can manage this soil on the FTC property in a berm or similar location near the GETS building.

The DNR requests that within 30 days after JCI/Tyco completes its management of this soil, that JCI/Tyco submit to the DNR documentation that includes:

- statement of how the material was managed prior to placement
- a map of the location (or confirmation that it is the same as in the attached pages from the GETS documentation report)
- photographs of the soil management location

This documentation can be sent via email in response to this email.

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Alyssa Sellwood, PE (WI)

Water Resources Engineer | Remediation and Redevelopment Program

Wisconsin Department of Natural Resources

101 S. Webster St., Madison, WI 53703

Phone/Mobile: 608-622-8606

Alyssa.Sellwood@wisconsin.gov



From: Denice Nelson <denice.karen.nelson@jci.com>

Sent: Thursday, February 22, 2024 3:43 PM

To: Sellwood, Alyssa A - DNR <alyssa.sellwood@wisconsin.gov>

Cc: May, Wesley <Wesley.May@arcadis.com>; TerBeek, Emma <Emma.TerBeek@arcadis.com>

Subject: Tyco GETS Material Management Plan - Request for Approval for Soil Reuse- WDNR BRRTS Number 02-38-580694

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Alyssa-

As you are aware, as part of our GETS optimization activities, Tyco has installed two supplemental extraction wells (EX-1S and EX-2S) near to the current EX-1 and EX-2 well locations and associated GETS treatment building. Part of this work included installing well vaults and connecting the new wells to the GET treatment building.

We are requesting approval to reuse the approximately 160 cubic yards (CY) of soil associated with the GETS optimization activities, in accordance with the 2021 Revised Interim Materials Management Plan (MMP) submitted previously by Geosyntec. I have attached the lab results from the two soil samples associated with the 160 CY of soil.

The soil will be used to create berms near previously placed berm areas and revegetated, in accordance with the 2021 MMP. The area near the GETS treatment building meets the criteria described in Wisconsin Administrative Code Chapter NR718, as detailed with the 2021 MMP.

Please let us know if you need additional information to approve this request. I have copied the Arcadis team as I'm out the rest of the week in case you require further information.

Sincerely,

Denice

Denice Nelson

Senior Director, Remediation and Strategy

[Johnson Controls](#)

+1 651 280 7259 cell

denice.karen.nelson@jci.com

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Johnson Controls
5757 North Green Bay Avenue
Glendale, WI 53209
USA

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Figure 1
Materials Management Locations

GETS Optimization, Marinette, Wisconsin



Source: Google Maps. (April, 2024). Marinette, WI.

ATTACHMENT 1 SOIL STOCKPILE PHOTOGRAPH LOG

Material Management Plan (MMP) Activities, GETS Optimization,
Marinette, Wisconsin



Photo: 1

Date: 01-29-2024

Description:

Sign placed in front of GETS soil in the containment pad at the FTC. Soil is from directional drilling work and sampled today for analysis for clean fill. (GETSWC_1_02012024).

Location:

Containment pad at FTC

Photograph Taken By:

Emma TerBeek

Direction:

South



Photo: 2

Date: 01-31-2024

Description:

Soil containment pad from soil removed from EX-1S excavated vault. Containment pad is 20 ft wide x 25 ft long.

Location:

East of GETS building

Photograph Taken By:

Emma TerBeek

Direction:

South

ATTACHMENT 1 SOIL STOCKPILE PHOTOGRAPH LOG

Material Management Plan (MMP) Activities, GETS Optimization,
Marinette, Wisconsin



Photo: 3

Date: 02-01-2024

Description:

GETS soil containment pad.
Soil from EX-1S and part of
North Receiving Pit.
Soil sampled for analysis today
(GETSWC_2_02012024).

Location:

GETS containment pad east of
building

Photograph Taken By:

Emma TerBeek

Direction:

South



Photo: 4

Date: 02-02-2024

Description:

Soil stockpile covered with tarp
while awaiting analysis of soil
samples.

Location:

GETS stockpile

Photograph Taken By:

Emma TerBeek

Direction:

South

ATTACHMENT 1 SOIL STOCKPILE PHOTOGRAPH LOG

Material Management Plan (MMP) Activities, GETS Optimization,
Marinette, Wisconsin



Photo: 5

Date: 02-05-2024

Description:

Stockpile at the end of the day from EX-2S excavated vault and receiving pit.

Location:

Soil stockpile east of GETS building

Photograph Taken By:

Nathan Nelson

Direction:

Southwest



Photo: 6

Date: 02-07-2024

Description:

Soil added to soil pile from trenching of conduit at both EX-1S and EX-2S. Final soil stockpile.

Location:

Soil stockpile east of GETS building

Photograph Taken By:

Nathan Nelson

Direction:

South

ATTACHMENT 1 SOIL STOCKPILE PHOTOGRAPH LOG

Material Management Plan (MMP) Activities, GETS Optimization,
Marinette, Wisconsin



Photo: 7

Date: 02-09-2024

Description:

Covered soil pile prior to demobilization; soil pending analysis.

Location:

Soil pile

Photograph Taken By:

Nathan Nelson

Direction:

South



Photo: 8

Date: 02-29-2024

Description:

Covered soil pile east of the GETS building awaiting regrading in the spring. Cover maintained throughout the winter.

Location:

Soil pile east of GETS building

Photograph Taken By:

Preston Pethan

Direction:

South

ATTACHMENT 1 SOIL STOCKPILE PHOTOGRAPH LOG

Material Management Plan (MMP) Activities, GETS Optimization,
Marinette, Wisconsin



Photo: 9

Date: 03-19-2024

Description:

Drone photo showing the soil stockpile has been removed, restored, and regraded at the site, north of the GETS building.

Location:

GETS Building

Photograph Taken By:

Drew Kehoe

Direction:

Drone Photo



Photo: 10

Date: 03-19-2024

Description:

Drone photo showing the soil stockpile has been removed, restored, and regraded at the site, north of the GETS building.

Location:

GETS Building

Photograph Taken By:

Drew Kehoe

Direction:

Drone Photo