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Date: October 3, 2024

Our Ref: 30168592

Subject: Response to *GETS Progress Report #3 (Nov. 13, 2023 – May 12, 2024)* JCI/Tyco FTC PFAS, 2700 Industrial Parkway South, Marinette, WI  
BRRTS #02-38-580694

Dear Ms. Sellwood,

Per Wisconsin Department of Natural Resources (WDNR) request, and on behalf of Tyco Fire Products LP (Tyco), Arcadis U.S., Inc. (Arcadis) prepared these responses to the August 5, 2024 comments made by the WDNR on the June 3, 2024 GETS Progress Report #3 associated with the Tyco Fire Technology Center (FTC) Site in Marinette, Wisconsin.

### **WDNR Comments and Tyco Responses**

**Comment #1 (GETS Performance Evaluation):** *Has the GETS reduced upwelling of groundwater into the upper, middle, and lower reaches of Ditch B? What locations or conditions are contributing to continued upwelling if any are observed? Operation of the GETS appears to have reduced, but not eliminated, groundwater upwelling into Ditch B (Table 10). The monitoring results suggest that upwelling of contaminated groundwater persists near monitoring points U10 through M07 and in the tributary flowing southwest into Ditch B at Pierce Avenue.*

**Tyco Response to Comment #1:** Upwelling across Ditch B has been significantly reduced since the onset of GETS operations. However, Tyco agrees with the observations of the WDNR that PFAS continues to have some upwelling into Ditch B, particularly in the area of M09 to M07. These observations were made by Tyco previously and were the basis for the ongoing GETS optimizations to increase groundwater pumping in the PFAS plume upgradient from Ditch B and were also the basis for the proposed GETS expansion to install supplemental extraction wells in the vicinity of M09 to M07. Additionally, a high capacity well permit was submitted to the WDNR to include potential additional expansion of extraction well(s) to the area between U10 to M09. The need for a well or wells within this area will be determined based on data collected following the optimization and expansion activities. The details of these activities are summarized in the request to modify the WPDES General Permit No: WI-0046566-07-0 (Arcadis 2024a).

**Comment #2 (GETS Performance Evaluation):** *How has the GETS affected groundwater migration paths between the FTC and Ditch B? Operation of the GETS has created a zone of drawdown, which focuses groundwater migration and capture near extraction wells EX-5 and EX-7; however, the GETS has not had a strong effect on the overall groundwater migration pathways between the FTC and Ditch B (Figures 6 and 7). Water levels recorded by transducers set near each extraction well indicate the shallow groundwater remains*

*connected and is most strongly influenced by the temporal changes and short-term precipitation events in the region (Figures 3-5).*

**Tyco Response to Comment #2:** The extraction wells have significantly reduced upwelling to Ditch B, as evidenced by PFOA and PFOS concentrations in the surface water. But we agree additional pumping is needed to manage seasonal water levels and periods of higher precipitation. We cannot do the additional groundwater pumping under the current high capacity well permit constraints and also require additional upgrades to the GETS treatment system. As we recognized the need to pump more water from more locations, multiple requests were submitted to the various WDNR entities to modify the treatment system, build more wells, amend the high capacity well permit and to modify the previous wetland permit. The approval to modify the treatment system was granted on 9/17/24 by the WDNR Bureau of Water Quality. The request for modifications associated with the high capacity permits are currently being evaluated for approval by WDNR's Bureau of Drinking Water and Groundwater. The modifications to the previous wetland permit was approved by the USACE on August 21, 2024 and by the WDNR (Bureau of Waterways) on August 28, 2024. Design of system modifications are underway to accommodate the increased flow and are expected to be installed by Spring 2025. Once we have the modifications complete and the High Capacity Well permit approvals, we will increase the flow rate, and based on the performance of the system at that time, evaluate if additional pumping and/or wells are needed.

**Comment #3 (GETS Performance Evaluation):** *Have PFAS concentrations in Ditch B surface water diminished? What locations or conditions contribute to observed increases, if any? There has been an overall decrease in the concentration of PFAS in surface water in Ditch B following startup of the GETS; however, the concentrations in Ditch B downstream of the GETS still exceed the Wis. Admin. Code § NR 102.04 surface water standards for PFOA and PFOS (Figure 8 and Table 13).*

*One likely contribution to these exceedances is the upwelling of contaminated groundwater that persists, albeit reduced, between monitoring points U10 through M07 as discussed above in item 1 and as shown on the first figure in Attachment B. JCI/Tyco's supplemental monitoring of surface water during this reporting period for points along the tributary to Ditch B near Pierce Avenue revealed that groundwater upwelling introduces PFAS contamination to this surface water tributary that enters Ditch B upstream of extraction well EX-3, near monitoring point M09.*

*The high groundwater levels influenced by spring melt and precipitation, and the drainage/runoff through streambanks and wetlands that accompany these events may also contribute to PFAS that continue to exceed surface water standards in Ditch B.*

*As noted in Attachment A, JCI/Tyco should prepare trend plots to evaluate the cause of the elevated PFAS concentrations detected in Ditch B. These plots include, spatial plots of PFAS concentrations from the streambed mini-piezometers (see example in Attachment B) and temporal plots that overlay streamflow rate with PFAS concentrations at selected locations.*

**Tyco Response to Comment #3:** Significant decreases in PFAS concentrations within Ditch B have occurred since the GETS began operations. In addition, several optimization events have occurred over the past two years to continue to lower concentrations in Ditch B. While significant precipitation events have caused temporary increases in concentrations relative to the significantly lower concentrations observed recently, increased pumping rates along with the installation of EX-1S and EX-2S have reduced the magnitude of those increases over time, and the "increases" are still significantly below those concentrations seen prior to the GETS operation. This supports that the primary mode of PFAS migration into Ditch B is through groundwater upwelling. Pumping rates will be increased once the approved GETS modifications are

implemented and the new high capacity well permits are issued (see GETS Performance Evaluation Response to comments #1 and #2).

The GETS reporting is consistent with the WPDES permit requirements to address PFOA and PFOS. These permit requirements are also consistent with conditions in the PFAS plume, i.e., the limit of the PFOA plus PFOS plume fully contain the FTC related PFAS. A combined figure with Figure 8 (PFOA plus PFOS in Ditch B) and Figure 2 (stream flow rates in Ditch B) will be added to the next report to illustrate the potential relationship between storms and PFAS concentrations.

Concentration profiles of PFOA plus PFOS will be prepared of the data collected at the stream bed piezometers for each event. It should be noted these data are presented from upstream to downstream in Table 13 for each sampling events during GETS monitoring.

**Comment #4 (GETS Performance Evaluation):** *How has the GETS affected trends of PFAS concentrations in groundwater near the GETS? There has not been a significant change in the PFAS concentrations in groundwater within the area of influence of the GETS. JCI/Tyco reported that concentrations increased in some wells and decreased in others over the last 6 months. These fluctuations are within an expected range and may also indicate shifting flow paths induced by the pumping of the extraction wells. JCI/Tyco indicates that statistical analysis of the trends in groundwater concentrations will be provided once at least eight rounds of data are available. One notable trend is the increase in PFAS observed in the groundwater near extraction well EX-3.*

*As noted in Attachment A, the DNR recommends that JCI/Tyco add trend plots for certain PFAS in selected wells within the area of influence of the GETS (see example in Attachment B).*

**Tyco Response to Comment #4:** Groundwater pathways are varying less under pumping conditions, with flow moving more consistently from the FTC toward the extraction wells. The plume has had variations in concentrations before the GETS began operations. As the intent of the GETS is to hydraulically contain the upgradient PFAS plume, these variations are reflected in the changes in PFAS concentrations at the extraction wells as PFAS moves from west to east, upgradient to downgradient. We will begin including trend plots for PFOA and PFOS as an appendix in the next GETS semi-annual report.

**Comment #5 (GETS Performance Evaluation):** *How much PFAS mass has been removed by the GETS over time? Operation of the GETS from Nov. 14, 2022, through May 12, 2024, has removed approximately 6 kg (13.2 pounds) of PFOA and PFOS; a majority of which (~93 percent) is PFOA. Other PFAS are removed by the GETS, but the specific mass removed is not reported (Table 14).*

*A majority (around 80 percent) of the mass of PFOA and PFOS removed by the GETS to date has come from groundwater captured from extraction wells EX-5, EX-6, EX-7 and EX-8 (Tables 2 and 5). This is a result of the higher concentrations of PFAS present in groundwater at these well locations and the higher pumping rates sustained to date at these four wells.*

**Tyco Response to Comment #5:** The WPDES permit only requires reporting of PFOA and PFOS, therefore we only analyze for PFOA and PFOS at this location. The WPDES permit is currently undergoing renewal and Tyco will revisit the analytical list based on the WPDES permit language, once issued.

**Comment #6 (GETS Performance Evaluation):** *Evaluate sustainability of the GETS operation in accordance with Wis. Admin. Code § NR 722.09(2m). The performance parameters (e.g., kilowatt hours and granulated activated carbon [GAC] usage during the reporting period) were included in the report. This*

*information is helpful and JCI/Tyco may consider having similar summaries completed for the Ditch A and Ditch B interim actions to assist in future decision making on remedial actions at the Site.*

**Tyco Response to Comment #6:** Beginning in 2025, Ditch A and B reporting will include a sustainability assessment in accordance with Wis. Admin. Code § NR 722.09(2m).

Sustainability reporting will include:

- (a) Total energy use and the potential to use renewable energy.
- (b) The generation of air pollutants, including particulate matter and greenhouse gas emissions.
- (c) Water use and the impacts to water resources.
- (d) The future land use and enhancement of ecosystems, including minimizing unnecessary soil and habitat disturbance and destruction.
- (e) Reducing, reusing, and recycling materials and wastes, including investigative or sampling wastes.
- (f) Optimizing sustainable management practices during long-term care and stewardship.

## Proposed Updates to the GETS

### DNR Review Proposed Updates to the GETS

*The remedial objectives established by JCI/Tyco in its Feb. 2021 Remedial Action Plan for the GETS were to (1) reduce upwelling of PFAS-contaminated groundwater into Ditch B; (2) treat the recovered groundwater to reduce the PFAS concentration in the water; and (3) reduce PFAS-mass flux throughout groundwater plume.*

*Generally speaking, the proposed updates to the GETS should help reduce PFAS-mass flux in groundwater and the updates for Ditch B will likely help reduce the upwelling near Pierce Avenue. However, there is insufficient information provided to determine if the proposed updates have been optimally designed towards these qualitative objectives.*

*Prior to implementing the proposed updates to the GETS, the DNR requests that JCI/Tyco submit a response to the following questions:*

#### **General Questions:**

**Comment #1 (GETS Optimization):** *What are the design specifications and anticipated pumping rates for the new extraction wells?*

**Tyco Response to Comment #1:** The four new extraction wells in the overburden will be constructed to the same specifications as EX-1S and EX-2S. The wells will be 8-inches in diameter, the screens will be stainless-steel wire wrapped (20-slot), and the risers will be schedule-40 PVC. The total depth will vary from 30 to 50 feet based on local geology and concentrations in the PFAS plume, and groundwater. Each well is anticipated to operate at approximately 25 gpm, and be equipped with pumps which can operate at up to 50 gpm.

**Comment #2 (GETS Optimization):** *Will the flow rates and concentrations from each new extraction well be monitored at the influent to the GETS building as is done for the current extraction wells?*

**Tyco Response to Comment #2:** Flow rates for the new wells will be measured at the extraction well and monitored electronically at the GETS building. Water samples will be collected monthly at the well vaults.

**Comment #3 (GETS Optimization):** *How/where will the new extraction wells connect to the treatment building?*

**Tyco Response to Comment #3:** During the initial GETS installation, two spare conveyance lines were connected to the GETS building with stubbed ends placed in the vicinity of EX-3 well vault. The water pumped from extraction wells EX-12 and EX-13 will be blended inline prior to flowing through one of the existing, currently unused conveyance lines to the GETS building. The water extracted from EX-14 (the bedrock extraction well) will be conveyed through the second currently unused conveyance line to the GETS building. The existing unused conveyance lines are already connected to the GETS building in the southeast corner of structure adjacent to the lines associated with the currently operating wells. The water pumped from wells EX-10 and EX-11 on the FTC near Ditch A will be blended and conveyed through a new to-be-installed conveyance line on the FTC property. The new line from EX-10 and EX-11 to the GETS building will enter the building on the north side near the existing Equalization Tank (TK-200), where a second manifold was constructed when EX-1S and EX-2S were connected to the system.

**Comment #4 (GETS Optimization):** *How will the additional volume of groundwater water captured by the GETS that was not hydraulically connected to Ditch B (i.e., from extraction wells EX-4BR, EX-10 and EX-11) affect the water level, flow rate and upwelling in Ditch B?*

**Tyco Response to Comment #4:** Overall there will be a small increase in total flow to the ditch, and negligible impact to the surface water levels within Ditch B. There will be, by design, a decline in groundwater elevations and continued reduction in groundwater discharge to Ditch B. The overburden groundwater to be extracted from EX-12 and EX-13 is currently already discharging to Ditch B leading to no net increase in flow. Additionally, most of the water extracted from EX-10 and EX-11 is already flowing eastward toward Ditch B and the currently operating extraction wells. Some short-term discharge of groundwater to Ditch A during precipitation events may occur when the groundwater table rises seasonally, but the groundwater gradient itself is towards Ditch B. The groundwater pumped from weathered bedrock (EX-14) is flowing under Ditch B toward Stanton Street. This flow, designed to be approximately 50 gpm, along with a small seasonal component of the water extracted from EX-10 and EX-11 will comprise the expected small increase in stream flow after system optimization is completed. Conservatively assuming up to 10% of the maximum flow for EX-10 and EX-11 coupled with the bedrock well flow will make up the increase, a range of 50 to 55 gpm of additional flow would potentially be discharged to Ditch B. For context, the average flow in the ditch this past summer was over 1,000 gpm from April through July, and the maximum daily flow was over 15,000 gpm (June 25<sup>th</sup>).

**Comment #5 (GETS Optimization):** *What is the anticipated schedule for installing and putting the new extraction wells online?*

**Tyco Response to Comment #5:** The schedule to complete the optimization/expansion activities and be ready to begin operations is anticipated to be Spring 2025. This will include construction of the new extraction and monitoring wells, construction of new conveyance lines (Wells EX-10 and EX-11) and well vaults, reengineering of the GETS treatment facility to operate 2 treatment trains simultaneously and making necessary adjustments to system controls and operational software to manage the system. The GETS will continue to operate under the currently permitted pumping rates until the approved GETS modifications are implemented and the new high capacity well permit is issued.

### **Ditch B:**

**Comment #1 (Ditch B):** *Did JCI/Tyco evaluate other locations (e.g., near PZ-23) or designs for the new extraction wells to optimize the reduction of upwelling of groundwater in Ditch B between U10 and M07?*

**Tyco Response to Comment #1:** The groundwater model was updated to evaluate the best locations for additional pumping. Options were considered nearer to the school, but the selected locations maximized capture while also containing the PFAS plume within its current footprint. EX-1 and EX-2 on the south side of the school property are located to limit future movement of PFAS toward the school property, while pumping from the wells located to the east of Pierce Avenue (EX-3 thru EX-5) controls upwelling into Ditch B and directs PFAS in the

vicinity of PZ-23 toward EX-3 and EX-4. The additional pumping proposed from wells EX-13 and EX-14 (located west of EX-3 and near EX-4) will address the upwelling of PFAS containing groundwater in Ditch B and the small tributary near Pierce Ave by further reducing upward gradients in this area. The basis for this approach with a summary of the updated groundwater model will be included as an appendix to the upcoming Semi-annual report of GETS operations.

**Bedrock:**

**Comment #1 (Bedrock):** *Why was PZ-64-67 selected for the bedrock extraction well? Did JCI/Tyco evaluate placing a bedrock extraction well where PFAS concentrations are higher (e.g., near PZ-69-30, PZ-4D or closer to the eastern FTC property boundary) to optimize the reduction of PFAS-mass flux in the weathered bedrock?*

**Tyco Response to Comment #1:** The selection of PZ-64-67 for groundwater extraction was based on the PFAS plume, the geology, and the GETS infrastructure. While well PZ-64-67 is down gradient of the FTC and PFAS concentrations are slightly lower, this bedrock location is in the centerline of the weathered bedrock PFAS plume (see Figures 5-3 and 5-6 of the bedrock plume in the August Site Investigation Report, Arcadis 2024b). This well has the highest specific capacity, is located adjacent to an existing unused conveyance pipe that is connected to the GETS building and produces more groundwater than other shallow bedrock wells that have been installed in the drilling program.

**Comment #2 (Bedrock):** *Will, or did, JCI/Tyco perform a short-term pumping test on the proposed bedrock extraction well to evaluate potential pumping rates, drawdown and yield?*

**Tyco Response to Comment #2:** A short-term pumping test was performed at PZ-64-67 on May 1, 2024. The well produced more than 65 gpm with less than 5 feet drawdown. The high specific capacity of PZ-64-67 (13 gpm/ft of drawdown = 65/5) is greater than the currently operating extraction wells, making this well ideal for future groundwater pumping. These findings will be included in the next Semi-annual report of GETS operations.

**Comment #3 (Bedrock):** *What monitoring will JCI/Tyco perform to confirm that pumping from a bedrock extraction well does not pull groundwater down from the overlying unconsolidated aquifer?*

**Tyco Response to Comment #3:** There is a thick sequence of silt and clay between PZ-64-67 and the shallow aquifer which will limit vertical migration of the PFAS plume. Monitoring to evaluate bedrock pumping on overburden conditions will be conducted using transducers. There are multiple water level transducers in the overburden near PZ-64-67 (MW-EX-3, MW-EX-4, and MW-EX-5). The closest is MW-EX-4, approximately 30 feet horizontally from PZ-64-67. Two additional transducers will also be installed in the new monitoring wells located near the new extraction wells (EX-12 and EX-13) to monitor water levels. Water levels at these five locations will be used to identify the potential effects of bedrock pumping on overburden conditions.

**Comment #4 (Bedrock):** *Does JCI/Tyco expect that water levels in monitoring wells PZ-1D and PZ-29-68 will be influenced by pumping in well PZ-64-67? Why was a piezometer adjacent to the new bedrock extraction well not proposed as was done for the extraction wells in the unconsolidated aquifer?*

**Tyco Response to Comment #4:** Water level drawdown is expected to be observed at distance from the extraction as the extraction zone is confined by silt and clay above, and shale sequences below. Bedrock wells PZ-1D and PZ-29-68 will have transducers installed to measure response. The video logging of PZ-64-67 indicates most of the water enters the well through a narrow fracture zone approximately 1.0 inch wide. The bedrock well is also very efficient as the specific capacity is 13 gpm/ft-of-drawdown (see the Bedrock Response to comment #2 above) even though all the water enters through 1-inch zone of the well bore; therefore, the water levels in the adjacent bedrock would be expected to be nearly identical to the water levels in the well and an adjacent monitoring well is not needed. If the anticipated water level response is not observed in monitoring wells, and the extraction well during operations and additional water level data are needed to interpret conditions, the installation of a new bedrock observation well will be evaluated.

**Ditch A:**

**Comment #1 (Ditch A):** *Is JCI/Tyco proposing a new remedial objective for the GETS associated with Ditch A?*

**Tyco Response to Comment #1:** No. As described in the 2021 GETS Remedial Action Design Report (Arcadis 2021), the primary remedial objectives of the GETS are: “to reduce PFAS groundwater plume upwelling into Ditch B, treat PFAS mass existing in the recovered groundwater, and significantly reduce PFAS mass flux throughout the groundwater plume.” Optimization activities near Ditch A will support the reduction of PFAS mass flux throughout the groundwater plume. As discussed above in the GETS Optimization Response to comment #4 and below in the Ditch A Response to comment #4, the primary flow path of groundwater near EX-10 and EX-11 is eastward towards the operating extraction wells and Ditch B. Flow may occur from this area into Ditch A during some seasonal groundwater water table increases but Ditch A is not the main discharge point for groundwater in this area. These extraction wells are removing the upgradient portion of the PFAS plume, thereby enhancing the existing GETS.

**Comment #2 (Ditch A):** *Does JCI/Tyco intend to continue to run the Ditch A treatment system?*

**Tyco Response to Comment #2:** Yes. The Ditch A treatment system will remain in place until influent concentrations decline to less than the surface water criteria and/or the criteria in the WPDES permit.

**Comment #3 (Ditch A):** *What is the design basis for the locations selected for extraction wells EX-10 and EX-11?*

**Tyco Response to Comment #3:** The well locations were selected using the updated groundwater model discussed above. The model and the analysis will be included in the next Semi-annual report of GETS operations.

**Comment #4 (Ditch A):** *How were the gaining/losing conditions of Ditch A on the FTC property factored into the proposed updates to the GETS in this area?*

**Tyco Response to Comment #4:** The upper reaches of Ditch A where EX-10 and EX-11 are proposed, was engineered when the FTC was constructed to be a storm water element conveying runoff southward to the north branch of Ditch A. The ditch is dry for most of the year, flowing during larger storm events and in the spring (typically late March through May). As noted in Ditch A Response #1 these spring flows observed in Ditch A are partly groundwater infiltration when snow melt and spring cause water levels to rise, but mostly surface water runoff. Unlike Ditch B, the groundwater interaction with Ditch A is not a natural process of the local geography that would have existed before the FTC was constructed, but a result of the incised manmade ditch. The updated groundwater model indicates the new wells will decrease seasonal groundwater flowing to Ditch A but will not impact surface water runoff which is why the Ditch A treatment system will remain in place until influent concentrations decline to less than the surface water criteria and/or the criteria in the WPDES permit.

**Comment #5 (Ditch A):** *Previous monitoring has shown that concentrations of PFAS in Ditch A increase between surface water monitoring points SW-40 and SW-26. How will the proposed extraction wells EX-10 and EX-11 reduce PFAS entering Ditch A in the area between surface water monitoring points SW-40 and SW-26? Will JCI/Tyco monitor PFAS in Ditch A at surface water monitoring point SW-26 or other downstream location(s) to evaluate the effect the proposed extraction wells have on downstream concentrations of PFAS in Ditch A?*

**Tyco Response to Comment #5:** The new extraction wells will remove PFAS from local groundwater. It is anticipated that after EX-10 and EX-11 become operational, the removal of PFAS will result in decreases of local PFAS concentrations in groundwater and surface water. The Ditch A treatment system will continue to be operated when water is present to remove PFAS from surface water. SW-40 and SW-26 will continue to be sampled as outlined in the long-term monitoring (LTM) plan to assess future changes in conditions.

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October 3, 2024

**Comment #6 (Ditch A):** *Did JCI/Tyco evaluate other locations along the southern boundary of the FTC property to reduce the mass flux of PFAS in groundwater and surface water south of the FTC?*

**Tyco Response to Comment #6:** Yes. The extraction well locations were evaluated using the updated groundwater model. Focused groundwater extraction along the southern boundary of the FTC provided less benefit than the selected locations as they would remove less PFAS mass and had the risk of increasing mass flux to the southeast, away from GETS operations.

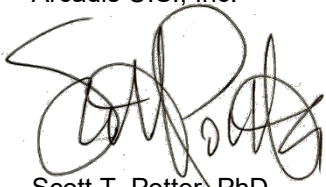
**Comment #7 (Ditch A):** *Why were monitoring well PZ-70-33 and surface water monitoring point SW-26 not included in the monitoring plan?*

**Tyco Response to Comment #7:** These locations are already included in other monitoring plans. SW-26 is monitored monthly when water is present in Ditch A as part of the Ditch A monitoring program, and PZ-70-30-33 is being sampled as part of LTM for the FTC monitoring. These data will be included in future GETS reports.

### Closing

The GETS is operating as intended by reducing PFAS groundwater plume upwelling into Ditch B, treating PFAS mass existing in the recovered groundwater, and significantly reducing PFAS mass flux throughout the groundwater plume. Data collected to date indicate optimization is required for the GETS to replace the Ditch B Treatment System as the long-term solution for managing PFAS in the ditch. As described above, Tyco will expand GETS operations to treat more groundwater while targeting specific areas of groundwater seepage to Ditch B and continue to monitor the effects of these optimization activities. As requested, Tyco will include trend plots and discuss the six performance criteria of the GETS in subsequent semi-annual GETS Progress Reports.

Sincerely,  
Arcadis U.S., Inc.



Scott T. Potter, PhD  
Program Manager

CC. Denice Nelson  
Scott Wahl  
Matthew Coleman

### References

Arcadis. 2024a. Modification to Groundwater Extraction and Treatment System (GETS). Tyco Fire Products LP, 2700 Industrial Parkway South, Marinette, Wisconsin 54143. WPDES General Permit No.: WI-0046566-07-0. May 31.

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