

Ms. Alyssa Sellwood
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
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Date: October 10, 2024
Subject: Q3 2024 Project Status; Tyco Fire Technology Center (FTC) PFAS at 2700 Industrial Parkway South and Stanton Street PFAS at One Stanton Street, Marinette, Wisconsin
BRRTS Activity#: 02-38-580694 and 02-38-581955

Dear Ms. Sellwood,

On behalf of Tyco Fire Products LP (Tyco), Arcadis submits this status report to summarize activities completed, data collected, corrective actions, and WDNR/Tyco correspondence for Q3 2024, as well as planned activities for the upcoming quarter (Q4 2024). As noted in previous quarterly status reports to WDNR, Tyco will continue to provide updates on a quarterly basis to reflect current and planned activities.

PROJECT STATUS

Below is a summary of the project status for the Tyco Fire Technology Center (FTC) and Stanton Street facilities and long-term drinking water supply for the period from July 1, 2024 to September 30, 2024 (Q3 2024) and planned activities from October 1, 2024 to December 31, 2024 (Q4 2024).

Activities Completed

Field Work

- July 1, 2024 to September 30, 2024 – Point-of-Entry Treatment (POET) system sampling and operation, maintenance, and monitoring (OMM)
- July 1, 2024 to September 30, 2024 – Private well sampling
- July 1, 2024 to September 30, 2024 – Ditch A Treatment System OMM, weekly and quarterly sampling for the Wisconsin Pollution Discharge Elimination System (WPDES) permit, monthly downstream surface water sampling
- July 1, 2024 to September 30, 2024 – Ditch B Treatment System OMM, weekly and quarterly sampling for the WPDES permit, monthly downstream surface water sampling
- July 1, 2024 to September 30, 2024 – Deep private well installations (29 locations)
- July 1, 2024 to September 30, 2024 – Short-Term Phase groundwater monitoring associated with the July 2021 Groundwater Extraction and Treatment System (GETS) Long-Term Monitoring (LTM) Plan
- July 1, 2024 to September 30, 2024 – Deep monitoring well quarterly sampling
- July 1, 2024 to September 30, 2024 – Continued operation of the GETS

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- July 1, 2024 to September 30, 2024 – Weekly foam monitoring at Ditch A through Ditch E, foam was observed and collected from Ditch B until mid-July, no foam observed after mid-July for Ditch B and no foam observed during this period at Ditches A and C through E
- July 8, 2024 to July 15, 2024 – Complete vertical aquifer profiling (VAP) sampling and monitoring well installations in accordance with the August 2023 Additional Site Investigation Work Plan for the FTC and the Response to April 17, 2024 Comments – Response to Interim Long Term Monitoring Plan for Groundwater and Surface Water for the FTC dated June 3, 2024
- July 11, 2024 to September 30, 2024 – Ongoing operation of pilot test at the GETS for new solids handling method utilizing Geotube (C) solids condensing system, in lieu of filter press use. This change has produced higher quality leachate water which in turn has allowed the sand filter to operate with fewer backwash cycles and improved system performance.
- July 24, 2024 – Complete groundwater sampling at two wells in accordance with the August 2023 Additional Site Investigation Work Plan for the FTC
- August 2, 2024 to September 30, 2024 – Approval received from WDNR for GETS modification to utilize hydrogen peroxide as an oxidant in lieu of potassium permanganate as an oxidant. Preparations are ongoing to modify the dosing pumps to begin use of hydrogen peroxide and a switch of oxidant chemical is anticipated for early October.
- September 11, 2024 – Q3 groundwater monitoring in accordance with the March 2024 Interim LTM Plan for Groundwater and Surface Water for the FTC

Deliverables Submitted to WDNR

- July 2, 2024 – Exemption Request for Beneficial Reuse of Soils; Tyco FTC
- July 2, 2024 – GETS Short-Term Monitoring Phase Report #3 – Lab Report Addendum; Tyco FTC
- July 15, 2024 – Q2 2024 Project Status; Tyco FTC, Stanton Street
- July 17, 2024 – Exemption Request for Beneficial Reuse of Soils; Tyco FTC
- July 19, 2024 – Ditch A, Ditch B, and GETS Monthly WPDES Discharge Monitoring Reports (June 2024); Tyco FTC
- July 26, 2024 – High Capacity, School or Wastewater Treatment Plant Well Approval Request (EX-10, EX-11, EX-0); Tyco FTC
- July 26, 2024 – High Capacity, School or Wastewater Treatment Plant Well Approval Request (EX-12, EX-13, EX-14); Tyco FTC
- July 31, 2024 – Potable Well Sampling Program Annual Summary Report; Tyco FTC
- August 6, 2024 – Notice of Termination, WDDES General Permit Discharge for the Soil Interim Remedial Action; Tyco FTC
- August 20, 2024 – Ditch A, Ditch B, and GETS Monthly WPDES Discharge Monitoring Reports (July 2024); Tyco FTC
- August 21, 2024 – WPDES General Permit No.: WI-0046566-07-0 GETS Request to Modify Permit; Tyco FTC
- August 23, 2024 – 2024 Site Investigation Status and Interim Long Term Monitoring Report; Tyco FTC
- September 3, 2024 – Deep Aquifer Bedrock Well Design and Long-Term Monitoring Update – Quarterly Deep Private Well Update (June - July 2024); Tyco FTC
- September 18, 2024 – Ditch A, Ditch B, and GETS Monthly WPDES Discharge Monitoring Reports (August 2024); Tyco FTC

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WDNR/Tyco Correspondence

Tyco Submittal to WDNR

- July 15, 2024; August 14, 2024; August 28, 2024; September 13, 2024 – Database Uploads
- July 1, 2024; July 3, 2024; July 23, 2024; August 13, 2024; September 9, 2024 – Sample Results Notifications
- July 1, 2024; July 7, 2024; July 10, 2024 – Foam Observation Notifications
- August 14, 2024; August 29, 2024; September 5, 2024 – FTC Soil Beneficial Reuse Notifications

WDNR Submittal to Tyco

- August 2, 2024 – Plans and Specifications for GETS Modifications; WPDES General Permit no. WI-0046566-07-0
- August 12, 2024 – Approval to Manage Contaminated Soil under Wis. Admin. Code § NR 718.12; BRRTS #02-38-580694 and #03-38-001345
- August 26, 2024 – Response to Potable Well Sampling Program Annual Summary Report April 1, 2023 to March 31, 2024; BRRTS #02-38-580694
- August 28, 2024 – Permit Amendment for wetland disturbance activities in the City of Marinette, Marinette County; IP-NE-2021-38-01597 and 10598

WDNR/Tyco Summits and Periodic Meetings

- Weekly calls between WDNR and Tyco

Planned Activities

- Continue field work related the GETS LTM Plan Short-Term Monitoring Phase and optimization activities
- Install new GETS wells: EX-10, EX-11, EX-12, EX-13, and modify existing monitoring well PZ-64-67 to become extraction well EX-14
- GETS modification to utilize hydrogen peroxide in lieu of sodium permanganate for an oxidizing chemical addition, in accordance with WDNR approval
- GETS modifications to add additional sand filters and permanent Geotube installation, in accordance with WDNR system modifications approval
- Continued field work related to the FTC Interim LTM Plan for Groundwater and Surface Water
- Continue field work related to the FTC 2023 Additional SIWP and in consideration of November 17, 2023 WDNR comments on the 2023 Additional SIWP
- Continue foam monitoring activities at Ditch A through Ditch E
- Continue outreach to Town of Peshtigo residents in the Potable Well Sampling Area (PWSA) to implement long-term drinking water solution(s)
- Continue installation of private deep drinking water wells
- Continue sampling of deep monitoring wells
- Continue OMM activities associated with the LTM Plan and reporting for the Ditch A and B Treatment Systems
- Continue OMM activities associated with the GETS building

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- Continue quarterly private well sampling and POET OMM per the Revised Long-Term Potable Well Sampling Plan, v.9
- Surveying of the channel cross section, instrument elevation, and surface water elevation at the Ditch B stilling well location for the calculated stream flow rates, scheduled for October 3, 2024

Tyco and Arcadis appreciate WDNR's collaboration on this project. Should you have any questions, please contact the undersigned.

Sincerely,
Arcadis U.S., Inc.

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Senior Environmental Specialist

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CC. Denice Nelson