

From: Chronert, Roxanne N - DNR
Sent: Wednesday, May 20, 2020 11:36 AM
To: Jeffrey Howard Danko
Cc: Rick Bethel; Neste, David E - DNR; Kelly, Bridget B - DNR; Haag, Christine T - DNR (Christine.Haag@wisconsin.gov)
Subject: COVID-19 Compliance Process - Land-Applied Biosolids Private Well Sampling

Jeff, as a follow-up to our discussion on April 29, 2020, the DNR Remediation and Redevelopment Team received your Land-Applied Biosolids Private Well Sampling compliance assistance request on April 10, 2020. After review, a response to each specific alternative request/schedule as a result of COVID-19 is outlined below:

Potable Wells within 1200 feet of Marinette Biosolid Applied Fields that Were Not Previously Sampled - JCI/Tyco has retracted their COVID-19 Compliance Assistance Request and will resume potable well sampling by June 1, 2020. For potable well owners/tenants that are NOT comfortable with someone entering the home to conduct the potable well sampling due to COVID19, JCI/Tyco shall provide bottled water and inquire about the ability to sample from outside port. Potable water should be offered to all potable well owners in the within 1200 feet of Marinette Biosolid Applied Fields that Were Not Previously Sampled.

Resampling of Potable wells previously sampled with combined PFOA/PROS at or above 20 ppt - The DNR concurs with the temporary suspension, until May 26, 2020, of the resampling of potable wells with a combined PFOA & PFOS at or greater than 20ppt as long as long as bottled water is continued to be provided. Sampling of these private drinking water well shall resume after May 26, 2020.

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Roxanne Nelezen Chronert

Phone: (920) 362-3981

Roxanne.Chronert@Wisconsin.gov

From: Neste, David E - DNR <David.Neste@wisconsin.gov>
Sent: Monday, April 13, 2020 6:38 AM
To: Chronert, Roxanne N - DNR <Roxanne.Chronert@wisconsin.gov>
Subject: FW: COVID-19 Compliance Process - Land-Applied Biosolids Private Well Sampling

Rox,

Below is the Compliance Assistance Request for the JCI/Tyco Biosolids fields. They are requesting to suspend the scheduled April 2020 sampling until approximately June 2020.

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Dave Neste

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david.neste@wisconsin.gov

From: Coleman, Matthew <Matthew.Coleman@arcadis.com>

Sent: Friday, April 10, 2020 12:56 PM

To: Neste, David E - DNR <David.Neste@wisconsin.gov>

Cc: Rick Bethel <rick.dewey.bethel@jci.com>; Jeffrey Howard Danko <jeffrey.howard.danko@jci.com>; Scott D Wahl <scott.wahl@jci.com>; Bedard, Michael <Michael.Bedard@arcadis.com>; Verburg, Ben <Ben.Verburg@arcadis.com>

Subject: COVID-19 Compliance Process - Land-Applied Biosolids Private Well Sampling

Dave,

Below is the information for the COVID-19 Compliance Process you requested specific to our support with the land-applied biosolids private well sampling.

1. Name of the facility/site: Land-Application of Biosolids from the Marinette Municipal Wastewater Treatment Plant One-Time Sampling Program
2. Contact information for the central point of contact for the facility/site:
 - a. Name of person notifying: Tyco | Rick Bethel
 - b. Address: 2700 Industrial Parkway South
 - c. City/Town: Marinette
 - d. State: Wisconsin
 - e. Zip: 54143
 - f. Email: Rick.Dewey.Bethel@jci.com
 - g. Phone: 715-735-7411 x 84750
 - h. Primary WDNR Contact for Site or Facility: David Neste
3. State what specific statute/rule/permit condition the individual party is looking for flexibility from.

The schedule outlined in our recently submitted work plan called for sampling of private drinking water wells to be completed by early April. COVID-19 forced us to suspend our program to maintain compliance with "Safer at Home" and "Social Distancing" recommendations.
4. Include the reasoning/rationale for the request and related to the COVID-19 emergency (1 paragraph)

"Safer at Home" and "Social Distancing" recommendations by state and local governments inhibit travel and the abilities of field personnel to carry out certain tasks in a safe manner. Activities that require potential close contact, e.g. entering a residential property for sampling, would directly contradict the intent of those recommendations.
5. Include bulleted points of what measures will be taken to mitigate/minimize the potential environmental impacts (if any)
 - a. Interim actions remain in place – bottled water will be offered for PFOS+PFOA results above 20 PPT.
6. Specify the specific time period that the request is for including the rationale.

We are hopeful that field work can continue in June once "Safer at Home" and "Social Distancing" recommendations have been lifted. However, that timeline remains fluid.

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