

Mr. David Neste
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
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Subject:

Q3 2020 Project Status; Tyco Fire Technology Center (FTC) PFAS at 2700 Industrial Parkway South, Stanton Street PFAS at One Stanton Street, and Land Applied Biosolids Area, Marinette, Wisconsin
BRRTS Activity#: 02-38-580694, 02-38-581955, and 02-38-583856

ENVIRONMENT

Dear Mr. Neste:

On behalf of Tyco Fire Products LP (Tyco), Arcadis submits this status report to summarize activities completed, data collected, issues identified, corrective actions, and WDNR/Tyco correspondence for the 3rd quarter, 2020, as well as planned activities for the upcoming quarter (Q4 2020). 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.

Date:
October 15, 2020

Contact:
Ben Verburg

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PROJECT STATUS

Below is a summary of the project status for the Tyco FTC and Stanton Street facilities and long-term drinking water supply for the period from July 1, 2020 to September 30, 2020 (Q3 2020) and planned activities from October 1, 2020 to December 31, 2020 (Q4 2020).

Activities Completed

Field Work

- July 1, 2020 - September 30, 2020 – Point-of-Entry Treatment (POET) system sampling and operation and maintenance (O&M)
- July 1, 2020 - September 30, 2020 – Ditch A/B treatment system O&M and weekly Wisconsin Pollutant Discharge Elimination System (WPDES) permit sampling
- July 1, 2020 - August 15, 2020 – Land Applied Biosolids Area drinking water well sampling
- July 21, 2020 - August 14, 2020 – operation of the temporary Building 105 addition dewatering system and weekly WPDES permit sampling
- July 28, 2020 – surface water sampling in Ditches A and B downstream of their surface water treatment systems

- August 11, 2020 – Hydraulic profiling tool (HPT) and soil boring data collection to support a future Groundwater and Soil Management Plan for municipal water supply line construction
- August 17, 2020 - August 28, 2020 – commenced field work for FTC investigation (field conditions reconnaissance, wetland delineation, and related work)
- August 24, 2020 - August 28, 2020 – fish tissue sampling in privately owned ponds within the FTC investigation area
- September 14, 2020 – Bay of Green Bay surface water sampling
- September 17, 2020 - September 18, 2020 – floating boom deployment to address third party oil release upstream of the Ditch B surface water treatment system
- September 18, 2020 - September 30, 2020 – daily foam monitoring and boom deployment activities (Ditch A – Ditch E)
- September 28, 2020 - September 30, 2020 – utility location and soil sampling associated with the August 2020 Supplemental Site Investigation Work Plan for the FTC

Deliverables Submitted to WDNR

- July 10, 2020 – Foam Monitoring Immediate Actions Report
- July 15, 2020 – Q2 2020 Project Status, Tyco FTC and Stanton Street, Marinette
- July 15, 2020 – Conceptual Site Model - Stanton Street
- July 16, 2020 – Air Deposition Evaluation Report – Stanton Street
- July 21, 2020 – Ditch A/B Monthly WPDES Report (June 2020)
- July 21, 2020 – Building 105 Monthly WPDES Report (June 2020)
- July 22, 2020 – Building 105 Soil Request to Manage Materials Report
- August 17, 2020 – Supplemental Site Investigation Work Plan – FTC
- August 21, 2020 – Ditch A/B Monthly WPDES Report (July 2020)
- August 21, 2020 – Building 105 Monthly WPDES Report (July 2020)
- August 28, 2020 – Ditch A/B Surface Water Data Submittal Letter
- August 28, 2020 – Green Bay Surface Water Data Submittal Letter
- September 1, 2020 – Draft Project Schedule, Tyco FTC and Stanton Street, Marinette
- September 9, 2020 – Ditch A/B Semi-Annual Monitoring Report (1/1/2020 – 6/30/2020)
- September 15, 2020 – Site Investigation Work Plan – Stanton Street
- September 18, 2020 – Drinking Water Well Sampling Summary Report - Land Applied Biosolids Area
- September 21, 2020 – Ditch A/B Monthly WPDES Report (August 2020)
- September 21, 2020 – Building 105 Monthly WPDES Report (August 2020)

Issues Identified

- While PFAS concentrations in Ditch A (sampled July 28) and Green Bay (sampled June 23) were below WDNR's proposed surface water standards, Ditch B surface water collected downstream of the Ditch B treatment system (sampled July 28) was above WDNR's proposed surface water standards. After discussion with WDNR, approval was provided by WDNR to increase the Ditch B treatment system flow rate, and the Ditch B treatment system flow rate was increased to 700 gallons per minute on September 17, 2020 to allow capture of more surface water. Since late

August 2020, discussions with WDNR have been on-going regarding a plan to address the groundwater source of PFAS in Ditch B.

Corrective Actions

- Field activities are on-going; personnel are following applicable federal, state, and local coronavirus guidance to prevent exposure to and spread of the disease while conducting field activities.
- On September 11, 2020, post cards were mailed to 20 homeowners. Only one well owner responded, and that well was not available for sampling prior to September 30, 2020. This well will be sampled during the Fall 2020 event.
- On September 17, 2020, an oil sheen originating from a third party was observed in Ditch B upstream of the Ditch B treatment system. This sheen was not related to Tyco activities. The Ditch B treatment system was shut down as a precautionary measure, and Tyco voluntarily deployed surface water booms. The Ditch B treatment system was restarted on September 25, 2020.
- An action plan to address PFAS entry to Ditch B via groundwater is in progress.

WDNR/Tyco Correspondence

Tyco Submittal to WDNR

- July 2, 2020; July 8, 2020; July 15, 2020; July 17, 2020; July 24, 2020; July 31, 2020; August 6, 2020; August 14, 2020; September 4, 2020 – copies of Land Applied Biosolids Area drinking water well results letters
- July 2, 2020; July 17, 2020; July 31, 2020; August 14, 2020; August 28, 2020; September 11, 2020 – bi-weekly update emails to provide Land Applied Biosolids Well Sampling Area information requested by WDNR
- July 2, 2020; July 17, 2020; July 31, 2020; August 14, 2020; August 28, 2020; September 11, 2020; September 22, 2020 – PFAS database uploads
- July 2, 2020; July 17, 2020; July 31, 2020; August 14, 2020; September 11, 2020; September 22, 2020 – GIS shape files requested by WDNR
- July 13, 2020 – response to WDNR Notice of Intent to Incur Expenses and Expand Potable Well Sampling

WDNR Submittal to Tyco

- July 7, 2020 – WDNR Notice of Intent to Incur Expenses and Expand Potable Well Sampling Letter
- August 12, 2020 – WDNR Requirements for Notification Letters based on DHS Recommendations for the Remedial Action Site Activities Related to BRRTS Nos. 02-38-000011, 02-38-559214, 02-38-580694, 02-38-581955, 02-38-583856, and 03-38-001345
- August 17, 2020 – WDNR Regulatory Reminder Sent (Emerging Contaminants Reminder Letter)
- September 25, 2020
 - Response to Materials Management Plan for Building 105 construction
 - Response to FTC Interim Site Investigation Report

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- Response to FTC Conceptual Site Model
- Response to Well Survey Reports for FTC and Stanton Street

WDNR/Tyco Summits and Periodic Meetings

- Informal weekly calls between WDNR and Tyco
- August 4, 2020 – quarterly WDNR-Tyco Summit (Q3 2020)
- September 11, 2020 – WDNR-Tyco meeting to discuss groundwater plume, Ditch B and related items
- September 16, 2020 – Tyco participated in WDNR Listening Sessions

Planned Activities

- Continue deliverable preparation and submittal, per the Draft Project Schedule submitted to the WDNR on September 1, 2020
- WDNR/Tyco Summit Meeting via conference call and web broadcast scheduled for October 20, 2020 and tentatively for October 28, 2020
- Continue field work related to the FTC Supplemental Site Investigation Work Plan
- Commence field work related to the Stanton Street Near-Term Bedrock Groundwater Evaluation Work Plan following access negotiations with the City of Marinette
- Continue daily foam monitoring activities on Ditch A – Ditch E until freezing weather conditions
- Continue negotiations and dialogue associated with long-term drinking water distribution system expansion into the Town of Peshtigo

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

Sincerely,

Arcadis U.S., Inc.



Benjamin J. Verburg, P.E.
Principal Engineer

Copies:

Katie McGinty, Jeffrey Danko, Scott Wahl – Johnson Controls