



June 2, 2021

MR. JEFFREY DANKO
JOHNSON CONTROLS, INC
5757 N. GREEN BAY AVENUE
MILWAUKEE, WI 53209

MR. SCOTT WAHL
TYCO FIRE PRODUCTS LP
1 STANTON STREET
MARINETTE, WI 54143

SUBJECT: Response to Quality Assurance Project Plan (QAPP)
JCI/Tyco FTC PFAS, 2700 Industrial Parkway South, Marinette, WI
JCI/Tyco Stanton PFAS, 1 Stanton Street, Marinette, WI
JCI/Tyco Biosolids PFAS, Multiple Landspreading Fields, Marinette, WI
BRRTS #02-38-580694, 02-38-581955, and 02-38-583856

Dear Mr. Danko and Mr. Wahl:

On March 16, 2021, the Wisconsin Department of Natural Resources (DNR) received the Quality Assurance Project Plan (QAPP) for the above-referenced sites submitted by Arcadis U.S, Inc. (Arcadis) on behalf of Johnson Controls, Inc. and Tyco Fire Products LP (JCI/Tyco). The QAPP was accompanied by the appropriate fee of \$700 required under Wisconsin Administrative Code (Wis. Adm. Code) ch. NR 749.04(1) for formal DNR review and response.

Background

On May 8, 2020, the DNR received JCI/Tyco's draft QAPP for the three BRRTS cases listed above that JCI/Tyco is responsible for responding to discharges of per- and polyfluoroalkyl substance (PFAS) compounds to the environment under Wis. Adm. Code chs. NR 700-799. JCI/Tyco submitted the draft QAPP in response to the DNR's letter dated February 19, 2021, in which the DNR directed JCI/Tyco to submit a QAPP to ensure consistency in the sampling procedures and methods used on these three PFAS projects (Wis. Adm. Code § NR 716.17(1)).

On January 21, 2021, the DNR provided JCI/Tyco with a technical review to its draft QAPP. In response, on March 16, 2021, JCI/Tyco's submitted a QAPP that incorporates the DNR's technical review comments and a cover letter that specifies how each of the DNR's comments were addressed.

Summary of QAPP

JCI/Tyco's QAPP details the planning processes for collecting investigation sampling data and describes the implementation of quality assurance (QA) and quality control (QC) activities developed for this investigation. The objectives of the QAPP are to generate project data that are technically defensible and useful in meeting the project goals. The project goals are to define the nature and extent of PFAS impacts in all media during the site investigation including private well sampling activities that JCI/Tyco is conducting in the city of Marinette and town of Peshtigo, Wisconsin. The QAPP is supplemented by individual Work Plans that define specific objectives and scopes of work for each project.

DNR Review

The DNR reviewed the QAPP and thanks JCI/Tyco for including a cover letter that makes it clear how each of the DNR's previous comments to the draft were addressed. The DNR's review was limited to the QAPP Worksheets and did not include review the Field Activity Standard Operating Procedures. The DNR finds that JCI/Tyco has adequately addressed the comments to the draft that were provided in January 2021 and has fulfilled its requirement to submit a QAPP per Wis. Adm. Code § NR 716.17(1) for the three BRRTS cases listed above.

Conclusions and Next Steps

The QAPP will be maintained for reference in the site file for each of the three BRRTS cases and it is expected to be updated as needed to reflect changes in project scope, team, methods or site conditions. **Hereafter, review the QAPP at least annually, and in March of each calendar year submit a letter to the DNR that indicates that the QAPP has been reviewed and no changes were needed or that the QAPP has been reviewed and revisions were made.** If the QAPP is revised, specify the changes made to the QAPP in the cover letter and include the revised QAPP (or specific QAPP Worksheets) in the submittal. The updated QAPP will be uploaded and saved as the current version in the site file for each of the three BRRTS cases.

As a reminder, this site is subject to an enforcement action and therefore all submittals to the DNR under Wis. Adm. Code chs. NR 700-799 and submittals directed by the DNR must be accompanied by an Wis. Adm. Code ch. NR 749 fee per Wis. Stat. § 292.94. These fees are not pro-ratable or refundable per Wis. Adm. Code § NR 749.04(1). **A Wis. Adm. Code ch. NR 749 review fee is not required to be submitted with the annual letter documenting review of the QAPP if there are no changes to the QAPP or if the changes do not require technical review.** If you have any questions about whether to include a fee with a submittal, please contact DNR staff prior to submitting a document without a fee.

The DNR appreciates your efforts to investigate and remediate this Site. If you have any questions, please contact me, the DNR Project Manager, at (608) 622-8606 or Alyssa.Sellwood@wisconsin.gov.

Sincerely,



Alyssa Sellwood, PE
Complex Sites Project Manager
Remediation & Redevelopment Program

cc: Scott Potter, Arcadis (via email: Scott.Potter@arcadis.com)
Bridget Kelly, DNR (via email: bridgetb.kelly@wisconsin.gov)
Jodie Peotter, DNR (via email: Jodie.Peotter@wisconsin.gov)