



July 1, 2019

Mr. Jeffrey Danko
EHS Manager – Environmental Remediation
Johnson Controls International
5757 N. Green Bay Ave
Milwaukee, WI 53209

Subject: Johnson Controls International - PFAS Contamination in Marinette and Peshtigo
Posting of Signs – Providing Surface Water Contamination Notifications
2700 Industrial Parkway South, Marinette, WI
DNR BRRTS Activity #: 02-38-580694

Dear Mr. Danko:

As you are aware, the Wisconsin Department of Natural Resources (Department) is working with Johnson Control, International (JCI) to develop and deliver public notifications pursuant to Wis. Admin Code ch. NR 714 regarding per- and polyfluoroalkyl substances (PFAS) contamination in the City of Marinette and Town of Peshtigo area. This includes publicly posted signs and notifications to landowners within the areas impacted by PFAS from JCI facilities.

Per your June 10, 2019 e-mail request for assistance, the Department has worked with the Department of Health Services (DHS) to develop language for signs and other public notifications. Enclosed with this letter is a copy of the correspondence the Department received from DHS with language that the state requests be used in public notifications (Attachment 1), as well as a copy of the necessary required sign language (Attachment 2). Detailed information about posting the signs and providing notice are described below.

Pursuant to Wis. Admin. Code §§ NR 714.07 (2), (3)(j), and (4) (JCI) shall provide public notice regarding PFAS contamination as follows:

1. Post signs at various surface water public access points that are visible to the general public (Ditches A-E, public ponds, and other surface waters) within the area impacted by PFAS from the JCI facilities in the City of Marinette and Town of Peshtigo.
 - a. The Department recommends that the signs be a minimum of 12 inches X 18 inches in size, constructed of a durable material that will withstand the elements, and posted in clearly visible locations to within the areas described above.
 - b. These signs shall be maintained and remain legible for the duration of the response action until final case closure is received in accordance with ch NR 726 or until no longer required by the Department.
2. Mail letters to all land owners adjacent to Ditches A -E and create a public notice that informs those in the community that have a private pond or storm water pond. The letter and public notice shall provide them with the same information as outlined in Attachment 1 and a map showing sample results of impacted surface waters and posted sign locations.

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Surface Water Signs
Tyco Fire Technology Center – BRRTS # 02-38-580694

3. Mail letters to the City of Marinette, and the Town of Peshtigo requesting that they post a copy of the sign and map of Ditches A-E on their website.
4. Post a copy of the sign, a map of Ditches A-E showing sign locations, an explanation of the sign and map, and a copy of this letter on the JCI website for the PFAS investigation (<http://marinette.tycofpp.com/>). Please work with the local governments and impacted citizens on the placement of the signs.
5. Provide a public notice in the local newspaper regarding the signs.

Additionally, Please provide the Department with a map of the proposed locations where signs will be posted throughout the areas described above, a mock-up of the proposed sign, a draft letter to adjacent homeowners and a list of homeowners who will receive the letter, a draft letter to the City of Marinette, and Town of Peshtigo (including a copy of the map of the sign locations and a copy of the letter to the landowners), and draft language for the JCI website **within 14 days** of the date of this letter.

Upon review and approval by the Department for the signs and sign locations, the signs shall be installed **within 14 days**.

If you have any questions or concerns regarding the above request, please contact the Department Project Manager, David Neste, at (920) 424-0399, or by email at david.neste@wisconsin.gov. Thank you for your attention to this matter.

Sincerely,



David Neste
Hydrogeologist
Remediation & Redevelopment Program

Attachments:

- Attachment 1
- Attachment 2

Tony Evers
Governor



State of Wisconsin
Department of Health Services

DIVISION OF PUBLIC HEALTH

1 WEST WILSON STREET
PO BOX 2659
MADISON WI 53701-2659

Telephone: 608-266-1251
Fax: 608-267-2832
TTY: 711 or 800-947-3529

Andrea Palm
Secretary

June 21, 2019

Roxanne Chronert
Wisconsin Department of Natural Resources
NR Region Program Manager

Dear Ms. Chronert,

The Wisconsin Department of Health Services (DHS) received a request from the Wisconsin Department of Natural Resources (DNR) to assess the health risks of perfluoroalkyl and polyfluoroalkyl substances (PFAS) in surface waters and foam. This request is part of the ongoing investigation into groundwater contamination in the Town of Peshtigo and the City of Marinette from the Tyco Fire Training Facility. We were specifically asked for assistance with messaging to put on signs in the area.

During recreational activities in streams and ponds, people can be exposed to PFAS by swallowing and touching the water. Accidental swallowing (ingestion) is the main source of PFAS exposure from surface water; this is especially true for children as they swallow more water than adults during recreational activities. However, touching (dermal) is a minor source of PFAS exposure. Available information suggests that as a class of chemicals PFAS do not easily enter through the skin, although the extent to which they do cross the skin depends on the chemical's characteristics and some PFAS are more readily absorbed than others. This means that people are not likely to absorb PFAS through the skin while swimming, splashing, or wading in the waters.

Sometimes foam can form on surface water due to various causes. Areas impacted by PFAS contamination can have foam on surface waters with much higher amounts of PFAS than the water. In general, DHS recommends people avoid swallowing foam on the water, whether it has PFAS in it or not. We also recommend people wash their hands after touching the foam. Touching the foam (dermal exposure) is not a health concern. DHS will continue to evaluate surface water and foam data and provide further recommendations as needed.

Conclusion:

There is a small chance to swallow (ingestion exposure) PFAS in surface water and foam during recreational activities. Accidentally swallowing water or foam is unlikely to cause someone to become sick. However, we recommend avoiding unnecessary exposure to PFAS to prevent any potential long-term health effects.

Touching (dermal exposure) is not a major source of exposure from surface water. Touching the water or foam should not lead to health effects. However, we recommend people wash their hands after touching foam to avoid accidentally swallowing PFAS.

Recommendation:

To best protect people from potential PFAS exposure from surface water, DHS recommends people avoid drinking or accidentally swallowing the water or foam and wash their hands after wading or playing in the water.

DHS also recommends this information be shared broadly with the community, either through the posting of signs or other communication methods, such as websites. These recommendations (i.e., avoid swallowing water or foam, touching the water or foam is fine) are the same for inland surface waters in the area, such as ponds.

The attached appendix has sample sign language to include on the signs.

Please let me know if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Disa Patel". The signature is fluid and cursive, with a horizontal line underneath the name.

Disa Patel
Site Evaluation Program Manager
Division of Public Health

cc: Dave Neste, DNR Project Manager

Appendix: Sample Sign Language

The Wisconsin Department of Health Services recommends people avoid drinking or accidentally swallowing the water or foam. To best protect you and your family from potential PFAS exposure from this water:

- Avoid drinking or accidentally swallowing the water or foam.
- Wash your hands after wading or playing in the water or foam.

Touching the water is not a health concern. For more health information, visit:

- WI DHS website: www.dhs.wisconsin.gov/chemical/pfas.htm
- WI DNR Fish Advisories: dnr.wi.gov/topic/fishing/consumption

ADVISORY

Possible Chemical Exposure Hazard

This water contains PFAS (per- and polyfluoroalkyl substances).

The Wisconsin Department of Health Services recommends people avoid drinking or accidentally swallowing the water or foam. To best protect you and your family from potential PFAS exposure:

- **Avoid drinking or accidentally swallowing the water or foam.**
- **Wash your hands after wading or playing in the water or foam.**

Touching the water or foam is not a health concern. For more health information, visit:

- WI DHS website: www.dhs.wisconsin.gov/chemical/pfas.htm
- WI DNR Fish Advisories: dnr.wi.gov/topic/fishing/consumption

This surface water is currently being investigated and cleaned up in accordance with Wisconsin laws. For more information:

- **WI Department of Natural Resources & WI Department of Health Services: 1-800-XXX-XXXX**
- **Johnson Controls, Inc. (Tyco), 1 Stanton St., Marinette, WI: 1-800-314-1381**
- **WI DNR web site: XXX**
- **WI JCI website: <http://marinette.tycofpp.com/>**