



July 11, 2019

JEFFREY DANKO
EHS MANAGER – ENVIRONMENTAL REMEDIATION
JOHNSON CONTROL
5757 N GREEN BAY AVENUE
MILWAUKEE WI 53209

Subject: Review of Site Investigation Work Plan
Johnson Controls/Tyco Fire Technology Center
2700 Industrial Parkway South, Marinette, WI
BRRTS #: 02-38-580694

Dear Mr. Danko:

On June 6, 2019, the Wisconsin Department of Natural Resources (DNR) received the *Heath Lane Area Site Investigation Work Plan* (Report) prepared for Johnson Controls International (JCI), dba Tyco Fire Products, LP, by Arcadis U.S., Inc. (Arcadis). The Report was submitted with a fee for DNR review and response. The submittal of a Site Investigation Work Plan (SIWP) is required per Wis. Admin. Code § NR 716.09, as this site is subject to regulation under Wis. Stat. § 292. The DNR reviewed the Report for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and has determined that the general code requirements have been met with additional comments as provided in this response letter.

Background

The JCI/Tyco Fire Technology Center (Site) is situated on an approximately 380-acre property located on the south side of the City of Marinette. The facility was built in the 1960s and is used to conduct fire suppressant training, testing, and development. Historically aqueous film-forming foams (AFFF) were used at the property as part of research and development, quality testing, and firefighting training.

A release of per- and polyfluoroalkyl substances (PFAS) containing compounds from the Site was reported to the DNR in November 2017. Subsequent investigation of drinking water and groundwater indicated contaminants had spread south-southeast into the Town of Peshtigo, which is serviced entirely by private potable wells.

The Heath Lane area is located approximately 1.5 miles southeast of the Site and consists of residential properties, undeveloped land, with a closed municipal landfill to the west. Laboratory analytical data from Vertical Aquifer Profile (VAP) samples collected in the Heath Lane area indicates PFAS contaminants are present at low concentrations in groundwater.

Site Investigation Work Plan Summary

In lieu of incorporating the residential properties in the Heath Lane area into the potable well monitoring program, JCI is submitting this work plan to further investigate surface and groundwater flow characteristics in the area. In

addition, permanent monitoring wells are proposed to conduct additional monitoring and analysis of the groundwater in the Heath Lane area.

DNR Review of the Site Investigation Work Plan

Following the DNR's review of the Report, the DNR requests that you proceed with the proposed work, while incorporating the following comment(s):

- The DNR requests the installation of one (1) additional piezometer on the west end of Edwards Avenue, near the proposed ditch piezometer/stilling well pair.
- Collect groundwater elevation data concurrently with groundwater sample collection from all monitoring wells, piezometers, and temporary wells. Develop and groundwater flow direction maps and groundwater contaminant isoconcentration maps to be submitted as part of the Site Investigation Report described below.

Other Considerations

Pursuant to Wis. Admin. Code §§ NR 716.11 (4), (5)(b), and (5)(c), the Department requests JCI collect samples from the four (4) private potable wells, previously sampled by the City of Marinette, and conduct laboratory analysis for per- and polyfluoroalkyl substances (PFAS) compounds. The potable wells to be sampled are located at:

1. 2017 Marinette Avenue;
2. 2025 Marinette Avenue;
3. 2033 Marinette Avenue, and;
4. 4161 Frontage Road.

Private potable well sampling results must be sent to the DNR and property owner(s), and occupants, from which samples have been collected, within 10 days of receipt (Wis. Admin. Code § NR 716.14). Please also submit a copy to Warren Howard at the City of Marinette.

Schedule

The submitted Report does not include a schedule for conducting the field investigation and reporting the results, per Wis. Admin. Code § NR 716.09(2)(h). The DNR requests that the field work outlined in the Report be conducted in conjunction with field work for 2019 previously approved by the DNR.

- Per Wis. Admin. Code § NR 716.14(2), provide sampling results to the DNR, property owner, and occupants within **10 business days** of receiving the sample results. Provide a recommendation based on the initial results for sampling of potable wells within the Heath Lane area. Upon the receipt the DNR will review the results and your recommendation for potable well sampling in the Heath Lane area, and provide a response.
- Per Wis. Admin. Code § NR 716.11(1)(2g), field investigation activities shall be initiated within 90 days of submittal of the work plan, by September 11, 2019.
- **Within 30 days** of the date of this letter, please provide a written response to the DNR's request to sample the four (4) potable wells in the City of Marinette.

- Results of the site investigation activities must be submitted to the DNR in a comprehensive Site Investigation Report (SIR) that meets the requirements in Wis. Admin. Code § NR 716.15. The SIR shall be submitted to the DNR within 60 days after completion of the field investigation and receipt of laboratory data. The DNR suggests that the SIR be submitted with a fee for review and response.
- NR 700 semi-annual progress reports will be required until the case is closed.

Closing

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at (920) 424-0399 or david.neste@wisconsin.gov.

Sincerely,



David Neste
Project Manager – Hydrogeologist
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

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