



February 18, 2020

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

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

**Subject: Preliminary Review of Site Investigation Work Plan  
WWTP Contamination and Associated Fields Utilized for Landspreading Municipal  
Biosolids; Marinette, Wisconsin; BRRTS #: 02-38-583856**

Dear Mr. Danko and Mr. Wahl:

On November 15, 2019, the Wisconsin Department of Natural Resources (DNR) received the *Biosolids Landspreading – Phase I Investigation Work Plan* (Phase I WP) prepared for Tyco Fire Products, LP (Tyco) by Arcadis US, Inc. (Arcadis). The Phase I WP was submitted with a fee for DNR review and response.

Since the submission of the Phase I WP, DNR and representatives from Johnson Controls, Inc. (JCI), Tyco and Arcadis have discussed the open site investigations in the Marinette area. DNR requested JCI and Tyco to prioritize sampling potable wells in and around the fields where Marinette municipal biosolids have been landspread. As agreed to, you will to perform sampling of potable wells within 1,200 feet of property boundaries of the known fields where Marinette municipal biosolids were applied. According to available records, this number is 61 total fields. A map of the fields is available on the website for the Waste & Wastewater Department of the City of Marinette.

City of Marinette Biosolids Map: <https://www.marinette.wi.us/421/Biosolids-Map>

Based on our discussions, you have committed to perform the following actions:

- Begin potable well sampling efforts in the field by March 3, 2020;
- Provide weekly updates to DNR regarding progress of the sampling efforts;
- Notify the well owners and occupants, as applicable, and DNR, of sample results within the required timeframe of 10 business days after receiving the sample results in accordance with Wis. Admin. Code § NR 716.14 (1);
- Provide bottled water to well owners whose wells are the subject of the testing, upon request of the well owner;
- Notify and work with DNR if a property owner refuses access at any of the locations;
- Submit a comprehensive report including analysis, per Wis. Admin. Code § NR 716.14, of the cause and significance of any contaminants of concern found in the sampling efforts by the week of May 11, 2020;
- Schedule a meeting with DNR to be held during the week of May 11, 2020 to discuss the cause and significance of any contaminant concentrations observed in the samples and recommended next steps.

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DNR will upload potable well data to its BRRTS on the web database in the same manner as potable well data provided by Arcadis associated with BRRTS case #02-38-580694.

With regard to the review of the Phase I WP, DNR has outlined the requirements of a site investigation work plan (SIWP) evaluating all media and migration pathways for PFAS in previous correspondence. Given weather limitations in the fields, DNR supports prioritizing potable well sampling at this time. At the proposed May 2020 meeting to discuss the potable well sampling results, the DNR may provide additional comments regarding the Phase I WP, including the elements of a SIWP necessary to address the investigation of soil, groundwater and surface water pathways.

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

Sincerely,



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

cc: Mike Bedard, Arcadis  
Linda Benfield, Foley & Lardner LLP  
David Mielke, ChemDesign, Inc.