

**Notice:** Use this form to request a **written response (on agency letterhead)** from the Department of Natural Resources (DNR) regarding technical assistance, a post-closure change to a site, a specialized agreement or liability clarification for Property with known or suspected environmental contamination. A fee will be required as is authorized by s. 292.55, Wis. Stats., and NR 749, Wis. Adm. Code., unless noted in the instructions below. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31 - 19.39, Wis. Stats.].

## Definitions

**"Property"** refers to the subject Property that is perceived to have been or has been impacted by the discharge of hazardous substances.

**"Liability Clarification"** refers to a written determination by the Department provided in response to a request made on this form. The response clarifies whether a person is or may become liable for the environmental contamination of a Property, as provided in s. 292.55, Wis. Stats.

**"Technical Assistance"** refers to the Department's assistance or comments on the planning and implementation of an environmental investigation or environmental cleanup on a Property in response to a request made on this form as provided in s. 292.55, Wis. Stats.

**"Post-closure modification"** refers to changes to Property boundaries and/or continuing obligations for Properties or sites that received closure letters for which continuing obligations have been applied or where contamination remains. Many, but not all, of these sites are included on the GIS Registry layer of RR Sites Map to provide public notice of residual contamination and continuing obligations.

## Select the Correct Form

This form should be used to request the following from the DNR:

- Technical Assistance
- Liability Clarification
- Post-Closure Modifications
- Specialized Agreements (tax cancellation, negotiated agreements, etc.)

Do **not** use this form if one of the following applies:

- Request for an **off-site liability exemption or clarification** for Property that has been or is perceived to be contaminated by one or more hazardous substances that originated on another Property containing the source of the contamination. Use DNR's Off-Site Liability Exemption and Liability Clarification Application Form 4400-201.
- Submittal of an Environmental Assessment for the **Lender Liability Exemption**, s 292.21, Wis. Stats., **if no response or review by DNR is requested**. Use the Lender Liability Exemption Environmental Assessment Tracking Form 4400-196.
- Request for an **exemption to develop on a historic fill site** or licensed landfill. Use DNR's Form 4400-226 or 4400-226A.
- **Request for closure** for Property where the investigation and cleanup actions are completed. Use DNR's Case Closure - GIS Registry Form 4400-202.

All forms, publications and additional information are available on the internet at: [dnr.wi.gov/topic/Brownfields/Pubs.html](http://dnr.wi.gov/topic/Brownfields/Pubs.html).

## Instructions

1. Complete sections 1, 2, 6 and 7 for all requests. Be sure to provide adequate and complete information.
2. Select the type of assistance requested: Section 3 for technical assistance or post-closure modifications, Section 4 for a written determination or clarification of environmental liabilities; or Section 5 for a specialized agreement.
3. Include the fee payment that is listed in Section 3, 4, or 5, unless you are a "Voluntary Party" enrolled in the Voluntary Party Liability Exemption Program **and** the questions in Section 2 direct otherwise. Information on to whom and where to send the fee is found in Section 8 of this form.
4. Send the completed request, supporting materials and the fee to the appropriate DNR regional office where the Property is located.

See the map on the last page of this form. A paper copy of the signed form and all reports and supporting materials shall be sent with an electronic copy of the form and supporting materials on a compact disk. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>

The time required for DNR's determination varies depending on the complexity of the site, and the clarity and completeness of the request and supporting documentation.

# Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

Form 4400-237 (R 12/18)

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## Section 1. Contact and Recipient Information

### Requester Information

This is the person requesting technical assistance or a post-closure modification review, that his or her liability be clarified or a specialized agreement and is identified as the requester in Section 7. DNR will address its response letter to this person.

Last Name Wahl	First Scott	MI	Organization/ Business Name Tyco Fire Products LP
Mailing Address 2700 Industrial Parkway South		City Marinette	State WI
		ZIP Code 54143	
Phone # (include area code)	Fax # (include area code)	Email	

The requester listed above: (select all that apply)

- Is currently the owner
  Is considering selling the Property  
 Is renting or leasing the Property
  Is considering acquiring the Property  
 Is a lender with a mortgagee interest in the Property  
 Other. Explain the status of the Property with respect to the applicant:

### Contact Information (to be contacted with questions about this request)

Select if same as requester

Contact Last Name Verburg	First Ben	MI	Organization/ Business Name Arcadis
Mailing Address 126 N Jefferson Street, Suite 400		City Milwaukee	State WI
		ZIP Code 53202	
Phone # (include area code) (414) 276-7742	Fax # (include area code)	Email Ben.Verburg@arcadis.com	

### Environmental Consultant (if applicable)

Contact Last Name Verburg	First Ben	MI	Organization/ Business Name Arcadis
Mailing Address 126 N Jefferson Street, Suite 400		City Milwaukee	State WI
		ZIP Code 53202	
Phone # (include area code) (414) 276-7742	Fax # (include area code)	Email Ben.Verburg@arcadis.com	

## Section 2. Property Information

Property Name Tyco Fire Technology Center - PFCs	FID No. (if known) 438005590
BRRTS No. (if known) 0238580694	Parcel Identification Number
Street Address 2700 Industrial Parkway South	City Marinette
	State WI
	ZIP Code 54143
County Marinette	Municipality where the Property is located <input checked="" type="radio"/> City <input type="radio"/> Town <input type="radio"/> Village of Marinette
	Property is composed of: <input type="radio"/> Single tax parcel <input type="radio"/> Multiple tax parcels
	Property Size Acres 380

# Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

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1. Is a response needed by a specific date? (e.g., Property closing date) Note: Most requests are completed within 60 days. Please plan accordingly.

No  Yes

Date requested by: \_\_\_\_\_

Reason: \_\_\_\_\_

2. Is the "Requester" enrolled as a Voluntary Party in the Voluntary Party Liability Exemption (VPLE) program?

No. **Include the fee that is required for your request in Section 3, 4 or 5.**

Yes. **Do not include a separate fee.** This request will be billed separately through the VPLE Program.

**Fill out the information in Section 3, 4 or 5 which corresponds with the type of request:**

**Section 3. Technical Assistance or Post-Closure Modifications;**

**Section 4. Liability Clarification; or Section 5. Specialized Agreement.**

## Section 3. Request for Technical Assistance or Post-Closure Modification

Select the type of technical assistance requested: [Numbers in brackets are for WI DNR Use]

- No Further Action Letter (NFA) (Immediate Actions) - NR 708.09, [183] - **Include a fee of \$350.** Use for a written response to an immediate action after a discharge of a hazardous substance occurs. Generally, these are for a one-time spill event.
- Review of Site Investigation Work Plan - NR 716.09, [135] - **Include a fee of \$700.**
- Review of Site Investigation Report - NR 716.15, [137] - **Include a fee of \$1050.**
- Approval of a Site-Specific Soil Cleanup Standard - NR 720.10 or 12, [67] - **Include a fee of \$1050.**
- Review of a Remedial Action Options Report - NR 722.13, [143] - **Include a fee of \$1050.**
- Review of a Remedial Action Design Report - NR 724.09, [148] - **Include a fee of \$1050.**
- Review of a Remedial Action Documentation Report - NR 724.15, [152] - **Include a fee of \$350**
- Review of a Long-term Monitoring Plan - NR 724.17, [25] - **Include a fee of \$425.**
- Review of an Operation and Maintenance Plan - NR 724.13, [192] - **Include a fee of \$425.**

Other Technical Assistance - s. 292.55, Wis. Stats. [97] (For request to build on an abandoned landfill use Form 4400-226)

- Schedule a Technical Assistance Meeting - **Include a fee of \$700.**
- Hazardous Waste Determination - **Include a fee of \$700.**
- Other Technical Assistance - **Include a fee of \$700.** Explain your request in an attachment.

Post-Closure Modifications - NR 727, [181]

- Post-Closure Modifications: Modification to Property boundaries and/or continuing obligations of a closed site or Property; sites may be on the GIS Registry. This also includes removal of a site or Property from the GIS Registry. **Include a fee of \$1050, and:**
  - Include a fee of \$300 for sites with residual soil contamination; and
  - Include a fee of \$350 for sites with residual groundwater contamination, monitoring wells or for vapor intrusion continuing obligations.

Attach a description of the changes you are proposing, and documentation as to why the changes are needed (if the change to a Property, site or continuing obligation will result in revised maps, maintenance plans or photographs, those documents may be submitted later in the approval process, on a case-by-case basis).

## Skip Sections 4 and 5 if the technical assistance you are requesting is listed above and complete Sections 6 and 7 of this form Section 6. Other Information Submitted

Identify all materials that are included with this request.

**Send both a paper copy of the signed form and all reports and supporting materials, and an electronic copy of the form and all reports, including Environmental Site Assessment Reports, and supporting materials on a compact disk.**

**Include one copy of any document from any state agency files that you want the Department to review as part of this request. The person submitting this request is responsible for contacting other state agencies to obtain appropriate reports or information.**

Phase I Environmental Site Assessment Report - Date: \_\_\_\_\_

Phase II Environmental Site Assessment Report - Date: \_\_\_\_\_

Technical Assistance, Environmental Liability  
Clarification or Post-Closure Modification Request

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Legal Description of Property (required for all liability requests and specialized agreements)

Map of the Property (required for all liability requests and specialized agreements)

Analytical results of the following sampled media: Select all that apply and include date of collection.

Groundwater     Soil     Sediment     Other medium - Describe: \_\_\_\_\_

Date of Collection: \_\_\_\_\_

A copy of the closure letter and submittal materials

Draft tax cancellation agreement

Draft agreement for assignment of tax foreclosure judgment

Other report(s) or information - Describe: Revised Long-Term Potable Well Sampling Plan

For Property with newly identified discharges of hazardous substances only: Has a notification of a discharge of a hazardous substance been sent to the DNR as required by s. NR 706.05(1)(b), Wis. Adm. Code?

Yes - Date (if known): \_\_\_\_\_

No

Note: The Notification for Hazardous Substance Discharge (non-emergency) form is available at:

[dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf](http://dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf)

**Section 7. Certification by the Person who completed this form**

I am the person submitting this request (requester)

I prepared this request for: Scott Wahl

Requester Name

I certify that I am familiar with the information submitted on this request, and that the information on and included with this request is true, accurate and complete to the best of my knowledge. I also certify I have the legal authority and the applicant's permission to make this request.

Joseph Rutkowski  
Signature

4/1/2020  
Date Signed

Project Environmental Specialist  
Title

(414) 276-7742  
Telephone Number (include area code)

# Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

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## Section 8. DNR Contacts and Addresses for Request Submittals

Send or deliver one paper copy and one electronic copy on a compact disk of the completed request, supporting materials, and fee to the region where the property is located to the address below. Contact a [DNR regional brownfields specialist](#) with any questions about this form or a specific situation involving a contaminated property. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>.

### DNR NORTHERN REGION

Attn: RR Program Assistant  
Department of Natural Resources  
223 E Steinfest Rd Antigo, WI 54409

### DNR NORTHEAST REGION

Attn: RR Program Assistant  
Department of Natural Resources  
2984 Shawano Avenue  
Green Bay WI 54313

### DNR SOUTH CENTRAL REGION

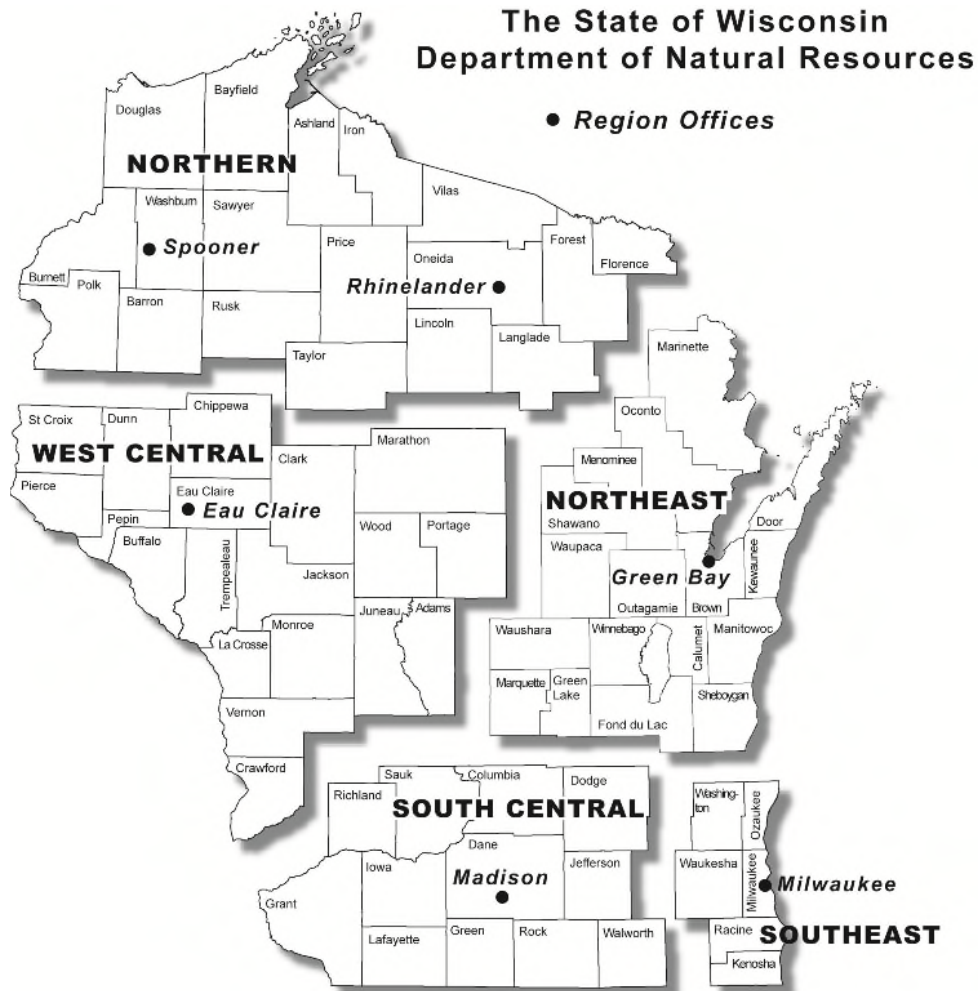
Attn: RR Program Assistant  
Department of Natural Resources  
3911 Fish Hatchery Road  
Fitchburg WI 53711

### DNR SOUTHEAST REGION

Attn: RR Program Assistant  
Department of Natural Resources  
2300 North Martin Luther King Drive  
Milwaukee WI 53212

### DNR WEST CENTRAL REGION

Attn: RR Program Assistant  
Department of Natural Resources  
1300 Clairemont Ave.  
Eau Claire WI 54702



*Note: These are the Remediation and Redevelopment Program's designated regions. Other DNR program regional boundaries may be different.*

DNR Use Only			
Date Received	Date Assigned	BRRTS Activity Code	BRRTS No. (if used)
DNR Reviewer		Comments	
Fee Enclosed? <input type="radio"/> Yes <input type="radio"/> No	Fee Amount \$	Date Additional Information Requested	Date Requested for DNR Response Letter
Date Approved	Final Determination		

Tyco Fire Products LP

# REVISED LONG-TERM POTABLE WELL SAMPLING PLAN

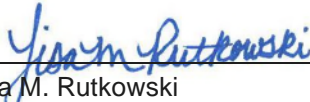
Tyco Fire Technology Center, 2700 Industrial  
Parkway, Marinette, Wisconsin 54143

BRRTS# 02-38-580694

April 2020



## REVISED LONG-TERM POTABLE WELL SAMPLING PLAN

  
\_\_\_\_\_  
Lisa M. Rutkowski  
Project Environmental Scientist

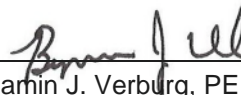
Tyco Fire Technology Center,  
2700 Industrial Parkway,  
Marinette, Wisconsin 54143  
BRRTS# 02-38-580694

Prepared for:

Tyco Fire Products LP  
2700 Industrial Parkway South  
Marinette, Wisconsin 54143


Prepared by:

Arcadis U.S., Inc.  
126 North Jefferson Street  
Suite 400  
Milwaukee  
Wisconsin 53202  
Tel 414 276 7742  
Fax 414 276 7603

  
\_\_\_\_\_  
Benjamin J. Verburg, PE  
Principal Engineer

Our Ref:

30015290, 30015292

  
\_\_\_\_\_  
Michael F. Bedard  
Project Lead/Associate Vice President

Date:

April 1, 2020

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## FIGURE

Figure 1. Private Drinking Water Well Sampling Area



## ACRONYMS AND ABBREVIATIONS

AFFF	aqueous film-forming foam
Arcadis	Arcadis U.S., Inc.
COC	chain of custody
FTC	Fire Technology Center
GAC	Granular Activated Carbon
HAL	Health Advisory Level
HDPE	high-density polyethylene
ID	identification
mL	milliliters
PFAS	per- and poly-fluoroalkyl substances
PFOA	perfluorooctanoic acid
PFOS	perfluorooctanesulfonic acid
POET	point of entry treatment
ppt	parts per trillion
PTFE	polytetrafluoroethylene
PWSA	private drinking water well sampling area
RL	reporting limit
Tyco	Tyco Fire Products LP
USEPA	United States Environmental Protection Agency
WDHS	Wisconsin Department of Health Services
WDNR	Wisconsin Department of Natural Resources

## 1 INTRODUCTION

On behalf of Tyco Fire Products LP (Tyco), Arcadis US, Inc. (Arcadis) has prepared this *Revised Long-Term Potable Well Sampling Plan* (sampling plan) for the Ansul Fire Technology Center (FTC) located at 2700 Industrial Parkway in Marinette, Wisconsin (the Site). Tyco and Arcadis are conducting Site investigation and monitoring activities under the oversight of the Wisconsin Department of Natural Resources (WDNR). As requested by WDNR, this document provides an update to the Revised Long-Term Potable Well Sampling Plan (Arcadis 2018) approved by WDNR.

Aqueous film-forming foams (AFFF) manufactured by Tyco and/or others have been used at the Site as part of research and development, quality control and firefighting training activities. Per- and polyfluoroalkyl substances (PFAS) such as perfluorooctanoic acid (PFOA) and/or perfluorooctanesulfonic acid (PFOS) have been present in various formulations of these foams. PFAS has been detected in groundwater at the Site and in off-Site potable wells. Tyco continues to conduct potable water sampling near the Site.

The U.S. Environmental Protection Agency (USEPA) classifies PFAS as a category of "emerging contaminants". In May 2016, the USEPA issued a drinking water Lifetime Health Advisory Level (HAL) for two PFAS, specifically the individual and combined values of PFOA and PFOS, of 70 nanograms per liter (ng/L, or parts per trillion [ppt]). In June 2019, the Wisconsin Department of Health Services (WDHS) recommended a groundwater enforcement standard of 20 ppt for PFOA and PFOS, individually and combined. While the 20 ppt value is a potential future groundwater standard, it is included for consideration in this sampling plan for discussion purposes. This sampling plan will be updated every six months, and relevant or potentially relevant PFAS benchmarks will be considered in future updates.

## 2 POTABLE WELL SAMPLING SUMMARY

### 2.1 Private Well Sampling Program

A potable well sampling program was initiated in December 2017 and has continued quarterly for nine events as of March 2020. During these events, Arcadis has sampled 171 potable wells located generally to the east and southeast of the Site. A summary of the results from the events are included in the following list:

- Potable wells sampled through September 2019: 171
  - Potable wells with results above the HAL: 18
  - Potable wells with results between 20 ppt and 70 ppt: 13
  - Potable wells with results between the reporting limit (RL) and 20 ppt: 29
  - Potable wells with results below the RL (non-detect): 111

Bottled water has been offered by Tyco to users of the private wells that have been sampled. Bottled water will be managed per the Comprehensive Alternative Water Management Plan submitted to WDNR in March 2020. Additionally, there are 40 properties where Point of Entry Treatment (POET) systems have been installed to treat the drinking water. Arcadis has collected POET system samples to confirm the effectiveness of PFAS compound removal and confirm the POET systems are functioning as designed.

### 2.2 POET Monitoring Program

The POET monitoring program was initiated in February 2018 for potable wells with results above the HAL and has been expanded to include potable wells with results above the RL with confirmed results. There are currently 40 POETs in use. Each one is sampled for PFAS on a monthly or quarterly schedule, based on prior data from that particular system, in order to determine POET system efficiency. Routine maintenance is conducted on each system. Sediment filters are typically replaced every three months, UV lights and the quartz sleeves are replaced once every year, and granular activated carbon (GAC) tanks are replaced when breakthrough is observed, which varies based on water usage and concentrations of PFAS for each well. POET system monitoring data noted just below has been provided to WDNR, and such data will continue to be provided on a routine basis. To aid WDNR in the review of the approach presented herein, Tyco will provide an updated comprehensive POET system monitoring data table under separate cover.

## 3 LONG-TERM SAMPLING PLAN

### 3.1 Potable Wells

It is important to note that all of the well owners/users within the defined private drinking water well sampling area (PWSA) have been offered bottled water, and those with results above the laboratory RL for PFOA and/or PFOS have been offered POET systems. The PWSA is roughly contained to the north by University Drive, to the west by County Road B, to the south by Rader Road and to the east by the Bay of Green Bay. All of the well owners within the PWSA will be offered connection to a community water system when that long-term drinking water solution becomes available.

Based on the data collected to date, and the bottled water and/or POET systems that are available to private drinking water well users in the PWSA, the updated potable well sampling plan includes the following sampling criteria.

#### 3.1.1 New Potable Well Samples

When potable wells are sampled for the first time for PFAS under this program, the wells will be sampled twice in consecutive quarterly events if access is granted by the well owner/user. Based on the results of these two events, subsequent sampling events will occur as follows:

- Annual sampling will be conducted if the combined concentrations of PFOA/PFOS are below 20 ppt for one or both events.
- Semi-annual (every 6 months) sampling will be conducted if the combined concentrations of PFOA/PFOS are between 20 and 70 ppt for one or both events.
- Quarterly sampling will be conducted if the combined concentrations of PFOA/PFOS are above 70 ppt for one or both events.

#### 3.1.2 Previously Sampled Potable Wells

Potable wells that have been sampled previously four or more times as part of the ongoing sampling program, or potable wells that have been subject to sampling four or more times using the criteria presented in the paragraph just above, will be sampled as follows:

- Biennial sampling (every 2 years) will be conducted if the combined concentrations of PFOA/PFOS are below 20 ppt for one or more prior events.
- Annual sampling will be conducted if the combined concentrations of PFOA/PFOS are above 20 ppt for one or more prior events.

As noted above in Section 1, this sampling plan will be updated every six months.

## 3.2 POET Systems

### 3.2.1 Proposed POET Schedule for Existing POET Systems

Any POET systems with original GAC tanks that have been in operation for a year or more will be maintained by replacing the GAC tanks once per year without the collection of additional samples. Over two years' worth of data supports that the following POET systems had non-detect concentrations at the mid-carbon and post-carbon sampling locations over the span of a year or more:

- POET Systems – 1, 2, 13, 14, 15, 16, 18, 20, 21, 23, 24, 25, 26, 27, 28, 29, 31, 32, 33, 34, 35, 36, 37

Any POET systems that show PFAS breakthrough between six months and one year will be maintained by replacing the GAC tanks every six months without the collection of additional samples. This applies to the following systems:

- POET Systems – 3, 6, 12, 17, 30, 38

Any POET systems that show PFAS breakthrough before six months will continue to be monitored on a quarterly basis. This applies to the following systems:

- POET Systems – 4, 5, 7, 19

Any POET systems that have not operated for at least a year will be monitored for at least 12 months to determine the future GAC maintenance schedule, at which point sampling will be discontinued. This applies to the following systems:

- POET Systems – 8, 9, 10, 11, 22, 39, 40

Sediment filters and UV/Quartz maintenance will continue to be changed out based on the original schedule.

### 3.2.2 Proposed POET Schedule for New POET Systems

New POET systems will be monitored quarterly for one year to determine the GAC maintenance schedule and monitor any fluctuation of potable well results. Sediment filters will continue to be changed out every three months and the UV light and quartz sleeves will continue to be changed out once per year. These timeframes are based on evaluation of data from more than two years of performance monitoring data collected from POET systems within the PWSA.

POET system performance monitoring samples will be collected at the inlet, mid-carbon and outlet locations according to the following schedule:

- Initial Sampling – Upon system installation and start-up;
- Month 3 (Week 12) – After three (3) months or twelve (12) weeks of system operation;
- Month 6 – After six (6) months of system operation;
- Month 9 – After nine (9) months of system operation;
- Month 12 – After twelve (12) months of system operation.

The future GAC change schedule will be determined based on the data obtained from the sampling activities described in this section. The POET systems will be scheduled for GAC changes without additional sampling based on this data.

In addition, other parameters may be monitored as needed for system performance assessment purposes.

## **4 SAMPLE PROCEDURE**

The sections that follow provide an overview of the potable well and POET system sample procedures.

### **4.1 Prior to Sample Collection**

Arcadis staff will coordinate a sample date and time with each well's contact person. Upon arrival, Arcadis will provide introductions and let the resident/property owner know the purpose is to collect a potable well sample for PFAS analysis in accordance with previous correspondence provided to them regarding the sampling. Arcadis will request information from the property owner regarding the water system at each property. Information that will be recorded includes presence of water softeners, sediment traps, filters, etc., and the location of these items.

Additional activities to be performed and procedures to be followed by the sampling team prior to potable well sample collection include:

- Don a new set of nitrile gloves immediately prior to sampling.
- Do not use gloved hands to subsequently handle papers, pens, clothes, etc., before collecting samples.
- Use the 2-250 milliliter (mL) high-density polyethylene (HDPE) bottles that are supplied by the laboratory for each sample location.
- Samples bottle caps must remain on the bottle until immediately prior to sample collection, and the bottle must be sealed immediately after sample collection.

### **4.2 During Sample Collection**

Potable water outfalls and taps are likely to vary. If possible, the team will avoid sampling from any taps fitted with Teflon tape or other PFAS-containing materials. Stainless steel and polyvinyl chloride materials are acceptable. The sampling team will collect unfiltered samples from a tap or port, as follows:

- Initiate flow from the water source and allow the system to flush for at least 3 minutes.
- Collect the sample into the HDPE bottle until the sample bottle is full (leaving slight headspace in the bottle is acceptable).
- Tightly screw on the polypropylene or HDPE cap.

### 4.3 After Sample Collection

Upon collection, the sample bottles will be placed in a sealed Ziploc® or similar bag. Sample collection information will be recorded including the sample identification (ID) and time of sampling on the sample bottle label, in the field notes, and on the chain-of-custody (COC) form. The COC form will be marked for analysis with a standard turnaround time (approximately 3 weeks). Samples will be placed in coolers, with enough ice to keep the sample temperature between 0 and 4°C until delivered to the laboratory. Only “wet” ice will be used, with no use of “blue ice” or similar cold storage packets. PFAS sample coolers will be shipped via Federal Express Priority Overnight delivery to:

Sample Receiving  
Eurofins TestAmerica Sacramento  
880 Riverside Parkway  
West Sacramento, California 95605-1500

Samples will be analyzed for the 36 PFAS compounds reportable using Method 537 Modified.

All disposable sampling materials will be treated as single use and disposed appropriately after sampling at each location. Samples from each residence will be kept in their own dedicated cooler with the appropriate quality assurance samples.

### 4.4 Quality Assurance/Quality Control

Avoiding cross-contamination from PFAS-containing materials during this sampling will be of utmost importance given the very low detection limits for the analyses that will be conducted for these compounds. As such, materials with the potential to contain PFAS will not be used during the sampling (including polytetrafluoroethylene [PTFE] pipe tape, pipe thread pastes that contain PTFE, PTFE sample tubing, food wrappers, water resistant/proof clothing, waterproof field books, etc.)

Sample information, including sample ID and date/time collected, will be recorded on the provided bottle labels and attached to the sample bottles immediately after sealing the bottles. This information also will be recorded on the COC form provided by the laboratory, in a Potable Water Supply Sample Log, and in the sampling team’s field notes. A signed copy of the COC form will be provided to the laboratory whenever a sample cooler is delivered to the laboratory. A copy of each COC form will be kept with the field notes and sample logs.

After receipt from the laboratory, Arcadis will conduct a preliminary data quality review (Level 2 data validation). The sample results will be communicated to well owners/users after completion of the preliminary data quality review, as outlined in the “Project Communication” section below. After completion of the preliminary data quality review, Arcadis will conduct a more comprehensive validation of the data (Level 4 data validation). The timeframe for the Level 4 validation may vary based on the amount of time required for the laboratory to send additional Quality Assurance/Quality Control information to Arcadis, and the number of samples under review. The anticipated timeframe for completion of Level 4 validation is approximately 4 weeks after receipt of the complete Level 4 data package from the laboratory. If any changes to the reported sampling results become necessary after completion of the Level 4 validation, the well owners/users and WDNR will be notified of those changes.

## 5 PROJECT COMMUNICATION

Results letters will be provided to the applicable well owners/users and WDNR within ten business days of Arcadis receiving results from the laboratory. If the combined PFOA/PFOS values at a well were below the HAL for past sampling events, but are above the HAL for future sampling events, then a phone call will be placed to the well owner/user within 2 days of completing the preliminary data quality review for the laboratory results for that sample.

Tyco will also provide WDNR with periodic sampling result updates as wells are sampled, approximately every one to three weeks depending on the number of wells sampled in any time period.



## **6 CLOSING**

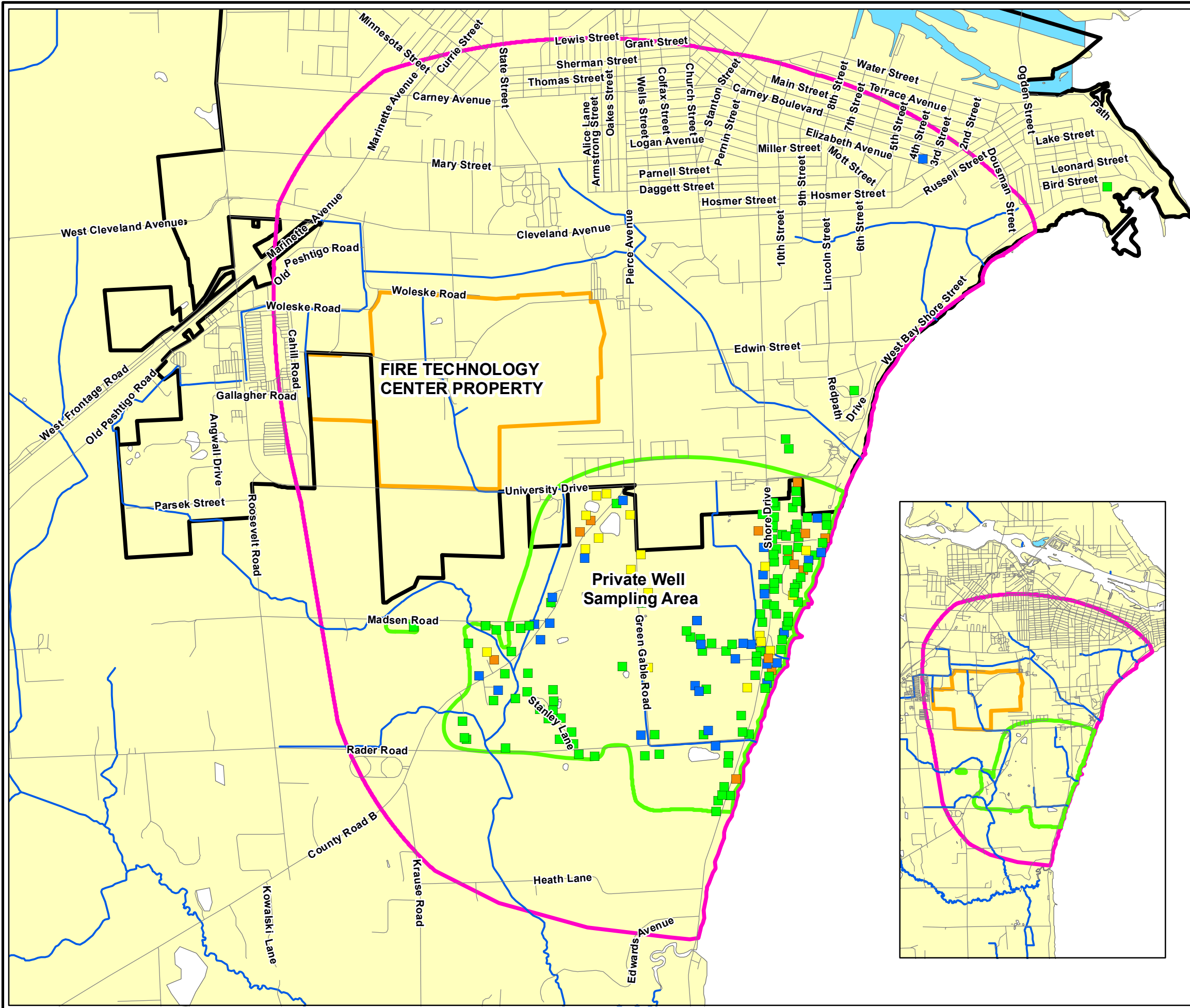
This sampling plan presents the approach for sampling private wells and POET systems, bottled water service, and POET system operation and maintenance. Tyco continues to work directly with residents, community leaders and other federal, state and local agencies on this important sampling work, and will continue to keep the community informed of these activities.

## 7 REFERENCES

Arcadis 2018. Revised Long-Term Potable Well Sampling Plan. Tyco Fire Technology Center, 2700 Industrial Parkway, Marinette, Wisconsin 54143. BRRTS# 02-38-580694. April 20, 2018.

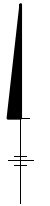
# FIGURE





LEGEND:

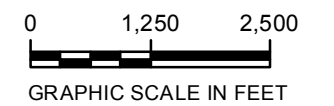
- DRINKING WATER WELL LOCATION**
- PFOA AND/OR PFOS BELOW REPORTING LIMIT (RL)
  - PFOA AND/OR PFOS DETECTION - RL < 20 PPT
  - PFOA AND/OR PFOS DETECTION - 20 - 70 PPT
  - PFOA AND/OR PFOS DETECTION ABOVE HAL
- APPROXIMATE SITE PROPERTY BOUNDARY
  - APPROXIMATE MARINETTE CITY BOUNDARY
  - PRIVATE WELL SAMPLING AREA
  - INVESTIGATION AREA
  - WATERBODY
  - DITCH/STREAM
  - ROAD



**4/1/2020**

NOTES:

1. WELL LOCATIONS ARE APPROXIMATE
2. SERVICE LAYER CREDITS:



TYCO FIRE PRODUCTS LP  
 MARINETTE, WISCONSIN

**PRIVATE DRINKING WATER  
 WELL SAMPLING AREA**



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A decorative graphic consisting of three thin orange lines. One line is horizontal, extending across the bottom of the page. Two other lines are diagonal, starting from the bottom left and extending towards the top right, crossing the horizontal line.