

From: Dunn, Shannon <Shannon.Dunn@arcadis.com>
Sent: Friday, March 27, 2020 2:51 PM
To: Chronert, Roxanne N - DNR; Neste, David E - DNR
Cc: Rick Bethel; Jeffrey Howard Danko; Scott D Wahl; Verburg, Ben; Bedard, Michael
Subject: Proposed Excavation Dewatering Plan, BRRTS 02-38-580694 - Tyco FTC - Marinette
Attachments: 2020.03.27 Proposed Excavation Dewatering Plan Cover Letter.pdf;
2020.03.27 Proposed Excavation Dewatering Plan Memo.pdf

Roxanne and Dave,

The attached Proposed Excavation Dewatering Plan (BRRTS 02-38-580694) will be uploaded to WDNR's file transfer site today.

Thanks.

Shannon Dunn PG | Vice President | shannon.dunn@arcadis.com

Arcadis | Arcadis U.S., Inc.

123 North 3rd Street, Suite 705 Minneapolis MN | 55401 | USA

M. +1 206 399 5307

Professional Geologist / PG-AR, 2004 | PG-ID, PGL-1416 | PG-MN, 46366 | PG-OR, G2082 | PG-WA, 2234

Connect with us! www.arcadis.com | [LinkedIn](#) | [Twitter](#) | [Facebook](#)



This email and any files transmitted with it are the property of Arcadis and its affiliates. All rights, including without limitation copyright, are reserved. This email contains information that may be confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not an intended recipient, please note that any form of distribution, copying or use of this communication or the information in it is strictly prohibited and may be unlawful. If you have received this communication in error, please return it to the sender and then delete the email and destroy any copies of it. While reasonable precautions have been taken to ensure that no software or viruses are present in our emails, we cannot guarantee that this email or any attachment is virus free or has not been intercepted or changed. Any opinions or other information in this email that do not relate to the official business of Arcadis are neither given nor endorsed by it.

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.

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)

Page 2 of 5

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 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

Form 4400-237 (R 12/18)

Page 3 of 5

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

Form 4400-237 (R 12/18)

Page 4 of 5

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: _____

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.

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.



Signature

3/27/2020

Date Signed

Project Environmental Specialist

Title

(312) 575-3732

Telephone Number (include area code)

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

Form 4400-237 (R 12/18)

Page 5 of 5

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

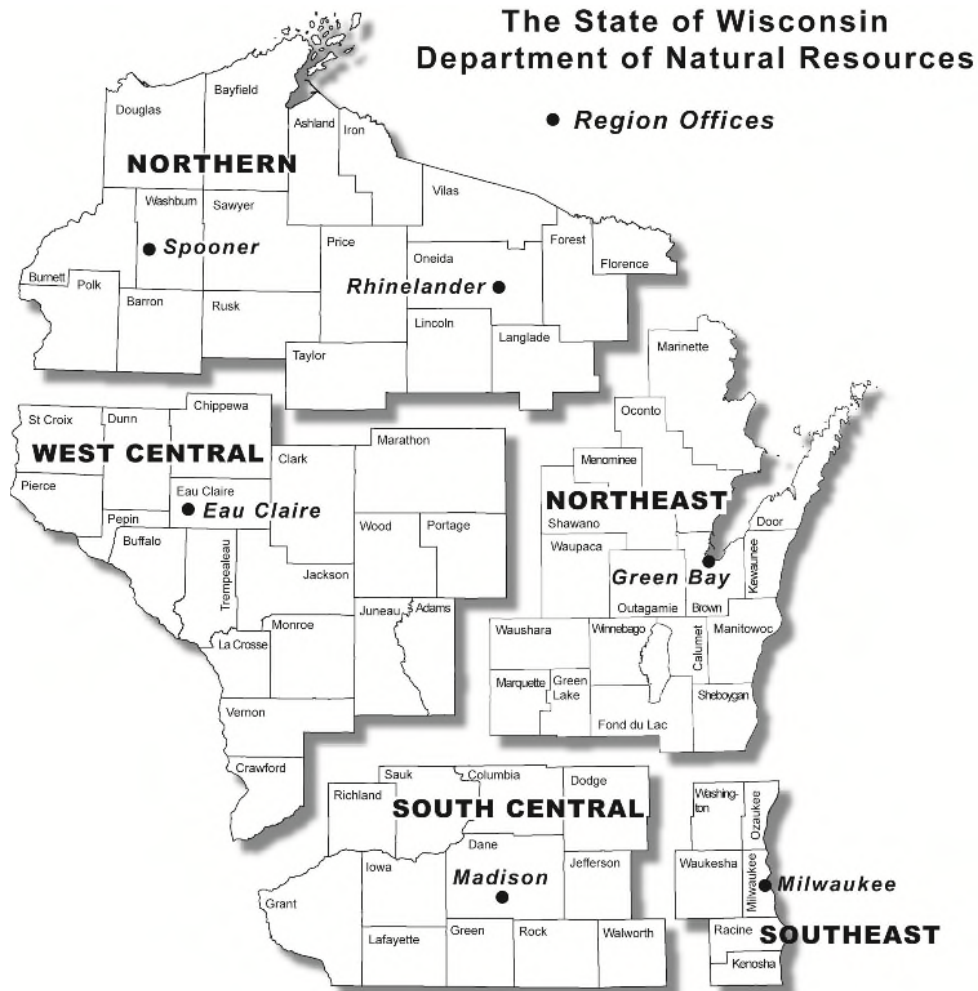
Attn: RR Program Assistant
Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg WI 53711

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		

David Neste
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay, Wisconsin 54313-6727

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

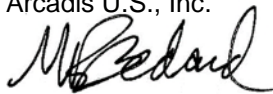
Subject:
Proposed Excavation Dewatering Management Plan

Dear Mr. Neste:

As requested by the WDNR, Arcadis U.S., Inc. submits the following proposed *Excavation Dewatering Management Plan* (Plan). The Wisconsin Department of Natural Resources (WDNR) requested a plan for evaluating whether water in construction excavations may be impacted with per- and poly-fluorinated alkyl substances (PFAS). This Plan describes the evaluation process.

This Plan is suggested for use by WDNR and entities/contractors that are performing dewatering activities; however, implementing this Plan, including performing the evaluation, collecting and analyzing samples, obtaining permits, treating water, disposing of soil, and complying with all applicable laws is the sole responsibility of the entity performing the work. Preparation and submittal of this proposed Plan should not be interpreted that Tyco or Arcadis will conduct any of the testing or evaluating activities described herein or will perform the waste management activities, or that either Tyco or Arcadis are providing technical, regulatory or legal advice to any party.

Sincerely,
Arcadis U.S., Inc.



Michael Bedard
Project Lead

Enclosures:

Attachment

Proposed Excavation Dewatering Management Plan Memo

ENVIRONMENT

Date:
March 27, 2020

Contact:
Michael Bedard

Phone:
267-685-1821

Email:
Michael.Bedard@
arcadis.com

Our ref:
30015294

ATTACHMENT

Proposed Excavation Dewatering Management Plan Memo



MEMO

To:
David Neste, Wisconsin Department
of Natural Resources

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

From:
Michael Bedard

Date: March 27, 2020
Arcadis Project No.:
30015294

Subject:
Proposed Excavation Dewatering Plan

The Wisconsin Department of Natural Resources (WDNR) requested that Arcadis prepare a proposed plan for evaluating whether water in certain construction excavations in the Plan Implementation Area should be evaluated for per- and poly-fluorinated alkyl substances (PFAS) and thereafter disposed in accordance with law. This Proposed Excavation Dewatering Plan (Plan) describes the proposed approach for determining whether groundwater encountered in a construction excavation should be evaluated for PFAS, and the suggested approach for management of the groundwater. This Plan does not address other potential contaminants (e.g., petroleum) that could also require management by the WDNR as part of excavation dewatering and which are addressed in other WDNR documents such as Dewatering Operations (WDNR 2018a) and/or Contaminated Groundwater from Remedial Actions (WDNR 2018b).

This Plan is suggested for use by WDNR and entities/contractors that are performing dewatering activities; however, implementing this Plan, including performing the evaluation, collecting and analyzing samples, obtaining permits, treating water, disposing of soil, and complying with all applicable laws is the sole responsibility of the entity performing the work. Preparation and submittal of this proposed Plan should not be interpreted that Tyco or Arcadis will conduct any of the testing or evaluating activities described herein or will perform the waste management activities, or that either Tyco or Arcadis are providing technical, regulatory or legal advice to any party.

Figure 1 presents a decision flow chart to evaluate excavation dewatering. The first step is to evaluate whether the excavation is within the Plan Implementation Area shown on Figure 2. If the excavation is outside the area, then the Plan is not needed. If the excavation is inside the area, the next step is to evaluate whether the excavation is within the proposed excavation dewatering area shown on Figure 2. If the excavation is outside of the proposed excavation dewatering boundary, then implementation of further elements of the Plan is not necessary.

The proposed excavation dewatering boundary was created by first determining the western groundwater boundaries of 11 parts per trillion (ppt) perfluorooctanesulfonic acid (PFOS) and 420 ppt perfluorooctanoic acid (PFOA) concentrations. These values are the surface water quality criteria for PFOS and PFOA. The 11 ppt PFOS boundary is farther west and thus represents a larger area than the 420 ppt PFOA boundary. The proposed excavation dewatering boundary was drawn 500 ft outside of the 11 ppt PFOS boundary. The 500 ft distance is a conservative distance given that there is uncertainty regarding the groundwater boundaries. The 11 ppt PFOS groundwater boundary is based on existing groundwater results and is drawn between sample locations with concentrations above and below 11 ppt PFOS. To account for the uncertainty on the location of the boundary, 500 ft was added to the boundary.

If the excavation is in the proposed excavation dewatering area shown on Figure 2, it is recommended that the entity performing the work conduct the steps outlined herein. A groundwater sample should be collected from the planned excavation prior to the start of field activities. The groundwater sample should be collected from the depth of the planned excavation. The groundwater sample should then be submitted to a qualified laboratory and analyzed for PFOS and PFOA.

The sample results should be compared to the Wisconsin surface water quality criteria (11 ppt for PFOS and 420 ppt for PFOA). If the concentration of PFOS and/or PFOA are greater than the surface water quality criteria, then an approach for treating the groundwater prior to discharge should be developed and a dewatering permit should be obtained from the regulatory entity (WDNR 2018a and b). Generation of water that requires treatment should be minimized.

The regulatory entity for the permit depends on the excavation location. WDNR should be coordinated with in all cases. Additional regulatory entities may need to be coordinated with, for example:

- If the excavation is within the City of Marinette limits, coordinate with the City of Marinette.
- If the excavation is within the Town of Peshtigo limits, coordinate with the Town of Peshtigo.
- If the excavation is outside of city or town limits and within a county road right of way, coordinate with the county.

This list is not intended to replace a regulatory evaluation for the dewatering work. Each project should perform a regulatory evaluation to identify permits and regulatory coordination.

REFERENCES

WDNR. 2018a. Permit Fact Sheet Dewatering Operations Permit Number WI-0049344-05-0. June 29.

WDNR. 2018b. Permit Fact Sheet Contaminated Groundwater from Remedial Action Operations Permit Number WI-0046566-07-0. June 29.

Enclosures:

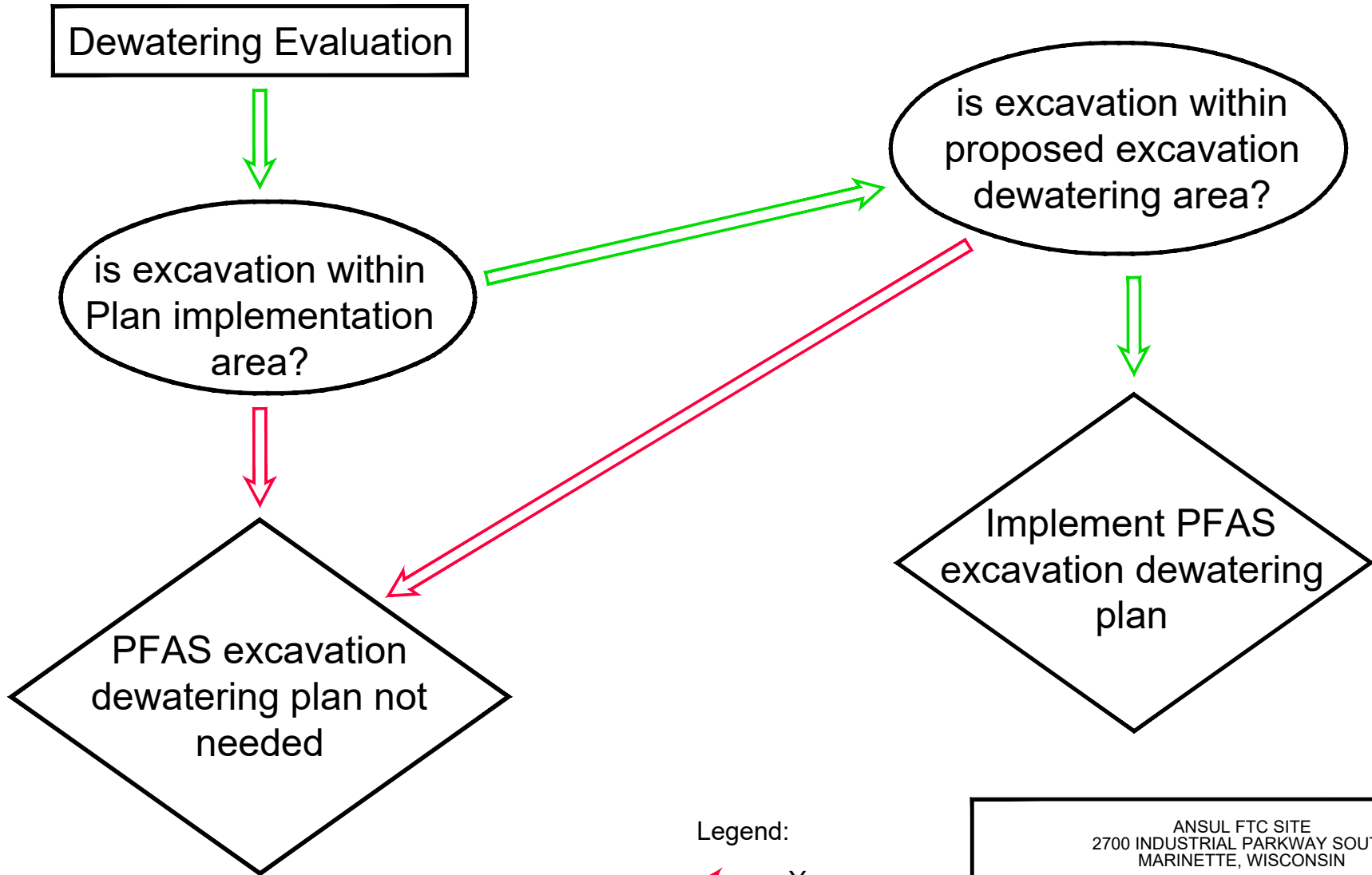
Figures

- 1 Excavation Dewatering Evaluation
- 2 Implementation Area and Groundwater Boundary

FIGURES



XREFS: IMAGES: PROJECTNAME: ---



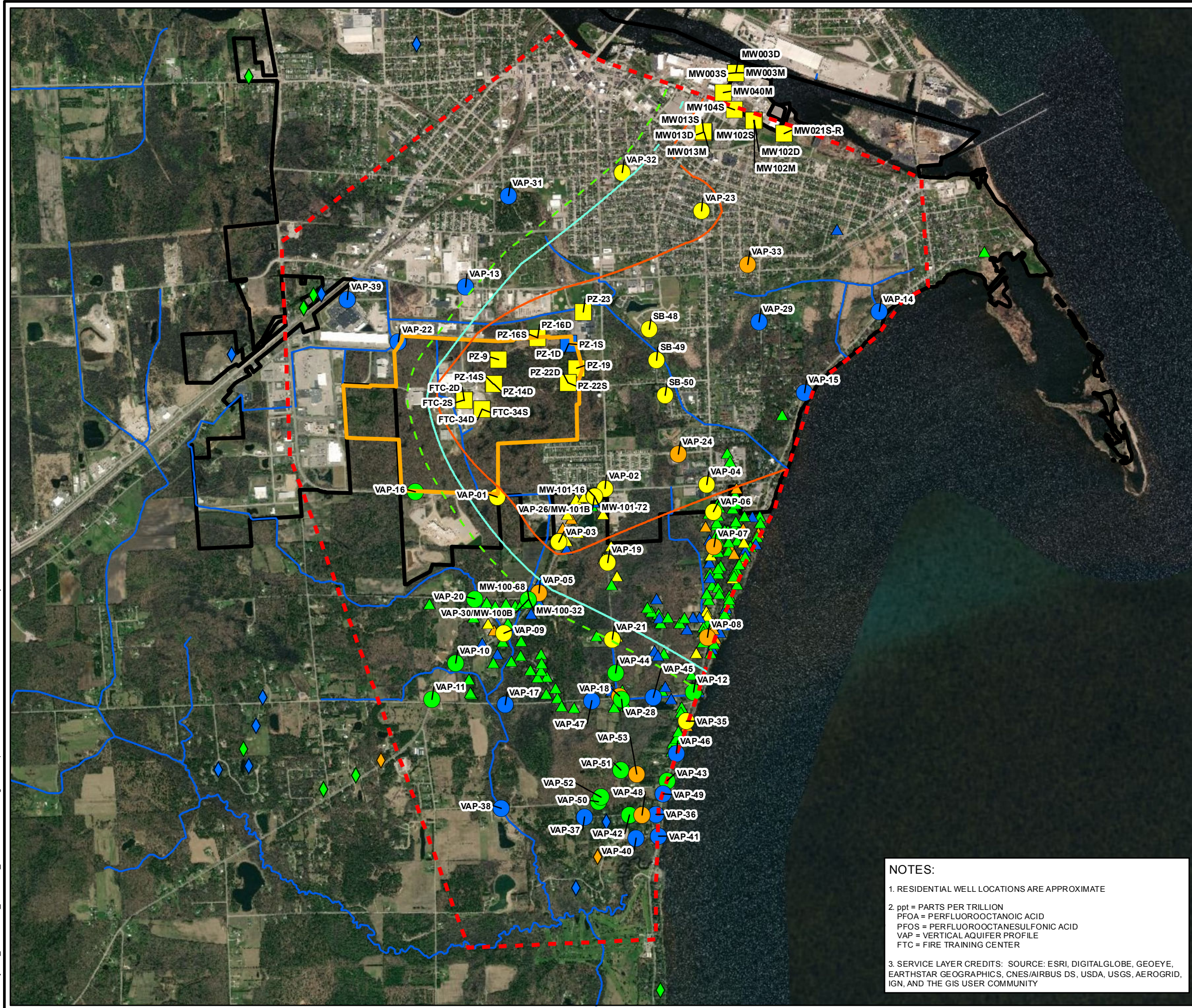
Legend:

- Yes
- No

Note: review schedule guidance in management plans.

ANSUL FTC SITE
2700 INDUSTRIAL PARKWAY SOUTH
MARINETTE, WISCONSIN

DEWATERING EVALUATION



- LEGEND:**
- PROPOSED EXCAVATION DEWATERING AREA
 - APPROXIMATE WESTERN EXTENT OF GROUNDWATER WHERE PFOA WAS DETECTED ABOVE 420 PPT (DASHED WHERE INFERRED)
 - APPROXIMATE WESTERN EXTENT OF GROUNDWATER WHERE PFOS WAS DETECTED ABOVE 11 PPT (DASHED WHERE INFERRED)
 - PLAN IMPLEMENTATION AREA BOUNDARY
 - APPROXIMATE SITE PROPERTY BOUNDARY
 - APPROXIMATE MARINETTE CITY BOUNDARY
 - DITCH/STREAM

TOTAL PFOS AND PFOA IN GROUNDWATER

VAP BORING (MAX RESULT AT ANY SAMPLE DEPTH)

- ND - 2 ppt
- 2 - 20 ppt
- 20 - 70 ppt
- >70 ppt

MONITORING WELL SAMPLE RESULT (AUGUST 2019)

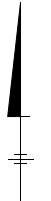
- ND - 2 ppt
- 2 - 20 ppt
- 20 - 70 ppt
- >70 ppt

RESIDENTIAL WELL SAMPLING RESULT (SPRING 2019)

- ▲ ND - 2 ppt
- ▲ 2 - 20 ppt
- ▲ 20 - 70 ppt
- ▲ >70 ppt

PRIVATE WELL SAMPLING

- ◆ ND - 2 ppt
- ◆ 2 - 20 ppt
- ◆ 20 - 70 ppt



0 1,200 2,400



GRAPHIC SCALE IN FEET

NOTES:

1. RESIDENTIAL WELL LOCATIONS ARE APPROXIMATE
2. ppt = PARTS PER TRILLION
 PFOA = PERFLUOROOCTANOIC ACID
 PFOS = PERFLUOROOCTANESULFONIC ACID
 VAP = VERTICAL AQUIFER PROFILE
 FTC = FIRE TRAINING CENTER
3. SERVICE LAYER CREDITS: SOURCE: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEROGRID, IGN, AND THE GIS USER COMMUNITY

TYCO FIRE PRODUCTS, LP
 MARINETTE, WISCONSIN

IMPLEMENTATION AREA AND PROPOSED EXCAVATION DEWATERING AREA

