

From: Chronert, Roxanne N - DNR
Sent: Wednesday, May 20, 2020 11:32 AM
To: Jeffrey Howard Danko
Cc: Rick Bethel; Neste, David E - DNR; Kelly, Bridget B - DNR; Haag, Christine T - DNR (Christine.Haag@wisconsin.gov)
Subject: COVID-19 Compliance Process - FTC and Stanton

Jeff, as a follow-up to our discussion on April 29, 2020, the DNR Remediation and Redevelopment Team received your Fire Training Center (FTC) compliance assistance request on April 10, 2020. After review, a response to each specific alternative request/schedule as a result of COVID-19 is outlined below:

FTC Quarterly Drinking Water Well Sampling –

For the current potable wells with a history of quarterly monitoring the DNR concurs with the temporary suspension of the quarterly spring 2020 private well sampling as long as bottled water and/or Point of Entry Treatment System (POET) is maintained. Private drinking water well sampling shall resume with the planned quarterly monitoring event in Summer 2020.

FTC Expanded Potable Well Sampling -

The DNR is NOT suspending the requirement to sample the private potable wells in the expanded Potable Well Sampling area as outlined in the [DNR Letter of February 19, 2020](#), because there is no history of sampling or installation of POET systems. If homeowners in the FTC Expanded Potable Well sampling area are NOT comfortable with someone entering the home to conduct the potable well sampling due to COVID19, JCI/Tyco shall provide bottled water and inquire about the ability to sample from outside port. Potable water should be offered to all potable well owners in the Expanded Potable Well Sampling area.

FTC Field Tasks (other media sampling) outlined in the April 2020 workplan –

The DNR concurs with the field tasks being suspended until May 26, 2020, except the foam monitoring and response.

FTC - Schedule for Deliverables -

The DNR does NOT concur with an overall suspension of deliverables included in the draft schedule provided to DNR on March 12, 2020. JCI/Tyco shall make individual, specific requests for any item in which you would like an alternative schedule for deliverables or review by the DNR.

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Roxanne Nelezen Chronert

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From: Neste, David E - DNR <David.Neste@wisconsin.gov>
Sent: Monday, April 13, 2020 6:44 AM
To: Chronert, Roxanne N - DNR <Roxanne.Chronert@wisconsin.gov>
Subject: FW: COVID-19 Compliance Process - FTC and Stanton

Rox,

Below is the Compliance Assistance Request for the JCI/Tyco FTC and Stanton Street PFAS cases. They are requesting to temporarily suspend the scheduled round of private well sampling, potentially resuming in June 2020. In addition, the request states there will be delays in submittal of unspecified deliverables (to be communicated as necessary).

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Dave Neste

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david.neste@wisconsin.gov

From: Coleman, Matthew <Matthew.Coleman@arcadis.com>

Sent: Friday, April 10, 2020 12:56 PM

To: Neste, David E - DNR <David.Neste@wisconsin.gov>

Cc: Rick Bethel <rick.dewey.bethel@jci.com>; Jeffrey Howard Danko <jeffrey.howard.danko@jci.com>; Scott D Wahl <scott.wahl@jci.com>; Bedard, Michael <Michael.Bedard@arcadis.com>; Verburg, Ben <Ben.Verburg@arcadis.com>

Subject: COVID-19 Compliance Process - FTC and Stanton

Dave,

Below is the information for the COVID-19 Compliance Process you requested specific to our FTC and Stanton Street projects.

1. Name of the facility/site: Tyco Fire Technology Center and Tyco Stanton Street Facility
2. Contact information for the central point of contact for the facility/site:
 - a. Name of person notifying: Tyco | Rick Bethel
 - b. Address: 2700 Industrial Parkway South
 - c. City/Town: Marinette
 - d. State: Wisconsin
 - e. Zip: 54143
 - f. Email: Rick.Dewey.Bethel@jci.com
 - g. Phone: 715-735-7411 x 84750
 - h. Primary WDNR Contact for Site or Facility: David Neste

3. State what specific statute/rule/permit condition the individual party is looking for flexibility from.

The long-term private drinking water well sampling program that has been ongoing since 2017 was temporarily suspended due to COVID-19. The approved site work plan from April 2020 included field tasks and other deliverables that have been delayed as a result of COVID-19. Additionally, there may be some deliverables included in our draft schedule provided to WDNR on March 12 that will also be delayed. Tyco will continue communicating schedule adjustments and justifications relative to COVID-19.

4. Include the reasoning/rationale for the request and related to the COVID-19 emergency (1 paragraph)

“Safer at Home” and “Social Distancing” recommendations by state and local governments inhibit travel and the abilities of field personnel to carry out certain tasks in a safe manner.

Where possible, we have mobilized local subcontractors to conduct some sampling tasks to maintain compliance with permits to continue meeting operating requirements for specific interim measures. This approach was not feasible for activities that require potential close contact, e.g. entering a residential property for sampling.

5. Include bulleted points of what measures will be taken to mitigate/minimize the potential environmental impacts (if any)
 - a. Interim measures remain in place for all properties within the private drinking water well sampling program and POETs are being maintained by Culligan on an as-needed basis.
 - b. Permitted interim actions with specific reporting requirements continue to be met.
6. Specify the specific time period that the request is for including the rationale.

We are hopeful that field work can continue in June once “Safer at Home” and “Social Distancing” recommendations have been lifted. However, that timeline remains fluid.

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