

From: Jeffrey Howard Danko <jeffrey.howard.danko@jci.com>
Sent: Wednesday, December 16, 2020 8:30 AM
To: Sellwood, Alyssa A - DNR
Cc: Kelly, Bridget B - DNR; Neste, David E - DNR; Haag, Christine T - DNR; Tim Maciolek; Scott D Wahl; Katie McGinty; Scott D Wahl
Subject: RE: Review of Potable Well Results Using Cycle 11: BRRTS #02-38-580694, 02-38-581955, and 02-38-583856

Alyssa:

Thank you for your concern about drinking water quality for potentially impacted residents in the environmental investigation areas you listed. Presented herein is a summary of the status of the private well sampling in each of the BRRTS sites listed and the sampling and actions completed or planned for the sites.

BRRTS #02-38-583856 (Land Applied Biosolids) – Tyco has already completed sampling of all responsive property owners’ private drinking water wells within the investigation area for the 36 analyte list of PFAS.

Upon receiving the recommended groundwater standards for Cycle 11, Tyco initiated a review of private drinking water well results for the Land Applied Biosolids area. It is important to note that Tyco had previously offered bottled water to 28 homes/businesses following receipt of the sample results and comparison to the Cycle 10 proposed enforcement standard criteria. A total of 22 homes/businesses representing 19 wells accepted and are currently receiving bottled water. After a thorough review of Cycle 11 proposed criteria, it was determined that 3 additional properties within the study area had concentrations exceeding the proposed enforcement standard.

Tyco proactively reached out to those three properties to provide them bottled water service. Information specific to each of those property owners is provided below:

- BWS-069 - [REDACTED]
- BWS-074 - [REDACTED]
- BWS-140 - [REDACTED]

[REDACTED] accepted bottled water service on November 20, 2020 and service was initiated November 25, 2020. [REDACTED] have to date been non-responsive to repeated voicemails. They will be offered bottled water when Tyco is able to connect with them.

Consistent with the *Drinking Water Well Sampling Summary Report – Land Applied Biosolids Area* submitted in September 2020, no point of entry treatment (POET) systems were offered or installed related to the Land Applied Biosolids investigation. For the Land Applied Biosolids area, bottled water has been offered to all private well owners/tenants with detections above Cycle 10 enforcement standards and with the offers to the three properties listed above, bottled water has also been offered to all private well owners/tenants with detections above Cycle 11 enforcement standards.

BRRTS #02-38-581955 (Stanton Street) – The City of Marinette provides municipal water within the study area. There are 3 private drinking water wells within the City of Marinette that are sampled as part of the Fire Technology Center (FTC) Private Well Sampling Area (PWSA) that currently receive

bottled water. Tyco is not aware of any other private drinking water wells that are not already captured as part of the sampling activities.

BRRTS #02-38-580694 (FTC) - There are 172 private drinking water wells within the PWSA for the FTC investigation area. Eight (8) have been sampled for the 36 analyte list of PFAS; 154 have been tested for the 14 PFAS analyte list and 10 have been tested for the 6 PFAS analyte list.

It is important to note that the potential ingestion exposure pathway within the PWSA was eliminated because **Tyco offered all residents bottled water within the study area regardless of test results**. This decision was made early in the process to ensure all residents felt confident in the safety of their drinking water. To date, a total of 149 residences within the study area have accepted bottled water and 137 remain active. Twelve (12) properties elected to remove bottled water service. In addition, Tyco has provided 41 Point-of-Entry Treatment (POET) systems to residences with confirmed detections of PFOA and/or PFOS. A review of results for Cycle 11 PFAS found no additional properties that exceeded recommended enforcement standards that would make them eligible for a POET system.

Tyco engaged in a robust quarterly sampling program at the end of 2017 that provided every resident with a private drinking water well that did not have a POET system within the PWSA an opportunity to have their water sampled once per quarter until March 2020 when COVID-19 temporarily suspended in-person testing for the safety of residents and the people conducting the sampling. Sampling activities were re-initiated at the end of summer 2020 and will remain in place according to our *Revised Long-Term Potable Well Sampling Plan* (RLTPWSP).

All private drinking water wells within the PWSA for the FTC not enrolled in the POET system program, which has its own monitoring and maintenance program, will have the opportunity to get their drinking water tested using the 36 analyte list by the winter 2022 sampling event. Sampling activities, as presented in the RLTPWSP, will continue on a quarterly basis until a long-term drinking water solution is in place. This is consistent with the approach defined in our RLTPWSP submitted in April 2020. The process defined in that plan adjusts sampling frequency based on the number of sampling events for each well to date and the results of those events. Tyco believes this schedule for sampling is more than adequate and protective of human health because all parcels with private drinking water wells within the PWSA were provided the opportunity to eliminate the ingestion risk via bottled water. Properties not accepting the bottled water offer were informed of known risks at the time of the offer and still have the option to accept bottled water service to eliminate ingestion risk they may face.

For WDNR information, prior to suspending sampling for pandemic-related health reasons, there was a significant reduction in the number of properties voluntarily engaging in quarterly sampling. The initial sampling event that ran from approximately December 2017 through March 2018 included a total of 140 wells sampled. The spring 2018 event (April-June) saw a similar volume of wells sampled at 135. However, as sampling activities continued on a quarterly basis, participation by residences has generally decreased to as low as 55 wells volunteering to be sampled in the winter events for 2019 and 2020. It is important to note that of the 36 residences proposed for sampling under the RLTPWSP, only 4 have agreed to be sampled during the fall 2020 event. There are outstanding offers to 32 residences to have their water tested for the 36 PFAS analyte list based on criteria established in the RLTPWSP. This information is important because, while Tyco will make every effort to complete sampling as prescribed in our RLTPWSP, sampling of all private wells in the study area is dependent on voluntary participation by residents.

Lastly, as you are aware, Tyco is actively pursuing a permanent drinking water solution that will include municipal water service to properties within the PWSA. In addition, groundwater data in the area will continue to be collected and analyzed through a network of monitoring wells that are distributed throughout the City of Marinette and Town of Peshtigo. This series of monitoring wells will provide ample data to inform plume characteristics of the entire plume and not just the areas where there are private drinking water wells.

I trust the information presented herein meets with your expectations. We will be happy to discuss any questions or comments at any time.

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From: Sellwood, Alyssa A - DNR <alyssa.sellwood@wisconsin.gov>
Sent: Monday, November 23, 2020 5:12 PM
To: Jeffrey Howard Danko <jeffrey.howard.danko@jci.com>
Cc: Kelly, Bridget B - DNR <BridgetB.Kelly@wisconsin.gov>; Neste, David E - DNR <David.Neste@wisconsin.gov>; Haag, Christine T - DNR <Christine.Haag@wisconsin.gov>
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Jeff ,

As you are aware, on 11/6/2020 the Wisconsin Department of Health Services (DHS) provided the Wisconsin Department of Natural Resources (DNR) with recommended groundwater standards for 22 substances ("Cycle 11"). These recommendations include individual standards for 12 per- and polyfluoroalkyl substances (PFAS), and combined standards for six PFAS. Information regarding the DHS's Cycle 11 proposed groundwater standards are can be found here: <https://www.dhs.wisconsin.gov/water/gws-cycle11.htm>. If you need any assistance in understanding the Cycle 11 recommendations, let us know and we would be happy to coordinate a meeting with DHS.

The DNR appreciates JCI/Tyco's efforts to provide safe drinking water to affected residences. With that in mind, please review the potable well sampling results for PFAS collected to date under BRRTS #02-38-580694, 02-38-581955, and 02-38-583856 and compare the results to the new Cycle 11 proposed groundwater standards. Following your review, take the following actions for any potable wells not currently receiving treatment to remove PFAS:

1. Identify potable wells where PFAS meet or exceed the Cycle 11 proposed groundwater standards. Offer and provide temporary bottled water and point of entry treatment (POET) to affected properties.

2. Identify potable wells where the PFAS parameters included under Cycle 11 were not previously analyzed. Make a plan to resample those wells using the Wisconsin 36 PFAS Analyte List and offer and provide temporary bottled water and POET to properties where the potable wells results meet or exceed the Cycle 11 proposed groundwater standards.

We understand that JCI/Tyco has initiated some of this work, thank you. Please respond in writing with JCI/Tyco's schedule and plan to complete these actions, and submit your findings and results as they become available.

Thank you,

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Alyssa Sellwood, PE (WI)

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