



September 9, 2021

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

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

Via Email Only to jeffrey.howard.danko@jci.com and scott.wahl@jci.com

SUBJECT: Updates to Wis. Adm. Code ch. NR 714 Public Notifications and Posting of Signs
JCI/Tyco FTC PFAS, 2700 Industrial Parkway South, Marinette, WI
DNR BRRTS Activity #: 02-38-580694

Dear Mr. Danko and Mr. Wahl:

Johnson Controls, Inc. and Tyco Fire Products LP (JCI/Tyco) are investigating and responding to the discharge of polyfluoroalkyl substances (PFAS) to the environment at the JCI/Tyco Fire Technology Center (FTC), located at 2700 Industrial Parkway South in Marinette, Wisconsin (“Site”). As part its responsibility under Wis. Adm. Code § NR 714.07, JCI/Tyco notifies the public of the contamination and related site activities using various communication methods.

In August 2019, JCI/Tyco posted signs at approximately 20 locations along surface water ditches to advise the public of PFAS contamination detected in these waterways (Wis. Adm. Code § NR 714.07(4)). The signs were developed using language provided by the Wisconsin Department of Health Services (DHS). JCI/Tyco completed the work in accordance with the plan reviewed by the Wisconsin Department of Natural Resources (DNR) and it documented the work in a letter dated October 30, 2019. JCI/Tyco continues to maintain the posted signs.

Recently, the DNR received feedback from the public regarding the signs and other methods to keep the community informed on the contamination and progress at the Site. This direct feedback is valuable because it allows JCI/Tyco to adapt and respond accordingly to “promote effective and meaningful public participation and notification” in the affected community pursuant to Wis. Adm. Code § NR 714.07(1). The DNR discussed the recent feedback with JCI/Tyco; based on these discussions it is the DNR’s understanding that JCI/Tyco plans to update the surface water advisory signs and expand its approaches for public notification at the Site. The purpose of this letter is to document the recent feedback from the community and outline next steps for JCI/Tyco pursuant to Wis. Adm. Code § NR 714.07.

Posting of Signs - Wis. Adm. Code § NR 714.07(4)

Community members provided feedback that the current surface water advisory signs need updates and to be posted to additional locations to effectively notify the public of PFAS contamination in the surface water ditches associated with the Site. Based on this feedback, the DNR worked with the DHS to improve the impact and clarity of the sign design. A mockup of the updated sign template developed by the DHS is provided in **Attachment A**, and directions for next steps based on the concepts JCI/Tyco and DNR discussed are provided below.

1. Use the template provided by the DHS in **Attachment A** to prepare new signs to replace current ones and post at additional locations selected based on input from local government, citizens and the DHS. Signs shall be a minimum of 12-inch x 18-inch and constructed of a durable material to withstand the elements.
2. Work with the local governments, citizens and the DHS to select additional locations where there is public access to surface waters impacted by PFAS from the Site to post the updated advisory signs. The locations where a group of citizens shared that additional advisory signs are needed are summarized in **Attachment B**. This is not an exhaustive list and it does not account for local rules or restrictions for posting of signs. Other locations or modifications may be required based on directions JCI/Tyco receives from local governments, citizens and the DHS.
3. Post the updated signs at existing locations and the additional selected locations as soon as practicable, but no later than **November 9, 2021**. Post the signs in clearly visible locations on both sides of public access to ditches and mount signs on both the front and back of each signpost so that the signs are noticeable regardless of which direction the public accesses the area.
4. Document the updates to the signs and locations in letter to the DNR within **30 days** after installation of the signs is complete. Include mockup of the final revised sign template, description of how new locations were selected, locations chosen but to which access could not be obtained, maps identifying the final posted locations, and photos documenting the posted signs.
5. Maintain the signs to remain legible for the duration of the response action until final case closure is received in accordance with Wis. Adm. Code ch. NR 726 or until no longer required by the DNR.

Public Participation and Notification - Wis. Adm. Code § NR 714.07

The DNR is aware that JCI/Tyco uses various methods listed in Wis. Adm. Code § NR 714.07 to notify the public. However, the community shared feedback that additional methods, which do not rely on a person's access or use of the internet, are needed to reach people in the area. Suggestions from the local community included:

- post or leave project factsheets in public buildings and community spaces;
- send occasional bulk mailings to share project background and milestones;
- send occasional bulk mailings with offer to be on JCI/Tyco email distribution list and JCI/Tyco contacts;
- send bulk mailings postcard notifying of upcoming public meetings and host a group meeting space with the appropriate technology for people to access "virtual-only" public meetings in person.

This is not an exhaustive list; JCI/Tyco must work with local government and citizens to evaluate the need for and the level of public participation and notification as required by Wis. Adm. Code § NR 714.07(1).

Please understand that the public notification requirements specify:

Notice shall be provided to the public by means designed to reach those members of the public directly or indirectly affected by the discharge of a hazardous substance and the implementation and operation of any proposed or actual remedial action. The department.... may require departmental approval of materials prepared by the responsible party...

Therefore, JCI/Tyco must provide a summary of its completed, on-going, and new methods of public notification for the Site pursuant to the requirements of Wis. Adm. Code § NR 714.07(3). Please provide this summary to DNR by **December 1, 2021**.

If you have any questions, please contact me at (608) 622-8606 or Alyssa.Sellwood@wisconsin.gov.

Sincerely,



Alyssa Sellwood, PE
Complex Sites Project Manager
Remediation & Redevelopment Program

Attachment: Attachment A – Surface water advisory sign mock-up
Attachment B – Citizens recommendations for added locations of surface water advisory signs

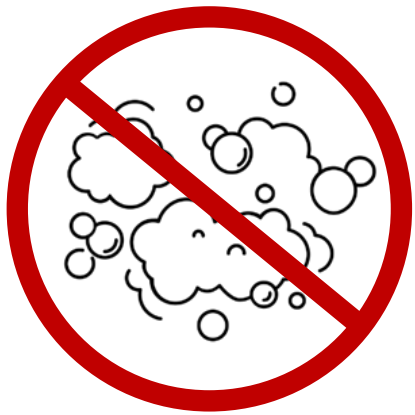
cc: Bridget Kelly, DNR (via email: Bridgetb.kelly@wisconsin.gov)
Jodie Peotter, DNR (via email: Jodie.peotter@wisconsin.gov)
Brita Kilburg-Basnyat, DHS (via email: Brita.Kilburgbasnyat@dhs.wisconsin.gov)
Amanda Koch, DHS (via email: Amanda.Koch@dhs.wisconsin.gov)

ADVISORY



THIS WATER HAS PFAS CHEMICALS

Per- and polyfluoroalkyl substances (PFAS) are human-made chemicals that can be harmful to health when swallowed. PFAS are in this surface water and can be found in high levels in foam.



People and pets should avoid foam and should not swallow the water.



Wash skin that has touched this water or foam with clean water as soon as possible.



If pets go in, wash them off with clean water and do not let them lick foam from their fur.

This water is currently being investigated and cleaned up by JCI/Tyco in accordance with Wisconsin laws (DNR Site Activity # 02-38-580694). Contact JCI/Tyco's hotline at 715-582-7100 or visit tycomarinette.com.

- ▶ To learn more about this cleanup effort, visit dnr.wisconsin.gov and search "Marinette".
- ▶ For information about PFAS and health, visit dhs.wisconsin.gov and search "PFAS".

Sign Locations Description

Ditch B

- 1. Starting at the Bay, signs at the mouth of Ditch B**
- 2. Signs at both sides of Bay Shore Street**
- 3. Signs at the footbridge on UWGB, Marinette Campus**
- 4. Signs on a walking trail on UWGB, Marinette Campus**
- 5. A Sign at Edgewood Circle Drive**
- 6. Signs at both sides of Shore Drive**
- 7. A Sign at Florence Street**
- 8. Signs at both sides of the open ditch/Zion Lutheran Church between Florence and James Streets**
- 9. Signs on both sides of Edwin Street**
- 10. Signs at both sides of Pierce Ave.**

Ditch A

1. Add signs on both the north and south sides of University Ave
2. Add sign on other side of road where Ditch A crosses Madsen Road
3. Add signs on both the north and south sides of County B
4. Add signs on the north and south side signs along Radar Road
5. Add signs on the north and south side of the signs Health Lane

Ditch C

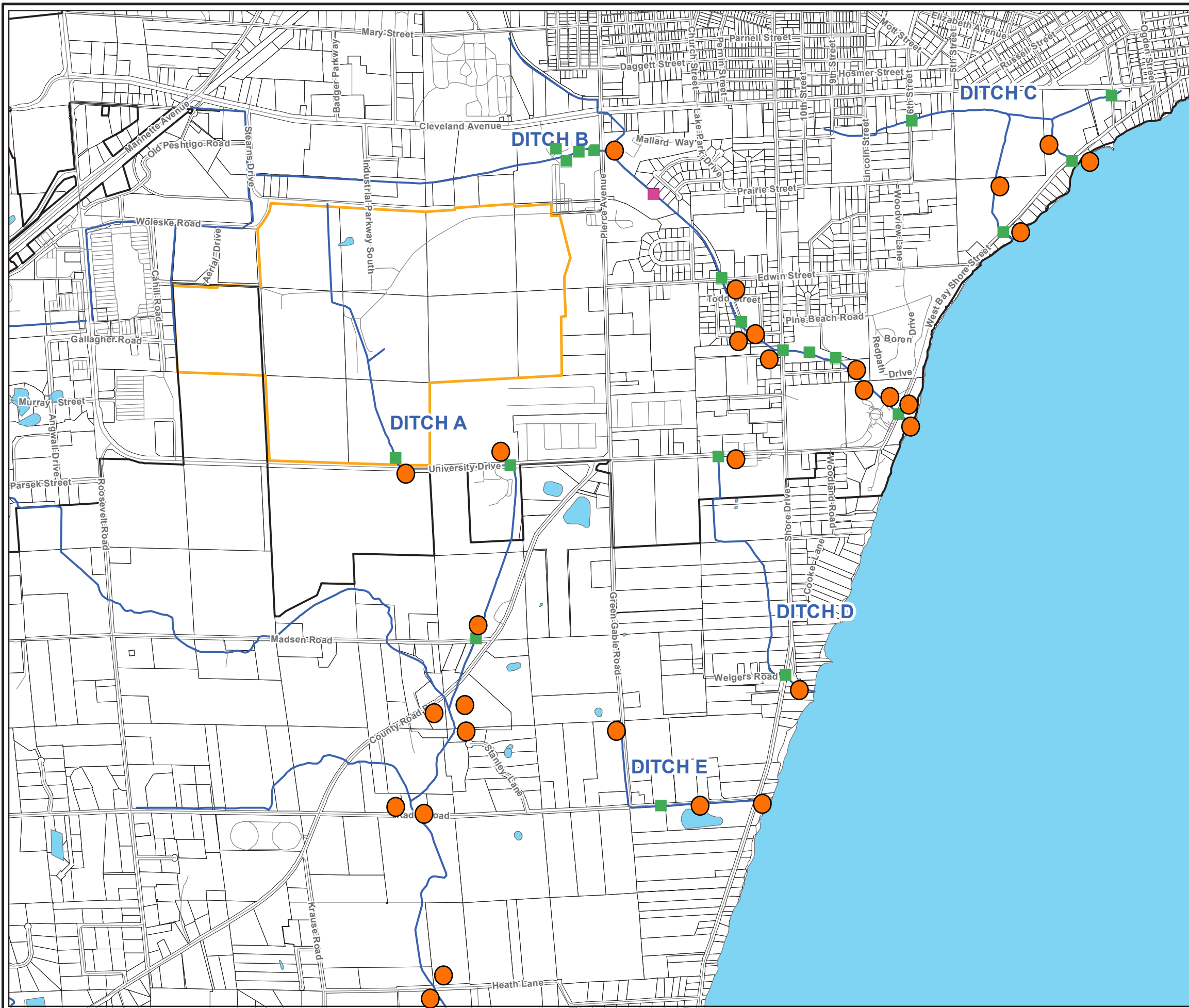
1. Signs at both sides of Bay Shore Street at the two branches of Ditch C
2. Two Signs along the nature trail

Ditch D

1. Add sign on the north side of University Ave
2. Add 1 sign on the east side of Shore Drive

Ditch E

1. Add sign along Ditch on west side Green Gable Road (add 1 sign on the of the road)
2. Add 1 sign at the pond along Radar Road (pond that is used as a source of water for the Town of Peshtigo Fire Department)
3. Add one sign on the east side of Shore Drive (underground culvert is west side of Shore Drive)



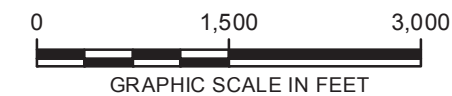
LEGEND:

- PROPOSED SIGN LOCATION
- INSTALLED SIGN LOCATION
- APPROXIMATE SITE PROPERTY BOUNDARY
- APPROXIMATE MARINETTE CITY BOUNDARY
- PARCEL BOUNDARY
- ROAD
- DITCH/STREAM
- WATERBODY

● Suggested Additional Sign Location

NOTES:

1. CITY BOUNDARY DATA SOURCE: WISCONSIN LEGISLATIVE TECHNOLOGY SERVICES BUREAU, WISCONSIN COUNTY CLERKS AND LAND INFORMATION OFFICES, ACCESSED FALL 2017.
2. DITCH/STREAM AND WATERBODY DATA SOURCE: U.S. GEOLOGICAL SURVEY NATIONAL HYDROGRAPHY DATASET, ACCESSED FALL 2017.
3. ROAD DATA SOURCE: OPEN STREET MAP, ACCESSED FALL 2017.



TYCO FIRE PRODUCTS, LP
 MARINETTE, WISCONSIN

DITCH SIGN
 LOCATION & STATUS

