

Ms. Alyssa Sellwood
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
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Date: October 15, 2021

Subject: Q3 2021 Project Status; Tyco Fire Technology Center (FTC) PFAS at 2700 Industrial Parkway South, Stanton Street PFAS at One Stanton Street, and Land Applied Biosolids Area, Marinette, Wisconsin
BRRTS Activity#: 02-38-580694, 02-38-581955, and 02-38-583856

Dear Ms. Sellwood,

On behalf of Tyco Fire Products LP (Tyco), Arcadis submits this status report to summarize activities completed, data collected, corrective actions, and WDNR/Tyco correspondence for Q3 2021, as well as planned activities for the upcoming quarter (Q4 2021). As noted in previous quarterly status reports to WDNR, Tyco will continue to provide updates on a quarterly basis to reflect current and planned activities.

PROJECT STATUS

Below is a summary of the project status for the Tyco FTC and Stanton Street facilities and long-term drinking water supply for the period from July 1, 2021 to September 30, 2021 (Q3 2021) and planned activities from October 1, 2021 to December 31, 2021 (Q4 2021).

Activities Completed

Field Work

- July 1, 2021 to September 30, 2021 – Ditch A treatment system operation, maintenance, and monitoring (OMM) and weekly sampling for Wisconsin Pollutant Discharge Elimination System (WPDES) permit, except for August 23 to 26, 2021 and September 5 to 30, 2021 due to dry channel conditions and no upstream flow; Commencement of monthly downstream surface water sampling in August 2021
- July 1, 2021 to September 30, 2021 – Ditch B treatment system OMM and weekly sampling for WPDES permit; Commencement of monthly downstream surface water sampling in August 2021
- July 1, 2021 to September 30, 2021 – Daily foam monitoring of Ditch A through Ditch E
- July 1, 2021 to September 30, 2021 – FTC Summer 2021 Private Well Sampling Event
- July 1, 2021 to September 30, 2021 – Point-of-Entry Treatment (POET) system sampling and OMM
- July 1, 2021 to September 30, 2021 – Installation of permanent dosing pumps for peroxide and polymer, turbidity sensors, and programming for the Ditch B water matrix unit operation as authorized per the modification request for the WPDES permit

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- July 12, 2021 to July 14, 2021 – Groundwater Extraction and Treatment System (GETS) Long-Term Monitoring (LTM) Pre-Startup Phase surface water sampling, streambed groundwater sampling, and groundwater gauging
- July 19, 2021 – Quarterly ChemDesign outfall sampling
- July 19, 2021 – Monthly FTC and Stanton Street outfall sampling
- August 2, 2021 to August 19, 2021 – Sonic drilling mobilization to collect grain size samples at five boring locations near proposed GETS extraction wells; vertical aquifer profiling (VAP) groundwater sampling completed at two of the five borings, eight piezometers installed on-site and within the City of Marinette rights-of-way
- August 20, 2021 – Abandonment of 31 injection wells associated with former pilot testing of enhanced reductive dechlorination and in situ chemical oxidation conducted at the FTC in 2014 and 2015
- August 30, 2021 – Monthly FTC and Stanton Street outfall sampling
- September 7, 2021 to September 10, 2021 – GETS LTM Pre-Startup Phase surface water sampling, streambed groundwater sampling, and groundwater gauging
- September 13, 2021 to September 14, 2021 – Geoprobe groundwater and soil sampling at 11 proposed GETS vault locations associated with the GETS Revised Interim Remedial Action Materials Management Plan; VAP groundwater sampling at three of the locations in proximity to proposed GETS extraction wells
- September 21, 2021 – Sonic soil sampling at one proposed GETS vault location associated with the GETS Revised Interim Remedial Action Materials Management Plan
- September 22, 2021 – Hand auger surface soil sampling at four locations associated with the FTC Air Pathway Site Investigation Work Plan
- September 30, 2021 – Monthly FTC and Stanton Street outfall sampling

Deliverables Submitted to WDNR

- July 15, 2021 – Q2 2021 Project Status; Tyco FTC, Stanton Street, and Land Applied Biosolids Area, Marinette
- July 16, 2021 – Revised Long-Term Monitoring Plan for the GETS and Response to Comments; Tyco FTC
- July 16, 2021 – Ditch A OMM Manual and LTM Plan; Tyco FTC
- July 16, 2021 – Ditch A OMM Manual and LTM Plan; Tyco FTC
- July 16, 2021 – Revised Long Term Potable Well Sampling Plan Response to Comments; Tyco FTC
- July 21, 2021 – Ditch A and B Monthly WPDES Discharge Monitoring Reports (June 2021); Tyco FTC
- August 6, 2021 – Private Drinking Water Well Sampling Program Annual Summary Report – FTC Sampling Area; Tyco FTC
- August 20, 2021 – Ditch A and B Monthly WPDES Discharge Monitoring Reports (July 2021); Tyco FTC
- September 1, 2021 – Draft Project Schedule; Tyco FTC and Stanton Street, Marinette
- September 10, 2021 – Semi-Annual Operation, Maintenance and Optimization Progress Report #5, Ditch A; Tyco FTC
- September 10, 2021 – Semi-Annual Operation, Maintenance and Optimization Progress Report #4, Ditch B; Tyco FTC
- September 16, 2021 – Ditch A Semi-Annual Monitoring Report (1/1/2021 - 6/30/2021); Tyco FTC
- September 16, 2021 – Ditch B Semi-Annual Monitoring Report (1/1/2021 - 6/30/2021); Tyco FTC
- September 20, 2021 – Proposed Modification to Foam Management Plan; Tyco FTC

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- September 21, 2021 – Ditch A and B Monthly WPDES Discharge Monitoring Reports (August 2021); Tyco FTC

Corrective Actions

- Field activities are ongoing; personnel are following applicable federal, state, and local coronavirus guidance to prevent exposure to and spread of the disease while conducting field activities

WDNR/Tyco Correspondence

Tyco Submittal to WDNR

- July 9, 2021; July 23, 2021; August 6, 2021; August 20, 2021; September 3, 2021; September 17, 2021 – PFAS Database Uploads and GIS Shape Files
- July 15, 2021; July 28, 2021; July 29, 2021; August 16, 2021; August 27, 2021; September 10, 2021; September 30, 2021 – Sample Results Notifications

WDNR Submittal to Tyco

- August 31, 2021 – Response to Near-Term Bedrock Groundwater Evaluation Work Plan; BRRTS #02-38-581955, 02-38-580694
- August 31, 2021 – Response to Site Investigation Work Plan, Interim Site Investigation Report, Conceptual Site Model and Aerial Deposition Evaluation Report; BRRTS #02-38-581955
- September 14, 2021 – Air Pathway Site Investigation Work Plan: Approval with Additional Requirements; BRRTS #02-38-580694
- September 14, 2021 – Notice of Non-Compliance and DNR Response to Drinking Water Well Sampling Summary Report – Land Applied Biosolids Area; BRRTS #02-38-583856

WDNR/Tyco Summits and Periodic Meetings

- Weekly calls between WDNR and Tyco
- August 4, 2021; August 6, 2021; August 9, 2021; August 18, 2021; August 20, 2021; August 31, 2021; September 1, 2021; September 29, 2020 – Community update communications and corresponding Tyco website updates
- July 21, 2021 – WDNR Listening Session
- September 8, 2021; September 22, 2021 – GETS “Office Hours” Zoom calls

Planned Activities

- WDNR-Tyco Working Technical Session planned for October 7, 2021 for discussion of the land-applied biosolids area
- Continue deliverable preparation and submittal, per the Draft Project Schedule submitted to the WDNR on September 1, 2021
- Preparation of deliverables and initiation of field work in response to the WDNR comment letters received in August and September 2021
- Continue field work related to the Ditch B GETS LTM Plan pre-startup activities

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- Continue daily foam monitoring activities on Ditch A through Ditch E until the onset of frozen channel conditions and/or rim ice. Request to reduce monitoring frequency to weekly in the Modified Foam Management Plan is pending WDNR approval
- Continue discussions associated with long-term drinking water distribution system expansion into the Town of Peshtigo
- Continue monitoring activities associated with the LTM Plan and reporting for the Ditch A and B Treatment Systems
- Continue quarterly private well sampling and POET OMM per the Revised Long-Term Potable Well Sampling Plan
- Continue operation and biological calibration of the treatment system equipment at the FTC Wastewater Treatment Facility

Tyco and Arcadis appreciate WDNR's collaboration on this project. Should you have any questions, please contact the undersigned.

Sincerely,
Arcadis U.S., Inc.



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