

From: [DuFresne, Kristin I - DNR](#)
To: [Danko, Jeff](#)
Cc: [Neal, Conor \(Neal.Conor@epa.gov\)](#); [DuFresne, Kristin I - DNR](#)
Subject: RE: Standard Operating Procedure for Surface Water Sampling - Tyco Fire Products LP site
Date: Thursday, June 22, 2017 8:24:10 AM
Attachments: [2017-06-13_99.pdf](#)

Jeff – Attached please find the Department of Natural Resources (DNR) comments regarding Tyco’s submittal titled *Standard Operating Procedure, Surface Water Sampling – Menominee River, Tyco Fire Products LP Site, Marinette, Wisconsin*.

Please feel free to contact the DNR or EPA if you have any questions.

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From: Danko, Jeff [<mailto:jdanko@tycoint.com>]
Sent: Wednesday, May 31, 2017 7:50 AM
To: DuFresne, Kristin I - DNR; Neal, Conor
Subject: Standard Operating Procedure for Surface Water Sampling - Tyco Fire Products LP site

Kristin/Conor:

Attached for your information is the planned standard operating procedure for surface water sampling in the Menominee River. The sampling is to be conducted per the request presented in the March 21, 2016 comments on the Outfall Investigation Report for the Tyco Fire Products LP site and subsequent discussions. Tyco is currently coordinating with a contractor to supply a boat for the first round of sampling collection activities, with an anticipated start date as early as June 8 (Thursday of next week); the specific date will be provided to the agency once it is determined.

Jeff Danko

Environmental Project Geologist

262-951-6888

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DATE: June 13, 2017

TO: Conor Neal – Ansul/Tyco Project Manager
U.S. EPA Region 5

FROM: Department of Natural Resources Ansul/Tyco Team
Cheryl Bougie – Office of Great Waters
Jim Killian – Office of Great Waters
Trevor Moen – Wastewater
Kristin DuFresne – Remediation & Redevelopment

SUBJECT: DNR comments regarding Standard Operating Procedure, Surface Water Sampling
– Menominee River, Tyco Fire Products LP Site, Marinette, Wisconsin

The Department of Natural Resources (DNR) is in receipt of Tyco's submittal titled *Standard Operating Procedure, Surface Water Sampling – Menominee River, Tyco Fire Products LP Site, Marinette, Wisconsin*. The DNR has reviewed this submittal and offers the following comments:

- Page 1, Scope, Second Paragraph – Provide an approximate location for the background sample. Identify how far upstream from the turning basin this sample will be collected. Provide a sample location map. Note: The DNR recognizes that Homeland Security prevents the water intake locations from being publicly known.
- Page 1, Equipment List – Add the following:
 - Sampling boat (*and accessories, anchors, ropes, first aid kit*)
 - Preservative (nitric acid)
 - Cooler with ice
 - Decontamination of sampling equipment between samples (Alconox, brush and rinse water)
- Page 1, Sampling Procedure, First Paragraph – Provide the accuracy of the hand-held GPS receiver. The DNR assumes the same unit or grade of hand-held GPS receiver will be used for all sampling events.
- Page 2, Sampling Procedure, First Paragraph
 - The DNR assumes the boat will be anchored when:
 - the GPS location is being determined
 - the water thickness is being determined
 - the water sample is being collected
- Page 2, Sampling Procedure, First and Second Paragraphs - Thickness is not a typical term used to describe water depth. Change references to thickness to depth.
- Page 2, Sampling Procedure, Second Paragraph
 - New gloves should be worn at each sample location.
 - Identify the sample preservation method that will be used.
- Page 2, Sampling Procedure, Third Paragraph

- Provide an example of the unique sample ID.
- Provide a link to the QAPP.
- Include specifics regarding: GPS accuracy, sample preservation, equipment decontamination, duplicate samples, a laboratory slip, sample location map, sounding pole with measurement increments, etc.

- Page 2, Sampling Procedure, Fourth Paragraph
 - The DNR recommends the collection of a duplicate sample at the municipal intake sample locations.
 - Specify the sample perseveration method.

- Page 2, Sampling Procedure, Fifth Paragraph – Note the field conditions (i.e. weather, water flow, seiche, etc...).

- Page 2, Laboratory Testing
 - Specify the laboratory that will analyze the samples.
 - Verify that the selected sample method and laboratory can achieve a detection limit of less than 0.2 ug/L.
 - To achieve this detection limit, consider using EPA Method 200.8.
 - Ask the laboratory to identify their limit of detection and limit of quantification.
 - Ask the laboratory if their limit of detection is realistic.

The DNR appreciates the opportunity to provide U.S. EPA with comments. Please feel free to contact DNR staff if you have any questions or if you require additional information.

cc: Ansul (DNR BRRTS # 02-38-000011) Case File