



March 30, 2018

Mr. Richard Mator
Senior EHS Manager – Environmental Remediation
Tyco Fire Products, LP
1400 Pennbrook Parkway
Lansdale, PA 19446

SUBJECT: March 2018 *Long-Term Potable Well Sampling Plan*
Tyco Fire Technology Center, 2700 Industrial Parkway, Marinette, WI
DNR BRRTS Activity #: 02-38-580694

Dear Mr. Mator:

On March 9, 2018, the Department of Natural Resources (Department) received the *Long-Term Potable Well Sampling Plan* dated March 2018 (Sampling Plan), submitted by Arcadis U.S. Inc. (Arcadis) on behalf of Tyco Fire Products, LP (Tyco), along with the associated \$425 review fee in accordance with Wis. Admin. Code ch. NR 749.

The Department performed a detailed technical review of the Sampling Plan and associated site file to provide this response. The review indicated the following items where requirements of Wis. Admin. Code § NR 724.17 were not satisfied:

1. The Sampling Plan should state that all potable well sampling results must be provided to the Department, well owner(s), and occupant(s), as applicable, within 10 business days after receiving the sampling results [Wis. Admin. Code § NR716.14(1)].

The following are the Departments recommendations for inclusion in the Sampling Plan:

2. The Department recommends the potable well sampling area be expanded to include all properties south of Radar Road and west of Green Gable Road to County Trunk Highway (CTH) B. The additional area includes approximately three (3) properties and serves as a logical southern boundary as there is very little development in the area immediately south of Radar Road.
3. The Sampling Plan states that a modified version of United States Environmental Protection Agency (US EPA) Method 537. To maintain consistency with other PFAS investigations in the State of Wisconsin, the Department is requesting that the complete Method 537 be used for all drinking water samples, while the modified Method 537 can be employed for sampling of other media.
4. The Department recommends that each potable well sampled as part of the Sampling Plan be assigned a Wisconsin Unique Well Number (WUWN). This will aid in locating and tracking well sample results.

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In Closing

The Department requests that, **within 60 days of this letter**, you address the issues addresses above to bring the Sampling Plan into compliance with the standards outlined in Wis. Admin. Code § NR 724.17.

This letter is in response to only the actions outlined in the March 2018 *Long-Term Potable Well Sampling Plan*, and does not constitute approval of future workplans and/or monitoring plans, or completion of the site investigation. Based on data that has been submitted to the Department to date, the activities outlined in the Workplan will not likely complete the site investigation. The Department understands this investigation is an iterative process, with additional workplans and site investigation activities required to completely delineate environmental impacts resulting from the PFAS release from the site.

The Bureau for Remediation and Redevelopment Tracking System (BRRTS) identification number for this activity is shown at the top of this letter. The Department tracks information on all case determinations such as this letter in a Department database that is available on the internet at:

<http://dnr.wi.gov/topic/Brownfields/botw.html>.

Thank you for the opportunity to review the Workplan. If you have any questions, please contact Dave Neste at 920-662-5165, by writing to the address at the top of this letter, or by email at David.Neste@Wisconsin.gov.

Sincerely,



David Neste
Hydrogeologist
Remediation & Development Program

cc: Mr. Michael Bedard, Arcadis U.S., Inc. (via email: michael.bedard@arcadis.com)
Mr. Chris Ryan, Arcadis U.S., Inc. (via email: christopher.ryan@arcadis.com)
Mr. Chris Behrend, Tyco Fire Products, LP (via email: christopher.behrend@jci.com)