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February 5, 2026

MS. DENICE NELSON
JOHNSON CONTROLS, INC
5757 N. GREEN BAY AVENUE
MILWAUKEE, WI 53209

Via Email Only to denice.karen.nelson@jci.com

SUBJECT: Response to Construction Documentation Report for the Interim Groundwater Extraction and Treatment System Optimization
JCI/Tyco FTC PFAS, 2700 Industrial Parkway South, Marinette, WI
BRRTS #02-38-580694

Dear Ms. Nelson:

On Nov. 25, 2025, the Wisconsin Department of Natural Resources (DNR) received the *Construction Documentation Report for the Interim Groundwater Extraction and Treatment System Optimization* ("GETS Optimization Construction Report") for the above-referenced site (the "Site"). The report was submitted by Arcadis U.S., Inc. (Arcadis) on behalf of Johnson Controls, Inc. and Tyco Fire Products LP (JCI/Tyco) and was accompanied by the fee required under Wisconsin Administrative Code (Wis. Admin. Code) § NR 749.04(1) for DNR review and response.

On Feb. 3, 2026, the DNR received waste disposal manifests from JCI/Tyco, which were needed to complete its documentation of soil managed during the construction activities. The DNR amended the "GETS Optimization Construction Report" to include these waste manifests as an attachment.

The GETS Optimization Construction Report is approved. The report included the revised Operation, Monitoring and Maintenance (OM&M) Plan and one change is needed to this OM&M Plan, which is described herein.

Background

JCI/Tyco is investigating and responding to the discharge of per- and polyfluoroalkyl substances (PFAS) to the environment at the JCI/Tyco Ansul Fire Technology Center (FTC), located at 2700 Industrial Parkway South in Marinette, Wisconsin.

A significant groundwater contaminant plume of PFAS is present at the Site; the concentrations of perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) in groundwater on the FTC property are on the order of 10,000 – 100,000 parts per trillion (ppt). The contaminated groundwater migrates eastward and some upwells into the surface water ditches; all of which contribute to PFAS migrating to the Bay of Green Bay.

In Nov. 2022, JCI/Tyco began operating the GETS with stated goals to (1) reduce upwelling of PFAS-contaminated groundwater into Ditch B; (2) treat the recovered groundwater to reduce the PFAS concentration in the water; and (3) reduce PFAS-mass flux throughout groundwater plume.

Originally, the GETS included nine vertical groundwater extraction wells to pump and convey contaminated groundwater through buried pipes to a treatment building on the FTC property. Treatment included oxidation, filtration, granular activated carbon (GAC) and ion exchange resins to remove PFAS from the groundwater. The treated water is discharged back to Ditch B surface water downstream of where the ditch crosses Pierce Avenue.

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Following construction, JCI/Tyco submitted OM&M reports for the GETS in accordance with Wis. Admin. Code § NR 724.13(3). JCI/Tyco proposed modifications to the GETS based its operations and performance documented in these OM&M reports.

GETS Optimization Construction Report

The GETS Optimization Construction Report documents modifications made to the GETS that were completed by JCI/Tyco to meet the objectives it set "*to reduce PFAS concentrations in Ditch B such that surface water treatment is no longer necessary and alleviate potential impacts to the environment near Ditch A*."

The modifications to the GETS included:

- Installation of supplemental 8-inch–diameter extraction wells EX-1S and EX-2S next to the original 6-inch–diameter extraction wells EX-1 and EX-2. The supplemental wells are easier to maintain and are currently in use; the original wells are not currently in use but remain available for future use, if needed.
- Addition of six new extraction wells (EX-10 to EX-15):
    - EX-10 and EX-11 were installed to extract groundwater water near Ditch A.
    - EX-12, EX-13 and EX-15 were installed to increase the amount of groundwater extracted near Ditch B.
    - EX-14 was converted from a previous monitoring well PZ-64-67 to capture PFAS-contaminated groundwater migrating in the weathered bedrock layer under Ditch B.
- Numerous changes to the treatment system to accommodate the nominal increase in flow from 300 gallons per minute (gpm) to 600 gpm and meet the Wisconsin Pollutant Discharge Elimination System (WPDES) permit limits.

The GETS Optimization Construction Report documents the construction, permitting, startup/shakedown activities and management of contaminated materials generated during the work. A revised OM&M Plan was included in Appendix B. The construction and startup activities for the GETS optimization were finished in Oct. 2025.

DNR Review and Next Steps

Currently, the GETS is an interim action that operates in pursuit of meeting the general remedial objectives set by JCI/Tyco. An evaluation of remedial action options, including identification of environmental standards, completed in accordance with Wis. Admin. Code ch. NR 722, is required to select the remedial action(s) for the Site. The GETS may become a remedial action selected by JCI/Tyco for the Site based on its future remedial action options evaluation.

The GETS Optimization Construction Report documents the construction modifications to the GETS in accordance with Wis. Admin. Code § 724.15 and included a revised OM&M Plan as required under Wis. Admin. Code § NR 724.13(4). The DNR approves this GETS Optimization Construction Report with the following condition:

- In Section 6.1 of the Revised OM&M Plan, add to the list of required reports the submittal of Wis. Admin. Code § NR 724.13(3) Operation and Maintenance (O&M) Progress Report and submit the revised page to the DNR to have for the project record.
- Please refer to the DNR's response to *GETS Short-Term Monitoring Report #6* that was sent to JCI/Tyco under separate cover on same date as this letter for additional information on O&M Progress Reports.

As a reminder, this Site is subject to an enforcement action and therefore all submittals to the DNR under Wis. Admin. Code chs. NR 700-799 and submittals directed by the DNR must be accompanied by an Wis. Admin. Code ch. NR 749 fee per Wis. Stat. § 292.94. These fees are not pro-ratable or refundable per Wis. Admin. Code § NR 749.04(1). If you have any questions about whether to include a fee with a submittal, please contact DNR staff prior to submitting a document without a fee.

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

Sincerely,

Alyssa Sellwood, PE
Water Resources Engineer
Remediation & Redevelopment Program

cc: Jodie Thistle, DNR (via email: jodie.thistle@wisconsin.gov)