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March 30, 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 *Revised Comprehensive Alternative Water Management Plan*
JCI/Tyco FTC PFAS, 2700 Industrial Parkway South, Marinette, WI
BRRTS #02-38-580694

Dear Ms. Nelson:

On Feb. 2, 2026, the Wisconsin Department of Natural Resources (DNR) received the *Revised Comprehensive Alternative Water Management Plan* (the "Revised CAWMP") for the above-referenced site (the "Site"). The Revised CAWMP 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.

Background

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

PFAS from the FTC have impacted private drinking water wells in the area. JCI/Tyco identified a geographic area where it offers and provides alternative safe drinking water – this area is called the Potable Well Sampling Area (PWSA). The monitoring and specific actions JCI/Tyco has taken to address drinking water in the PWSA are detailed in other reports. The CAWMP is an overview of the process to offer and provide safe drinking water to all households in the PWSA.

- On May 8, 2020, JCI/Tyco submitted the original CAWMP.
- On April 1, 2024, JCI/Tyco submitted the first Revised CAWMP on to document updates to the plan.
- On June 24, 2024, JCI/Tyco submitted a response to the DNR's comments to the Revised CAWMP.

Summary of the Revised Comprehensive Alternative Water Management Plan

The Feb. 2, 2026, Revised CAWMP is the second revision to the plan and includes the following updates from the previous version:

- Updated the description as to why connecting to the city of Marinette's public water supply was not advanced as an option for safe drinking water for the PWSA.
- Added that the two homes located within the city of Marinette, which each still use a private drinking water well, will be connected to public water in 2026.
- Updated the background summary to reflect that most households in the PWSA have received a replacement deep private well and that 24 shallow private drinking wells remain (nine of which have a point of entry treatment system [POET]).

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- Added to the criteria for when JCI/Tyco will stop providing bottled water and maintenance to POET systems if *"three consecutive samples from an associated monitoring well below current WDHS-recommended criteria and a confirmation sample from the private well is below current WDHS-recommended criteria*." The new criterion only applies to 24 households having a shallow private drinking well.

Review

The DNR acknowledges the changes in the Revised CAWMP and notes the following:

- Because of the criterion was added for stopping bottled water and POET maintenance, there should be a parallel process presented to start (or restart) providing alternative safe drinking water when monitoring indicates that a household's private wells has been or is likely to be impacted with PFAS over the current Wisconsin Department of Health Services (DHS) drinking water health advisory levels (Wis. Admin. Code § NR 708.05(4)(f)).
- The replacement deep private wells should not be categorized as a remedial action in Section 4.1. The term remedial action…"*means those response actions…taken to control, minimize, restore, or eliminate the discharge of hazardous substances or environmental pollution so that the hazardous substances or environmental pollution do not present an actual or potential threat to public health, safety, or welfare or the environment*" (wis. Admin Code § NR 700.03(48)). The replacement deep private wells are a long-term alternative source of drinking water in the PWSA.

Next Steps

The status of alternative drinking water in the PWSA has evolved since the original CAWMP and documentation is dispersed throughout many documents in the project record. Thus, the DNR requests that JCI/Tyco use the next Revised CAWMP to summarize the alternative drinking water options and status for <u>each parcel</u> in the PWSA. Please submit the next Revised CAWMP by **<u>Jan. 31, 2027</u>**.

General recommendations for information to include in the next Revised CAWMP:

- Concise and consolidated summary of the alternative drinking water options offered in the PWSA:
  - Options: Bottled Water, POET, City Water and Replacement Deep Wells
  - Reference applicable governing documents in the project record
  - Define the criteria for starting and stopping an option (if applicable to that option)
- A map and table listing all parcels, which communicates the following information:
  - Selected Option: None, Bottled Water, POET, City Water, or Replacement Deep Well
  - Developed or undeveloped
  - If parcel is developed, and has not accepted a replacement deep well, identify if the private well contains PFAS above the current DHS health advisory levels.

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)