

Notice: Use this form to request a **written response (on agency letterhead)** from the Department of Natural Resources (DNR) regarding technical assistance, a post-closure change to a site, a specialized agreement or liability clarification for Property with known or suspected environmental contamination. A fee will be required as is authorized by s. 292.55, Wis. Stats., and NR 749, Wis. Adm. Code., unless noted in the instructions below. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31 - 19.39, Wis. Stats.].

Definitions

"Property" refers to the subject Property that is perceived to have been or has been impacted by the discharge of hazardous substances.

"Liability Clarification" refers to a written determination by the Department provided in response to a request made on this form. The response clarifies whether a person is or may become liable for the environmental contamination of a Property, as provided in s. 292.55, Wis. Stats.

"Technical Assistance" refers to the Department's assistance or comments on the planning and implementation of an environmental investigation or environmental cleanup on a Property in response to a request made on this form as provided in s. 292.55, Wis. Stats.

"Post-closure modification" refers to changes to Property boundaries and/or continuing obligations for Properties or sites that received closure letters for which continuing obligations have been applied or where contamination remains. Many, but not all, of these sites are included on the GIS Registry layer of RR Sites Map to provide public notice of residual contamination and continuing obligations.

Select the Correct Form

This form should be used to request the following from the DNR:

- Technical Assistance
- Liability Clarification
- Post-Closure Modifications
- Specialized Agreements (tax cancellation, negotiated agreements, etc.)

Do not use this form if one of the following applies:

- Request for an **off-site liability exemption or clarification** for Property that has been or is perceived to be contaminated by one or more hazardous substances that originated on another Property containing the source of the contamination. Use DNR's Off-Site Liability Exemption and Liability Clarification Application Form 4400-201.
- Submittal of an Environmental Assessment for the **Lender Liability Exemption**, s 292.21, Wis. Stats., **if no response or review by DNR is requested**. Use the Lender Liability Exemption Environmental Assessment Tracking Form 4400-196.
- Request for an **exemption to develop on a historic fill site** or licensed landfill. Use DNR's Form 4400-226 or 4400-226A.
- **Request for closure** for Property where the investigation and cleanup actions are completed. Use DNR's Case Closure - GIS Registry Form 4400-202.

All forms, publications and additional information are available on the internet at: dnr.wi.gov/topic/Brownfields/Pubs.html.

Instructions

1. Complete sections 1, 2, 6 and 7 for all requests. Be sure to provide adequate and complete information.
2. Select the type of assistance requested: Section 3 for technical assistance or post-closure modifications, Section 4 for a written determination or clarification of environmental liabilities; or Section 5 for a specialized agreement.
3. Include the fee payment that is listed in Section 3, 4, or 5, unless you are a "Voluntary Party" enrolled in the Voluntary Party Liability Exemption Program and the questions in Section 2 direct otherwise. Information on to whom and where to send the fee is found in Section 8 of this form.
4. Send the completed request, supporting materials and the fee to the appropriate DNR regional office where the Property is located. See the map on the last page of this form. A paper copy of the signed form and all reports and supporting materials shall be sent with an electronic copy of the form and supporting materials on a compact disk. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>

The time required for DNR's determination varies depending on the complexity of the site, and the clarity and completeness of the request and supporting documentation.

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

Form 4400-237 (R 12/18)

Page 2 of 7

Section 1. Contact and Recipient Information

Requester Information

This is the person requesting technical assistance or a post-closure modification review, that his or her liability be clarified or a specialized agreement and is identified as the requester in Section 7. DNR will address its response letter to this person.

Last Name Ensch	First Mary	MI	Organization/ Business Name Geosyntec Consultants
Mailing Address 309 N Water Street, Suite 350			City Milwaukee
			State WI
			ZIP Code 53202
Phone # (include area code) (414) 918-7493		Fax # (include area code)	Email mensch@geosyntec.com

The requester listed above: (select all that apply)

- | | |
|--|--|
| <input type="checkbox"/> Is currently the owner | <input type="checkbox"/> Is considering selling the Property |
| <input type="checkbox"/> Is renting or leasing the Property | <input type="checkbox"/> Is considering acquiring the Property |
| <input type="checkbox"/> Is a lender with a mortgagee interest in the Property | |
| <input checked="" type="checkbox"/> Other. Explain the status of the Property with respect to the applicant: | |

Requester is an Environmental Consultant for the Site.

Contact Information (to be contacted with questions about this request)

Select if same as requester

Contact Last Name Tracy	First Jeff	MI	Organization/ Business Name Geosyntec Consultants
Mailing Address 309 N Water Street, Suite 350			City Milwaukee
			State WI
			ZIP Code 53202
Phone # (include area code) (414) 918-7481		Fax # (include area code)	Email jtracy@geosyntec.com

Environmental Consultant (if applicable)

Contact Last Name Tracy	First Jeff	MI	Organization/ Business Name Geosyntec Consultants
Mailing Address 309 N Water Street, Suite 350			City Milwaukee
			State WI
			ZIP Code 53202
Phone # (include area code) (414) 918-7481		Fax # (include area code)	Email jtracy@geosyntec.com

Property Owner (if different from requester)

Contact Last Name Bretl	First Eric	MI	Organization/ Business Name Tyco Fire Products LP
Mailing Address 1 Stanton Street			City Marinette
			State WI
			ZIP Code 54143
Phone # (include area code) (715) 735-7411		Fax # (include area code)	Email eric.bretl@jci.com

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

Form 4400-237 (R 12/18)

Page 3 of 7

Section 2. Property Information

Property Name Tyco FTC		FID No. (if known)	
BRRTS No. (if known) 02-38-580694	Parcel Identification Number 251-01004.000		
Street Address 2700 Industrial Parkway South	City Marinette	State WI	ZIP Code 54143
County Marinette	Municipality where the Property is located <input checked="" type="radio"/> City <input type="radio"/> Town <input type="radio"/> Village of Marinette	Property is composed of: <input type="radio"/> Single tax parcel <input checked="" type="radio"/> Multiple tax parcels	Property Size Acres

1. Is a response needed by a specific date? (e.g., Property closing date) Note: Most requests are completed within 60 days. Please plan accordingly.

No Yes

Date requested by: 09/03/2021

Reason: Start of construction, Requesting review of Materials Management Plan

2. Is the "Requester" enrolled as a Voluntary Party in the Voluntary Party Liability Exemption (VPLE) program?

No. Include the fee that is required for your request in Section 3, 4 or 5.

Yes. Do not include a separate fee. This request will be billed separately through the VPLE Program.

Fill out the information in Section 3, 4 or 5 which corresponds with the type of request:

Section 3. Technical Assistance or Post-Closure Modifications;

Section 4. Liability Clarification; or Section 5. Specialized Agreement.

Section 3. Request for Technical Assistance or Post-Closure Modification

Select the type of technical assistance requested: [Numbers in brackets are for WI DNR Use]

- No Further Action Letter (NFA) (Immediate Actions) - NR 708.09, [183] - Include a fee of \$350. Use for a written response to an immediate action after a discharge of a hazardous substance occurs. Generally, these are for a one-time spill event.
- Review of Site Investigation Work Plan - NR 716.09, [135] - Include a fee of \$700.
- Review of Site Investigation Report - NR 716.15, [137] - Include a fee of \$1050.
- Approval of a Site-Specific Soil Cleanup Standard - NR 720.10 or 12, [67] - Include a fee of \$1050.
- Review of a Remedial Action Options Report - NR 722.13, [143] - Include a fee of \$1050.
- Review of a Remedial Action Design Report - NR 724.09, [148] - Include a fee of \$1050.
- Review of a Remedial Action Documentation Report - NR 724.15, [152] - Include a fee of \$350
- Review of a Long-term Monitoring Plan - NR 724.17, [25] - Include a fee of \$425.
- Review of an Operation and Maintenance Plan - NR 724.13, [192] - Include a fee of \$425.

Other Technical Assistance - s. 292.55, Wis. Stats. [97] (For request to build on an abandoned landfill use Form 4400-226)

- Schedule a Technical Assistance Meeting - Include a fee of \$700.
- Hazardous Waste Determination - Include a fee of \$700.
- Other Technical Assistance - Include a fee of \$700. Explain your request in an attachment.

Post-Closure Modifications - NR 727, [181]

- Post-Closure Modifications: Modification to Property boundaries and/or continuing obligations of a closed site or Property; sites may be on the GIS Registry. This also includes removal of a site or Property from the GIS Registry. Include a fee of \$1050, and:
 - Include a fee of \$300 for sites with residual soil contamination; and
 - Include a fee of \$350 for sites with residual groundwater contamination, monitoring wells or for vapor intrusion continuing obligations.

Attach a description of the changes you are proposing, and documentation as to why the changes are needed (if the change to a Property, site or continuing obligation will result in revised maps, maintenance plans or photographs, those documents may be submitted later in the approval process, on a case-by-case basis).

Technical Assistance, Environmental Liability
Clarification or Post-Closure Modification Request

Form 4400-237 (R 12/18)

Page 4 of 7

Skip Sections 4 and 5 if the technical assistance you are requesting is listed above and complete Sections 6 and 7 of this form.

Section 4. Request for Liability Clarification

Select the type of liability clarification requested. Use the available space given or attach information, explanations, or specific questions that you need answered in DNR's reply. Complete Sections 6 and 7 of this form. [Numbers in brackets are for DNR Use]

"Lender" liability exemption clarification - s. 292.21, Wis. Stats. [686]

❖ Include a fee of \$700.

Provide the following documentation:

- (1) ownership status of the real Property, and/or the personal Property and fixtures;
- (2) an environmental assessment, in accordance with s. 292.21, Wis. Stats.;
- (3) the date the environmental assessment was conducted by the lender;
- (4) the date of the Property acquisition; for foreclosure actions, include a copy of the signed and dated court order confirming the sheriff's sale.
- (5) documentation showing how the Property was acquired and the steps followed under the appropriate state statutes.
- (6) a copy of the Property deed with the correct legal description; and,
- (7) the Lender Liability Exemption Environmental Assessment Tracking Form (Form 4400-196).
- (8) If no sampling was done, please provide reasoning as to why it was not conducted. Include this either in the accompanying environmental assessment or as an attachment to this form, and cite language in s. 292.21(1)(c)2., h.-i., Wis. Stats.:
 - h. The collection and analysis of representative samples of soil or other materials in the ground that are suspected of being contaminated based on observations made during a visual inspection of the real Property or based on aerial photographs, or other information available to the lender, including stained or discolored soil or other materials in the ground and including soil or materials in the ground in areas with dead or distressed vegetation. The collection and analysis shall identify contaminants in the soil or other materials in the ground and shall quantify concentrations.
 - i. The collection and analysis of representative samples of unknown wastes or potentially hazardous substances found on the real Property and the determination of concentrations of hazardous waste and hazardous substances found in tanks, drums or other containers or in piles or lagoons on the real Property.

"Representative" liability exemption clarification (e.g. trustees, receivers, etc.) - s. 292.21, Wis. Stats. [686]

❖ Include a fee of \$700.

Provide the following documentation:

- (1) ownership status of the Property;
- (2) the date of Property acquisition by the representative;
- (3) the means by which the Property was acquired;
- (4) documentation that the representative has no beneficial interest in any entity that owns, possesses, or controls the Property;
- (5) documentation that the representative has not caused any discharge of a hazardous substance on the Property; and
- (6) a copy of the Property deed with the correct legal description.

Clarification of local governmental unit (LGU) liability exemption at sites with: (select all that apply)

- hazardous substances spills - s. 292.11(9)(e), Wis. Stats. [649];
- Perceived environmental contamination - [649];
- hazardous waste - s. 292.24 (2), Wis. Stats. [649]; and/or
- solid waste - s. 292.23 (2), Wis. Stats. [649].

❖ Include a fee of \$700, a summary of the environmental liability clarification being requested, and the following:

- (1) clear supporting documentation showing the acquisition method used, and the steps followed under the appropriate state statute(s).
- (2) current and proposed ownership status of the Property;
- (3) date and means by which the Property was acquired by the LGU, where applicable;
- (4) a map and the ¼, ¼ section location of the Property;
- (5) summary of current uses of the Property;
- (6) intended or potential use(s) of the Property;
- (7) descriptions of other investigations that have taken place on the Property; and
- (8) (for solid waste clarifications) a summary of the license history of the facility.

Technical Assistance, Environmental Liability
Clarification or Post-Closure Modification Request

Form 4400-237 (R 12/18)

Page 5 of 7

Section 4. Request for Liability Clarification (cont.)

- Lease liability clarification - s. 292.55, Wis. Stats. [646]
- ❖ Include a fee of \$700 for a single Property, or \$1400 for multiple Properties and the information listed below:
 - (1) a copy of the proposed lease;
 - (2) the name of the current owner of the Property and the person who will lease the Property;
 - (3) a description of the lease holder's association with any persons who have possession, control, or caused a discharge of a hazardous substance on the Property;
 - (4) map(s) showing the Property location and any suspected or known sources of contamination detected on the Property;
 - (5) a description of the intended use of the Property by the lease holder, with reference to the maps to indicate which areas will be used. Explain how the use will not interfere with any future investigation or cleanup at the Property; and
 - (6) all reports or investigations (e.g. Phase I and Phase II Environmental Assessments and/or Site Investigation Reports conducted under s. NR 716, Wis. Adm. Code) that identify areas of the Property where a discharge has occurred.

General or other environmental liability clarification - s. 292.55, Wis. Stats. [682] - Explain your request below.

- ❖ Include a fee of \$700 and an adequate summary of relevant environmental work to date.
- No Action Required (NAR) - NR 716.05, [682]
- ❖ Include a fee of \$700.
- Use where an environmental discharge has or has not occurred, and applicant wants a DNR determination that no further assessment or clean-up work is required. Usually this is requested after a Phase I and Phase II environmental assessment has been conducted; the assessment reports should be submitted with this form. This is not a closure letter.
- Clarify the liability associated with a "closed" Property - s. 292.55, Wis. Stats. [682]
- ❖ Include a fee of \$700.
- Include a copy of any closure documents if a state agency other than DNR approved the closure.

Use this space or attach additional sheets to provide necessary information, explanations or specific questions to be answered by the DNR.

Section 5. Request for a Specialized Agreement

Select the type of agreement needed. Include the appropriate draft agreements and supporting materials. Complete Sections 6 and 7 of this form. More information and model draft agreements are available at: dnr.wi.gov/topic/Brownfields/lgu.html#tabx4.

- Tax cancellation agreement - s. 75.105(2)(d), Wis. Stats. [654]
- ❖ Include a fee of \$700, and the information listed below:
 - (1) Phase I and II Environmental Site Assessment Reports,
 - (2) a copy of the Property deed with the correct legal description.
- Agreement for assignment of tax foreclosure judgement - s.75.106, Wis. Stats. [666]
- ❖ Include a fee of \$700, and the information listed below:
 - (1) Phase I and II Environmental Site Assessment Reports,
 - (2) a copy of the Property deed with the correct legal description.
- Negotiated agreement - Enforceable contract for non-emergency remediation - s. 292.11(7)(d) and (e), Wis. Stats. [630]
- ❖ Include a fee of \$1400, and the information listed below:
 - (1) a draft schedule for remediation; and,
 - (2) the name, mailing address, phone and email for each party to the agreement.

Technical Assistance, Environmental Liability
Clarification or Post-Closure Modification Request

Form 4400-237 (R 12/18)

Page 6 of 7

Section 6. Other Information Submitted

Identify all materials that are included with this request.

Send both a paper copy of the signed form and all reports and supporting materials, and an electronic copy of the form and all reports, including Environmental Site Assessment Reports, and supporting materials on a compact disk.

Include one copy of any document from any state agency files that you want the Department to review as part of this request. The person submitting this request is responsible for contacting other state agencies to obtain appropriate reports or information.

Phase I Environmental Site Assessment Report - Date: _____

Phase II Environmental Site Assessment Report - Date: _____

Legal Description of Property (required for all liability requests and specialized agreements)

Map of the Property (required for all liability requests and specialized agreements)

Analytical results of the following sampled media: Select all that apply and include date of collection.

Groundwater Soil Sediment Other medium - Describe: _____

Date of Collection: _____

A copy of the closure letter and submittal materials

Draft tax cancellation agreement

Draft agreement for assignment of tax foreclosure judgment

Other report(s) or information - Describe: Materials Management Plan, Please Review

For Property with newly identified discharges of hazardous substances only: Has a notification of a discharge of a hazardous substance been sent to the DNR as required by s. NR 706.05(1)(b), Wis. Adm. Code?

Yes - Date (if known): _____

No

Note: The Notification for Hazardous Substance Discharge (non-emergency) form is available at:
dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf.

Section 7. Certification by the Person who completed this form

I am the person submitting this request (requester)

I prepared this request for: _____

Requester Name

I certify that I am familiar with the information submitted on this request, and that the information on and included with this request is true, accurate and complete to the best of my knowledge. I also certify I have the legal authority and the applicant's permission to make this request.

Mary Enslin
Signature

08/06/2021
Date Signed

Senior Staff Professional
Title

(414) 918-7493
Telephone Number (include area code)

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

Form 4400-237 (R 12/18)

Page 7 of 7

Section 8. DNR Contacts and Addresses for Request Submittals

Send or deliver one paper copy and one electronic copy on a compact disk of the completed request, supporting materials, and fee to the region where the property is located to the address below. Contact a [DNR regional brownfields specialist](#) with any questions about this form or a specific situation involving a contaminated property. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>.

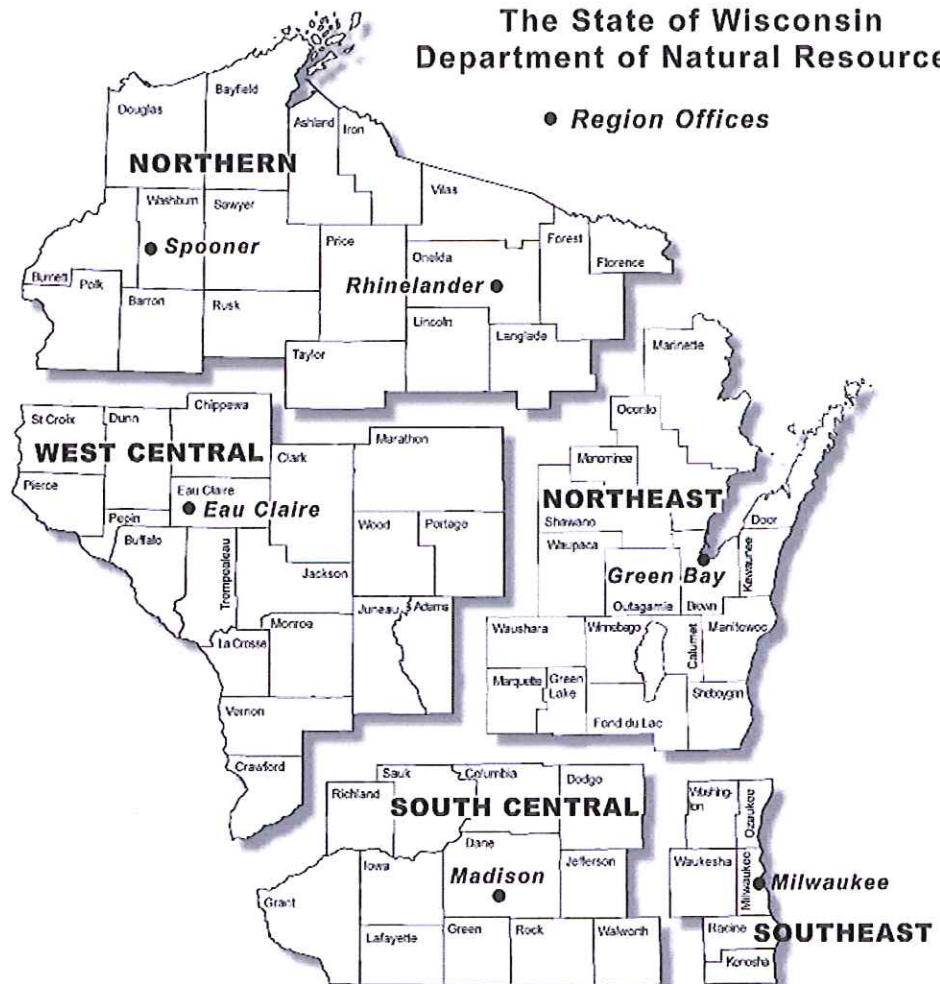
DNR NORTHERN REGION
 Attn: RR Program Assistant
 Department of Natural Resources
 223 E Steinfest Rd Antigo, WI 54409

DNR NORTHEAST REGION
 Attn: RR Program Assistant
 Department of Natural Resources
 2984 Shawano Avenue
 Green Bay WI 54313

DNR SOUTH CENTRAL REGION
 Attn: RR Program Assistant
 Department of Natural Resources
 3911 Fish Hatchery Road
 Fitchburg WI 53711

DNR SOUTHEAST REGION
 Attn: RR Program Assistant
 Department of Natural Resources
 2300 North Martin Luther King Drive
 Milwaukee WI 53212

DNR WEST CENTRAL REGION
 Attn: RR Program Assistant
 Department of Natural Resources
 1300 Clairemont Ave.
 Eau Claire WI 54702



Note: These are the Remediation and Redevelopment Program's designated regions. Other DNR program regional boundaries may be different.

DNR Use Only			
Date Received	Date Assigned	BRRTS Activity Code	BRRTS No. (if used)
DNR Reviewer		Comments	
Fee Enclosed? <input type="radio"/> Yes <input type="radio"/> No	Fee Amount \$	Date Additional Information Requested	Date Requested for DNR Response Letter
Date Approved	Final Determination		

August 5, 2021

Ms. Alyssa Sellwood, P.E.
Complex Sites Project Manager, Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
101 South Webster Street
Box 7921
Madison, WI 53707-7921

**Subject: Tyco Fire Technology Center
Groundwater Extraction and Treatment System
Interim Remedial Action Materials Management Plan
WDNR BRRTS No. 02-38-580694**

Dear Ms. Sellwood:

SUMMARY

The purpose of this Materials Management Plan (MMP) is to provide a plan for properly managing potentially impacted personal protective equipment, soil, and water generated during construction of the groundwater extraction and treatment system (GETS) interim remedial action at the Tyco Fire Products LP (Tyco) Fire Technology Center (FTC) in Marinette, Wisconsin. This MMP will be implemented by contractors and subcontractors disturbing, generating and handling soil, generating and handling water, and using disposable personal protective equipment (PPE).

Per- and polyfluoroalkyl substances (PFAS) are the primary constituents of concern in soil, and PFAS and volatile organic compounds (VOCs) are the primary constituents of concern in the groundwater.

SOIL MANAGEMENT

This MMP will be implemented during all soil disturbing and handling activities during construction of the GETS including, but not limited to, open excavation work, groundwater extraction well installation, and treatment building and access road area grading. Soil disturbance activities will be conducted in such a manner that limits:

- size and period of open excavation;

- size and period of exposed soil in stockpiles;
- storm water runoff into and from soil disturbance areas;
- runoff of water from point of generation temporary management areas/stockpiles;
- contact water generation;
- tracking of soil;
- dust generation; and
- potential for cross-contamination (refer to FTC Property Soil Stockpile Management section).

Open Excavation Work

Open excavation work will generally include, but is not limited to, horizontal directional drilling (HDD) entry/exit pits for GETS piping installation, open trench excavations for GETS conveyance piping, and extraction well vault and piping connection vault installation.

Soil generated from open excavation areas will be beneficially reused at the point of generation to the extent feasible. Generated soil designated for reuse will be managed during interim conditions in a manner that prevents erosion and runoff in accordance with the project Stormwater Pollution Prevention Plan (SWPPP). Proper management will include placing the soil upon and covering with plastic sheeting, placing in a lined and covered roll-off box, or other method as approved by the supervising Engineer. Soil piles will be constructed in such a way as to minimize free water accumulation. Any free water that accumulates in lined stockpiles or roll-off boxes will be collected and managed consistent with other generated water (refer to Water Management section). Excess soil that is unable to be reused at the point of generation will be loaded onto trucks, transported to, and managed in segregated stockpiles or roll-offs in a designated area on the FTC property.

The soil will be characterized by Tyco or its designee to determine whether the soil may be beneficially reused on the FTC property, or if the soil will be transported off-site for disposal.

Extraction Well Installation

Soil generated from the extraction well installation (borehole cuttings) will be direct loaded onto trucks or water-tight roll-off boxes, transported to, and managed in segregated stockpiles or water-tight roll-off boxes in a designated area on the FTC property. The soil generated during extraction well installation will be properly characterized for off-site disposal.

GETS Treatment Building and Access Road Area Grading

Soil that is disturbed/generated by grading of the treatment building and access road areas will be reused for grading purposes near the point of generation.

Unexpected Subsurface Conditions

Soil-disturbing activities will immediately cease upon the discovery of unexpected

subsurface conditions including, but not limited to, the following:

- Stained or discolored soil;
- significant odor;
- drums, underground storage tanks, piping, sumps, etc.;
- suspect regulated materials (e.g. suspect asbestos containing debris); and/or.
- significant uncharted utilities or subsurface obstructions/features.

FTC Property Soil Stockpile Management

Soil transported to and stockpiled on the FTC property will be placed upon and covered with secured plastic-sheeting or in roll-offs at the location shown on **Figure 1**. Soil generated from common locations, such as paired exit/entry pits, will be managed in a common stockpile. Common stockpiles shall be segregated in a manner that prevents any comingling with adjacent common stockpiles. Each common stockpile will be properly labeled with the source location(s) and date(s) of generation.

If soil is in wet condition, with the potential to generate significant free water, the soil will be placed in roll-off boxes or managed in another consistent manner, as approved by the supervising Engineer, to prevent free-water runoff.

The stockpiled soil will be characterized by Tyco or it's designee to determine whether the soil may be beneficially reused on the FTC property, or if the soil will be transported off-site for disposal. If the soil remains on the FTC property for 90 days or more, Tyco will notify the Wisconsin Department of Natural Resources (WDNR) in writing in accordance with Wisconsin Administrative Code Chapter NR 718.

Each common stockpile will be characterized using the following procedure:

- Five discrete samples will be collected from random locations in each stockpile;
- The five discrete samples will be homogenized in a stainless-steel mixing bowl by stirring the material in a circular fashion, reversing direction, and occasionally turning the material over until the samples are thoroughly mixed and uniform;
- A portion of the mixed sample will be placed into a laboratory-supplied sample container; and
- For soil identified for reuse on the property, the composite samples will be analyzed for the 36 per- and polyfluoroalkyl substances (PFAS) outlined in the Wisconsin PFAS list and volatile organic compounds (VOCs). The samples will be managed and analyzed in accordance with the WDNR-approved QAPP (Arcadis, 2021). Soil may be reused on the property if the data indicate PFAS and VOC concentrations are below residential direct contract standards for compounds where the standards have been or can be developed.
- For soil that will not be reused on the property (based on analytical results identified in the previous bullet, or soil generated during extraction well installation), the soil will be

characterized for disposal. Characterization analyses will be determined by the disposal facility.

Impacted soil designated for off-site disposal will be transported by a licensed transporter in accordance with Federal, State, and local marking, labeling, placarding, and manifesting requirements, and treated or disposed at a facility licensed to accept the material.

WATER MANAGEMENT

Water generation will be minimized to the extent feasible. Water generated during construction activities (i.e., excavation dewatering) and extraction well and piezometer installation, development, and aquifer testing will be directly pumped into tanker trucks at each point of generation. The tanker trucks will transfer the water to frac tanks placed on the FTC property and near the GETS treatment building. The water will remain in the frac tanks until after the GETS system is fully operational, at which time the water will be slowly incorporated into the influent, processed through the GETS and discharged as treated effluent into Ditch B. Alternatively, Tyco may elect to properly dispose of the water.

Water in the frac tanks may be stored on the FTC property for an extended period due to the GETS system capacity and the potential for the frac tank water to freeze. Although not required under Wisconsin Administrative Code Chapter 718, if the water remains in the frac tanks on the FTC property for 90 days or more, Tyco will notify the WDNR as a courtesy.

Equipment will be cleaned on decontamination pads to contain liquids generated during the cleaning process. In general, decontamination pads will be constructed using impermeable liners with berms around the edges. The liner will be placed over the berms to prevent liquid from running off the decontamination pad. Liquids contained in the decontamination pad will be transferred to frac tanks and stored on the FTC property.

Each frac tank will be cleaned after the water is transferred to the GETS. Solids that settle in the frac tanks will be removed, placed in water-tight roll-off boxes, properly characterized, and transported off-site for disposal. The frac tanks will be cleaned using potable water from a PFAS-free source. Water generated during the cleaning activities will be incorporated into the GETS influent for treatment.

PERSONAL PROTECTIVE EQUIPMENT AND GENERAL DEBRIS MANAGEMENT

Personal protective equipment (PPE) and general debris will be managed as trash. The material will be placed in trash bags and stored in a roll-off box designated as PPE and debris management specific to the GETS construction project. The PPE and debris will be disposed at a local disposal facility licensed to accept general trash, or to the same facility that accepts the PFAS-impacted soil

Materials Management Plan
August 5, 2021
Page 5

for disposal. Geosyntec requests the WDNR review and approve this plan. Please call (414.918.7481) or e-mail (jtracy@geosyntec.com) me with any questions or if you wish to discuss.

Regards,

A handwritten signature in black ink, appearing to read "Jeff Tracy". The signature is fluid and cursive, with the first name "Jeff" and last name "Tracy" clearly distinguishable.



Jeff Tracy, PG (WI)
Senior Geologist

Attachment:

Copies to:



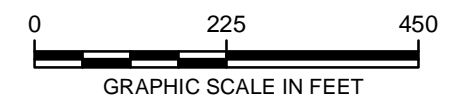
LEGEND:

-  DITCH
-  SOIL STOCKPILE LOCATION



NOTES:

1. IMAGERY SOURCE: 4/27/2016, DIGITALGLOBE, VIVID - USA.
2. FTC: Fire Technology Center.
3. OTA: Outdoor testing/training area.



TYCO FIRE TECHNOLOGY CENTER MARINETTE, WISCONSIN	
Soil Stockpile Location	
	FIGURE
MILWAUKEE, WISCONSIN	MAY 2021
1	