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Date: November 22, 2021  
BRRTS No.: 02-38-580694  
Our Ref: 30015290  
Subject: Updates to Point of Entry Treatment System Sampling,  
Tyco FTC PFAS, 2700 Industrial Parkway South, Marinette, WI

Dear Ms. Sellwood,

After reviewing the Wisconsin Department of Natural Resources (WDNR) comment letter on the third revision of the Long-Term Potable Well Sampling Plan from WDNR on June 18, 2021, and engaging in multiple discussions with the agency related to the fourth revision of the Long-Term Potable Well Sampling Plan, Tyco is updating the Long-Term Potable Well Sampling Plan to include effluent sampling of Point of Entry Treatment (POET) systems on a limited basis to confirm the effectiveness of the maintenance program. Specifically, in lieu of annual or biennial (every other year) influent sampling based on previous influent results, Tyco will sample effluent results prior to granular activated carbon (GAC) tank changeout at approximately the same frequency as previously proposed influent sampling. Sampling the effluent of the treatment system will demonstrate the effectiveness of the system within the conservative maintenance program time frames.

POET systems with historical influent results above the Wisconsin Department of Health Services (WDHS) Cycle 11 recommended groundwater enforcement standards (ES) will be sampled from the effluent port at least annually during regularly scheduled GAC changeouts. POET systems with historical influent results below the WDHS recommended ES will be sampled from the effluent port at least biennially (every other year) during regularly scheduled GAC changeouts.

The updated, anticipated sampling schedule is included in the attached table. All target sampling dates are dependent on owner access and availability.

In the event that breakthrough is observed in the effluent above WDHS Cycle 11 recommended groundwater enforcement standards, Tyco will replace both GAC tanks and monitor the system on a quarterly basis by sampling the influent, mid-point, and effluent for up to 1-year to evaluate and update the maintenance program as necessary.

Alyssa Sellwood, P.E.  
Wisconsin Department of Natural Resources  
November 22, 2021

Tyco will implement the updated sampling procedures beginning in December 2021 and the fifth revision of the Long-Term Potable Well Sampling Plan that is due to WDNR on April 1, 2022 will reflect these changes.

Sincerely,  
Arcadis U.S., Inc.



Matthew Coleman  
Project Communications Manager

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CC. J. Danko  
S. Wahl  
D. Nelson

**Table 1**  
**Updates to POET System Sampling**  
**Marinette, Wisconsin**

Well Sample ID	POET ID	Most Conservative Category <sup>(1)</sup>	GAC Change Frequency	Next GAC Change/Sampling Event <sup>(2)</sup>
WS-058	POET-1	> ES	9 months	March 2022
WS-052	POET-2	> ES	9 months	February 2022
WS-090	POET-4	> ES	Observed breakthrough	February 2022
WS-019	POET-5	> ES	2-3 months	February 2022
WS-096	POET-6	> ES	Observed breakthrough	January 2022
WS-008	POET-7	> ES	2-3 months	December 2021
WS-146AR	POET-8	> ES	TBD	March 2022
WS-013	POET-10	RL < ES	TBD	February 2022 <sup>(3)</sup>
WS-024	POET-11	> ES	TBD	December 2021
WS-068	POET-12	> ES	Observed breakthrough	December 2021
WS-097	POET-13	RL < ES	12 months	November 2022
WS-023	POET-14	RL < ES	12 months	October 2022
WS-099	POET-15	RL < ES	12 months	December 2021
WS-121A	POET-16	> ES	12 months	March 2022
WS-109	POET-17	> ES	6 months	February 2022
WS-111	POET-18	RL < ES	12 months	January 2022
WS-038	POET-19	> ES	2-3 months	February 2022
WS-115	POET-20	< RL	12 months	December 2021
WS-053	POET-21	RL < ES	12 months	December 2021
WS-092	POET-22	< RL	12 months	August 2022
WS-126	POET-23	< RL	12 months	April 2022 <sup>(3)</sup>
WS-100	POET-24	RL < ES	12 months	December 2021
WS-032	POET-25	< RL	12 months	October 2022
WS-009	POET-26	RL < ES	12 months	March 2022
WS-061B	POET-27	> ES	12 months	January 2022
WS-025	POET-28	> ES	12 months	July 2022
WS-018	POET-29	> ES	12 months	September 2022
WS-054	POET-30	> ES	6 months	January 2022
WS-030	POET-31	> ES	12 months	December 2021
WS-037	POET-32	> ES	12 months	November 2022
WS-133	POET-33	RL < ES	12 months	July 2022
WS-057	POET-34	> ES	12 months	August 2022
WS-049	POET-35	RL < ES	12 months	February 2022
WS-121B	POET-36	RL < ES	TBD	March 2022 <sup>(3)</sup>
WS-106R	POET-37	> ES	Observed breakthrough	February 2022
WS-129	POET-38	RL < ES	TBD	December 2021
WS-067	POET-39	RL < ES	12 months	December 2021
WS-017	POET-40	RL < ES	12 months	June 2022
WS-163	POET-41	> ES	TBD	February 2022
WS-152	POET-42	RL < ES	TBD	January 2022
WS-007A	POET-43	> ES	TBD	January 2022
WS-062	POET-44	> ES	TBD	January 2022
WS-042	POET-45	RL < ES	TBD	January 2022
WS-041	POET-46	RL < ES	TBD	December 2021
WS-060	POET-47	RL < ES	TBD	January 2022

**Notes:**

<sup>(1)</sup> = Data represents highest historical results from well; data compared against Cycle 11 recommended groundwater standards; some compounds with recommended criteria may not have been analyzed

<sup>(2)</sup> = All sampling events subject to owner approval and availability

<sup>(3)</sup> = Sampling date subject to change based on potential winterization schedule

< RL = Not detected above the laboratory Reporting Limit

Categories current through Spring 2021 Sampling Event

ES = Wisconsin Department of Health Services recommended Enforcement Standard

ID = Identification

OM&M = Operations, Maintenance and Monitoring

POET = Point of Entry Treatment

RL = Reporting Limit