

From: [Sellwood, Alyssa A - DNR](#)
To: ["Denice Nelson"](#)
Cc: [May, Wesley](#); [TerBeek, Emma](#)
Subject: RE: Tyco GETS Material Management Plan - Request for Approval for Soil Reuse- WDNR BRRTS Number 02-38-580694
Date: Monday, February 26, 2024 9:31:00 AM
Attachments: [Lab Report 1.pdf](#)
[Lab Report 2 .pdf](#)
[20211006_857_MMP_Appr.pdf](#)
[Pages from 20230616_152_RADR_GETS.pdf](#)

Denice –

Thank you for notifying the Wisconsin Department of Natural Resources (DNR) of the approximately 160 cubic yards (cy) of excess soil generated from Johnson Controls, Inc. and Tyco Fire Products LP (JCI/Tyco's) recent construction of additional vaults and trench lines for the Groundwater Extraction and Treatment System (GETS), and for providing the two attached laboratory reports for samples JCI/Tyco collected on Feb. 1, 2024, to characterize this soil for contaminants of concern at the Fire Technology Center (FTC).

Previously, on Oct. 6, 2021, the DNR granted approval for JCI/Tyco to manage contaminated soil under Wisconsin Administrative (Wis. Admin.) Code § NR 718.12. (A copy of that letter is attached to this email for reference). This approval was granted only for the specific activities described within JCI/Tyco's Sept. 10, 2021, GETS Material Management Plan, which included JCI/Tyco's plans to take excess soil generated during construction of trenches and vaults for the GETS and to manage that soil on the FTC property in a berm near the GETS building. This management of soil on the FTC property was allowed under the condition that characterization of the soil showed that the concentrations of perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA) in the soil were below site-specific residual contaminant levels.

The two samples JCI/Tyco collected for analysis from the recently generated 160 cy of excess soil satisfies the requirements for characterization set forth in Wis. Admin. Code § NR 718.12(1)(e). The concentrations of PFOA and PFOS in these two samples were below the site-specific screening levels of 0.9 µg/kg PFOS and 5.0 µg/kg PFOA.

The DNR concurs that the approximately 160 cy of soil generated during recent construction activities for the GETS falls within the conditions of approval in DNR's Oct. 6, 2021 letter and that JCI/Tyco can manage this soil on the FTC property in a berm or similar location near the GETS building.

The DNR requests that within 30 days after JCI/Tyco completes its management of this soil, that JCI/Tyco submit to the DNR documentation that includes:

- statement of how the material was managed prior to placement
- a map of the location (or confirmation that it is the same as in the attached pages from the GETS documentation report)
- photographs of the soil management location

This documentation can be sent via email in response to this email.

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Alyssa Sellwood, PE (WI)

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From: Denice Nelson <denice.karen.nelson@jci.com>
Sent: Thursday, February 22, 2024 3:43 PM
To: Sellwood, Alyssa A - DNR <alyssa.sellwood@wisconsin.gov>
Cc: May, Wesley <Wesley.May@arcadis.com>; TerBeek, Emma <Emma.TerBeek@arcadis.com>
Subject: Tyco GETS Material Management Plan - Request for Approval for Soil Reuse- WDNR BRRTS Number 02-38-580694

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Alyssa-

As you are aware, as part of our GETS optimization activities, Tyco has installed two supplemental extraction wells (EX-1S and EX-2S) near to the current EX-1 and EX-2 well locations and associated GETS treatment building. Part of this work included installing well vaults and connecting the new wells to the GET treatment building.

We are requesting approval to reuse the approximately 160 cubic yards (CY) of soil associated with the GETS optimization activities, in accordance with the 2021 Revised Interim Materials Management Plan (MMP) submitted previously by Geosyntec. I have attached the lab results from the two soil samples associated with the 160 CY of soil.

The soil will be used to create berms near previously placed berm areas and revegetated, in accordance with the 2021 MMP. The area near the GETS treatment building meets the criteria described in Wisconsin Administrative Code Chapter NR718, as detailed with the 2021 MMP.

Please let us know if you need additional information to approve this request. I have copied the

Arcadis team as I'm out the rest of the week in case you require further information.

Sincerely,

Denice

Denice Nelson

Senior Director, Remediation and Strategy

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