

State of Wisconsin
DEPARTMENT OF NATURAL
RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Tony Evers, Governor
Preston D. Cole, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711



February 12, 2019

Ms. Ann Hartnell
Marinette County Association for Business and Industry (MCABI)
1926 Hall Avenue, Room C314
Marinette, WI 54143

Subject: Additional Site Investigation Required - Tyco Redevelopment Site
1310-1330 Main Street, Marinette, WI
DNR BRRTS Activity # 02-38-564236

Dear Ms. Hartnell:

On July 25, 2018, the Wisconsin Department of Natural Resources (the "department") reviewed your request for closure of the case described above (the "Site"). As you are aware, the department reviews environmental remediation cases for compliance with applicable laws, including Wis. Stat. ch. 292 and Wis. Admin. Code chs. NR 700 – 754 and whether any further threat to public health, safety or welfare or the environment exists at the site or facility, per Wis. Admin. Code § NR 726.13(2)(b). In a letter dated August 22, 2018, the department notified you that case closure is not recommended because additional legal requirements must be met, including one additional round of groundwater sampling for per- and polyfluoroalkyl substances ("PFAS") chemicals for the Site described above.

Wis. Admin. Code § NR 716.07(1) requires responsible parties to evaluate the "history of the site or facility, including industrial, commercial or other land uses that may have been associated with one or more hazardous substance discharges at the site or facility." In making its determination to require additional groundwater monitoring for PFAS, the department considered the historic ownership and use of the site, the placement of fill from an unknown source and the information you provided and discussed on a phone call with department staff on September 14, 2018. We also considered the proximity of the site to a known PFAS source site.

On August 22, 2018, we requested that you respond in writing within 60 days with a work plan to meet these requirements, per Wis. Admin. Code § NR 716.09 (1). This request was discussed with you and MCABI representatives on February 11, 2019 by phone. Please provide a work plan, including the PFAS analytical method and all analytical parameters, prior to any groundwater samples being collected and analyzed for PFAS. Depending on the analytical results, additional soil and groundwater sampling may be needed to fully define degree and extent of contamination.

If you have any questions regarding this Site, please contact the department project manager, Dave Neste at (920) 662-5165 or david.neste@wisconsin.gov. If you have questions regarding your status in the VPLE program, please contact Christine Haag at (608) 266-0244 or christine.haag@wisconsin.gov

Sincerely,

Darsi Foss, Director
Remediation and Redevelopment Program

cc: Kenan Pulver, Tyco Fire Products LP, One Stanton Street, Marinette, WI 54143
Lynelle Caine, Stantec Consulting (via email: Lynelle.Caine@stantec.com)
Roxanne Chronert – DNR, NER
David Neste – DNR, NER
Christine Haag – DNR, RR/5
Michael Prager – DNR, RR/5
William J. Nelson – DNR, LS8