



September 24, 2020

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SUBJECT: Response to Well Survey Report
JCI/Tyco FTC PFAS, 2700 Industrial Parkway South, Marinette
JCI/Tyco Stanton PFAS, 1 Stanton Street, Marinette
WDNR BRRTS #: 02-38-580694, 02-38-581955

Dear Mr. Bethel and Mr. Wahl:

On April 10, 2020, the Wisconsin Department of Natural Resources (DNR) received the *Well Survey Report* (Report) for the above-referenced sites, dated March 31, 2020, and submitted by Arcadis U.S., Inc. (Arcadis), on behalf of Johnson Controls, Inc. and Tyco Fire Products LP (JCI/Tyco). The report was accompanied by the appropriate fee of \$700, required under Wisconsin Administrative Code § NR 749.04(1), for formal DNR review and response.

Background

On January 17, 2018, JCI/Tyco reported a discharge of per- and polyfluoroalkyl substance (PFAS) compounds to the environment. The discharge occurred as the result of PFAS-containing aqueous film forming foams (AFFF) being discharged as part of firefighting training activities conducted at the JCI/Tyco Fire Technology Center (FTC) from approximately the 1960s through the fall of 2017.

On July 23, 2018, JCI/Tyco reported a discharge of PFAS compounds at the JCI/Tyco Stanton Street facility (Stanton). The discharge occurred as a result of the use and/or storage of PFAS compounds related to AFFF at the facility.

Data collected as part of site investigation activities indicate PFAS contaminants have spread from the FTC and Stanton via surface water and/or groundwater, impacting potable wells and surface water in the Town of Peshtigo and City of Marinette. Data indicates PFAS contaminants have spread east to the Bay of Green Bay (Lake Michigan).

Report Summary

JCI/Tyco prepared and submitted the Report in response to DNR's request to identify private water supply wells within an expanded site investigation area, identified in a February 19, 2020 letter from the DNR to JCI/Tyco, to address potential impacts associated with other potential PFAS migration pathways including surface water-to-groundwater discharge and air deposition. The expanded study area proposed by DNR is bound on the north by

Mr. Scott Wahl & Mr. Rick Bethel, Tyco Fire Products LP
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the Menominee River, on the east by the Bay of Green Bay, on the south by Leaf Road, and on the west by Pleasant View Road. The objective of the DNR request was to locate private wells that have not been sampled by JCI/Tyco to date to ensure that future sampling could be planned to ensure the protection of human health.

Arcadis conducted the private well survey by evaluating all parcels within the expanded area that had structures that may have drinking water supplied through a private well source. The total list of parcels was refined using information for those properties with structures and subsequently those parcels where municipal service existed.

The Report provides an estimate of the number of private drinking water wells based on the number of parcels with improvements as identified in the Marinette County Geographical Information System (MCGIS). The estimate also includes parcels not identified as having improvements that contain significant structures where it is suspected a well may be present. The Report includes the approximately 210 parcels and 171 drinking water wells already identified in the private drinking water well sampling area (PWSA). Additional steps would require door-to-door validation and/or mailings in accordance with a defined sampling plan.

The Report identifies the following in the expanded study area:

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| Total Parcels in Expanded Study Area | 6,054 |
| Total Parcels Not Connected to Municipal Water | 968 |
| Parcels with Improvements | 697 |
| Parcels without Improvements | 271 |
| Parcels with Structures | 709 |
| Parcels without Structures | 259 |
| Wells Identified in DNR Database | 365 |
| Estimated Number of Private Drinking Water Wells | 700 |

DNR Review

The Report states that the PWSA as shown in the report reflects the “total area of potential effect of PFAS containing groundwater associated with the FTC and Stanton Street facility”; however, the extent of the groundwater plume for either FTC or Stanton Street is not defined by the PWSA as shown. The DNR does not concur with the assertion that the degree and extent of PFAS contamination in the groundwater has been defined to date. However, the approach conducted for the well survey is valid and acceptable for a desktop well survey.

Of the 700 estimated private drinking water wells in the PWSA, JCI/Tyco has tested 168 wells. In a letter dated February 19, 2020, the DNR requested JCI/Tyco expand the private well sampling program to include the additional wells in this area. As stated most recently in the May 27, 2020 notice of non-compliance and the July 7, 2020 letter of intent to incur expenses to JCI/Tyco, the DNR directed JCI/Tyco to conduct this sampling effort as required under Wis. Admin. Code NR § 716.13(16). The DNR has authority to perform this direct action due to JCI/Tyco’s failure to adequately do so under Wis. Stat. § 292.11(7)(a).

The DNR appreciates your completion of this desktop well survey. If you have any questions about this letter, please contact me, the DNR Project Manager, at (920) 362-2072 or david.neste@wisconsin.gov.

Sincerely,



David Neste
Hydrogeologist
Northeast Region Remediation & Redevelopment Program

cc: Jeff Danko, Johnson Controls, Inc. (via email: jeffrey.howard.danko@jci.com)
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