



November 6, 2019

MR JEFFREY DANKO
JOHNSON CONTROLS INC
5757 NORTH GREEN BAY AVENUE
MILWAUKEE WI 53209

MR SCOTT WAHL
TYCO FIRE PRODUCTS LP
ONE STANTON STREET
MAREINTTE WI 54143

Subject: Response to Questions regarding WWTP Contamination and Associated Fields Utilized for Landspreading Biosolids Sludge; Marinette, Wisconsin; BRRTS #: 02-38-583856

Dear Mr. Danko and Mr. Wahl:

On July 10, 2019, the Wisconsin Department of Natural Resources (DNR) received your letter requesting answers to questions which can assist you in addressing the hazardous substance discharges of per- and polyfluoroalkyl substances (PFAS) caused by Johnson Controls Inc. (JCI) and Tyco Fire Products, LP (Tyco) facilities discharging to the sanitary sewer within the City of Marinette to its Waste Water Treatment Plant, the biosolids sludge generated by the plant, and the associated fields utilized for landspreading the biosolids sludge in the area. You submitted these questions without an Wis. Admin. Code ch. NR 749 fee. Specifically, you did not submit a Technical Assistance and General Liability Clarification Letter Request.

In addition, on July 18, 2019, the DNR received a public records request from Linda Benfield, outside council for Johnson Controls, Inc. (JCI) and Tyco Fire Products, LP (Tyco) of Foley & Lardner LLP, requesting records in possession of the DNR pertaining to this matter. This records request includes public records responsive to your three questions. The records request is still pending with the DNR records program; however, one partial release was issued on October 31, 2019, that provided the supporting rec.

1. *Has DNR issued any Responsible Party letters to any other persons or entities in this matter?*

Yes. The first letter was sent to you on July 3, 2019. DNR issued a second responsible party letter to Johnson Controls, Inc. and Tyco Fire Products, LP on November 4, 2019. In addition, DNR issued a responsible party letter to ChemDesign, Inc. on November 4, 2019.

2. *Has DNR investigated all potential sources of PFAS contamination in any of the City of Marinette Waste Water Treatment Plant lines, and if so, what were its findings?*

No. The City of Marinette conducted an investigation of major sources of PFAS in June 2018.

3. *Has DNR investigated whether land applied biosolids from sources other than the City of Marinette were supplied to the properties; if so, what were the results of that investigation?*

No. However, the DNR and respective municipalities have biosolids landspreading records and can share them to assist in your efforts to prioritize the fields and evaluate the potentially impacted potable wells near the biosolids fields. The DNR has identified fields in which the city of Peshtigo applied biosolids to and is identifying other fields in the area in which biosolids have been applied to.

The DNR appreciates the effort you are taking to address PFAS contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at (920) 424-0399 or David.Neste@wisconsin.gov.

Sincerely,



Roxanne N. Chronert
Team Supervisor, Northeast Region
Remediation & Redevelopment Program

cc: William J. Nelson, DNR
David Neste, DNR