

Ms. Alyssa Sellwood
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
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Date: January 18, 2022

Subject: Q4 2021 Project Status; Tyco Fire Technology Center (FTC) PFAS at 2700 Industrial Parkway South, Stanton Street PFAS at One Stanton Street, and Land Applied Biosolids Area, Marinette, Wisconsin
BRRTS Activity#: 02-38-580694, 02-38-581955, and 02-38-583856

Dear Ms. Sellwood,

On behalf of Tyco Fire Products LP (Tyco), Arcadis submits this status report to summarize activities completed, data collected, corrective actions, and WDNR/Tyco correspondence for Q4 2021, as well as planned activities for the upcoming quarter (Q1 2022). As noted in previous quarterly status reports to WDNR, Tyco will continue to provide updates on a quarterly basis to reflect current and planned activities.

PROJECT STATUS

Below is a summary of the project status for the Tyco FTC and Stanton Street facilities and long-term drinking water supply for the period from October 1, 2021 to December 31, 2021 (Q4 2021) and planned activities from January 1, 2022 to March 31, 2022 (Q1 2022).

Activities Completed

Field Work

- October 1, 2021 to December 31, 2021 – Ditch A treatment system operation, maintenance, and monitoring (OMM), weekly sampling for Wisconsin Pollutant Discharge Elimination System (WPDES) permit; monthly downstream surface water sampling was not performed from October 1, 2021 to December 31, 2021 due to dry channel conditions and no upstream flow
- December 17, 20, and 22, 2021 – Ditch A treatment system was used to treat construction dewatering for the Groundwater Extraction and Treatment System (GETS); weekly and quarterly sampling was performed during treatment of the GETS construction dewatering
- October 1, 2021 to December 31, 2021 – Ditch B treatment system OMM, weekly sampling for WPDES permit, and monthly downstream surface water sampling
- October 1, 2021 to November 30, 2021 – Daily foam monitoring of Ditch A through Ditch E
- November 30, 2021 – Removal of sorbent booms and foam monitoring ceased for the season at Ditches A through E due to ice forming weather conditions
- October 1, 2021 to December 31, 2021 – FTC Fall 2021 Private Well Sampling Event

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- October 1, 2021 to December 31, 2021 – Point-of-Entry Treatment (POET) system sampling and OMM
- October 1, 2021 to December 31, 2021 – Installation of permanent dosing pumps for polymer, turbidity sensors, and programming for the Ditch B water matrix unit operation as authorized per the modification request for the WPDES permit
- October 8, 2021 – Monthly FTC and Stanton Street sanitary sewer outfall sampling
- October 11, 2021 – Transducers retrieved from wells associated with the Stanton Street Near-Term Bedrock Groundwater Evaluation Work Plan
- October 12, 2021 to October 22, 2021 – Groundwater sampling at 45 monitoring wells associated with the Stanton Street Site Investigation Work Plan and Near-Term Bedrock Groundwater Evaluation Work Plan
- November 9, 2021 to November 10, 2021 – Wetlands evaluation and soil sample location ground-truthing associated with the FTC Air Pathway Site Investigation Work Plan
- November 11, 2021 – Monthly FTC and Stanton Street sanitary sewer outfall sampling
- November 15, 2021 to November 17, 2021 – Hand auger surface soil sampling at 52 locations associated with the FTC Air Pathway Site Investigation Work Plan
- November 15, 2021 to November 18, 2021 – GETS LTM Pre-Startup Phase surface water sampling and streambed groundwater sampling
- November 15, 2021 to November 19, 2021 – Pretreatment system startup at the FTC Wastewater Treatment Facility
- December 7, 2021 – Monthly FTC and Stanton Street sanitary sewer outfall sampling
- December 7, 2021 – Quarterly ChemDesign outfall sampling

Deliverables Submitted to WDNR

- October 1, 2021 – Revised Long-Term Potable Well Sampling Plan; Tyco FTC
- October 15, 2021 – Q3 2021 Project Status; Tyco FTC, Stanton Street, and Land Applied Biosolids Area, Marinette
- October 20, 2021 – Ditch A and B Monthly WPDES Discharge Monitoring Reports (September 2021); Tyco FTC
- November 19, 2021 – Ditch A OMM Manual Amendment; Tyco FTC
- November 19, 2021 – Ditch B OMM Manual Amendment; Tyco FTC
- November 19, 2021 – Ditch A and B Monthly WPDES Discharge Monitoring Reports (October 2021); Tyco FTC
- November 19, 2021 – Revised Air Pathway Site Investigation Work Plan and Response to Comments; Tyco FTC
- December 1, 2021 – Draft Project Schedule; Tyco FTC and Stanton Street, Marinette
- December 15, 2021 – Sanitary Sewer Rehabilitation Completion Report; Tyco FTC, Stanton Street
- December 21, 2021 – Ditch A and B Monthly WPDES Discharge Monitoring Reports (November 2021); Tyco FTC
- December 23, 2021 – Land Applied Biosolids Preliminary Assessment/Site Investigation Work Plan; Land Applied Biosolids Area

Corrective Actions

- Field activities are ongoing; personnel are following applicable federal, state, and local COVID-19 guidance to prevent exposure to and spread of the disease while conducting field activities

WDNR/Tyco Correspondence

Tyco Submittal to WDNR

- October 14, 2021; October 29, 2021; November 9, 2021; November 10, 2021; November 11, 2021; November 12, 2021; November 23, 2021; December 1, 2021; December 15, 2021; December 21, 2021; December 23, 2021 – Sample Results Notifications
- October 29, 2021; November 12, 2021; November 24, 2021; December 13, 2021; December 28, 2021 – PFAS Database Uploads and GIS Shape Files
- November 11, 2021; December 6, 2021 – Updates to Advisory Signs and Public Notification Methods
- November 22, 2021 – Updates to POET System Sampling; Tyco FTC

WDNR Submittal to Tyco

- October 27, 2021 – Site Investigation – Additional Actions Required (1) Review of Isoconcentration Maps and Cross-Section Figures (2) Potable Well Sampling Results from the Expanded Site Investigation Area; BRRTS #02-38-580694
- December 16, 2021 – Response to 4th Revised Long-Term Potable Well Sampling Plan; BRRTS #02-38-580694

WDNR/Tyco Summits and Periodic Meetings

- Weekly calls between WDNR and Tyco
- October 4, 2021; October 6, 2021; October 15, 2021; October 20, 2021; October 25, 2021; November 1, 2021; November 10, 2021; November 17, 2021; December 2, 2021; December 15, 2021 – Community update communications and corresponding Tyco website updates
- October 20, 2021 – WDNR Listening Session
- October 6, 2021; November 3, 2021; November 17, 2021; December 1, 2021 – GETS “Office Hours” Zoom calls
- October 7, 2021 – WDNR-Tyco Working Technical Session for discussion of the land-applied biosolids area
- October 28, 2021 – GETS Construction Community Crew Event
- November 17, 2021 – WDNR-Tyco Working Technical Session for FTC site investigation data gaps and expanded site investigation area discussion

Planned Activities

- Continue deliverable preparation and submittal, per the Draft Project Schedule submitted to the WDNR on December 1, 2021 and schedule update email sent to the WDNR on December 6, 2021
- Preparation and submittal of deliverables in response to the WDNR comment letters received in August and September 2021, referencing the following:

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- August 31, 2021 – Response to Near-Term Bedrock Groundwater Evaluation Work Plan; BRRTS #02-38-581955, 02-38-580694
- August 31, 2021 – Response to Site Investigation Work Plan, Interim Site Investigation Report, Conceptual Site Model and Aerial Deposition Evaluation Report; BRRTS #02-38-581955
- September 14, 2021 – Air Pathway Site Investigation Work Plan: Approval with Additional Requirements; BRRTS #02-38-580694
- Continue field work related to the Ditch B GETS LTM Plan pre-startup activities
- Resume foam monitoring activities at Ditch A through Ditch E in Spring 2022
- Continue discussions with the WDNR, Town of Peshtigo, City of Peshtigo, and City of Marinette associated with long-term drinking water distribution system expansion into the Town of Peshtigo
- Continue OMM activities associated with the LTM Plan and reporting for the Ditch A and B Treatment Systems
- Continue quarterly private well sampling and POET OMM per the Revised Long-Term Potable Well Sampling Plan
- Continue Operations support of the wastewater treatment system at the FTC Wastewater Treatment Facility

Tyco and Arcadis appreciate WDNR's collaboration on this project. Should you have any questions, please contact the undersigned.

Sincerely,
Arcadis U.S., Inc.



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