



July 2, 2019

Jeffery Danko  
EHS Manager – Environmental Remediation  
Johnson Controls International, plc  
5757 North Green Bay Avenue  
Milwaukee WI 53209

SUBJECT: Request for Additional Site Information in Marinette, Wisconsin  
Request for Submittals on Behalf of JCI  
DNR BRRTS Activity #s 02-38-581955 & 02-38-580694

Dear Mr. Danko:

The Wisconsin Department of Natural Resources ("department") has asked for responses to two information requests from Johnson Controls International, plc ("JCI") and Tyco Fire Products, LP ("Tyco"). Your predecessor at JCI, Mr. Richard Mator, shared a response regarding the Fire Training Center ("FTC") facility located at 2700 Industrial Parkway South on March 12, 2018. In addition, Mr. Mator shared a response regarding the 1 Stanton Street facility on October 18, 2018. Both responses were submitted on behalf of Tyco. To date, all submittals by the environmental consultant retained by JCI and Tyco, Arcadis US, Incorporated ("Arcadis"), have been submitted on behalf of Tyco.

The department requests all future submittals by JCI employees regarding the investigation of per- and polyfluoroalkyl substance (PFAS) contamination at all sites in the Marinette area to be submitted to the department on behalf of JCI or on behalf of both JCI and Tyco. Accordingly, the department requests all future submittals by Arcadis to be on behalf of JCI or on behalf of both JCI and Tyco.

The department understands JCI is the parent company of Tyco as defined by the terms "subsidiary or parent corporation" contemplated by Wis. Stat. § 292.31 (8) (a) (3). Future submittals received from or on behalf of Tyco exclusively will not be accepted by the department. Previous department acceptance of Tyco-only submittals does not constitute a waiver of liability for JCI by the department.

The department has follow-up questions regarding historic disposal practices of PFAS containing wastes.

**Request #1:** Where was wastewater generated by JCI/Tyco transported to prior to the recent or current practice of off-site transportation of wastewater to the Publicly Owned Treatment Works ("POTW") located in Kimberly, Wisconsin by Covanta or out-of-state wastewater transportation to Ohio? Please provide a list of service providers and associated local POTWs denoting years utilized by Ansul, Tyco International, plc and JCI for the disposal of PFAS-containing wastewater.

**Request #2:** Where was the solid waste found in the wastewater generated by JCI/Tyco, the out-of-specification or out-of-date products created by JCI/Tyco, or clean up material generated by JCI/Tyco transported to prior to the recent or current practice of out-of-state transportation of

solids by Heritage Environmental Services to Indianapolis, IN? Please provide a list of service providers and associated landfills or incineration facilities denoting years utilized by Ansul, Tyco International, plc and JCI for the disposal of PFAS-containing solid waste and waste products.

**Request #3:** Where were totes previously containing PFAS transported to for reconditioning or disposal prior to the current or recent or current practice of off-site transportation to Menominee Falls, Wisconsin by Covanta, and to the Kitzinger Cooperage facility in St. Francis, Wisconsin? Please provide a list of service providers and facilities denoting years utilized by Ansul, Tyco International, plc and JCI for the reconditioning or disposal of PFAS-containing totes and containers

**Request #4:** Please provide a list of entities and businesses acquired by JCI and your predecessors that manufactured PFAS-containing products such as Rockwood Systems, Inc. (dba Rockwood Foam) previously located at 171 Stephenson Ave in Peshtigo, Wisconsin.

**Request #5:** Please provide all field sampling data of PFAS that was collected on or off the FTC property by your previous environmental consultant, O&M Inc. or any other parties prior to 2016. Please provide any reports generated by O&M Inc. pertaining to this data.

**Within 60 days of receipt of this notice, please provide me with a letter containing the information requested above.** This information is requested by the department under the authority of Wis. Stats. §292.11 (8), 292.31 (1), and 292.31 (1) (d) 1-3.

Your cooperation in this matter is appreciated. If you have any questions regarding the content of this letter, please contact me at (920) 924-6819 or by email at [David.Neste@wisconsin.gov](mailto:David.Neste@wisconsin.gov).

Sincerely,



David Neste  
Hydrogeologist  
Bureau for Remediation & Redevelopment

cc: Mike Bedard, Arcadis  
Roxanne Chronert, NER Supervisor