


RE: Town of Peshtigo Update

Sellwood, Alyssa A - DNR <alyssa.sellwood@wisconsin.gov>

Mon 11/20/2023 4:44 PM

To: Town of Peshtigo Chair <topchair@townofpeshtigo.org>

Cc: Town of Peshtigo Clerk <topclerk@townofpeshtigo.org>; Thistle, Jodie M - DNR <jodie.thistle@wisconsin.gov>

 1 attachments (704 KB)

Pages from 20230824_152_RADR_Deep_Well.pdf;

Good Afternoon Jennifer - Thank you for sharing the updates that JCI/Tyco provided to the town. I can confirm that the details JCI/Tyco shared with you are consistent with the DNR's understanding of the status of the deep wells.

Per your request, below are additional updates from the DNR for the town's board meeting set for 11/21:

1. In October 2023, the DNR issued [a notice to well drillers regarding deep wells \[PDF\]](#) requesting they alert customers about possible water quality issues in the deep aquifer.
 - A copy is posted to the [DNR's webpage](#) under "Safe Drinking Water Solutions and New Wells".
 - The notice was done to make sure that residents living outside the PWSA, who may be considering a deep well because of concerns they have about PFAS in their current well, have details to make an informed decisions about the water quality of the deep aquifer before proceeding with a new private well.
 - The water quality concerns for the deep aquifer include aesthetic issues and elevated levels of radium and strontium (naturally-occurring contaminants).
 - Treatment is recommended to address radium and strontium if they are detected at elevated levels in private wells.
2. JCI/Tyco plans to use four deep monitoring wells to test the deep aquifer for PFAS and water quality in long-term.
 - Two of the deep monitoring wells (DMW-01 and DMW-02) were installed last spring, and installation of the other two (DMW-03 and DMW-04) began this month.
 - The locations are shown on the attached map taken from JCI/Tyco's [Aug. 2023 Deep Well Status Update](#).
 - DNR recently sent a [Response to the Deep Well Update](#) to JCI/Tyco
 - JCI/Tyco's anticipates that installation of the new deep private wells will be done by the end of 2024. At that time, JCI/Tyco will evaluate all the results and document if the water quality measured in deep monitoring wells is representative of the water quality measured in the deep private wells.
3. JCI/Tyco provided a Work Plan for sampling it will complete through spring 2024 for its site investigation. The DNR reviewed and [responded to the Site Investigation Work Plan](#). In its review, DNR provided JCI/Tyco with recommendations for additional testing.
4. JCI/Tyco submitted a semi-annual progress report for the GETS last week. The DNR will review this report and provide feedback in the near future.

Alyssa Sellwood

Phone: 608-622-8606

Alyssa.Sellwood@wisconsin.gov



October 27, 2023

Subject: **Well Construction Considerations Near Marinette County Remediation Investigation**

Dear Licensed Well Drillers:

The Department is seeking to update licensed well drillers who have historically completed wells in Marinette County about the ongoing remediation investigation that may influence well construction considerations. In 2017, Johnson Controls, Inc. and Tyco Fire Products (JCI/Tyco) began investigating Per- and Polyfluoroalkyl Substances (PFAS) contamination in the Marinette and Peshtigo area in Marinette County.

CONTAMINANT: PER- AND POLYFLUOROALKYL COMPOUNDS (PFAS)

LOCATION: Marinette County – Area Around City of Marinette and Town of Peshtigo
Township 30N – Range 23E Sections: 1, 12, 13, & 24 – Range 24E Sections: 5-9, 17, 18, 19, & 20

JCI/Tyco has provided some private well owners the option to have a new deep well (> 400 feet deep) constructed to avoid the shallow aquifer which may contain PFAS. The deep aquifer in this area may have poor aesthetic quality due to high levels of hardness, iron and sulfate and may also produce water with high levels of naturally occurring contaminants that pose a health risk including radium and strontium.

The Department asks that when a customer requests construction of a deep well in this area, you alert them to the possible water quality issues in this deep aquifer. This will help to ensure that those customers looking to drill a deep well to avoid PFAS are also informed of contaminants and potential risks associated with deep wells and can make the most informed decisions regarding their well construction and drinking water supply.

For questions about how contaminants in drinking water can affect health, area residents can contact the Department of Health Services (DHS) at DHSEnvHealth@dhs.wisconsin.gov. More information about the active investigation involving potential or known contamination to soil, surface water, and ground water, is available on our dedicated webpage: <https://dnr.wisconsin.gov/topic/PFAS/Marinette.html>. For questions about the risks of deep wells in this area and how to test and treat for radium and strontium in drinking water, or any other drinking or groundwater concerns, area residents can contact me at (608) 419-7637 or Benjamin.Degner@Wisconsin.gov.

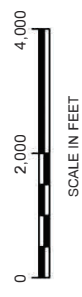
Sincerely,

Benjamin Degner
Private Water Supply Specialist
Wisconsin Dept. of Natural Resources

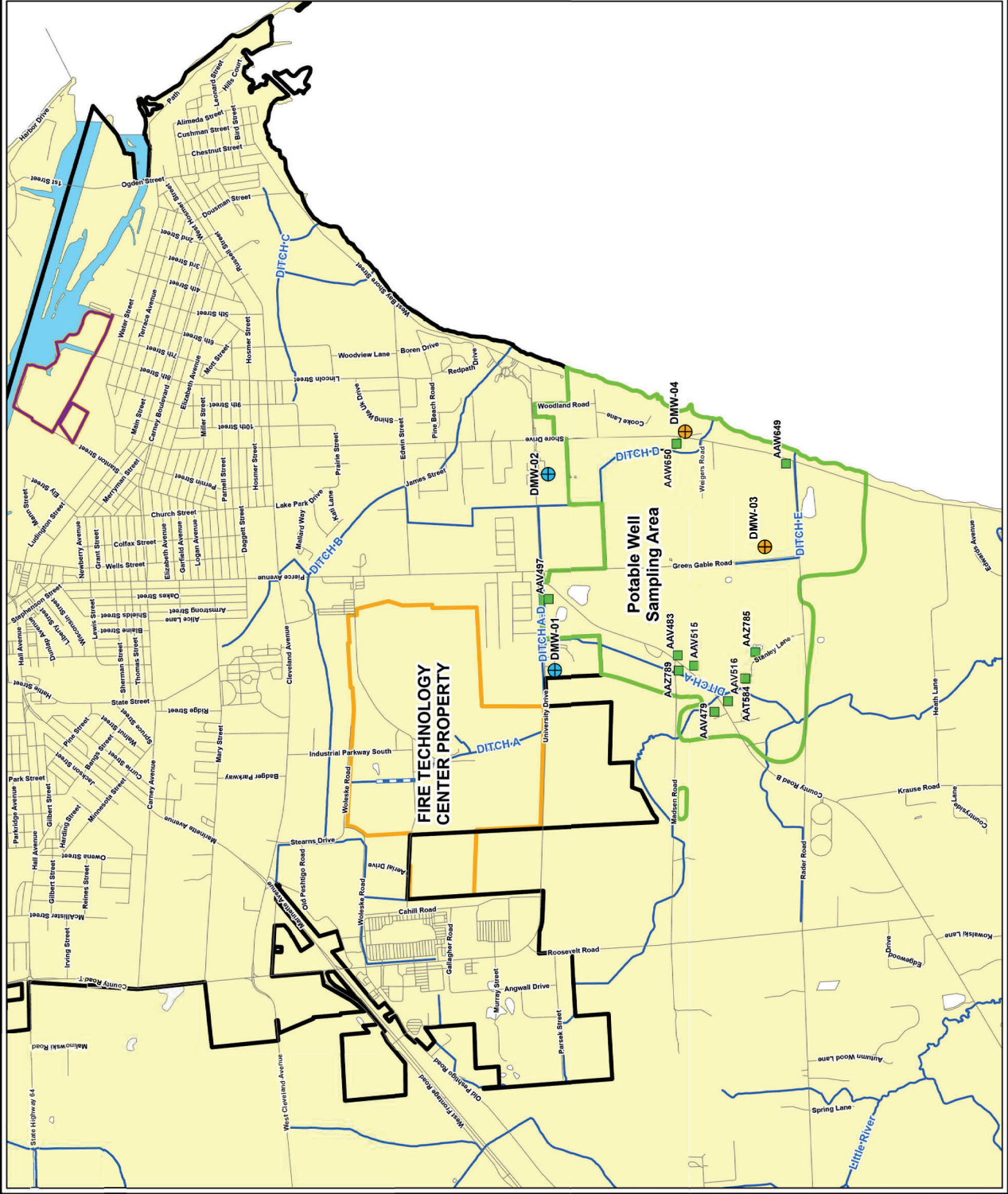
CC: WDNR Remediation & Redevelopment Northeast Region

LEGEND:

- POTABLE WELL LOCATION
- ⊕ DEEP MONITORING WELL LOCATION
- ⊕ PROPOSED DEEP MONITORING WELL LOCATION
- POTABLE WELL SAMPLING AREA
- STANTON STREET FACILITY BOUNDARY
- APPROXIMATE SITE PROPERTY BOUNDARY
- APPROXIMATE MARINETTE CITY BOUNDARY
- WATERBODY
- DITCH OR STREAM
- ROAD



SCALE IN FEET



7. ENVIRONMENTAL PROTECTION REPORT FIGURES/Deep Monitoring Well.aprx 8/19/2023 11:45 AM



November 17, 2023

MS. DENICE NELSON
JOHNSON CONTROLS, INC
5757 N. GREEN BAY AVENUE
MILWAUKEE, WI 53209

Via Email Only to denice.karen.nelson@jci.com

SUBJECT: Response to Deep Aquifer Bedrock Well Design and Long-Term Monitoring –
Interim Response Status Update
JCI/Tyco FTC PFAS, 2700 Industrial Parkway South, Marinette, WI
BRRTS #02-38-580694

Dear Ms. Nelson:

On Aug. 24, 2023, the Wisconsin Department of Natural Resources (DNR) received the *Deep Aquifer Bedrock Well Design and Long-Term Monitoring – Interim Response Status Update* (the “Deep Well Update”) for the above-referenced site (the “Site”). The report was submitted by Arcadis U.S., Inc. (Arcadis) on behalf of Johnson Controls, Inc. and Tyco Fire Products LP (JCI/Tyco) and included the fee required under Wisconsin Administrative Code (Wis. Admin. Code) § NR 749.04(1) for DNR review and response.

Within this letter, the DNR summarizes its review of the Deep Well Update and outlines an approach for JCI/Tyco to document completion of the work it has proposed for this interim remedial action.

Background

JCI/Tyco is investigating and responding to the discharge of per- and polyfluoroalkyl substances (PFAS) to the environment at the JCI/Tyco Fire Technology Center (FTC), located at 2700 Industrial Parkway South in Marinette, Wisconsin.

PFAS from the FTC have impacted private drinking water wells in the area. JCI/Tyco has defined a boundary and designated it the Potable Well Sampling Area (PWSA)¹. JCI/Tyco provides alternative drinking water (bottled water and/or point of entry treatment [POET] systems) and has offered residents in PWSA the option to replace their existing private well with a new deep well – wells installed to approximately 500 feet below ground surface (bgs) with a casing set to approximately 150 feet bgs.

On Sept. 27, 2022, JCI/Tyco submitted its plans to install new deep private wells and its plan to monitor water quality long-term in the deep aquifer beneath the PWSA using a monitoring well network. The DNR reviewed and responded to these plans on Nov. 18, 2022. In that response, the DNR made recommendations and requested that JCI/Tyco submit an update within 6 months after wells for the deep monitoring network were installed.

¹ The PWSA was designated prior to completion of the site investigation. The area(s) impacted by PFAS from the FTC will be determined when the site investigation that meets all applicable requirements (Wis. Admin. Code ch. NR 716) is complete. The PWSA does not necessarily include all persons whose water supply has been or is likely to be affected by migration of contamination from the FTC (Wis. Admin. Code § NR 708.05(4)(f)).

Summary of the Deep Well Update

Two of the four wells proposed for the deep monitoring network (deep monitoring wells DMW-01 and DMW-02) were completed in Feb. 2023; however, the other two wells (DMW-03 and DMW-04) were delayed pending access agreements and are anticipated to be complete by the end of 2023. Rather than wait for completion of all four wells, JCI/Tyco submitted the Deep Well Update 6 months after completion of DMW-01 and DMW-02. At the time that the Deep Well Update was submitted, 10 deep private wells had also been installed. The construction and initial monitoring results from deep monitoring wells DMW-01, DMW-02 and the 10 new deep private wells were documented in the Deep Well Update. (Leading up to this, JCI/Tyco had also copied the DNR on the notifications to individual residents regarding the construction and testing results from each new deep private well per Wis. Admin. Code § 716.14(1)).

JCI/Tyco's PWAS Deep Well Update included the following:

- Updated well design details to retrofit certain deep wells with a liner to approximately 300 feet below ground surface (bgs). This modification was needed for DMW-01 and possibly other deep wells that encounter a shale seam below the depth of the casing – a seam which produces sulfur rich water with a strong sulfur odor.
- The geophysical well profiling results for deep monitoring wells DMW-01 and DMW-02.
- Well construction forms and unique well IDs for each of the new deep wells.
- Well abandonment forms for the private wells that were removed and replaced with a new deep well.
- Monitoring results for PFAS and other water quality parameters from the new deep private wells and new deep monitoring wells.
- Monitoring results for PFAS and other water quality parameters after water treatment (water softening and reverse osmosis) in the new deep private wells.
- Plans to continue with the installation of deep private wells and the deep monitoring wells per approved plan, with modification to retrofit wells with a deeper liner if needed.
- Plans to report on completion of the deep aquifer monitoring network after completion of deep monitoring wells DMW-03 and DMW-04, including an assessment if the water quality measured in the four wells is a good measure of the overall water quality delivered by the new deep private wells.

DNR Review

JCI/Tyco's Deep Well Update provided the information requested in the DNR's Nov. 2022 letter. The data presented in the Deep Well Update demonstrate:

- PFAS concentrations in the deep aquifer are currently below levels recommended by the Wisconsin Department of Health Services (DHS) for safe drinking water.
- The concentrations of naturally-occurring contaminants in the deep aquifer (radium and strontium) often exceed levels recommended for safe drinking water, and thus the DNR recommends that water treatment systems designed to remove these naturally-occurring contaminants continue to be offered and installed for residents receiving new deep private wells.
- Water treatment that has been installed to date on the new deep private wells (water softener for the house and reverse osmosis at the tap) is effective, upon installation, at removing the radium and strontium to recommended safe drinking water levels and improving the aesthetic water quality.
- The long-term effectiveness of the treatment systems and adequacy of the routine maintenance schedule in sustaining effective treatment will be determined in future monitoring.

- Sulfur-rich water may impact some wells and a deep liner retrofit is planned for those wells to prevent sulfur rich water from entering the well. Data to document the effectiveness of this modification were not available at the time of the Deep Well Update.

Next Steps

The DNR appreciates the opportunity to review JCI/Tyco's Deep Well Update, which included a plan to document completion of the deep monitoring well network. To ensure the DNR has timely access to information and to streamline future submittals, the DNR requests that JCI/Tyco use the following approach to document the remaining work.

Deep Monitoring Wells:

Submit a report to the DNR documenting completion of the deep well monitoring network within **60 days** after receipt of the laboratory data from initial testing of deep monitoring wells DMW-03 and DMW-04 (Wis. Admin. Code § 716.15(1)(a)). A DNR technical review fee is not required for this report. The following information is requested for the report:

- As-built design schematic for deep monitoring well DMW-01 (with liner), and an evaluation about the effectiveness of the design modification in preventing sulfur rich water from entering the well.
- Well construction reports, geophysical logs and laboratory reports.
- Table with well construction details and map showing the as-built locations of the four wells.
- Summary of the testing results for the four deep monitoring wells.
- A plan for reporting long-term monitoring results for the deep monitoring network. If JCI/Tyco would like these with other long-term monitoring for Site, that would be agreeable, with two conditions:
 - Maintain separate summary tables and evaluation of the deep aquifer in the reports.
 - If results from sampling indicate migration of PFAS into the deep aquifer or that the water quality has shifted toward conditions that may be less safe to drink, then these results should be reported and discussed *immediately* to the DNR and should not wait for a future documentation report.

Deep Private Wells:

Document progress and completion for the deep private drinking water wells with the following three tasks:

- Continue to copy the DNR on the notifications sent to property owners with well construction details and sampling results (Wis. Admin. Code § 716.14(1)).
- Update Figure 1 and Table x.4 and submit the updates **quarterly** to the DNR starting in Feb. 2024 until installation of the deep private wells are complete. Please add the well depth to the table and note if a well required a retrofit with deeper liner.
- Submit a final interim action report (Wis. Admin. Code § NR 724.15) within **60 days** after receipt of laboratory data of raw water and initial post-treatment water from the last well to be installed. The following information is requested, at a minimum, for the report:
 - Final versions of Table x.4 and Figure 1.
 - Schematics of the wells construction details and specifications for the water treatment system(s).
 - Table summarizing the raw water sampling results for each new deep private well.
 - An assessment if the results of monitoring from the four deep monitoring wells (DMW-01 to DMW-04) are representative of the water quality observed in the new deep private wells.

- Table summarizing the post-treatment results available to date for each new deep private well.
- Evaluation on effectiveness and operation and maintenance plans for the water treatment systems installed on the new deep private wells.
- Well construction logs for each of the deep private wells.
- Well abandonment forms for each well that was replaced and description or summary of any wells that were not abandoned and why.

As a reminder, this Site is subject to an enforcement action and therefore all submittals to the DNR under Wis. Admin. Code chs. NR 700-799 (unless otherwise directed by the DNR) must be accompanied by a Wis. Admin. Code ch. NR 749 fee per Wis. Stat. § 292.94. These fees are not pro-ratable or refundable per Wis. Admin. Code § NR 749.04(1). If you have any questions about whether to include a fee with a submittal, please contact DNR staff prior to submitting a document without a fee.

If you have any questions, please contact me at (608) 622-8606 or Alyssa.Sellwood@wisconsin.gov.

Sincerely,



Alyssa Sellwood, PE
Complex Sites Project Manager
Remediation & Redevelopment Program

cc: Christine Sieger, DNR (via email: Christine.Sieger@wisconsin.gov)
Jodie Thistle, DNR (via email: Jodie.Thistle@wisconsin.gov)
Kyle Burton, DNR (via email: Kyle.Burton@wisconsin.gov)



November 17, 2023

MS. DENICE NELSON
JOHNSON CONTROLS, INC
5757 N. GREEN BAY AVENUE
MILWAUKEE, WI 53209

Via Email Only to denice.karen.nelson@jci.com

SUBJECT: Response to *Additional Site Investigation Work Plan*
JCI/Tyco FTC PFAS, 2700 Industrial Parkway South, Marinette, WI
BRRTS #02-38-580694

Dear Ms. Nelson:

On Aug. 24, 2023, the Wisconsin Department of Natural Resources (DNR) received the *Additional Site Investigation Work Plan* (the “SI Work Plan”) for the above-referenced site (the “Site”) that was submitted by Arcadis U.S., Inc. (Arcadis), on behalf of Johnson Controls, Inc. and Tyco Fire Products LP (JCI/Tyco). The SI Work Plan was accompanied by the fee required under Wisconsin Administrative Code (Wis. Admin. Code) § NR 749.04(1) for DNR review and response. On Oct. 6, 2023, JCI/Tyco submitted an email with minor revisions to the SI Work Plan (attached). DNR included these revisions in its review of the SI Work Plan.

The DNR reviewed the SI Work Plan, which summarized JCI/Tyco’s planned activities to continue the investigation of per- and polyfluoroalkyl substances (PFAS) at the Site and JCI/Tyco’s response to the DNR’s comments to the Apr. 2023 Site Investigation Status Report. The SI Work Plan included sampling to address data gaps, but some data gaps previously identified by the DNR may not be fully addressed in the upcoming proposed scope of work. In this response, the DNR identifies the areas where data gaps may remain and recommends actions JCI/Tyco can take to begin addressing those questions.

Background

JCI/Tyco is investigating and responding to the discharge of PFAS to the environment at the JCI/Tyco Fire Technology Center (FTC), located at 2700 Industrial Parkway South in Marinette, Wisconsin. The discharge occurred as the result of fire suppressant training, testing, research and development of PFAS-containing aqueous film forming foams (AFFF) at the Site starting in the early 1960s.

JCI/Tyco’s site investigation activities and its progress to define the degree and extent of PFAS contamination at the Site are documented in seven prior reports¹.

¹ Reports documenting prior progress in the SI include:

- *Site Investigation Report* – Sept. 28, 2018 (Posted to BRRTS Oct. 4, 2018)
- *Data Summary Report* – Mar. 8, 2019 (Posted to BRRTS Mar. 13, 2019)
- *Southern Area Groundwater Evaluation Report* – Mar. 20, 2020 (Posted to BRRTS Apr. 10, 2020)
- *Interim Site Investigation Report* – May 15, 2020 (Posted to BRRTS Jun. 5, 2020)
- *Conceptual Site Model* – May 20, 2020 (Posted to BRRTS Jun. 5, 2020)
- *Air Pathway Site Investigation Report* – Submitted as App. A to the Site Investigation Work Plan – Feb. 11, 2022
- *Site Investigation Status Report* – Apr. 3, 2023

Additional work is needed for JCI/Tyco to meet the requirements of Wis. Admin. Code ch. NR 716 for a complete site investigation. The DNR has provided recommendations in prior correspondence to close data gaps and help JCI/Tyco make progress to achieve a complete site investigation. The most recent correspondence was provided to JCI/Tyco on June 23, 2023, and a technical meeting was held with JCI/Tyco and the DNR on July 24, 2023, to discuss the comments.

Summary of the SI Work Plan

JCI/Tyco's SI Work Plan included a response to each of the comments in the DNR's June 23, 2023 letter and outlined JCI/Tyco's planned activities for the next steps in the investigation. The locations listed below are shown on Figure 1 in the SI Work Plan, with revisions to I, L and H proposed in the Oct. 6, 2023 email (attached).

The scope in the SI Work Plan includes:

- Installation of vertical aquifer profiles (VAP) borings to evaluate overburden geology and PFAS concentration in groundwater at four locations (H, J, K and L).
- Installation of monitoring wells at three locations (H, K and L) based on the upcoming VAP results.
- Installation of five monitoring wells at four locations (A, C, E and F) based on the results from VAPs completed in 2022.
- Installation of three wells installed into weathered bedrock at three locations (D, G and I).

The DNR infers from previous correspondence with JCI/Tyco that the following activities have been or will be completed in 2023 and the results will be included with documentation of the investigation activities listed above.

- Three flow and gradient measurements in Ditches A, C, D, and E.
- One sample of surface water in the Menominee River.
- Two samples of surface water in Ditches A, C, D, and E and Green Bay.

DNR Review

The headings used to categorize data gaps identified in the DNR's June 2023 letter and which JCI/Tyco used to present its response to comments in the SI Work Plan are repeated in the comments below for continuity.

1. Groundwater East and Below Ditch B:

The objective of the additional sampling that DNR recommended for this area is to identify zones that may act as preferential flow pathways in the unconsolidated aquifer east of Ditch B and confirm the PFAS levels in those zones. In the SI Work Plan, JCI/Tyco proposed to install a VAP boring at location "H" and up to two monitoring wells installed at different depths at this location based on the VAP results, with refinements to the location of "H" provided in the Oct. 6, 2023, email. The DNR concurs with JCI/Tyco's recent refinement of the location for "H" and recommends that JCI/Tyco make its final selection based on where PFAS is most likely to be detected (e.g., evaluation of data it previously collected in other VAPs in this area and groundwater data for samples collected by the city of Marinette during road projects). DNR may request additional VAPs if preferential flow pathways are not identified in the unconsolidated aquifer at proposed location "H."

2. Groundwater Southeast of FTC:

Similar to the comment above, the objective to make progress toward a complete site investigation is to identify zones that may act as preferential pathways and to measure the PFAS concentrations in those zones. While this comment was partially addressed by the new wells and VAPs proposed in the SI Work Plan for this area, the locations where PFAS were detected in previous VAP samples should be considered when identifying new well locations. Elevated concentrations of PFAS were previously detected around 30 feet below ground surface (bgs) at VAP-PZ-73 and VAP-35. Rather than install a new VAP and well(s) at location “K,” the DNR recommends JCI/Tyco consider monitoring wells, screened around 30 feet bgs, be installed near VAP-PZ-73 and VAP-35.

3. Groundwater flow paths originating from the entire losing segment of Ditch A south of the FTC:

The two VAPs proposed at locations “J” and “L” coupled with completion of the recommended well near VAP-PZ-73 will help to further advance the understanding of the complex groundwater-surface water interactions and groundwater flow paths from Ditch A in this area.

Recognizing that recent snapshots of data collected during the site investigation may not fully characterize the current or historical flow patterns from Ditch A and having confirmation that losing stream conditions exist where there are elevated concentrations of PFAS in sediment keep this an important pathway of consideration when interpreting data and scoping the site investigation activities in this area.

4. Weathered bedrock layer following the slope and strike of bedrock south of the FTC:

There are currently insufficient number of bedrock wells to characterize flow in weathered bedrock south of the FTC. JCI/Tyco’s proposed locations of bedrock monitoring wells “G” and “I” (as revised) will add monitoring points that help improve the understanding of the flow direction and if PFAS migration occurs in the weathered bedrock to the south from the FTC. It is of particular importance to investigate along the strike in bedrock that follows the elevation where the former production well at the FTC intersected the weathered bedrock layer.

5. Surface water in Ditch B at SW-15:

The DNR understands that routine monitoring began in August 2023 at a location near surface water monitoring location SW-15 as part of the monitoring for the Ditch B treatment system and that this data will be reported in future semi-annual progress reports.

6. West and Northwest of FTC:

The need for further characterization in this area has not been addressed in the SI Work Plan. JCI/Tyco’s response to comments focused on how diffusion in groundwater does not explain why PFAS is present in groundwater west of Ditch A. With diffusion ruled out, it leads to the conclusion that the detections of PFAS in groundwater on the FTC property to the west of Ditch A are from other migration pathways or direct discharges of PFAS in this half of the FTC property. The extent of contamination resulting from discharge(s) at the FTC must be determined to complete the site investigation (Wis. Admin. Code § 716.11(4)). The DNR recommends JCI/Tyco consider installing additional NR 141 wells on the western portion of the FTC and to the west of the FTC property to determine the extent of contamination.

7. Impacts at PZ-27-12:

A revised and corrected version of the sanitary sewer map for the city of Marinette was provided in the SI Work Plan and this map addressed the DNR’s question and concern for this item at this time.

8. Plume Stability:

The DNR concurs that JCI/Tyco can propose and use a network of monitoring wells to track plume stability over time with the understanding that the site investigation into nature, degree and extent will continue and that other wells may be added to the long-term monitoring program based on the findings from the additional investigation.

9. Flow into Green Bay:

JCI/Tyco has indicated that the results from the surface water data collected from the Bay of Green Bay in 2023 and the additional groundwater sampling proposed in the SI Work Plan will be evaluated and used to update the conceptual site model and interpretations of the groundwater contaminant plume. This holistic evaluation of the data will be presented in the next status update to the site investigation. This response is noted and the DNR will be looking for plume maps that honor the data in the next site investigation status report.

10. Principal Component Analysis:

The DNR contends that JCI/Tyco's principal component analysis (PCA) does not adequately justify excluding certain areas outside the current study area from further testing and evaluation in the site investigation. PCA can be a useful indicator for separating complex PFAS analytical data to a few groups of similar composition. However, proper use and interpretation of PCAs must consider compositional variations in AFFF sources used at the FTC, as well as differential partitioning and transformation of PFAS in aquifer media and the effects of transport through multiple pathways. JCI/Tyco did not fully share PCA work (e.g., input, code, post-processing, handling of non-detects) with DNR, and therefore the DNR was not able to fully evaluate the validity of the approach. If JCI/Tyco opts to advance the PCA as one part of its data analysis and interpretation in the site investigation, the sample data set should be expanded to include additional investigation areas discussed in the comments above and the DNR requests that the input data be supplied in future submittals.

Next Steps

Conduct the proposed site investigation activities and submit a site investigation status report to the DNR which document the results and conclusions within **60 days** after completion of the activities and receipt of the laboratory data (Wis. Admin. Code § NR 716.15(1)(a)). To make more efficient progress toward a complete site investigation, the DNR recommends that the additional or revised sample locations and evaluations suggested herein be completed in the upcoming work and that JCI/Tyco outline its recommendations for next steps or investigation activities at the conclusion of the documentation report (Wis. Admin. Code § NR 716.15(6)). A supplemental site investigation work plan can follow, but a clear presentation of recommendations will expedite the DNR's review and comment to the status report.

As a reminder, this Site is subject to an enforcement action and therefore all submittals to the DNR under Wis. Admin. Code chs. NR 700-799 and submittals directed by the DNR must be accompanied by an Wis. Admin. Code ch. NR 749 fee per Wis. Stat. § 292.94. These fees are not pro-ratable or refundable per Wis. Admin. Code § NR 749.04(1). If you have any questions about whether to include a fee with a submittal, please contact DNR staff prior to submitting a document without a fee.

If you have any questions, please contact me at Alyssa.Sellwood@wisconsin.gov or (608) 622-8606.

Sincerely,

A handwritten signature in cursive script that reads "Alyssa Sellwood".

Alyssa Sellwood, PE
Complex Sites Project Manager
Remediation & Redevelopment Program

Attachments: Oct. 6, 2023, Email with Revisions to the SI Work Plan

cc: Jodie Thistle, DNR (via email: Jodie.Thistle@wisconsin.gov)

Sellwood, Alyssa A - DNR

From: Denice Nelson <denice.karen.nelson@jci.com>
Sent: Friday, October 6, 2023 2:10 PM
To: Sellwood, Alyssa A - DNR
Subject: Revisions to the FTC 2023 Additional Site Investigation work Plan

**CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Hi Alyssa,

Per our discussions earlier this week the following revisions are being made to the site investigation work we have planned for this fall:

1. The proposed bedrock well at location "I" will be moved to the Madsen Rd right-of-way near the 550 ft bedrock contour. This location is west of PZ-75 near the crossing of the west branch of Ditch A with Madsen Rd.
2. Location "L" along Rader Road will be completed as a piezometer based upon VAP results.
3. We will evaluate the potential to adjust "H" to the west near the intersection of Prairie and 10th. It should be noted that the drainage along Prairie and 10th flows directly east toward the intersection of Lincoln and Prairie. This intersection is the planned location for a bedrock well (Location "D"). If the intersection of Prairie and 10th is inaccessible, the previously planned location of "H" near the intersection of Shin Wa Uk Dr and Lincoln will be moved to the north, to the intersection of Lincoln and Prairie.

Note that we are also further evaluating your other areas of comment, but wanted to get you the above as these actions are planned to take place.

We can discuss further on our call next week if you would like additional follow-up.

Have a good weekend-

Denice

Denice Nelson

Senior Director, Remediation and Strategy
Johnson Controls

+1 651 280 7259 cell

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The power behind **your mission**

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