

From: [Carey, Angela J - DNR](#)
To: [Denice Nelson](#)
Cc: [Kleinberg, Andrew](#); [Krueger, Sarah E - DNR](#); [Fassbender, Judy L - DNR](#); Heather.Ziegelbauer@jacobs.com; [Ryan Suennen](#)
Subject: RE: Stanton Street NR718 Location Standards Exemption Request
Date: Friday, June 30, 2023 11:22:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Denice,

The DNR has reviewed your submittal *Tyco Fire Products LP, Stanton Street Property NR 718 Location Standards Exemption Request*, dated May 19, 2023. The location standards exemption request cannot be approved at this time for the following reasons:

- Under Wis. Admin. Code ch. NR 718, a separate materials management plan (MMP) must be submitted for individual activities. [Form 4400-315, Recommended Template for a Request to Manage Materials under Wis. Admin. Code § NR 718.12 or 718.15](#) facilitates this process and can be submitted with other requests, depending on the activities being proposed at the site. When submitting an MMP, Tyco must consider other requirements of the site's soil/material management plan (currently under development).
- A singular waste profile is not acceptable for all activities at the site. The heterogeneous nature of fill and soil at the site and history of contamination require a waste determination for each activity.

We recognize that the location of the site, within a floodplain, adjacent to a wetland and river, and persistent high groundwater table, will require a location exemption request with each activity. However, there are options to address the risks associated with management of contaminated soil that can be approved.

Additional resources regarding soil management under NR 718, Wis. Admin. Code are available on our website at: [Contaminated soil and sediment | Wisconsin DNR](#). Please let me know if you have any questions or would like to discuss this further.

Regards,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Angela Carey

Cell Phone: (608) 219-2143

angela.carey@wisconsin.gov



dnr.wi.gov

From: Denice Nelson <denice.karen.nelson@jci.com>
Sent: Friday, May 19, 2023 1:56 PM
To: Krueger, Sarah E - DNR <sarah.krueger@wisconsin.gov>
Cc: Carey, Angela J - DNR <Angela.Carey@wisconsin.gov>; Kleinberg, Andrew <Kleinberg.Andrew@epa.gov>; Ryan Suennen <ryan.suennen@jci.com>; Heather.Ziegelbauer@jacobs.com
Subject: Stanton Street NR718 Location Standards Exemption Request

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Sarah – I’ve attached an exemption from NR718 Location Standard requirements request for the Stanton Street site.

Please let me know if you have any questions regarding this request.

Sincerely,
Denice

Denice Nelson
Senior Director, Remediation and Strategy
[Johnson Controls](#)

+1 651 280 7259 cell
denice.karen.nelson@jci.com
www.johnsoncontrols.com
Twitter: [@JohnsonControls](#) • LinkedIn: [Johnson-Controls](#)

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Johnson Controls
5757 North Green Bay Avenue
Glendale, WI 53209
USA

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