



## REGION 5

CHICAGO, IL 60604

December 20, 2023

### **Via E-mail**

Denice Nelson  
Johnson Controls  
5757 N. Green Bay Ave.  
Milwaukee, WI 53209

Subject: 2023 Q3 Progress Report Review with Comments  
Tyco Safety Products - Ansul Stanton St Fac  
U.S. EPA ID NO. WID006125215  
1 Stanton Street  
Marinette, WI 54143

Dear Ms. Nelson,

The Environmental Protection Agency (EPA) and the Wisconsin Department of Natural Resources (WDNR) has reviewed the 2023 Q3 Progress Report dated and received on October 16, 2023, submitted for this facility. Prior to the report being approved, the following comments will need to be addressed:

### **Comments:**

1. Page 3, Groundwater Collection & Treatment System (GWCTS): Discuss how contaminated surface and ground water stored on site in frac tanks (1,000,000 gallons) is compliant with the Large-Quantity Generator (LQG), 90-day accumulation regulation.
2. Page 3 Pump Down Program (PDP) Water Levels: Consider evaluating the water level in each individual well compared to the target elevation. Any individual well with a higher-than-average head may be an indicator that additional assessment is needed.
  - a. Provide individual PDP system hydrographs for the salt vault and 8th street slip, with elevations from individual wells, the average, and river elevations.
3. Page 4, Maintenance Inspections: Include discussion related to how the cover and/or Phyto-plots in the coal dock area have changed following the stormwater improvements.
  - a. Describe any areas of exposed soil present and confirm they are covered in accordance with approved Operation & Maintenance plans.

4. Page 8-9, List of Correspondence: Table 2 lists August 24 and 29, 2023 for an EPA “Email Request – Additional Data Requested for Sediment Sampling Even Data”. Records indicate the request was August 28 and 29, 2023.
5. Figures:
  - a. Please provide an explanation for the color blocking used in all site figures for the aerial photo.
  - b. Update the figures if changes in the coal dock area will result in changes to cover and Phyto-plot areas.
6. Attachment 1, GWCTS summary: Include beginning and ending balances for all storage components and discuss discrepancies in system balance totals to accurately illustrate how surface and ground water at the site are being managed.
7. Attachment 4, PDP Groundwater Elevations: Provide the mean (5 year) conductivity value used in the corrected groundwater elevation calculation, in the footnote of the table.
8. Provide an inventory of all soil and groundwater generated at the site during each quarter and indicate how it was managed (treated in GWCTS, returned to site, off-site disposal, etc.).

If you have any questions about this review, please contact me via phone at (312) 353-4374 or through email at [Kleinberg.Andrew@epa.gov](mailto:Kleinberg.Andrew@epa.gov).

Sincerely,



Andrew Kleinberg  
Project Manager - Geologist  
RCRA Corrective Action Section 2  
Land, Chemicals & Redevelopment Division, Region 5, U.S. EPA  
77 West Jackson Blvd. (LR-16J), Chicago, IL 60604

cc: Heather Ziegelbauer, Jacobs Engineering Group  
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