



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 30 2018

REPLY TO THE ATTENTION OF:
LU-16J

VIA ELECTRONIC MAIL ONLY

Mr. Jeffery Danko
Environmental Geologist
Johnson Controls International
1 Stanton Street
Marinette, WI 54143-2542

Subject: Agency comments – 2017 Barrier Wall Groundwater Monitoring Annual Report
Tyco Fire Products, LP, Stanton Street Facility, Marinette, Wisconsin
EPA RCRA Administrative Order Docket No. RCRA-05-2009-0007
EPA Facility ID WID 006 125 215

Dear Mr. Danko:

The U.S. Environmental Protection Agency (EPA) and Wisconsin Department of Natural Resources (WDNR) have reviewed Tyco's 2017 Barrier Wall Groundwater Monitoring Annual Report, received electronically on June 29, 2018. The Agencies appreciate Tyco's commitment to operating, maintaining, and monitoring the constructed remedies at the Site. In general, the Agencies found few issues with the report, but have follow up questions and comments pertaining to ongoing projects listed below.

Section 1. Introduction

The text indicates that a separate report will be submitted to include information on the stormwater system upgrades. Tyco last provided an update on this project to the Agency at the December 20, 2017 meeting. The meeting summary describes ongoing activities including: catch basin repair and lining, installation and modification of a catch basin near Building 14 and another near Building 70, installation of a gate valve at outfall 5 and 6, seam sealing in the areas of outfalls 3, 5, and 6, and post-improvement stormwater sampling. Please describe the work that remains and a schedule for completion, including dates for post-improvement stormwater sampling. This work is necessary to continue ensuring that contaminated groundwater is not leaving the Site.

Section 3.2. Pump Down System Operation

Please include a description of the over-winter operations of EW-2 and EW-3, including operation times and gallons removed, as well as a description of EW-12 operations for 2017.

Section 3.3 Groundwater Treatment System Testing

The RCRA Corrective Action program understands that updates to the Groundwater Collection and Treatment System (GWCTS) are awaiting permit approval from other programs. On July 11, 2018, EPA was copied on the Preliminary Design Plan submittal for Phase 1 of the Groundwater Collection and Treatment System Modifications. Please provide an update on the permit inquiries Tyco has made about the conveyance line plans (including to the State, County, Municipality, etc.), the status of the design, and any changes to the schedule for construction of the system provided in Appendix B of the above referenced document.

Section 4.3 Total Arsenic in Groundwater

Please describe/address the impact of surface water infiltration into MW040 and MW105 well nests (as described in Sections 4.2.2 and 4.2.3) on groundwater sampling and analysis for Arsenic.

Section 4.4 2017 Barrier Wall Visual Inspections and Surveys

Please include a figure indicating the locations where horizontal or vertical deflections exceeding general tolerances were measured, and the size of the deflections.

Appendix C Phyto-Pumping System Inspection Report

Please include a figure or brief description of where each of the phytoremediation zones 1-6 are located on the site.

Should you have any questions, please contact me at (312) 886-7193 or neal.conor@epa.gov.

Sincerely,



Conor Neal
Geologist and Project Manager
RCRA Corrective Action Section 2

Ecc: Tammy Moore, EPA
Angela Carey, WDNR
Joseph Janeczek, Johnson Controls Inc.
Richard Mator, Johnson Control Inc.
Ryan Suennen, Tyco Fire Products, LP