



**REGION 5**  
CHICAGO, IL 60604

November 1, 2024

**Via E-mail**

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

Subject: Extraction Well Design Memo Approval 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) have reviewed the Extraction Well Design Memo submitted and received on August 28, 2024, and the Response to Comments (RTC) submitted and received September 13, 2024, for this facility. The RTC was requested in an EPA/WDNR review email sent on September 6, 2024. The Extraction Well Design Memo is approved and construction may proceed for HW-3, HW-4, and EW-15; however, as discussed during the October 3, 2024, monthly meeting, a Pilot Test must be conducted on EW-15 and approved prior to it being fully incorporated into the extraction well network at the facility. Additionally, the following comments will need to be addressed and/or considered:

1. Provide a Pilot Test Workplan for EW-15 that includes:
  - a. A summary of why the Pilot Test is being conducted and the goals the study is trying to achieve.
  - b. Well Configuration and Design (Extraction Well Construction Memo can be referenced).
  - c. Hydraulic and Specific Capacity Testing Procedures
  - d. Pilot Test Project Timeline
  - e. Discussion of how the Area of Influence will be determined.
  - f. A summary of what will be provided in the Pilot Test Completion Report. This should include but is not limited to:
    - i. Field Notes
    - ii. Waste Manifest or Disposal Documentation (water)
    - iii. Drawdown and flow nets
    - iv. A discussion of the pumping rate's influence on the hydrogeology of the area and where water is being pulled from.
    - v. Estimate of the mass flux of water through and/or over the slurry wall
    - vi. Estimate of the mass flux of contamination that is captured by EX-15 in comparison to the mass flux that still reaches the river at the chosen pumping rate.

2. Submit an Extraction Well Construction Completion Memo after work has been completed that includes:
  - a. Boring/NR812 Well Construction Report
  - b. Waste Manifest and IDW Sampling Results
  - c. Photo Documentation (before and after pictures).
  - d. Maps/figures
  - e. Information related to Well Abandonment of EW-2 and EW-3 including photos and the NR 812 Fill and Seal Report.

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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Angela Carey, WDNR  
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