

From: Denice Nelson <denice.karen.nelson@jci.com>
Sent: Thursday, January 30, 2025 1:09 PM
To: Krueger, Sarah E - DNR
Cc: Carey, Angela J - DNR; Tom Willis; Ziegelbauer, Heather/MKE; Jeff Danko; Ryan Suennen; Kleinberg, Andrew; Cooper, Shanelle; Kirk Kapfhammer
Subject: Re: DNR Review of MMP for Installation of ChemDesign Water Line, Stanton Street Facility
Attachments: ChemDesignWaterLineMMPDoc - 1-29-25 final complete.pdf

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Sarah-

Attached is the documentation of the MMP activities conducted for the Water Line installation work by ChemDesign.

Please let us know if you have any questions or comments on the attached.

Sincerely,
Denice

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

+1 651 280 7259 cell

[The power behind your mission](#)

This email (including any attachments) may contain information that is private or business confidential. If you received this email in error, please delete it from your system without copying it and notify sender by reply email so that our records can be corrected.

From: Krueger, Sarah E - DNR <sarah.krueger@wisconsin.gov>
Sent: Friday, March 1, 2024 4:12 PM
To: Denice Nelson <denice.karen.nelson@jci.com>
Cc: Carey, Angela J - DNR <Angela.Carey@wisconsin.gov>; Tom Willis <TWillis@chemdesign.com>; Ziegelbauer, Heather/MKE <Heather.Ziegelbauer@jacobs.com>; Jeff Danko <jeff@endpointcorporation.com>; Ryan Suennen <ryan.suennen@jci.com>; Kleinberg, Andrew <Kleinberg.Andrew@epa.gov>; Cooper, Shanelle <Cooper.Shanelle@epa.gov>
Subject: DNR Review of MMP for Installation of ChemDesign Water Line, Stanton Street Facility

Denice,

The DNR has reviewed the Wis. Admin Code NR 718 Material Management Plan submitted by Tyco on behalf of ChemDesign on February 13, 2024.

1. The request for a locational criteria exemption under Wis. Admin. Code § NR 718.12(1)(c) is granted.
2. The request to manage contaminated soil as backfill within the area from which it is excavated for the ChemDesign water line work is approved, per Wis. Admin. Code § NR 718.12(1)(d).
3. Best management practices for stormwater control must be implemented at the site to mitigate any releases of contaminated surface water to the environment.
4. Following work completion, documentation of the material management activities shall be provided. The documentation must describe how the activities complied with the approved management plan and must also comply with the requirements of Wis. Admin. Code § NR 724.15(3). Including, but not limited to:
 - a. Maps, drawings, and/or cross sections that depict how contaminated material was managed.
 - b. A synopsis of the work conducted and an explanation as to how it complied with the material management plan.
 - c. A description of any changes made to the planned management activity and an explanation as to why they were necessary for the project.
 - d. Any field observations or results of monitoring conducted during the management activity.
 - e. A description of how new site conditions are protective of human health, safety, welfare and the environment.
 - f. Fieldnotes.
 - g. Waste Characterization Lab Data.
 - h. Photo Logs.
 - i. Waste Manifest.

Thank you,
Sarah

We are committed to service excellence.

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

Sarah Krueger, P.G.

Contaminated Sediment Specialist
Wisconsin Department of Natural Resources
2984 Shawano Avenue, Green Bay WI 54313-6727
Phone: (920) 510-8277
Sarah.Krueger@wisconsin.gov



MEMORANDUM

Date:	January 29, 2025	From:	Tom Willis, Director HES, Chem Design. c/o Endpoint Solutions
RE:	ChemDesign Products Inc. Water Line Installation Project – Soil & Water Management		
To:	Sarah Krueger - Wisconsin Department of Natural Resources		
	Andrew Kleinberg – U.S. Environmental Protection Agency		
Address:	2984 Shawano Avenue		
	Green Bay, WI 54143-6727		
Project #:	732-003-001		

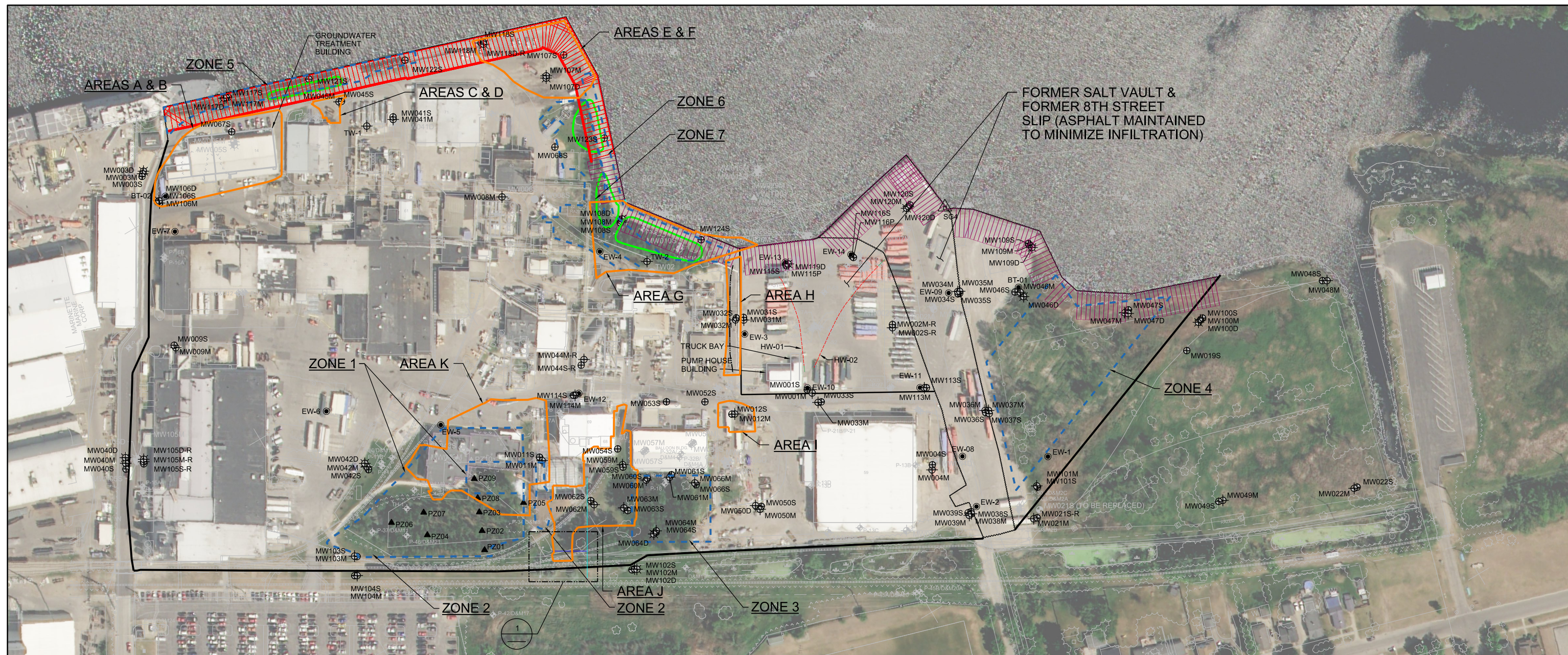
This technical memorandum has been prepared to document compliance with the Material Management Plan (MMP) previously prepared by ChemDesign Products Inc. (ChemDesign) associated with the installation of an underground potable water line on a portion of leased property owned by Tyco Fire Products LP (Tyco) at One Stanton Street, Marinette, Wisconsin. The MMP was prepared by Endpoint Solutions Corporation (Endpoint) under direction of ChemDesign and submitted to the U.S. Environmental Protection Agency (USEPA) and Wisconsin Department of Natural Resources (WDNR) for review and approval prior to commencement of work. The Tyco property is undergoing environmental investigation and remediation under a Resource Conservation and Recovery Act (RCRA) Administrative Order on Consent (AOC) between Tyco and the USEPA. In addition, environmental investigation and remedial actions are being conducted by Tyco with the support of the WDNR. A Site plan along with the location of the work discussed herein has been attached as **Figure 1**.

Commencing on October 14, 2024, a potable water line was installed on the property using horizontal well drilling techniques in accordance with information provided in the MMP. Two small excavations were completed and trench boxes were installed at each end of the proposed water line to facilitate horizontal drilling and line installation. Approximately 85 cubic yards of soil was excavated and temporarily stockpiled on plastic adjacent to the excavation areas during the work. If excavated soils were not placed back in the excavation at the cessation of the day's activities, any residual soil piles were also covered with plastic pending placement back into the excavation area. Note, all soils were placed back into their respective excavation areas during the nine (9) day time period over which these activities occurred.

In addition, approximately 4,500 gallons of groundwater was pumped from the ground as part of construction dewatering activities during installation. The groundwater was temporarily containerized in frac tanks until it could be transported for offsite disposition. The recovered groundwater was transported from the site on October 17 and October 31, 2024 under manifest numbers 020906138 and 020906128, respectively and disposed at Waste Management's Vickery, Ohio facility. A copy of the manifests and associated disposal documentation is attached.

Following installation of the water line, all soil excavated and temporarily stockpiled on site was reused to fill the excavated areas. Therefore, no offsite disposal of soil was required. It should be noted that the work was conducted on a portion of the RCRA soil cover (Area J), which consists of a geotextile membrane placed on top of impacted surface soils followed by six-inches of clean soil/topsoil and seeded with grass. The work resulted in limited disturbance of the soil cover, which was properly restored as presented in the MMP following the work. The intrusive work and restoration activities were completed on October 23, 2024. For reference, photographs of the area of work and following completion have been attached.

We trust the information provided herein demonstrates compliance with the MMP for the project. Should you have any questions, please do not hesitate to contact us.



1 ENLARGED PLAN
0 20 40 60
SCALE IN FEET

LEGEND

- EW-5 OR BT-02 ● EXTRACTION WELL OR TEST WELL
- MW002S OR MW115P ⊕ MONITORING WELL - SHALLOW OR PEAT
- MW002M ⊕ MONITORING WELL - MEDIUM
- MW002D ⊕ MONITORING WELL - DEEP (BEDROCK)
- PZ04 ▲ PIEZOMETER
- VW-TB01 ▲ VIBRATING WIRE PIEZOMETER
- SG1 ▲ STAFF GAUGE
- ⊙ WELLS PREVIOUSLY ABANDONED OR DESTROYED
- GRAB GROUNDWATER SAMPLE LOCATION
- SHEET PILE WALL
- SLURRY WALL
- - - HORIZONTAL WELL (SCREEN)
- - - HORIZONTAL WELL (RISER)
- - - PHYTO-PUMPING AREAS
- COVER AREA LOCATIONS
- SOIL BERM
- 2010 H-PILE WALL AND TIE-RODS
- 2013 H-PILE WALL AND TIE-RODS

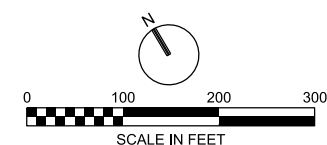


FIGURE 1
SITE PLAN WITH RCRA COMPONENTS
AND CHEMDESIGN'S PROPOSED WATER LINE
TYCO FIRE PRODUCTS LP
MARINETTE, WISCONSIN

Vickery Environmental, Inc.

***** Receipt # 296121 *****

Page - 1

Date/Time In 11/01/24 8:42

Load Type Tanker

Federal EPA ID ILR000107581

Transporter ZIRON ENVIRONMENTAL SERVICES

CHICAGO HEIGHTS

IL Load Priority : 1 Scheduled On-time

Truck Number 187-24 Trailer/Contr #1 138-02 #2 #3

Weight-In:

ID# 21

06:40 am 11/01/24

47530 lb

Weight-Out:

ID# 21

10:42 am 11/01/24

47530 lb TR Gross

35020 lb Ttare

12510 lb TNet

Rcpt Doc Ln#	Document Ln#	Profile Number	Profile Sales	Generator Invoicing	Customer	Cnt #	Cnt Code	Total Quan.	W DCS V Units	Sched PCB	Federal Cat	EPA Waste Status
1	1	020906128JJK	133146	WI	CHEMDESIGN PRODUCTS	1	TT	1000.00	G Gallons	DDNB	AC	Undeterminable
Doc Seq # 1 VIC CHEMDESIGN PRODUCTS INC						P.O. Num						

Waste Desc: CONTAMINATED GROUNDWATER FROM

Waste Codes checked ☒ Truck Inspected by: Jab Malfunctions Noted: NONE
Malfunction Notification: Transporter: Whom _____ Date _____ Time _____

PUMP UNLOAD REQ'D?: YES _____ NO ☒ RINSE: YES _____ P-CODE _____ NO ☒ RINSE OK'D BY _____

Sampling Tech: MH Time Sampled: 8:59 am / pm

APPROVED LOADS

Lab Sample No: 24-07667 Load Accepted by: CJB Time in: 9:29 am / pm

Discharge to: V-Tank # pump T-Tank # 2 Load Temp(c): 15 pH: 6 Spec Grav: 1.005 Time out: 9:26 am / pm

TSS (%): 0 PCB's: 0 (ppm) CN: 0 S: 0 MV: 0 DO02?: 0 MX W/RCF#: pump T2 monitor
Lab Comments: _____

Solid Surcharge: Customer Contacted (whom): _____ Date: _____ Time: _____

REJECTED LOADS

Load Rejected by: _____ Title: _____ Date: _____
Reason for rejection: _____

Rejection Reviewed by: _____ Title: _____ Date: _____
Customer Contacted: Yes _____ No, if yes, whom: _____ Date: _____
Generator Contacted: Yes _____ No, if yes, whom: _____ Date: _____

SCBA REQUIRED

UNLOADING

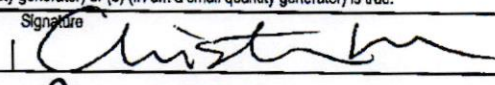
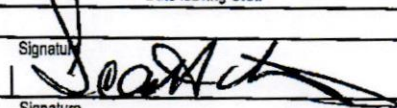

Date 11-1-24 Trailer Unloaded by: MH Start time: 9:30 am / pm End Time 10:34 am / pm

Trailer Rinsed Internal: Yes _____ No ☒ P-Code Rinse(Y/N) DN Number of Rinse Cycles: _____
Vac Tanker Surge Tanks Drained: Yes _____ No _____ N/A _____ Trailer Valves Closed?: YES ☒ NO _____
Unloading Comments: _____

Vol/Wt 1508 (gal) / lb/kg Is there a > 10% manifest discrepancy? YES ☒ NO _____ If yes, then NOTE IN SECTION 18a. of
MANIFEST AND CONTACT GENERATOR. Is discrepancy resolved? YES ☒ NO _____ Comments: Resolved per Chris Moore
Fastlane Ticket Number: 62001

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number WI D980898266	2. Page 1 of	3. Emergency Response Phone 920 471-8004	4. Manifest Tracking Number 020906128 JJK	
5. Generator's Name and Mailing Address ChemDesign Products Inc 2 Stanton Street Marinette WI 54143		Generator's Site Address (if different than mailing address) Clotyc				
Generator's Phone: 715 735-8393						
6. Transporter 1 Company Name Vickery Transportation, Inc		U.S. EPA ID Number OH0000103762				
7. Transporter 2 Company Name		U.S. EPA ID Number				
8. Designated Facility Name and Site Address Vickery Environmental Inc 3956 State Route 412 Vickery OH 43464		U.S. EPA ID Number OH0020273819				
Facility's Phone: 419 547-7791						
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.
			No.	Type		
	1.	Non-Hazardous, Non-Regulated waste				
		Groundwater	001	TT	1,000	G
	2.					
	3.					
	4.					
14. Special Handling Instructions and Additional Information Waste Profile # 133146 WI 18724 13F-00 Contact: Chris Kanikula						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name Christopher Moore		Signature 		Month Day Year 10/3/24		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:						
TRANSPORTER INT'L	17. Transporter Acknowledgment of Receipt of Materials					
	Transporter 1 Printed/Typed Name Scott L Meadows		Signature 		Month Day Year 10/3/24	
	Transporter 2 Printed/Typed Name		Signature		Month Day Year	
DESIGNATED FACILITY	18. Discrepancy					
	18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
	710% Gallonage Discrepancy. Actual 1508 gallons JAG 11/24 Resolved per Chris Moore JAG 11/24					
	18b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number					
	Facility's Phone: Month Day Year					
18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. H134		2.		3.		4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name Jessica Grishind		Signature 		Month Day Year 11/1/24		

Date/Time In 10/18/24 8:29

Load Type Tanker

Federal EPA ID ILR000107581

Transporter ZIRON ENVIRONMENTAL SERVICES

CHICAGO HEIGHTS

IL Load Priority : 1 Scheduled On-time

Truck Number 187=24 Trailer/Contnr #1 138-02 #2 #3

10/18/24 8:29 AM
187=24
138-02
#2
#3
Sched Federal EPA
Cat Waste Status

35120 1b TRTare
28700 1b TRNet

Rcpt Doc Ln#	Ln#	Document Number	Profile Sales	Profile Invoicing	Generator Customer	Cnt #	Cnt Code	Total Quan.	W DCS V Units	PCB Cat	Waste Status
1	1	020906138JJK	133146WI	CHEMDESIGN PRODUCTS	1	TT	4200.00	G	Gallons	DDNB AC	Undeterminable
Doc Seq # 1 VIC CHEMDESIGN PRODUCTS INC						P.O. Num					

Waste Desc: CONTAMINATED GROUNDWATER FROM

Waste Codes checked ☒ Truck Inspected by: CJB Malfunctions Noted: none

Malfunction Notification: Transporter: Whom _____ Date _____ Time _____

PUMP UNLOAD REQ'D?: YES _____ NO Y RINSE: YES _____ P-CODE _____ NO Y RINSE OK'D BY _____Sampling Tech: R Time Sampled: 845 am pm

APPROVED LOADS

Lab Sample No: 24-07322 Load Accepted by: [Signature] Time in: 643 am pmDischarge to: V-Tank # Pump T-Tank # 2 Load Temp(c): 13 pH: 6 Spec Grav: 1.010 Time out: 941 am pmTSS (%): Na PCB's: Na (ppm) CN: Na S: Na MV: Na D002?: N MX W/RCF#: Pump T2 M100K

Lab Comments: _____

Solid Surcharge: Customer Contacted (whom): _____ Date: _____ Time: _____

REJECTED LOADS

Load Rejected by: _____ Title: _____ Date: _____

Reason for rejection: _____

Rejection Reviewed by: _____ Title: _____ Date: _____

Customer Contacted: _____ Yes _____ No, if yes, whom: _____ Date: _____

Generator Contacted: _____ Yes _____ No, if yes, whom: _____ Date: _____

SCBA REQUIRED

UNLOADING

Date 10-18-24 Trailer Unloaded by: MH Start time: 914 am pm End Time 940 am pmTrailer Rinsed Internal: Yes _____ No Y P-Code Rinse(Y/N) N Number of Rinse Cycles: _____Vac Tanker Surge Tanks Drained: Yes _____ No _____ N/A _____ Trailer Valves Closed?: YES Y NO _____

Unloading Comments: _____

Vol/Wt 3412 gal/lb/kg Is there a > 10% manifest discrepancy? YES _____ NO YMANIFEST AND CONTACT GENERATOR. Is discrepancy resolved? YES Y NO _____Comments: Chris Mayne CJB 10-18-24Fastlane Ticket Number: 61764

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number W1D980898266		2. Page 1 of		3. Emergency Response Phone 9204718004		4. Manifest Tracking Number 020906138 JJK		
		5. Generator's Name and Mailing Address ChemDesign Products Inc. 2 Stanton Street Marinette WI 54143								
Generator's Phone: 715735-8393		Generator's Site Address (if different than mailing address)						U.S. EPA ID Number OH000103763		
6. Transporter 1 Company Name Richard Environmental Services		U.S. EPA ID Number OH000103763						U.S. EPA ID Number		
7. Transporter 2 Company Name								U.S. EPA ID Number		
8. Designated Facility Name and Site Address Vickery Environmental Inc. 3956 State Route 412 Vickery, OH 43464		U.S. EPA ID Number OH0020273819						Facility's Phone: 419547-7791		
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers No. Type		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes
	1.	Non-Hazardous, Non Regulated waste Groundwater				001 TT		4,200	G	
	2.									
	3.									
	4.									
14. Special Handling Instructions and Additional Information Waste Profile # 133146W1 contact: Chris Kanikula (8) 24 (3502)										
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.										
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:										
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials				Signature		Month Day Year			
	Transporter 1 Printed/Typed Name Scott Leonard				Signature Scott Leonard		Month Day Year 10/15/04			
Transporter 2 Printed/Typed Name				Signature		Month Day Year				
DESIGNATED FACILITY	18. Discrepancy									
	18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection 71060 gallonage discrepancy. Actual gallons: 34121 by 10-18-04									
	18b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number									
	Facility's Phone: 18c. Signature of Alternate Facility (or Generator) Month Day Year									
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)										
1. H134		2.		3.		4.				
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a										
Printed/Typed Name Car Ban				Signature Car Ban		Month Day Year 10/18/04				



1. Initial excavation to expose lines for connection and boring.

2. Initial excavation to expose lines for connection and boring. Excavated soils placed on plastic pending reuse.



3. Initial excavation to expose line for boring.

SITE PHOTOGRAPHS	
ONE STANTON STREET	
MARINETTE, WISCONSIN	
PROJECT NO: 732-003-001	Endpoint



4. Initial excavation to expose line for boring.



5. Initial excavation to expose line for boring.



6. Initial excavation to expose line for boring.

SITE PHOTOGRAPHS	
ONE STANTON STREET	
MARINETTE, WISCONSIN	
PROJECT NO: 732-003-001	Endpoint



7. Initial excavation to expose line for boring.



8. Initial excavation to expose line for boring.



9. Initial excavation to expose line for boring.

SITE PHOTOGRAPHS	
ONE STANTON STREET	
MARINETTE, WISCONSIN	
PROJECT NO: 732-003-001	Endpoint



10. Excavation to expose water line for connection.

11. Excavation to expose water line for connection.



12. Water line being exposed.

SITE PHOTOGRAPHS	
ONE STANTON STREET	
MARINETTE, WISCONSIN	
PROJECT NO: 732-003-001	Endpoint



13. Water line being exposed.

14. Water line exposed.



15. Water line exposed.

SITE PHOTOGRAPHS

ONE STANTON STREET

MARINETTE, WISCONSIN

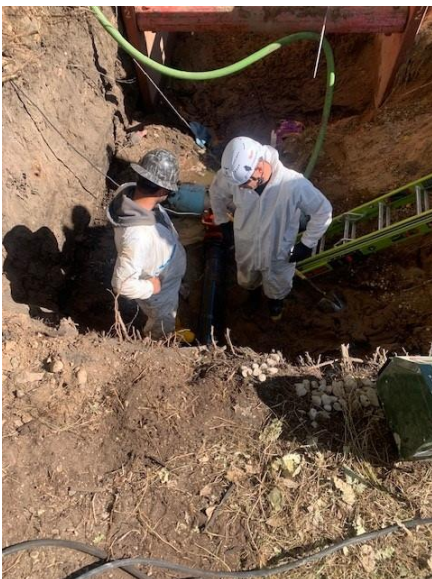
PROJECT NO:
732-003-001

Endpoint



16. Water line exposed.

17. Water line connection being prepared.



18. Tap to water line being made.

SITE PHOTOGRAPHS	
ONE STANTON STREET	
MARINETTE, WISCONSIN	
PROJECT NO: 732-003-001	Endpoint



19. Tap to water line being made.

20. Excavation with trench box and stockpiled soils on plastic noted adjacent to excavation.



21. Water line connection with dewatering hose noted.

SITE PHOTOGRAPHS

ONE STANTON STREET

MARINETTE, WISCONSIN

PROJECT NO:
732-003-001

Endpoint



22. Water line connection with dewatering hose noted.

23. View of excavation and backfilled / reseeded area October 23, 2024.



24. View of excavation and backfilled / reseeded area October 23, 2024.

SITE PHOTOGRAPHS	
ONE STANTON STREET	
MARINETTE, WISCONSIN	
PROJECT NO: 732-003-001	Endpoint



25. View of excavation and backfilled / reseeded area October 23, 2024.

26. View of excavation and backfilled / reseeded area October 23, 2024.



27. View of excavation and backfilled / reseeded area December 9, 2024.

SITE PHOTOGRAPHS	
ONE STANTON STREET	
MARINETTE, WISCONSIN	
PROJECT NO: 732-003-001	Endpoint



28. View of excavation and
backfilled / reseeded area
December 9, 2024.



29. View of excavation and
backfilled / reseeded area
December 9, 2024.



30. View of excavation and
backfilled / reseeded area
December 9, 2024.

SITE PHOTOGRAPHS	
ONE STANTON STREET	
MARINETTE, WISCONSIN	
PROJECT NO: 732-003-001	Endpoint



31. View of excavation and backfilled / reseeded area
December 9, 2024.



32. View of excavation and backfilled / reseeded area
December 9, 2024.



33. View of excavation and backfilled / reseeded area
December 9, 2024.

SITE PHOTOGRAPHS	
ONE STANTON STREET	
MARINETTE, WISCONSIN	
PROJECT NO: 732-003-001	Endpoint