

Joslin, Richard R - DNR

From: Jeffrey Howard Danko <jeffrey.howard.danko@jci.com>
Sent: Tuesday, January 21, 2020 1:11 PM
To: Joslin, Richard R - DNR
Cc: Neste, David E - DNR; Chronert, Roxanne N - DNR
Subject: RE: Additional Questions / Documentation for JCI Spills (SERTS #s 20190925NE38-1; 20191015NE38-1; and 20191108NE38-1)

Follow Up Flag: Follow up
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Rick:

Below is a response to your questions concerning the spills. Upon disposal, proper documentation will be provided to the WDNR.

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From: Joslin, Richard R - DNR [mailto:Richard.Joslin@wisconsin.gov]
Sent: Wednesday, December 11, 2019 1:22 PM
To: Jeffrey Howard Danko <jeffrey.howard.danko@jci.com>
Cc: Neste, David E - DNR <David.Neste@wisconsin.gov>; Chronert, Roxanne N - DNR <Roxanne.Chronert@wisconsin.gov>
Subject: Additional Questions / Documentation for JCI Spills (SERTS #s 20190925NE38-1; 20191015NE38-1; and 20191108NE38-1)

Mr. Danko

In reviewing the documents submitted by you for the above-referenced spills a few questions / request were identified. Could you please review that items below and provide a response or additional information as requested:

20190925NE38-1 – Who pumped out the catch basin? Please provide more information with regard to disposal (where was it taken and documentation supporting that) of all materials (absorbent pads, water, etc.)

JCI's contractor (MJB) used their vac truck to pump up all observable impacted water that was released. The contents were then drained into a dewatering box (to remove sediment) and the water was pumped into an onsite frac tank that was in use to store water (for off-site disposal) from the on-site sewer rehabilitation activities. The water recovered from the release has the same waste designation as water that was being stored in the frac tank, so there was no need to modify the existing disposal plan. Absorbent pads were disposed of in the roll-off container that contained the dewatered solids from the on-site sewer rehabilitation activities (along with disposal personal protective equipment [PPE] such as gloves). The rolloff containers are currently onsite, to be managed by Clean Harbors for disposal in their Sarnia, Ontario, Canada facility. Disposal manifests will be submitted to the WDNR when Clean Harbors disposes of the roll-off containers.

20191015NE38-1 – Was soil excavated? Please provide more information with regard to disposal of absorbent pads, gravel, soil (if excavated) and where it was disposed of including documentation. A small volume of gravel and soil were hand excavated and placed in a drum along with the absorbent pads and other clean up materials. The drum is currently stage on-site in a secured area pending appropriate off site disposa.

20191108NE38-1 – Any photos before and after cleanup? No photos were taken of the release area or following the response actions. Was soil excavated? No soils or gravel were excavated during the response action. Please provide more information with regard to disposal of absorbent pads, gravel, soil (if excavated) and where it was disposed of including documentation. The absorbent pads and other clean up materials were placed in a drum that is currently stored on site pending disposal.

If you have any questions please feel free to contact me.

Thanks

Rick

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Richard R. Joslin

Hydrogeologist / NER Spills Coordinator – Remediation & Redevelopment Bureau

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December 10, 2019

Mr. Rick Joslin
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Remediation and Redevelopment – Northeast Region
625 E. County Road Y
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Oshkosh, WI 54901-9731

RE: Spill Report for November 7, 2019 Event
Tyco Fire Products LP Facility
2700 Industrial Parkway
Marinette, WI
SERTS ID: 20191108NR38-1

Dear Mr. Joslin:

The following information is provided in accordance with Wisconsin Administrative Code Chapter NR 708 regarding the reported discharge of a wastewater solution containing aqueous film forming foam (AFFF) and water at the Tyco Fire Products LP (Tyco) facility located at 2700 Industrial Parkway, Marinette, Wisconsin. For additional reference, the facility location is:

Latitude – 45°05'41" N
Longitude – 87°38'36" W
T30N, R23E, Sec 12, SE1/4, SE1/4 of USGS Marinette East Quadrangle.

A Figure showing the location of the event at the site is attached.

Description of Event:

In the morning of November 7, 2019, a tanker filled with foam/water solution for eventual offsite disposal was being transferred to a staging area within the facility. Unknown to the technician that filled the tank or the driver, the top hatch of the tanker was not fully secured. During the transfer, the truck stopped at stop sign internal to the property and the solution splashed out of the hatch, with material released onto the tanker and asphalt road. A small portion of the material drained to a nearby grass and gravel area. Due to weather conditions, the material quickly froze on the pavement and the grass and gravel area. The onsite response team place salt on the roadway and used oil dry and absorbent spill pads to capture the material on the pavement. The frozen mixture in the grass and gravel area was shoveled and contained in drums. The actual quantity of material released is unknown, but is estimated at no more than 20 gallons. Spill containment materials were placed under the tanker to capture any residual material dripping off the tanker. The captured water, gravel, oil dry, and spent spill containment equipment were properly disposed.

Cause of Event:

The hatch on the top of the tanker was not properly secured and the on-site technicians did not confirm that the hatch was properly secured before filling and transferring the tanker to the staging area. These hatches are not operated on site at any time, so the hatch was likely left open when the tanker was initially brought on site. During transfer of the filled tanker to the staging area, the mixture splashed out of the unsecured hatch while the transfer truck stopped at a site stop sign.

Immediate Actions:

Spill containment equipment was deployed after the release. The asphalt road was cleaned, frozen water was removed from the grassy area and the gravel was removed. Spill containment equipment was deployed under the tanker to capture any residual material dripping from the tanker sides.

Follow-up Corrective and Preventative Measures:

A Job Safety Analysis was prepared to assess the tanker hatch condition prior to filling, but inadvertently was not followed at the time of filling the tanker. Re-training was conducted with the on-site technicians regarding inspection of the tankers and a checklist and log sheet developed for technicians to use to insure all inspection steps are taken prior to and during filling operations. In addition, the tanker supplier has been instructed that the hatches on future tankers must to be secured prior to the tanker arriving on site. The on-site technician will verify that the hatch is secured prior to filling. If the tanker hatch is not secured, that tanker will be returned to the staging area (unfilled) and the tanker supplier will be notified of the condition and requested to remove the tanker from the site until the condition is corrected. Tyco is additionally evaluating other control measures to prevent recurrence.

Sincerely
Johnson Controls



Jeffrey Danko
EHS Manager - Remediation

Attachments

cc: Roxanne Chronert - WDNR
David Neste - WDNR
Ryan Suennen – Tyco Fire Products LP



Site Figure showing location of foam/water release at 2700 Industrial Parkway South, Marinette, WI.