



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

REPLY TO THE ATTENTION OF:

LR-16 J

**Via E-mail**

August 4, 2023

Heather Ziegelbauer, PE  
Jacobs Engineering Group Inc.  
1610 N. 2nd Street, Suite 201  
Milwaukee, Wisconsin 53212

Subject: EPA Review: ChemDesign Building 67 Expansion Memo  
Tyco Safety Products - Ansul Stanton St Fac  
U.S. EPA ID NO. WID006125215  
1 Stanton Street  
Marinette, WI 54143

Dear Ms. Ziegelbauer,

The Environmental Protection Agency (EPA) and the Wisconsin Department of Natural Resources (WDNR) have reviewed the ChemDesign Building 67 Expansion Memo dated and received on May 26, 2023, submitted for this facility. Prior to the memo being approved, please address the following comments:

**Comments**

1. "This memorandum describes the limited impacts that the Building 67 expansion will have on the remedy components of the AOC. Tyco and ChemDesign are addressing these impacts in the same manner that was approved by EPA and WDNR in the 2019 memorandum (Jacobs 2019) for a new ChemDesign building constructed in 2019/2020."
  - a. This approval was specifically for the 2019-2020 construction event and does not serve as a generalized approval for all future building projects. Similar work projects will need to be reviewed and approved by EPA and WDNR on a case-by-case basis. This statement should be modified or removed.

2. "During construction, soil cover in Areas J and K were removed, and subsurface soil was excavated to allow for building construction."
  - a. As previously stated, and per the 2010 Cover Maintenance Plan, disturbances of capped areas and underlying soils are prohibited without prior written approval from US EPA.
3. "Monitoring wells MW011S and MW011M were abandoned on April 24, 2023, by ChemDesign's contractor."
  - a. Monitoring wells are only to be abandoned after receiving written approval from EPA and WDNR.
4. "Per the approved Cover Maintenance Plan (CH2M 2010b), soil removed during the construction process was managed appropriately onsite and disposed offsite in accordance with applicable regulations."
  - a. Provide all soil management documentation including but not limited to:
    - i. Fieldnotes
    - ii. Waste Characterization Lab Data
    - iii. Photo Logs
    - iv. Waste Manifest
5. "Approximately 150 cubic yards of subsurface soil below the demarcation fabric was temporarily stockpiled."
  - a. The design specifications of the temporary stockpile need to be reviewed by WDNR and EPA prior to work occurring to ensure it meets the specified requirements under Wis. Admin. Code § NR 718.05 (3).
  - b. Provide a timeline (with documentation) of when the soils were excavated and removed from the site.
  - c. Provide a map marking where the temporary stockpile was located.
6. "An additional 40 cubic yards of subsurface soil are anticipated to be excavated during the installation of the valley gutter to manage stormwater. Soil is planned to be temporarily stockpiled (15 days or less), if needed, and placed into rolloffs for offsite disposal to the same Waste Management landfill located in Arlington, Oregon."
  - a. Provide the design specifications of the planned temporary stockpile.
  - b. Provide a map marking the anticipated location of the temporary stockpile.

- c. Waste characterization sampling procedures are to be conducted in accordance with section F-1 and F-7 of the Quality Assurance Project Plan (QAPP).

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

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