



REGION 5
CHICAGO, IL 60604

January 3, 2024

Via E-mail

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

Subject: French Drain Construction Memo Review 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) has reviewed the French Drain Construction Memo dated and received on December 6, 2023, submitted for this facility. Prior to the workplan being approved, the following comments will need to be addressed:

Comments:

1. Provide waste manifests for roll-off boxes, and summarize timeline for waste material on site, e.g. how long roll-offs were on site before transport to the Waste Management Facility.
2. The provided waste characterization is from sampling completed in 2019 and 2021 and the Chain of Custody for Eurofins lists the site address as "N2844 Shore Dr". No information is provided as to the location of the sampling or how it is representative of the waste materials from the installation of the French drain system.
 - a. As previously stated in EPA's and WDNR's October 20, 2023, review of the Tyco Revised Soil Management Plan, generator knowledge and/or the use of waste profiles are not appropriate means to characterize waste. Representative analytical data through sampling must occur with each waste determination.
3. The report describes how various waste materials including asphalt and subsurface materials, drilling fluids and other excess subsurface materials were placed into lined and covered roll-off boxes for off-site disposal. Field notes describe mixing stormwater and debris collected during hydrovac excavation with sawdust within a containment area.
 - a. Describe how and where waste was treated with sawdust on site prior to off-site disposal.

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.

Sincerely,



Andrew Kleinberg
Project Manager - Geologist
RCRA Corrective Action Section 2
Land, Chemicals & Redevelopment Division, Region 5, U.S. EPA
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cc: Heather Ziegelbauer, Jacobs Engineering Group
Shilpa Patel, RB, USEPA
Rich Clarizio, US EPA ORC
Angela Carey, WDNR
Sarah E. Krueger, WDNR