



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

August 10, 2017

LU-16J

VIA ELECTRONIC MAIL

Mr. Joseph Janeczek, PE, ARM
Assistant Director – Global Environmental Health
and Safety / EHS
Johnson Controls
9 Roszel Road
Princeton, New Jersey 08540

RE: July 25, 2017 Meeting Follow-up
Tyco Fire Products, LP, Stanton Street Facility, Marinette, Wisconsin
EPA RCRA Administrative Order Docket No. RCRA-05-2009-0007
EPA Facility ID WID 006 125 215

Dear Mr. Janeczek:

The US Environmental Protection Agency (EPA), Wisconsin Department of Natural Resources (WDNR), and Tyco/Johnson Controls Inc., met on July 25, 2017 at EPA offices in Chicago, IL to discuss a path forward for the Pump Down Program (PDP) at the Tyco Fire Products Stanton Street Facility in Marinette, WI. Tyco requested the meeting in response to EPA's June 26, 2017 letter directing Tyco to restore groundwater elevations in the Salt Vault and 8th Street Slip to the Target Elevation by September 8, 2017.

As discussed in the meeting, EPA's position remains that Tyco needs to resume pump down activities in 2017 to bring groundwater below the Target Elevation as soon as possible, pursuant to the approved 2015 Barrier Wall Groundwater Monitoring Plan and consistent with the 2014 Agreement on Resolution (AOR). Tyco may pilot test the upgraded groundwater collection and treatment system (GWCTS) to determine its flow rate treatment capabilities during 2017 pump down activities, but should also rely on offsite disposal. As of today's date, Tyco has re-installed pump down program equipment. Based on pumping data from 2016, EPA expects that Tyco can achieve the Target Elevation with four weeks of pumping. EPA understands that the offsite disposal facility in Vickery, OH that Tyco utilized in 2016 is not currently available for use, and additional time may be needed to find an alternative. Consequently, EPA directs Tyco to restore the Target Elevation in the Salt Vault and 8th Street Slip by September 22, 2017.

At the meeting Tyco indicated that it anticipates groundwater recharge during the winter and is working on upgrades to the GWCTS that will allow it to meet the AOR, including a pilot test. EPA requests that within 30 days of receipt of this letter, Tyco submit to EPA a schedule and workplan detailing the work Tyco will perform to meet the requirements of the AOR up until, and beyond December 31, 2017. This

should include the GWCTS pilot test work plan, Tyco's continued planned use of the existing permanent extraction wells EW-02 and EW-03 during interim shutdown, the design for each water management option based on the results of the pilot test, and the anticipated schedule of work.

Sincerely,



Conor Neal, Geologist and Project Manager
Corrective Action Section 2
Remediation and Reuse Branch
Land and Chemicals Division
U.S. EPA, Region 5

Ecc: Kristin DuFresne, WDNR
Molly Finn, USEPA
Richard Clarizio, USEPA
Richard Mator, Johnson Controls
Jeff Danko, Tyco Fire Protection Products
Ryan Suennen, Tyco Fire Protection Products