

Tyco Fire Products LP
One Stanton Street
Marinette, WI 54143-2542



December 22, 2017

Mr. Conor Neal
Senior Environmental Engineer
Land & Chemicals Division
US Environmental Protection Agency
77 West Jackson Blvd
Chicago, IL 60604-3590

RE: Winter Operation and Optimization, Pump Down Program, EPA RCRA Administrative Order Docket No. RCRA-05-2009-0007 Tyco Stanton Street Facility; EPA ID No. WID 006 125 215

Dear Mr. Neal:

Pursuant to our discussions during the December 20, 2017 project status meeting, presented herein is a summary of planned winter operations and optimization efforts for managing water levels within the pump down area during the winter 2017-2018 period at the Tyco Fire Products LP (Tyco) site.

As discussed during the meeting, the temporary extraction system that consists of extraction wells EW-8, EW-9, EW-10, EW-11, EW-13, and EW-14 and aboveground conveyance and temporary storage tanks, has been temporarily dismantled for the winter period because it is not constructed or intended to operate during freezing conditions. However, extraction wells EW-2, located within the 8th Street Slip area, and EW-3, located within the former Salt Vault area, remain connected to the permanent groundwater treatment plant. These extraction wells (EW-2 and EW-3) have generally not been operated during the aggressive pump down operations. In an effort to maintain or reduce water levels within the pump down area, extraction wells EW-2 and EW-3 are now being operated approximately 24-hours per day, 5 days per week, consistent with operation of the groundwater treatment plant.

At the current time, extraction wells EW-2 and EW-3 are each recovering approximately 0.5 gallons per minute during operation. However, Tyco has procured a contractor to perform general maintenance and attempt to enhance hydraulic connection with the aquifer in each extraction well, including those not currently connected to the groundwater treatment plant. The maintenance activities will include:

- removal of the submersible pumps (only present in extraction wells EW-2 and EW-3),
- down hole camera surveying of each well to assess degree of precipitate and biological accumulation on the well screens,
- surge and purge of the well to remove fine-grained materials from the filter pack to improve communication with the aquifer,
- brush cleaning of the well screen to remove precipitate and biological accumulation on the well screens,
- replacement of the submersible pumps.

The intent of the activities is to increase recovery rates, at least temporarily, to improve water level reduction capabilities. The maintenance activities are tentatively scheduled for mid-January 2018.

Mr. Conor Neal
December 22, 2017

I trust the information presented herein sufficiently documents the winter pump down program operations and optimization activities for the 2017-2018 period. If you have any questions regarding this information, please contact Jeff Danko at 262-951-6888 or jeff.danko-ext@jci.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey Danko". The signature is written in a cursive, flowing style.

Jeffrey Danko
Environmental Project Geologist

cc: Kristin DuFresne – WDNR
Joseph Janeczek – Johnson Controls
Richard Mator – Johnson Controls
Ryan Suennen – Tyco Fire Products

Document Control No.:20171222 US10 11014