Message

From: Clarizio, Richard [Clarizio.Richard@epa.gov]
Sent: 3/6/2023 5:47:34 PM
To: Muniz, Nuria [Muniz.Nuria@epa.gov]; Patel, Shilpa [patel.shilpa@epa.gov]
CC: Black, Christopher [black.christopher@epa.gov]; Kleinberg, Andrew [Kleinberg.Andrew@epa.gov]; Clarizio, Richard [Clarizio.Richard@epa.gov]
Subject: RE: PRIVILEGED AND CONFIDENTIAL: References for edits to the FPAR (JCI/TYCO Stanton St. Facility)
Attachments: Ansul - Final PA DNR Comments + ORC cmts.pdf

My annotated comments.

From: Muniz, Nuria <Muniz.Nuria@epa.gov>
Sent: Thursday, March 2, 2023 10:09 AM
To: Patel, Shilpa <patel.shilpa@epa.gov>
Subject: FW: PRIVILEGED AND CONFIDENTIAL: References for edits to the FPAR (JCI/TYCO Stanton St. Facility)

Shilpa: comments 2 of 2

From: Carey, Angela J - DNR <Angela.Carey@wisconsin.gov>
Sent: Wednesday, March 1, 2023 5:24 PM
To: Moss, Philip D - DNR <philip.moss@wisconsin.gov>
Cc: Muniz, Nuria <Muniz.Nuria@epa.gov>; Shultz, Alicia <alicia.shultz@tetratech.com>
Subject: PRIVILEGED AND CONFIDENTIAL: References for edits to the FPAR (JCI/TYCO Stanton St. Facility)

PRIVILEGED AND CONFIDENTIAL:

Hello Duncan,
As requested by Nuria Muniz, I have assembled the information below related to the JCI/TYCO FPAR and have copied Alicia Schultz who will be using the information to update the document.

References for the recommended edits to the FPAR and specifically related to the JCI/TYCO (ANSUL) facility located at One Stanton Street in Marinette, WI are provided in the table. Thanks again for your consideration and please let me know if you need additional information.
Angie

FPAR Page, Section	Comment	Reference
Page 5, Section 2.1	Site acreage has historically been documented in RCRA corrective action submittals to be 63 acres as opposed to 66 acres.	September 2015 Revised Barrier Wall Groundwater Monitoring Plan Update (page 9, Section 1.2)
Page 7, Section 2.3.1 first paragraph	Sediment dredged 2012-2013 = 259,000 CY Sediment dredged 2014 = 41,000 CY Total dredged 2012-2014 = 300,000 CY It appears that only the volume from the 2012-2013 event was included. An additional 41,000 CY were dredged in 2014.	Dredge volumes are documented in the following reports: March, 2014 Construction Completion Report – Tyco Facility (Page 14, Section 3, Table 3-1) December, 2015 GLLA Remedial Action Completion Report -Final (page 12, Section 2.1.1)

Page 7, Section 2.3.1 second paragraph	During the 2018 PFAS sampling event, PFAS was detected in both shallow *and* medium depth wells.	See BRRTS #02-38-581955 for 06/26/2018 entry titled "GW Sample Results" (Page 3)
Page 7, Section 2.3.1 first paragraph	The statement "*installation of a groundwater collection and treatment system ~~in response to arsenic contamination~~*" may be misleading. Pumping and treating groundwater at the site is performed for hydraulic control and not for groundwater remediation. Groundwater is pumped to prevent it from flooding the site and to maintain an inward hydraulic gradient around the vertical barrier wall system where possible. We recommend replacing "in response to arsenic contamination" with "for hydraulic control" or similar.	See BRRTS #02-38-000011 for the 01/17/2023 entry titled "QTLY PROGRESS REPORT (OCT-DEC 2022)" (Page 1 under "Work Completed during This Reporting Period," second sentence)
Page 20, Section 5.0 first paragraph	Similar to the comment above, the statement "*The PFAS groundwater contamination at the Stanton Facility has been contained by pumping and a containment wall." is misleading.* The agencies have not made the determination that this statement is true and pumping at the site is very limited. This statement could be omitted.	No reference required if statement is omitted.
Figures 1,2,4,8-11	The property boundaries include a portion of the site that was sold in 2020. Tyco notified the EPA on August 20, 2020 and the DNR received notification from the EPA on August 26, 2020.	See attached PDF of email to WDNR (FW-Property Sale Notification...PM.pdf) An example of how Tyco represents the property boundaries is provided in the attached PDF (TYCO Site Figure (2022-12-09 SSWP).pdf) and is extracted from their recent DRAFT work plan.

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