

Fax: (414) 220-5374

Tommy G. Thompson, Governor William J. McCoshen, Secretary

BRRTS #: 03-41-003450

July 24, 1997

Kerry DeKeyser Tecumseh Products Co. 1604 Michigan Ave. New Holstein, WI 53061

COMMERCE # 53061-1153-04A, B, C

Tecumseh Products Co., 1604 Michigan Ave., New Holstein, WI 53061

Clarification of Commerce #s

Dear Mr. DeKeyser:

The purpose of this letter is to clarify the Commerce (PECFA Claim) numbers that have been assigned to the subject site.

53061-1153-04A

2,000 gal. kerosene UST removed in 1992 case closed on 8/13/96

53061-1153-04B

East Section

case is still open

53061-1153-04C

West Section

case is still open

If you have any questions about this letter, please contact me at (414) 220-5372.

Sincerely,

Nancy S. Kochis Hydrogeologist

PECFA Site Review Section

Nancy Stangler Kochis

cc: Curtis Hoffart, Key Environmental, Inc.

✓ PECFA Site review file

Tommy Thompson Governor

William McCoshen Secretary

John Alberts

Division Administrator



ENVIRONMENTAL AND
REGULATORY SERVICES
1298 Lombardi Ave
P.O. Box 10448
Green Bay, Wi 54307-0448

State of Wisconsin Department of Commerce

August 13, 1996

Mr. Kerry DeKeysert Tecumseh Products 1604 Michigan Avenue New Holstein WI 53061

Subject:

Close-out of Tecumseh Products - TA-22, 1604 Michigan Avenue, New Holstein

DNR CASE #03-08-100390

Dear Mr. DeKeysert:

On August 13, 1996 the above site was reviewed for closure by the Site Review staff of the PECFA Bureau. Because the site involved only soil contamination, without a threat to groundwater, all issues relating to this site are administered by the staff within the Department of Commerce's PECFA Bureau. Using the standards established in NR 700, the Department has determined that this site has been remediated to a level protective of the environment and human health. The Department considers this site to meet environmental standards, and no further action is necessary.

If, in the future, site conditions indicate that any contamination that might remain poses a threat, the need for further remediation would be determined and required if necessary. If subsequent information indicates a need to reopen this case, any original claim under the PECFA fund would also reopen and you may apply for assistance to the extent of remaining eligibility.

Thank you for your efforts in the protection of the environment. If you have any additional questions, please call me at 414-492-5592.

Sincerely,

Roxanné Nelezen Chronert

Hydrogeologist

Department of Commerce

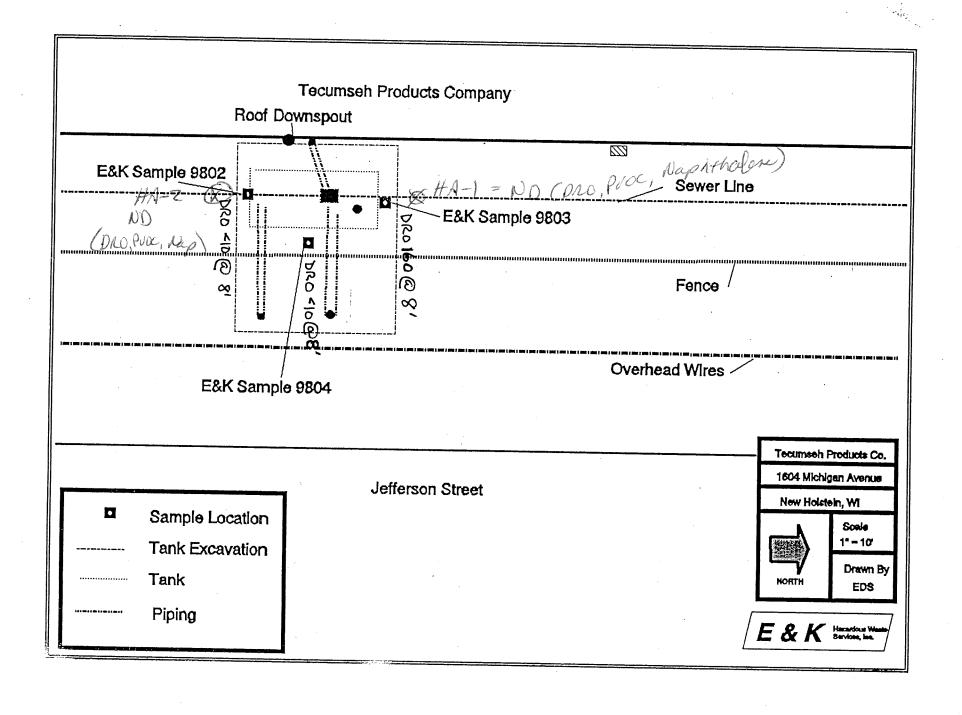
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WISCONSIN DEPARTMENT OF NATURAL RESOURCES CASE SUMMARY AND CLOSE OUT FORM

Close Out Option: Committee Fast Track DNR Project Manager:
Priority: High Medium Low Type of Release: LUST Spill ERP Other Unknown
Responsible Party Name/ Full Address: Julian Products
Site Name/Full Address: Secumber Porders - TATC; 160f Michigan Ave
Legal Description: 1/4, 1/4, Sec , T N, R (E/W) DNR Case No. 30340 County: Calculate
Contaminant Type(s) Mendere Quantity Released Nistra
Incident Type: (amount released if known):
Date of Incident/Discovered: 13-92 If Incident = LUST: Form 4 Pending?YesNo
Depth to Groundwater/Flow Direction: Perched Water? Y N Depth:
Soil TypeDepth to Bedrock
Potential Receptors:
Site Assessment Consultant:
Investigation/Remediation Consultant: Envir Service Due
Certified Lab Testing Soils/Water: GLA
Status of water supply wells within 1200 feet of the site?
Date Closure Submitted to DNR: 6-18-90 Enforcement Actions or Permits Closed Out?YesNo
Form completed by: I certify that, to the best of my knowledge, the information presented on and attached to this form are true and accurate. This recommendation for case closure is based upon all available data as of(date). I have read the Case Summary and Close Out Form Instructions and all required information has been included.
Name:Firm Name:
Affiliation with Site Owner:
Address:
City: State: Zip:
Telephone Number: ()
(Signature) Attach Case Summary and Justification for Closure

SOIL PRE-REMEDIATION OR INVESTIGATION ANALYTICAL RESULTS

Extent Defined?YN
Attach Table of Pre-remedial Soil Samples ORO 160ppm
SOIL POST REMEDIATION ANALYTICAL RESULTS
Attach the Table for Post Remedial Soil Results all NO - DRO, AVOCS, Rephthal
Remedial Action Completed? Y N 720.19 analysis Y N (if Y attach supporting documentation)
Final Confirmation Sampling Methods: DAO, PUCKS, Neighthalene
Description of remedial action taken: None taken, needed
Were Soils Excavated?YN Quantity: Disposal Method:
Soil Disposal Form Attached?YN Final Disposal Location:
Extent Defined?YN Remedial Action Completed?YN Field Analyses?YN Lab Analyses?YN No. of Sampling Points: Number of Sample Rounds:
#NR 141 Temporary Wells:#Recovery Sumps:
#Private Wells: Form 3300-67 completed:
#Municipal Wells:#NR 141 Monitoring Wells:
Preventive Action Limit exceeded?Y_N (If yes, location)
Enforcement Standard exceeded? Y N (If yes, location)
Attach Table of Groundwater Results
Description of remedial action taken:
Close Site/ Instant



091 = 000 and 180 59-8100-6 7-30-92 Tank Removed

Medile Soil
S' from indo of tende
8' EGS 5
DAC
PUCK
Nothalana

June 14, 1996

Wisconsin Department of Natural Resources Post Office Box 2565 Oshkosh, Wisconsin 54903

RECEIVED

Attention:

Kathleen M. Sylvester, Hydrogeologist

Leaking Underground Storage Tank Program

JUN 18 1996

Reference:

Request of Case Closure

Tank Number TA-22

Tecumseh Products Company 1604 Michigan Avenue New Holstein, Wisconsin WDNR OSH LUST PROGRAM

KEY ENVIRONMENTAL SERVICES, INC. File No. 0303002

Dear Ms. Sylvester:

The purpose of this letter is to request case closure for the Tank Number TA-22 site at the Tecumseh Products Company property in New Holstein, Wisconsin. As indicated in your letter to Tecumseh Products Company on April 12, 1996, the Wisconsin Department of Natural Resources (WDNR) has not assigned the site a separate LUST ID Number.

The site formerly contained one (1) 2,000 gallon kerosene underground storage tank (UST), designated as Tank TA-22. The site location is depicted in Figure 1. The UST and associated piping was removed on July 30, 1992. The UST removal is documented in *Site Assessment and Tank Closure Report*, E&K Hazardous Waste Services, Inc., September 18, 1992. Three (3) UST closure soil samples were collected from the UST excavation at a depth of approximately eight (8) feet below the ground surface. The samples were analyzed for diesel range organics (DRO). DRO was detected in one (1) of the soil samples at a concentration of 160 milligrams per kilogram (mg/kg).

In accordance with your April 12, 1996 letter to Tecumseh Products Company, Key Environmental Services, Inc. (KEY) completed further investigation at the site. KEY collected a total of two (2) soil samples (HA-1 and HA-2) in native soil within five (5) feet of each end of the former UST excavation as depicted on Figure 2. The soil samples were collected with a hand auger at a depth of approximately eight (8) feet below the ground surface. The soil samples were submitted to Great Lakes Analytical (GLA) laboratory for analysis of DRO, petroleum volatile organic compounds (PVOCs), and Naphthalene.

The laboratory results indicate that DRO, PVOCs and naphthalene were not detected in samples HA-1 and HA-2. The *GLA Analytical Report* is included in Attachment 1. Based on the results of the further investigation at the site, WDNR case closure is warranted.

Please call if you have any questions regarding this Request for Case Closure.

Sincerely,

KEY ENVIRONMENTAL SERVICES, INC.

Gregory L. Johnson, P.G., P.E.

Project Engineer

Kenneth W Mein CHMM Vice President

Enclosures:

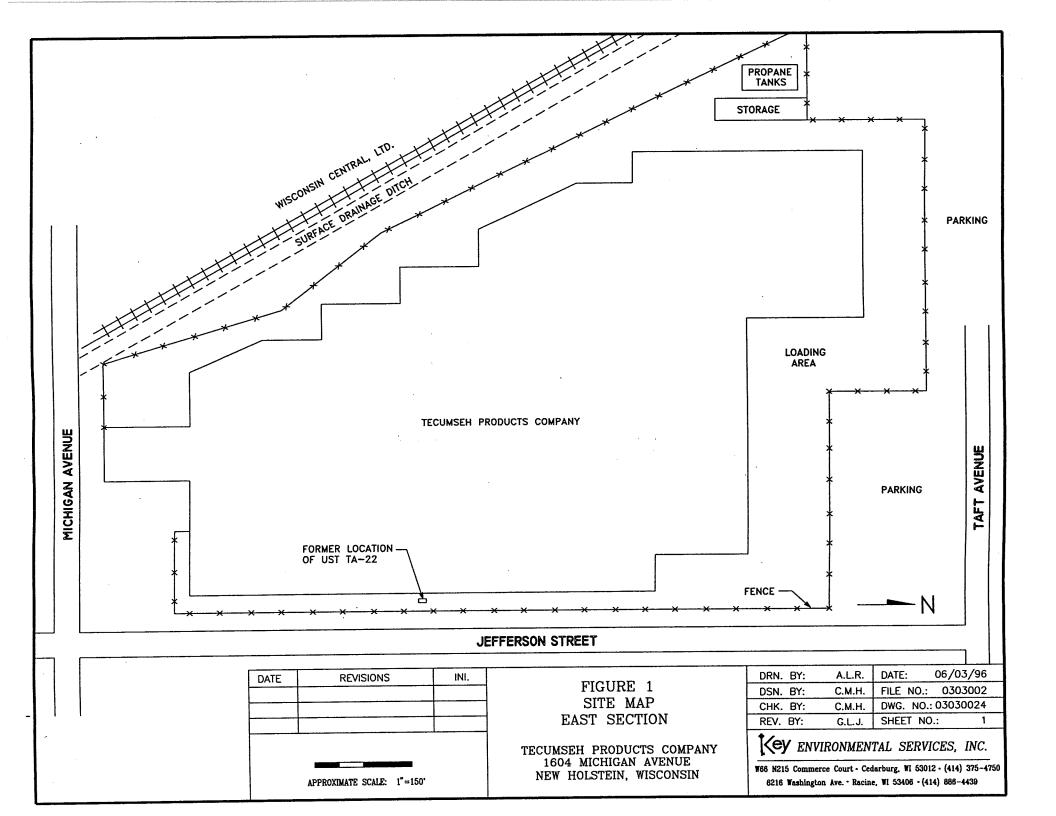
As Noted.

CC.

Mr. Kerry DeKeyser, Tecumseh Products Company

Mr. Bruce McCuaig, Tecumseh Products Company

F:\PROJECTS\0303002\LETTERS\061496.GLJ



TECUMSEH PRODUCTS COMPANY FORMER LOCATION OF TA-22-**EXISTING CONCRETE AST** FENCE JEFFERSON STREET 1996 Key Environmental Services, Inc. A.L.R. DATE: 06/03/96 DRN. BY: INI. DATE REVISIONS FIGURE 2 C.M.H. FILE NO.: 0303002 DSN. BY: LEGEND HAND AUGER LOCATIONS DWG. NO.: 03030025 CHK. BY: C.M.H. EAST SECTION REV. BY: SHEET NO .: G.L.J. HAND AUGER LOCATION Key ENVIRONMENTAL SERVICES, INC. TECUMSEH PRODUCTS COMPANY 1604 MICHIGAN AVENUE W66 N215 Commerce Court - Cedarburg, WI 53012 - (414) 375-4750 NEW HOLSTEIN, WISCONSIN

6216 Washington Ave. - Racine, WI 53406 - (414) 886-4439

SCALE: 1"=10"



Date: May 24, 1996

Key Environmental Services, Inc. W62 N244 Washington Avenue Cedarburg, WI 53012 Attention: Greg Johnson

Project: Tecumseh-East

Enclosed are the results from 2 soil samples, 1 liquid samples received at Great Lakes Analytical

on May 22, 1996. The requested analyses are listed below:

SAMPLE#	SAMPLE DESCRIPTION	DATE OF COLLECTION	TEST METHOD
6052681	Soil: HA-1	5/16/96	PVOC ,EPA 5030/8021 Percent Solids, EPA 7.3.3.1.5 WDNR DRO
6052682	Soil: HA-2	5/16/96	PVOC ,EPA 5030/8021 Percent Solids, EPA 7.3.3.1.5 WDNR DRO
6052683	Liquid: Blank	5/16/96	PVOC ,EPA 5030/8021

Wisconsin Lab Cert.#999917160

This report may not be reproduced, except in full, without the written approval of the laboratory.

Please contact me if you have any questions. In the meantime, thank you for the opportunity to work with you on this project.

Very truly yours,

GREAT LAKES ANALYTICAL



1380 Busch Parkway • Buffalo Grove, Illinois 60089

(847) 808-7766 FAX (847) 808-7772

Key Environmental Services, Inc. W62 N244 Washington Avenue

Client Project ID: Sample Descript:

Tecumseh-East Soil

Sampled: Received:

May 16, 1996 May 17, 1996

Cedarburg, WI 53012 Attention: Greg Johnson

Analysis for: First Sample #:

Percent Solids, EPA 7.3.3.1.5 605-2681

Analyzed: Reported: May 22, 1996 May 24, 1996

LABORATORY ANALYSIS FOR:

Percent Solids, EPA 7.3.3.1.5

Sample Number	Sample Description	Detection Limit %	Sample Result %
605-2681	HA-1	0.10	84
605-2682	HA-2	0.10	77

GREAT LAKES ANALYTICAL



Key Environmental Services, Inc. W62 N244 Washington Avenue Cedarburg, WI 53012 Attention: Greg Johnson Client Project ID: Matrix Descript: Analysis Method:

First Sample #:

Tecumseh-East Soil

WDNR DRO 605-2681 Sampled: May 16, 1996 Received: May 17, 1996

Received: May 17, 1996 Extracted: May 21, 1996 Analyzed: May 21, 1996

Reported: May 24, 1996

DIESEL RANGE ORGANICS

Sample Number	Sample Description	Detection Limit mg/kg, Dry Weight (ppm)	High B.P. Hydrocarbons mg/kg, Dry Weight (ppm)	Chromatogram Description
605-2681	HA-1	6.0	N.D.	
605-2682	HA-2	6.5	N.D.	

High Boiling Point Hydrocarbons is performed as described in Leaking Underground Storage Tank Analytical Guidance, July 1993 WDNR SW 130 93 REV. Analytes reported as N.D. were not present above the stated limit of detection. Because matrix effects and/or other factors required additional sample dilution, detection limits for this sample have been raised.

GREAT LAKES ANALYTICAL





Key Environmental Services, Inc. W62 N244 Washington Avenue Cedarburg, WI 53012 Attention: Greg Johnson

Client Project ID: Tecumseh-East Sample Descript: Analysis Method:

Lab Number:

Soil: HA-1 EPA 5030/8021 605-2681

May 16, 1996 May 17, 1996 Sampled: Received:

Analyzed: May 23, 1996 Reported: May 24, 1996

WDNR VOLATILE ORGANIC COMPOUNDS (EPA 8021)

Analyte	Method Detection Limit µg/kg	Practical Quanitation Limit µg/kg		WDNR Reporting Limit µg/kg Wet Weight	Sample Results <i>µ</i> g/kg Dry Weight
Benzene	4.8	15		25	N.D.
Ethyl Benzene	5.0	16	**********	25	N.D.
Methyl-t-Butyl Ether	12	37	**********	. 25	N.D.
Napthalene	7.4	24	**********	25	N.D.
Toluene	7.0	22	**********	. 25	N.D.
124 Trimethylbenzene	8.9	28	***********	25	N.D.
135 Trimethylbenzene	8.2	26	***********	- 25	N.D.
Xylene	4.9	16	***************************************	. 25	N.D.

Analytes reported as N.D. were not present above the WDNR Reporting Limit IN WET WEIGHT as specified in Release News, Volume 4, Number 3, July 1994.

GREAT LAKES ANALYTICAL



Key Environmental Services, Inc. W62 N244 Washington Avenue Cedarburg, WI 53012

Cedarburg, WI 53012 Attention: Greg Johnson Client Project ID: Sample Descript:

Tecumseh-East : Soil: HA-2

Analysis Method: Lab Number: Soll: HA-2 EPA 5030/8021 605-2682 Sampled: May 16, 1996

Received: May 17, 1996

Analyzed: May 23, 1996 Reported: May 24, 1996

WDNR VOLATILE ORGANIC COMPOUNDS (EPA 8021)

Analyte	Method Detection Limit µg/kg	Practical Quanitation Limit µg/kg	· .	WDNR Reporting Limit µg/kg Wet Weight	Sample Results µg/kg Dry Weight
Benzene	4.8	15		25	N.D.
Ethyl Benzene	5.0	16	************	OF	N.D.
Methyl-t-Butyl Ether	12	37		05	N.D.
Napthalene	7.4	24	***********	25	N.D.
Toluene	7.0	22		25	N.D.
124 Trimethylbenzene	8.9	28		25	N.D.
135 Trimethylbenzene	8.2	26	•••••	25	N.D.
Xylene	<i>,</i> 4.9	16	***********	25	N.D.

Analytes reported as N.D. were not present above the WDNR Reporting Limit IN WET WEIGHT as specified in Release News, Volume 4, Number 3, July 1994.

GREAT LAKES ANALYTICAL



Key Environmental Services, Inc. W62 N244 Washington Avenue Cedarburg, WI 53012 Attention: Greg Johnson

Client Project ID: Sample Descript: Analysis Method:

Lab Number:

Tecumseh-East Liquid: Blank EPA 5030/8021 605-2683 Sampled: May 16, 1996 Received: May 17, 1996

Analyzed: May 23, 1996 Reported: May 24, 1996

WDNR VOLATILE ORGANIC COMPOUNDS (EPA 8021)

Analyte	Method Detection Limit µg/L	Practical Quanitation Limit <i>µ</i> g/L	·	WDNR Reporting Limit µg/L	Sample Results µg/L
Benzene	4.8	15	••••••	25	N.D.
Ethyl Benzene	5.0	16	***********	25	N.D.
Methyl-t-Butyl Ether	12	37	***********	25	N.D.
Napthalene	7.4	24	************	25	N.D.
Toluene	7.0	22	***************************************	25	N.D.
124 Trimethylbenzene	8.9	28	***************************************	25	N.D.
135 Trimethylbenzene	8.2	26	•••••	25	N.D.
Xylene	4.9	16	•••••	25	N.D.

Analytes reported as N.D. were not present above the WDNR Reporting Limit IN WET WEIGHT as specified in Release News, Volume 4, Number 3, July 1994.

GREAT LAKES ANALYTICAL



CHAIN OF CUSTODY REPORT

1380 BUSCH PARKWAY BUFFALO GROVE, ILLINOIS 60089-4505 (708) 808-7766 FAX (708) 808-7772

ANALYTICAL	L			
Client: KEY ENVIRONMENTAL	56201 ES, 126	Project: TEcum.	SCH - FAST	TAT: 8 DAY 4 DAY 3 DAY 2 DAY 1 DAY < 24 HRS
Address: will N 215-Con			HARRIET - SCOTT TALOSSIN	DATE RESULTS NEEDED: 5-24-96
CEDMSUNG, WI	5-3012	PO #: 0303 0	s Z	TEMPERATURE UPON RECEIPT: ON TCE
Report to: GREG Jairnson			-4750 FAX #:(411) 375-9680	AIR BILL NO. GLA PLU
FIELD ID, LOCATION			// & /	SAMPLE CONTROL SAMPLE CONTROL LABORATORY
HA-1	51.1	14A Soll Most	3 2-40= OLO, PUOC - NA	MITHALENE, 4. 6052681
HA-2	C/ , and	HA SOL MICH	3 1-202 DAO, PUBE + NAPITALISTIL	
BLINK	5/14/5-	NeoH	1 202 PULL T NAPHTHALLA	6052683
		0 11	A	
Carrot 1	ATE PREIVED IME	Xen 5 17,1	G G PREUMONISMED S 1 1 96 4 9 1	THE RECEIVED OWELL Q and 5/196
,	ATE RECEIVED	DA T		ATE RECEIVÉD
	4 0-175	(HVI)		
•	•			200



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor George E. Meyer, Secretary William R. Selbig, District Director Department of Natural Resources
Box 2565
Oshkosh, Wisconsin 54903
TELEPHONE 414-424-3050
FAX 414-424-4404

April 12, 1996

Mr. Kerry DeKeyser Tecumseh Products 1604 Michigan Avenue New Holstein, WI 53061

SUBJECT: Status of WDNR LUST Unique ID # 03-08-to be assigned

Tecumseh Products - TA-22, 1604 Michigan Avenue, New Holstein

Dear Mr. DeKeyser:

The Department has noted that Tank Number TA-22 did have some minimal diesel related contamination in the soils. This site has not been given a separate LUST ID Number; however, I feel it is a distinct site and have requested that our Program Assistant assign a number to this tank area.

In a letter written by Mr. Greg Parker of our Central Office, he recommended further site investigation regarding this contamination. I briefly discussed this issue with your consultant and I recommended that soil samples be performed in native soil within 5' of the original excavation. These soil samples should be analyzed for PVOCs + Naphthalene and DRO.

When the above requested information is submitted, I will review the case for possible closure. Your cooperation is greatly appreciated. If you have any questions, please feel free to contact me at my office at (414)424-0399.

Sincerely,

Kathleen M. Sylvester, Hydrogeologist Leaking Underground Storage Tank Program

too prefluette

cc: Case File - OSH Greg Johnson, Key Environmental, W62 N244 Washington Avenue, Cedarburg, WI 53012

NOTE:If you are interested in obtaining the protection of limited liability under s. 144.765, Stats., please contact Mark Giesfeldt at (608) 267-7562 or Darsi Foss at (608) 267-6713, in the Department of Natural Resources' Madison office for more information. The liability exemption under s. 144.765, Stats., is available to persons who meet the definition of "purchaser" in s. 144.765 (1) (c) and receive Department approval for the response actions taken at the property undergoing cleanup. The Department will determine eligibility for this program on a case-by-case basis, prior to the "purchaser" developing a scope of work for conducting a ch. NR 716 site investigation at the property.



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edor + soil staming

REMOVED 7/30/92

Singled Hashmal

3000 KER0564E

(3418 38) SS-AT

TABLE 1
Laboratory Results From Soil Samples Collected at 1604 Michigan Avenue, New Holstein

SAMPLE ID	LOCATION	ANALYSIS PERFORMED	RESULTS
9802	South end of excavation @ 8' depth	WI DRO	< 10 PPM
9803	North end of excavation @ 8' depth	WI DRO	160 PPM
9804	East end of excavation @ 8'depth	WI DRO	< 10 PPM

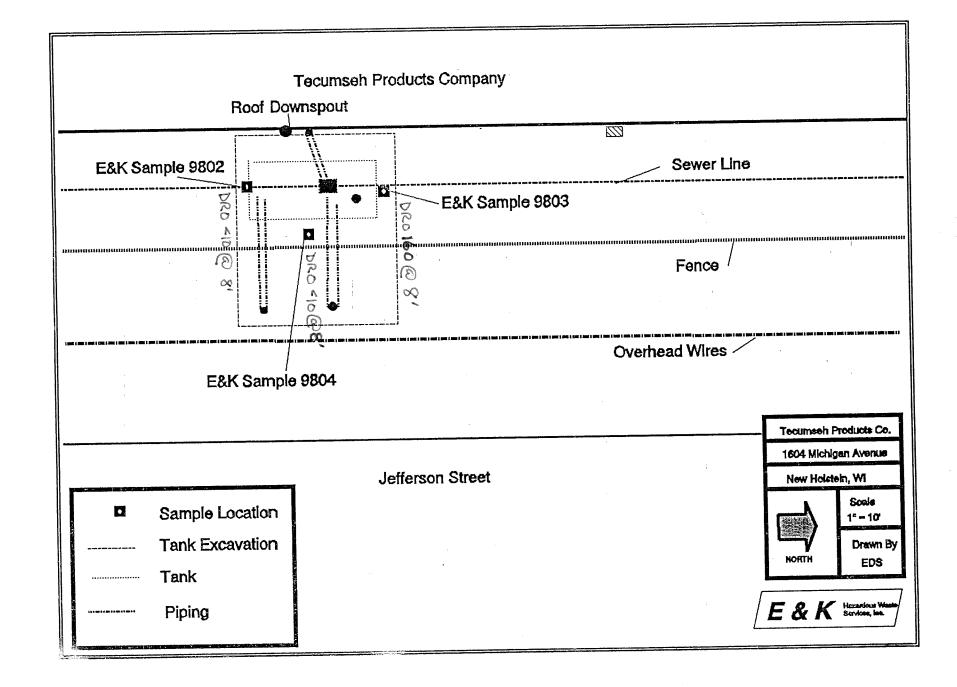
CONCLUSIONS

Odor and soil staining were observed in the excavation. Soils were separated with 60 yards of soil being stockpiled on-site.

Laboratory analyses of the soil from the kerosene tank excavation indicate levels that exceed the WDNR 10 ppm petroleum hydrocarbon guideline at the present time at the north end of the tank.

RECOMMENDATIONS

E&K Hazardous Waste Services, Inc. recommends that a Remedial Investigation be undertaken at 1604 Michigan Avenue, New Holstein, Wisconsin. The investigation should be conducted with the objective of defining the vertical and lateral extent of contamination in the tank excavation, specifically near the north end. Following the investigative work, a Remedial Action Plan should be drafted and implemented.



Site Assessment and **Tank Closure Report**

Underground Storage Tank Removal at

Tecumseh Products Company 1604 Michigan Avenue New Holstein, Wisconsin 53061

July 30, 1992 TA 22

The Contract of the Contract o

Prepared for:

Mr. Kerry DeKeyser **Tecumseh Products Company**

Prepared by:

E&K Hazardous Waste Services, Inc. 2905 Paine Avenue Sheboygan, Wisconsin 53082

E&K Project Number: 15602

September 18, 1992

Elizabeth Stueck

Project Assistant

Jed Hoffman 🥒

Project Manager

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EXECUTIVE SUMMARY

The site where the 2,000 gallon kerosene underground storage tank was removed is located at 1604 Michigan Avenue, New Holstein, Wisconsin. This site lies in the SE¼ of the SE¼ of Section 10, T 17 N, R 20 E in Calumet County.

The property is owned and occupied by the Tecumseh Products Company. Mr. Kerry DeKeyser can be reached at [414] 898-5711.

Analytical results indicate petroleum hydrocarbons above the current WDNR guidelines for underground storage tank closure assessments.

TECHNICAL REPORT

SCOPE OF WORK

E&K Hazardous Waste Services, Inc. supplied personnel and equipment to perform the following services:

- Excavate and remove (1) 2,000 gallon kerosene underground storage tank (UST) and associated piping.
- Monitor the excavation activities using a Foxboro Century Organic Vapor Analyzer (OVA) Flame Ionization Detector (FID) calibrated to methane, if required.
- Pump tank contents prior to removal.
- Properly contain and dispose of the residue generated from cleaning the underground storage tank.
- Vent, clean, transport and dispose of the underground storage tank upon cleaning.
- Collect soil samples that are representative of the site as per Department of Industry, Labor, and Human Relations (DILHR) guidelines.
- Submit samples for WI Modified Diesel Range Organics (WI DRO) analysis to Precision Analytical Lab, Inc., a WDNR certified laboratory.
- Compile the necessary data to complete the site assessment and tank closure report for Mr. Kerry DeKeyser.

TOPOGRAPHY AND SOILS

According to the United States Department of Agriculture Soil Conservation Service Soil Survey of Calumet County issued February 1980, the native soils at this location consist of Hochheim loam with 2-6% slopes. This soil is gently sloping and well drained. It is on slightly convex tops of drumlins and on ground moraines. Typically the surface layer is dark brown loam about 7 inches thick. The subsoil is about 14 inches thick. The upper part of the subsoil is dark yellowish brown, friable loam; the middle part is dark brown, friable clay loam; and the lower part is dark yellowish

brown, friable loam. The substratum to a depth of 60 inches is light yellowish brown, friable gravelly loam. In some areas of this soil, the subsoil is thinner and shallower to free carbonates.

FIELD ACTIVITIES

E&K field personnel were on-site July 30, 1992, to perform the tank removal and site assessment. Jed Hoffman was E&K's certified remover/cleaner and site assessor {Certification #02649}. Weather conditions at the time of tank removal consisted of overcast skies with an outside air temperature of 70° Fahrenheit and no precipitation. The location of the tank and the adjacent surroundings can be found in Appendices 1 and 2.

E&K personnel pumped approximately 10 gallons of kerosene from the tank and contained it into 1 drum. See Appendix 3 for photos of the tank removal activities.

The aboveground piping was diconnected. The tank was vented and excavation of the tank commenced. The grass overburden and sandy fill was removed to a depth of 4 feet below grade to expose the top of the tank. An underground sewer line was observed at 18 inches below grade in the excavation. Odor and soil staining was observed at the pumpout on top of the tank. A 12 inch thick layer of wet pea gravel containing water was discovered with odor and staining observed. Field screening of soils detected > 10 instrument units as methane. See Appendix 4 for Calibration Data. The soil from the excavation was separated. Approximately 60 yards of soil was stockpiled on-site. Odor and soil staining appear at approximately 3 feet below grade. Groundwater began entering the excavation at a depth of 4 feet below grade.

The tank and associated piping was removed. Visual observation found both the piping and tank to be in fair condition. The dimensions of the excavation were $14 \times 18 \times 10$ feet. The tank was vented and cleaned. Approximately 30 gallons of water was generated from the cleaning and contained into the same drum with the waste fuel. The tank was transported back to E&K's yard to be cut for scrap. See Appendix 5 for the Bill of Lading. See Appendix 6 for the completed DILHR Underground Petroleum Product Tank Inventory.

The south, north and east ends of the tank excavation were sampled and analyzed for WI DRO. All samples were collected at a depth of 8 feet below grade.

The excavation was backfilled with the clean excavation soil and also additional clean fill and brought to grade. Tecumseh Products Company will dispose of the 1 drum of waste kerosene/water. There is 60 yards of soil stockpiled on and covered with

visqueen.

SAMPLING PROCEDURES

E&K Hazardous Waste Services, Inc. technicians followed DILHR and DNR soil sampling specifications.

Prior to collecting the soil samples for laboratory analysis, the weight of the soil was determined. After this was complete, 10 grams of soil was collected using a disposable plastic syringe. The sample was then released into a 60 ml glass vial with a Teflon-lined cap.

Samples were stored in a cooler packed with ice, then stored in E&K's refrigerator at 36° Fahrenheit prior to being shipped in an iced cooler to Precision Analytical Lab, Inc., a WDNR certified laboratory, for analysis. Samples were handled in accordance with EPA protocol regarding chain-of-custody procedures. A copy of the chain-of-custody is included in Appendix 7. Locations where the laboratory samples were collected are noted on the site map found in Appendix 2.

ANALYTICAL RESULTS

Analytical results are described in Table 1. WI DRO analysis was performed on all samples to quantify possible contamination present in the tank excavation. Soil samples were collected at the north, south, and east ends of the tank excvation. Laboratory analysis data can be found in Appendix 8.

TABLE 1
Laboratory Results From Soil Samples Collected at 1604 Michigan Avenue, New Holstein

SAMPLE ID	LOCATION	ANALYSIS PERFORMED	RESULTS
9802	South end of excavation @ 8' depth	WI DRO	< 10 PPM
9803	North end of excavation @ 8' depth	WI DRO	160 PPM
9804	East end of excavation @ 8'depth	WI DRO	< 10 PPM

CONCLUSIONS

Odor and soil staining were observed in the excavation. Soils were separated with 60 yards of soil being stockpiled on-site.

Laboratory analyses of the soil from the kerosene tank excavation indicate levels that exceed the WDNR 10 ppm petroleum hydrocarbon guideline at the present time at the north end of the tank.

RECOMMENDATIONS

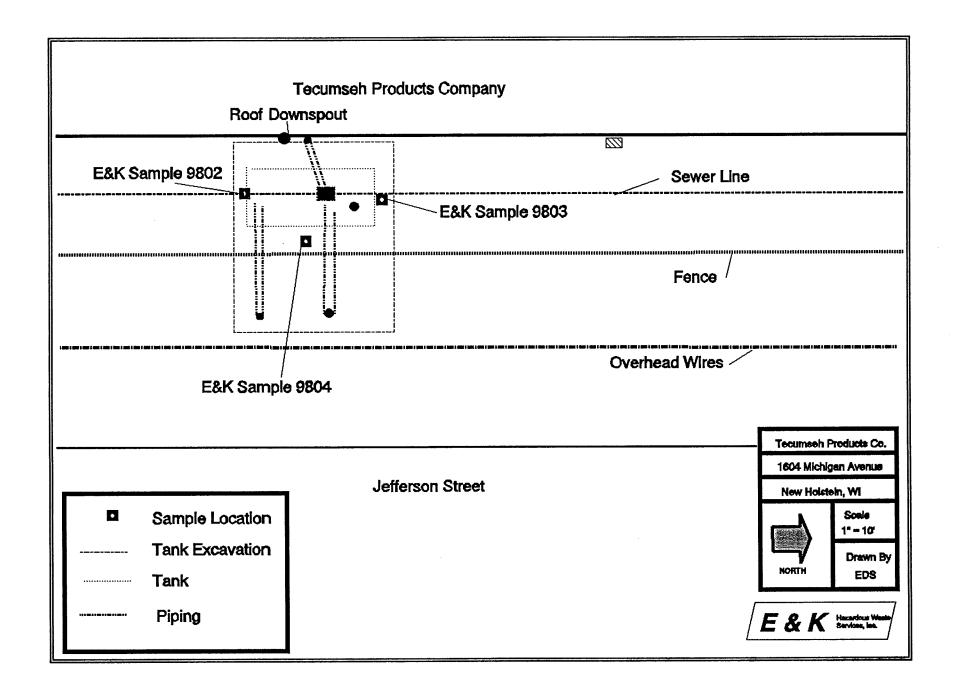
E&K Hazardous Waste Services, Inc. recommends that a Remedial Investigation be undertaken at 1604 Michigan Avenue, New Holstein, Wisconsin. The investigation should be conducted with the objective of defining the vertical and lateral extent of contamination in the tank excavation, specifically near the north end. Following the investigative work, a Remedial Action Plan should be drafted and implemented.

Appendix 1

Area Community Map

Appendix 2

Site Map



Appendix 3

Photographs of Tank Removal Activities





Description Prior to excavation of 2,000 kerosene UST

Date 07/30/92 Customer Tecumseh Products Company

Photo # 1-2 Camera Setting auto Project # 15602

Project Manager Jed Hoffman





Description Soil staining of 2,000 gallon kerosene UST

Date 07/30/92 Customer Tecumseh Products Company

Photo # 3-4 Camera Setting auto Project # 15602

Project Manager Jed Hoffman





Description Excavation of kerosene UST

Date 07/30/92 Customer Tecumseh Products Company

Photo # 5-6 Camera Setting auto Project # 15602

Project Manager Jed Hoffman





Description Removal of 2,000 gallon kerosene UST
Date 07/30/92 Customer Tecumseh Products Company
Photo # 7-8 Camera Setting auto Project # 15602
Project Manager Jed Hoffman

Appendix 4

Calibration Data

INSTRUMENT CALIBRATION DOCUMENTATION

Instrument Make and Model: Foxboro Century Model 128 OVA

CALIBRATION INFROMATION

DATE	TYPE OF CALIBRATION	SPAN	CALIBRATION GAS USED	PERFORMED BY
07-30-92	Field	3.0	Methane	Jed Hoffman

Appendix 5
Bill of Lading

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	4.
	5 _{TM}
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NO CARBON

BILL OF LADING

F _{TM}	FORM 3841		REQUIR	ED		TRIPLICAT	ΓE
ÁLTE	~ ERNATE STRAIGHT BILL	OF LADING—SHO	ORT FORM		Shipper No	D	
Original—Not I	Vegotiable £	How (Name of Carr	Dasti		Carrier No	-30-9	2
TO: Consignee Street Destination Route:		US Zip Code SIM	FROM: Shipper Street 164 Origin Ne	my Mole	Chica of Vehicle	To D, Zip Cod No.	e
No. Shipping Units		ig, Description of Articles arks and Exceptions	-	(Sub	ect to ection)	RATE	CHARGES
REMIT C.O.D. TO: ADDRESS	COD An	ıt: S	COO. FEE: PREPAID S		TOTAL	S	
required to state specificf the property.	atz is dependent on value, shippers are ically in writing the agreed or declared value of value of the property is hereby specifically to be not exceeding per	Subject to Section 7 of the delivered to the consignee witho signor shall sign the following s The carrier shall not make d ment of freight and all other ch	ut recourse on the consignor tatement. elivery of this shipment wit	the con-	FRE eck Appropris Freight pro		Collect
contents of packages unk property under the contra any of, said property over terms and conditions in t	the classifications and lawfully filed tariffs in eff nown), marked, consigned, and destined as indica ct) agrees to carry to its usual place of defivery at all or any portion of said route to destination and a he governing classification on the date of shipm is that he is familiar with all the bill of lading terms	ect on the date of the issue of this ted above which said carrier (the wo said destination, if on its route, othe is to each party at any time interest ent.	Bill of Lading, the property des rd carrier being understood the rwise to deliver to another car ad in all or any of said property,	roughout this cont rier on the route to that every service t	ract as meaning ar said destination. It is be performed her	ny person or corporati is mutually agreed as reunder shall be subje	on in possession of the to each carrier of all or ct to all the bill of lading

SHIPPER RECUMSON PER DEKYSES PES AL MARIER ET RECUMBANDATE 7-70-92 LITHOL IN U.S.A. A	assigns.					
TOPS PERM No. 3841	SHIPPER KESW	m sch	- ~ 1 11 11	CARRIER /	*K / //	
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Appendix 6

Department of Industry, Labor and Human Relations
Underground Petroleum Product
Tank Inventory

SBD-7437

TA-22 Wisconsin Department of Industry, Labor and Human Relations

UNDERGROUND PETROLEUM PRODUCT TANK INVENTORY

Send Completed Form To: Safety & Buildings Division P.O. Box 7969 Madison, WI 53707 Telephone (608) 267-5280

TANK INVENTORY For Office Use Only: Madison, WI 53707 Information Required By Sec. 102.142, Wis. Stats. Telephone (608) 267-5280 Tank ID # Underground tanks in Wisconsin that have stored or currently store petroleum or regulated substances must be registered. Please see the reverse side for additional information on this program. An underground storage tank is defined as any tank with at least 10 percent of its total volume (included piping) located below ground level. A separate form is needed for each tank. Send each completed form to the agency designated in the top right corner. Have you previously registered this tank by submitting a form? - YES \quad NO If yes, are you correcting/updating information only? \quad Yes \quad No This registration applies to a tank that is (check one): Fire Department Providing Fire Coverage 4. 🐧 Closed - Tank Removed 8. 🗌 Changed Ownership 1A. In Use or 1B. Newly installed Where Tank Located: 6. Closed - Filled With (Indicate new owner 2.

Abandoned With Product New Holstien F.D. 3.

Abandoned No Product (empty) Inert Material below) 7. Out of Service-Provide Date: or With Water Α. IDENTIFICATION: (Please Print) Site Telephone No. Site Address 1. Tank Site Name 1604 Michigan Ave. (414) 898-5711 Tecumseh Products Co. Zip Code County ☐ Village State 53061 Calumet New Holstien Wisconsin Owner Mailing Address (mail sent here unless indicated otherwise in #3) 2. Owner Name (mail sent here unless indicated otherwise in #3 below) Tecumseh Products Co. 1604 Michigan Ave. Zip Code County ☐ Village ☐ Town of: New Holstien Wisconsin 53061 Calumet Alternate Mailing Street Address If Different From #2 3. Alternate Mailing Name If Different Than #2 □ Village ☐ Town of: Zip Code County 4. Tank Age (date installed, if known: or years old)
Installed in late 1960's 5. Tank Capacity (gallons) 6. Tank Manufacturer's Name (if known) 2,000 unknown TYPE OF USER (check one): 1. 🔲 Gas Station 3. 🔲 Utility 4. Mercantile 2. Bulk Storage 7. 🗌 School 8. Residential 5. 🖸 Industrial 6.
Government 10. Other (specify): 9. ☐ Agricultural TANK CONSTRUCTION: 2. ☐ Cathodically Protected and Coated Steel (A. ☐ Sacrificial Anodes or B. ☐ Impressed Current) 1. | Bare Steel 5. Other (specify):
9. Unknown ☐ Fiberglass ☐ Steel - Fiberglass Reinforced Plastic Composite 3. XI Coated Steel 4. Relined - Date 7. 3. Other: is Tank Double Walled? ☐ Yes ☑ No 2. 🔲 UL Approval: 1. 🗌 Nat'l Std. None Noted ☐ Yes 😡 No Spill Containment? ☐ Yes ☑ No If yes, identify type: Overfill Protection Provided? 3.

Groundwater monitoring 4. Anventory control and Tank leak detection method: 1. Automatic tank gauging 2. Vapor monitoring tightness testing 5. Interstitial monitoring 6. Not required at present 7. Manual Tank Gauging (only for tanks of 1,000 gallons or less) PIPING CONSTRUCTION Piping System Type: 1. 🗶 Pressurized piping with: A. 🗆 auto shutoff; B. 🗀 alarm; or C. 🗀 flow restrictor 2. 🗀 Suction piping with check valve at tank 3. Suction piping with check valve at pump and inspectable Piping leak detection method: used if pressurized or check valve at tank: 1. 🔲 Vapor monitoring 2. Interstitial monitoring 5. Line Leak Detector 6. Not Required None Noted 4. Tightness testing 3. Groundwater monitoring Double Walled: ☐ Yes **₩**No Approval: 1. ☐ Nat'l Std 2. 🗆 UL 3. Other: None Noted TANK CONTENTS 3. Unleaded 4. Fuel Oil 2. 🗌 Leaded 1. Diesel 8. Sand/Gravel/Slurry 6.

Other 7. 🗌 Empty 5. Gasohol ☐ Waste Oil 12. 🗌 Propane 10.
Premix 9.
Unknown 13.

Chemical * 14. 🛛 Kerosene 15. Aviation * If # 13 is checked, indicate the chemical name(s) or number(s) of the chemical or waste. Has a site assessment been completed? (see reverse side for details) If Tank Closed, Give Date (mo/day/yr): ☐ Yes ☑ No 07/30/92 If installation of a new tank is being reported, indicate who performed the installation inspection: 2.

DILHR 3.

Other (identify) Indicate Whether: Name of Owner or Operator (please print): ☐ Owner or ☑ Operator Signature of/Owner or Operator: Date Signed:

BACKGROUND FOR TANK INVENTORY

On May 4, 1984, legislation commonly known as the Ground Water Protection Act was signed into law. This legislation required the creation of an inventory of underground petroleum product storage tanks. A record of this information was necessitated by numerous reported incidents of ground water contamination by petroleum products. Many tanks have been installed, used and forgotten. These installations can threaten the ground water.

This underground tank inventory is being established to help identify the need for future actions required to clear up potential problems before they occur. Your help in identifying abandoned, "in use" and "new use" tank locations will greatly assist this effort to protect Wisconsin's ground water.

SITE ASSESSMENT INFORMATION

Requirements for a site assessment at the closure or change in service for a federally regulated underground storage tank were outlined in federal rules published in the September 23,1988 Federal Register, 40 CFR 280 and 281.

The requirements in § 280.72 state:

(a) Before permanent closure or a change-in-service is completed, owners and operators must measure for the presence of a release where contamination is most likely to be present at the UST site. In selecting sample types, sample locations, and measurement methods, owners and operators must consider the method of closure, the nature of the stored substance, the type of backfill, the depth to ground water, and other factors appropriate for identifying the presence of a release. The requirements of this section are satisfied if one of the external release detection methods allowed in § 280.43 (e) and (f) is operating in accordance with the requirements in § 280.43 at the time of closure, and indicates no release has occurred.

The external release detection methods in § 280.43 (e) and (f) are summarized below:

- "(e) Vapor monitoring." This sub section refers to the testing or monitoring for vapors within the soil gas of the tank's excavation zone. It further requires seven (7) conditions to be met to qualify the testing program as a valid vapor monitoring system.
- "(f) Ground-water monitoring." This sub section refers to the testing or monitoring for liquids on the ground water below the tank. It establishes the requirements for an acceptable system that effectively monitors the ground water for the presence of regulated substances and insures the integrity of the monitoring wells so the wells themselves do not become conduits for ground water contamination.

Complete written guidelines on the conduct of a site assessment can be obtained from the DILHR Bureau of Petroleum Inspection & Fire Protection at the following address:

Bureau of Petroleum Inspection and Fire Protection P.O. Box 7969 Madison, WI 53707

Site assessments are to be submitted to both the DILHR office and to the DNR at the following addresses:

Bureau of Petroleum Inspection & Fire Protection P.O. Box 7969 Madison, WI 53707 Bureau of Solid and Hazardous Waste Management P.O. Box 7921 Madison, WI 53707 Appendix 7

Chain of Custody

HAZARDOUS WASTE SERVICES, INC., GENERAL HAULING, INC.

2905 Paine Avenue P.O. Dox 1249 Sheboygan, WI 53082-1249 Phone (414)458-6030 Fax (414)452-7254

CHAIN OF CUSTODY RECORD

Cller Proje Sam Sam	et No): _t	echanseh SLOD 04 Michligen A 5. Hoffman				2 V \$	An	alytic	sal Reque	eted			920	207
Date	Time	Sample I.D.	Description		/-	3 4	\$\$\times_{\tim	//	//	E ST.	Samp Source	Sample Procedure	Compo Of Grab		
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35	3:05	9803	TC5 No4 TA-22		Х	X				3,40ml 1,×40Z	exc.	Soil Cour	Snot	On Ice	3:06
3%2	2:45	9804	TC6 Exact	End	X	X				artomi Litez	éхс.	Soil Cour	Trab	On Tice @	3:06
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State of Jonsin Department of Natural Resources

CHAIN OF CUSTODY RECORD LUST PROGRAM Form 4400-151 11-91

Note: This form	ls required	by the Dep	partmen	t of Nati	ıral Resource	s for leaking underground storage ta	nk sites in co	mpliance with cl	ı. NR 500-540,	NR 158 and	NR 419, Wi	s. Adm. Cod	le.		
Sumple Collecto	01(1)	-				Title/Work. Station/Company	Inpany Telephone Number (include area code)								
Bot	Hoth	inas				Project Money	Project Manager Exk Haz. Waste (4H) 48-6030 roperly-Arkliess Telephone Number (include area of 1604 Michigan Ave, New Holstian, WI (414) 898-5711								
Property Owner	1 P.	1 1				11 of M. \	Michigan Ase, New Holstian WT (41+) 298-5711								
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·	I hereby certify that I received, properly handled, and disposed of these samples as noted						•		•		•				
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² Sample desc	cription mu	st clearly c	orrelate	the sam	ple ID to the	sampling location.									
DEPARTMENT USE/OPTIONAL FOR SOIL SAMPLERS					AMPLERS			DEPARTMENT	USEONLY						
Disposition of unused portion of sample Laboratory should:						Split samp	ples: Offered	7 Yes	□ No	(Check one))				
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Appendix 8
Laboratory Results

13602 (JCA) 874-92

Precision Analytical Lab, Inc 205 West Galena Milwaukee, WI 53212

Phone: (414) 272-5222

E & K Hazardous Waste Service

2905 Paine Ave.

Sheboygan, WI 53082

Attn: Janice Hintz Invoice Number:

Order #: 92-08-007

Date: 08/18/92 14:29

Work ID: 15602

Date Received: 07/31/92 Date Completed: 08/18/92 Client Code: E_K_HAZARD

SAMPLE IDENTIFICATION

Sample	Sample	Sample	Sample
Number	Description	Number	<u>Description</u>
01	9802	03	9804
02	9803		

Laboratory ID Number (Wisconsin DNR): 241369260

Certified By Jeff Bushner Order # 92-08-007 08/18/92 14:29

Precision Analytical Lab, Inc TEST RESULTS BY SAMPLE

Page 2

Sample: 01A 9802 Collected: 07/30/92

Test Description Mod. DRO (WDNR)

Result < 10

<u>Limit</u>

<u>Units</u> <u>Analyzed</u> <u>By</u>

mg/kg 08/09/92 SEL

Sample: 02A 9803

Collected: 07/30/92

Test Description Mod. DRO (WDNR)

Test Description

Mod. DRO (WDNR)

Result 160

<u>Limit</u>

<u>Units</u> <u>Analyzed</u> <u>By</u>

mg/kg 08/09/92 SEL

Sample: 03A

9804

Collected: 07/30/92

Result

<u>Limit</u>

<u>Units</u> <u>Analyzed</u> <u>By</u> mg/kg 08/09/92 SEL

< 10

Precision Analytical Lab, Inc REPORT COMMENTS

The organic data is reported out on a dry-weight basis.

Sample was covered air tight in approved container, shipped in cooler from the source to our lab, temperature upon arrival was 4 degrees C.

The samples ordered for DRO were analyzed by the Wisconsin DNR Modified DRO method.

PROJECT MANAGER:	The state of the s
UID Number: 03-08-100390 FID Number:	PMN Number:
OLIMET.	Initial Contact Date: 10, 13, 92
Site Name: TECUMSEH PRODUCTS - TA 22	Date RPLetter Sent:
Address: 1604 MICHIGAN AVE	Date Closure Approved: 8,13,96
NEW HOLSTEIN	
Municipality	Person/Firm:Reporting:
Legal Descript SE 1/4 SE 1/4 sec. 10 T 17NR 20(E)V)	
Lat.: Long.:	Phone Number:
Priority Screening Scoring Criteria Funding Son 1 = High	TF 1 = Federal 2 = Non-Federal
3. = Low 4 = Unknown 4 = 5	
Score:Init.: Date:	1
Case Status	
S	tart Date End Date
(F) Free Product Removal. (E) RP Emergency Response (R) LTF Emergency Response (L) Long Term Monitoring.	
	Impacts
Responsible Party Contact Person: KERRY DEKEYSER	Enter "P" for potential and "K" for known
Company Name: TECUMSEH PRODUCTS	(1) Fire/Explosion Threat
11 ALL MICHIGAN AMS	(2) Contaminated Private Well(s) #of Wells
Address: NEW HOLSTEIN, W/ 5306/	(3) Contaminated Public Well
4 Hul. 800-5711	(4) Groundwater Contamination
Phone Number:	(5) Soil Contamination
CC'F	(6) Other:
	(7) Surface Water Impacts
	(9) Floating Product
	#Tank(s) Size
Consultant	Substances
Contact Name: CREG JOHNSON Company Name:: KEY ENVIRONMENTAL	(1) Leaded Gas
Company Name:: KEY ENVIRONMENTAL	(2) Unleaded:Gas
Address: W62 N944 WASHINGTON A	14) Fuel Oil
CEDARBURG WI 53012	(5) Unkwri Hydrocrbn KEROSENE 2000
UN 37<-47<0	an Waste Oil — — — —