

E&K HAZARDOUS WASTE SERVICES, INC.

"YOUR WASTE HANDLING ALTERNATIVE"

P.O. BOX 1249 • 2905 PAINE AVENUE
SHEBOYGAN, WISCONSIN 53082-1249 • (414) 458-6030

December 8, 1988

Mr. John Mikyska
Tecumseh Products
900 North Street
Grafton, WI 53024

Subject: Removal of Underground Tanks at Grafton Plant

Dear John:

This letter summarizes our activities on site for the removal of two of your underground tanks on December 6, 1988. It also includes a proposal for the removal of the two remaining tanks and disposal of the contaminated soil from the site.

Initially, the plan was to remove the 300 gallon gasoline tank that served your emergency fire protection system. Contaminated soil, with HNU readings of 150ppm, was discovered around the tank. Approximately 35 cubic yards of soil was removed before further excavation was obstructed by the building on one side, a natural gas line, a feed line from an existing tank (the aviation fuel tank) and the 300 gallon tank still in place towards the loading dock. The decision was made by your company to remove the 300 gallon tank, as it was not in use at the time. This tank was also removed, and contaminated soil from around that tank removed as well. It is not known if the contaminated soil around the second tank resulted from a leak or if it was product from the first tank that had migrated. The second tank was installed in sand, so product from the first tank could have contaminated the sand. A total of approximately 65 cubic yards of soil was removed from the excavation of the two tanks. During excavation, this soil was placed on plastic.

When contamination was encountered, the Department of Natural Resources was contacted. I spoke with Margaret Graefe and indicated that there was contamination, based on the field meter reading and the odor of the soil and that we would attempt to excavate all the contaminated soil if possible. I asked about the possibility of treating the soil on site by allowing evaporation of the product. She said the Department may allow that, depending on the volume, concentration of product in the soil, type of site available for treatment and the potential for treatment during the winter. She also told me that soil stored on site would have to be contained in such a way as to not collect water. The soil would have to be bermed to prevent run-off and any water that collected in the soil would have to be analyzed, collected and treated.

You indicated that your company did not want to treat the soil, but preferred to have it disposed of. For this reason, two rolloff boxes were brought in to contain the soil so water would not collect in the soil. These were loaded, tarped and left on site.

By the end of the day, an excavation of approximately 20 feet long by 8 feet wide by 8 feet deep had been dug along the building. On Wednesday, December 7, 1988, you told me that your company decided to remove the remaining two tanks and that the gas line that had prevented further excavation on Tuesday had been removed from service by the gas company.

I will schedule a crew for this continuation as soon as possible. At this time, the next available date is Tuesday, December 20, 1988, but if a change in the schedule occurs, I will get a crew to your site sooner. My approach is to remove the remaining tanks and attempt to remove all contaminated soil, so the site can be tested and documented as clean. In my discussion with Margaret Graefe of the WDNR, I asked her about acceptable options if the extent of the contamination proved to be too large to remove or to be unaccessable, (such as if it extends underneath the building). Specific remedies would have to be matched to the extent and level of contamination but may include the installation of soil vent pipes or groundwater recovery wells.

A sample of the contaminated soil has been submitted for analysis to start the approval process to get the soil into the Omega Hills Landfill. A copy of this letter will be sent to Ms. Graefe to inform her of the status. Please call me if you have questions on this letter.

Cordially,



Peter Madden
Field Services Manager

PM:mk

enc.

cc Margaret Graefe-WDNR