

E&K HAZARDOUS WASTE SERVICES, INC.

"YOUR WASTE HANDLING ALTERNATIVE"

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December 21, 1988

Ken Wachal
Tecumseh Products Company
1604 Michigan Avenue
P.O. Box 700
New Holstein, WI 53061

Subject: Removal of Underground Storage Tanks at Grafton Plant

Dear Ken:

This letter summarizes our activities at the Grafton Plant and a meeting between Peter Madden, Bruce McCuaig, John Mikyska and myself on December 13th. I have included for your information two letters from Peter Madden which summarize our activities and findings regarding the removal of two tanks on December 6th.

At our meeting on December 13th, the following was discussed:

- a. need to confirm total petroleum hydrocarbon levels in excavation.
- b. obtain permission from the DNR to backfill the excavation to prevent damage to water main in vicinity and building foundation.
- c. empty the two remaining tanks through regular use and discontinue use until removal in the Spring of 1989.
- d. secure disposal of contaminated soil stored in roll off containers at Omega Hills Sanitary Landfill.
- e. schedule removal of two additional tanks and conduct soil remediation if required in the Spring of 1989.

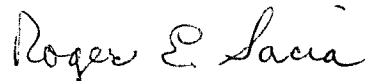
The following has occurred since our meeting or will be scheduled:

- a. Soil samples from the bottom and four side walls were collected on December 16th, and will be analyzed for TPH as requested by the WDNR.
- b. Margaret Graefe of Southeast District of the Wisconsin DNR was contacted and apprised of the situation. She approved the backfilling of the excavation with the understanding that the DNR may require soil remediation of some kind at a future date (prior to Spring when the other two tanks are scheduled for removal).

- c. It was discussed at our meeting that on-site remediation of the removed contaminated soil would not be attempted and that disposal of the soil would be arranged at Omega Hills as soon as possible. The soil is now in two covered roll off containers at the Grafton Plant. The approval process for disposal of the soil has begun. We expect to be able to dispose of the soil at Omega Hills in six to eight weeks, weather permitting.
- d. The remaining two tanks will be removed in the Spring and any contaminated soil (if found), will be disposed of at that time. A site assessment will be conducted to determine if any remedial action is required when the tanks are removed.

A copy of this letter will be sent to Margaret Graefe to demonstrate the actions taken by your company to deal with the contamination on site and to inform her of our proposal for future action. By removing the soil containing the bulk of the product and by taking the remaining two tanks out of service as soon as the product they presently hold is used, I believe that this proposal will prevent the spread of contamination and will provide a means for dealing with any contamination that remains at the site in the Spring. If you have any questions, or if we can be of further assistance to you, please do not hesitate to call Pete Madden or me.

Sincerely yours,



Roger E. Sacia
Environmental Specialist

enc.

cc: Margaret Graefe-WDNR
W. Bruce McCuaig-Tecumseh
John Mikyska-Tecumseh
Dave Eberhart-Tecumseh

RES:mk