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E&K

HAZARDOUS WASTE SERVICES, INC.



Site Assessment and Tank Closure Report

Underground Storage Tank Removal at

Tecumseh Products Company 1604 Michigan Avenue New Holstein, Wisconsin 53061

July 31, 1992 TA 23

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 1,000 gallon unleaded gasoline underground storage tank was removed is located at 1604 Michigan Avenue, New Holstein, Wisconsin. This site lies in the SE $\frac{1}{2}$ of the SE $\frac{1}{2}$ 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 below the current WDNR guidelines for underground storage tank closure assessments. A Clean Closure is recommended for the 1,000 gallon unleaed gasoline tank.

TECHNICAL REPORT

SCOPE OF WORK

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

- Excavate and remove (1) 1,000 gallon unleaded gasoline 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 Gasoline Range Organics (WI GRO) 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 31, 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 clear skies with an outside air temperature of 58° 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 3 gallons of gasoline from the tank and contained it into the drum from the aviation gasoline. See Appendix 3 for photos of the tank removal activities.

The product line was located in a 4 inch concrete tile. The soil and grass overburden, 8 inches of loamy sand, and poorly sorted pit run was removed to expose the top of the tank. Field screening was performed on soils in the excavation. A bucket from the bottom of the south end of the tank resulted in > 10 instrument units as methane. See Appendix 4 for Calibration Data. Soils were screened and separated appropriately with contaminated soil being stockpiled on visqueen. Groundwater was encountered under the tank. Venting of the tank commenced.

The tank was removed and visual inspection found the tank to be in good condition. The tank was vented, cleaned and transported to E&K's yard to be cut for scrap. The gasoline waste was consolidated with the aviation fuel and shipped to PCII, East Chicago, Indiana on 08/25/92. See Appendix 5 for the Bill of Lading and Manifest. The completed DILHR Underground Petroleum Product Tank Inventory form can be found in Appendix 6.

The tank was held in place with ¼" re-bar. Piping was located at 8 inches below grade. The piping was removed. Visual inspection found the piping to be in good condition.

The soil surrounding the piping was sampled every 20 feet at a depth of 3 feet below grade. The north, south, and east ends of the tank excavation were sampled.

The excavation dimensions were $11 \times 13 \times 6$ feet. The excavation was filled and brought to grade.

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. Ten milliliters of purge and trap grade methanol was released into the glass vial.

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 excavation and every 20 feet of piping. Laboratory analysis data can be found in Appendix 8.

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

	l l		
SAMPLE ID	LOCATION	ANALYSIS PERFORMED	RESULTS
9806	South end of excavation @ 8' depth	WI GRO	< 5.0 PPM
9807	East end of excavation @ 8' depth	WI GRO	< 5.0 PPM
9808	North end of excavation @ 8' depth	WI GRO	< 5.0 PPM
9865	20' Piping	WI GRO	< 5.0 PPM
9866	40' Piping	WI GRO	< 5.0 PPM
9867	60' Piping	WI GRO	< 5.0 PPM
9868	80' Piping	WI GRO	< 5.0 PPM
9869	100' Piping	WI GRO	< 5.0 PPM
9870	Pipe run in corner of AST	WI GRO	< 5.0 PPM

CONCLUSIONS

Odor and soil staining were observed in the excavation. Soils were separated with 10 yards of soil being stockpiled on-site.

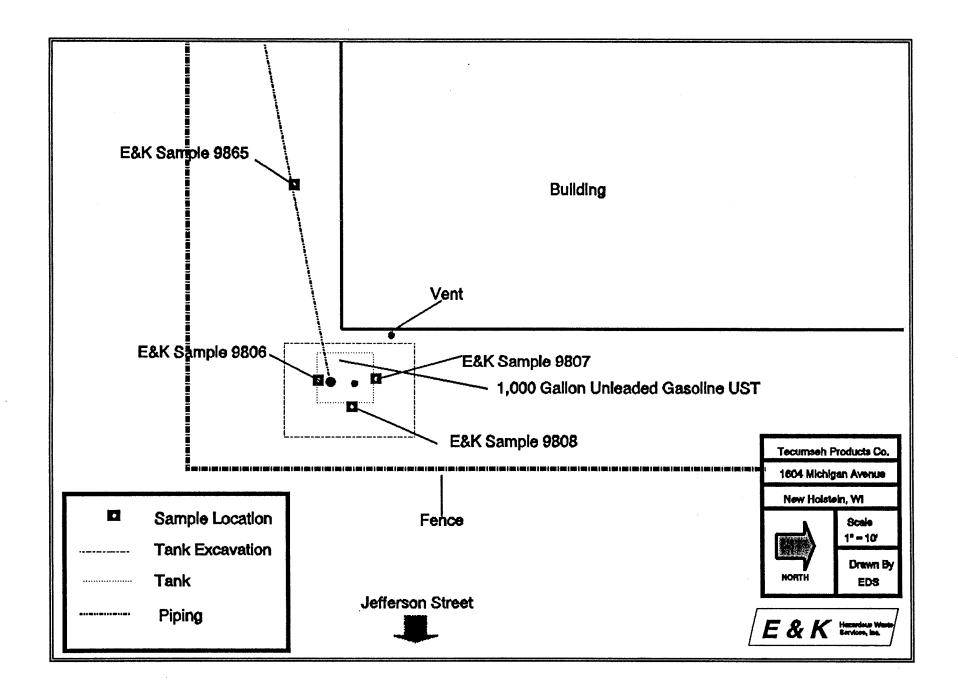
Laboratory analyses of the soil from the gasoline tank excavation indicate levels that are below the WDNR 10 ppm petroleum hydrocarbon guideline at the present time at the north end of the tank.

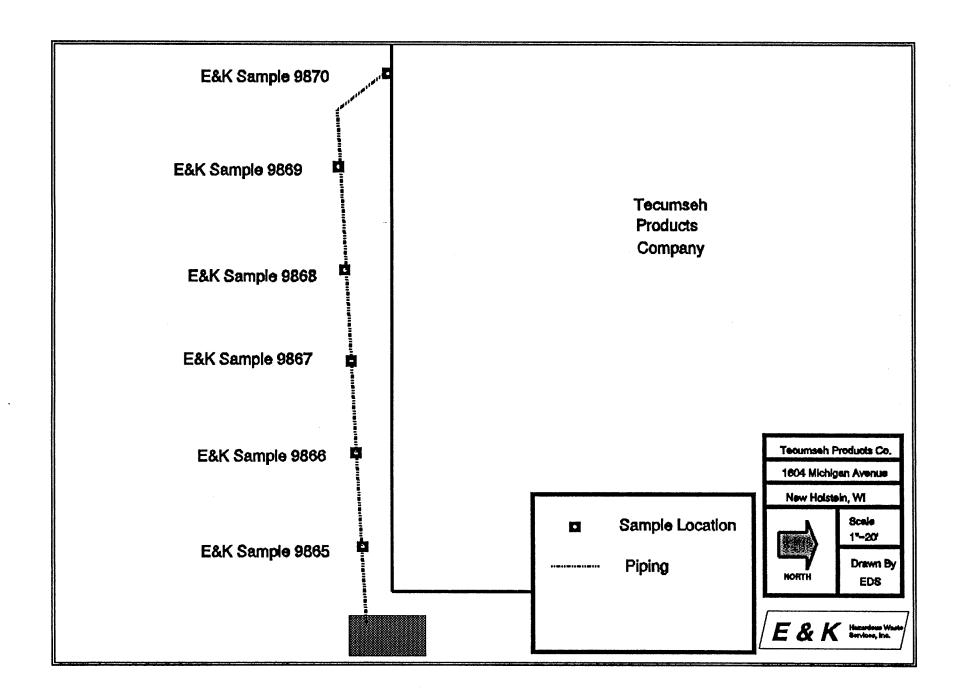
RECOMMENDATIONS

E&K Hazardous Waste Services, Inc. recommends that a Clean Closure be granted for the 1,000 gallon unleaded gasoline underground storage tank located at 1604 Michigan Avenue, New Holstein, Wisconsin.

Area Community Map

Site Map





Photographs of Tank Removal Activities





Description Activities prior to excavation of Gasoline UST

Date 07/31/92 Customer Tecumseh Products Company

Photo # 1-2 Camera Setting auto Project # 15602

Project Manager Jed Hoffman





Description Soils in excavation of 1,000 Gallon Gasoline UST

Date 07/31/92 Customer Tecumseh Products Company

Photo # 3-4 Camera Setting auto Project # 15602

Project Manager Jed Hoffman





Description Soils in excavation and removal of piping
Date 07/31/92 Customer Tecumseh Products Company
Photo # 5-6 Camera Setting auto Project # 15602
Project Manager Jed Hoffman





Description Removal of 1,000 gallon Gasoline UST
Date 07/31/92 Customer Tecumseh Products Company
Photo # 7-8 Camera Setting auto Project # 15602
Project Manager Jed Hoffman



Description Excavation brought to grade

Date 07/31/92 Customer Tecumseh Products Company

Photo # 9 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
07-31-92	Field	3.0	Methane	Jed Hoffman

Appendix 5

Bill of Lading

Manifest



CARBONLESS FORM 3841

NO CARBON REQUIRED

BILL OF LADING

TRIPLICATE

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ALTERNATE STRAIGHT BILL OF LA	DING—SHORT FORM	Shippe	r No	
Original—Not Negotiable		Carrie	r No	
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Consignee Ex K Yard	ے \ Shipper `\	chin Sep	Produc	ts Co.
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	the consignee without recourse on the consignor sign the following statement.	r, she con- Check Appro		
	er shall not make delivery of this shipment wit ght and all other charges.	hout pey-	•	
\$		Freight	t prepaid	☐ Collect
DECENTED cultural to the plane fraction and land it. State of the	(Signature of Consignor.)			
RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the dat contents of packages unknown), marked, consigned, and destined as indicated above which	h said carrier (the word carrier being understood th	roughout this contract as meani	ing any person or corpor	ation in possession of the
property under the contract1 agrees to carry to its usual place of delivery at said destination any of, said property over all or any portion of said route to destination and as to each party	m, if on its route, otherwise to deliver to another can rat any time interested in all or any of said remoerty:	rier on the route to said destinati that every service to be performe	on. It is mutually agreed and here under shall be said	as to each carrier of all or
terms and conditions in the governing classification on the date of shipment.				
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions assigns.	in the governing classification and the said terms a	ind conditions are hereby agreed	to by the shipper and acc	cepted for himself and his
SHIPPER TOCUMEN Prod. Co.	CARRIER C	& Han ha	ate San	wies
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1. Generator's US EPA ID No.

Day

EPA Form 8700-22 vious editions are obsolete? ite Form 11865 (R/4-89)

Printed/Typed Name

Signature

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

SBD-7437

TA-23

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

For Office Use Only:	I MIAN HAAEIAI ON I
Tank ID #	Information Required By Sec. 102.142, Wis. Stats.

Underground tanks in Wisconsin Please see the reverse side for adwith at least 10 percent of its total each tank. Send each completed	ditional information al volume (included p	on this pro liping) loca	ogram. An und ated below gro	dergrous and leve	nd storage ta el. A separat	nk is defined as any tank te form is needed for
X this tank by submitting a form?	TYES NO If	yes, are yo	u correcting/u	pdating	information	only? Yes No
This registration applies to a tank that is (1A.	check one): 4. 【 Closed - Tank Re	moved 8.	☐ Changed Own	ership \	Fire Department Where Tank Loc	Providing Fire Coverage
2. Abandoned With Product	6. 🔲 Closed - Filled W	ith	(Indicate new o	owner		
Abandoned No Product (empty)	Inert Material		below)		New Hol	lstien F.D.
or With Water	7. 🔲 Out of Service-1	Provide Date	:			
A. IDENTIFICATION: (Please Print)	``					
1. Tank Site Name Tecumseh Products Co	•	Site Address 1604 M	s ichigan Ave			Site Telephone No. (414) 898-5711
☐ City ☐ Village New Holstien	☐ Town of:		ate Wisconsin	Zip	Code 53061	County Calumet
2. Owner Name (mail sent here unless i Tecumseh Products Co	•	below) O			sent here unless	indicated otherwise in #3)
☑ City ☐ Village	☐ Town of:		tate		Code	County
New Holstien 3. Alternate Mailing Name if Different	Than #7		<u>Visconsin</u> Iternate Mailing St		53061	Calumet
3. Alternate Maining Name in Different	111011 72		iternate Maning St		ress it billerene.	10111 #2
☐ City ☐ Village	☐ Town of	: St	tate	Zip	Code	County
4. Tank Age (date installed, if known: c Installed in late 1960'			s) 6. Tank Man unknow		's Name (if know	(n)
8. TYPE OF USER (check one): 1. ☐ Gas Station 2. 5. ☒ Industrial 6.	Bulk Storage Government Other (specify):		3. Utility 7. School			☐ Mercantile ☐ Residential
3. Coated Steel 4. 6. Relined - Date 7. Approval: 1. Nat'l Std. 2. UL Overfill Protection Provided? Yes	অ No If yes, identify type	oforced Plasti Le Noted e:	5. c Composite 9.	Other Unkno	(specify): own is Tank Dou Spill Contai	uble Walled? 및 Yes 및 No Inment? 및 Yes 및 No
Tank leak detection method: 1. ☐ Autightness testing 5. ☐ Interstitial mo	omatic tank gauging 2. onitoring 6. Not requ		ionitoring 3. int 7. Manu			g 4. Thentory control and r tanks of 1,000 gallons or less)
1. X Bare Steel 2. Cathodically P 4. Fiberglass 5. Other (specif	y):					9. 🗆 Unknown
Piping System Type: 1. ∑ Pressurized pi 3. ☐ Suction pipine	ping with: A. \square auto shut with check valve at pump			restrictor	2. 🗌 Suction	piping with check valve at tank
Piping leak detection method: used if pre	essurized or check valve at 4. Tightness testing		apor monitoring .ine Leak Detector		☐ Interstitial mo ☐ Not Required	
Approval: 1. Nat'l Std 2. UL	3 5 0 0 1	Noted		1	Double Wailed:	
5. Gasohol 6.	Leaded Other Premix	1	3. Unleaded 7. Empty 1. Waste Oil 4. Kerosene		8. 12.	Fuel Oil Sand/Gravel/Slurry Propane Aviation
If Tank Closed, Give Date (mo/day/yr):		F	las a site assessme	nt been c	ompleted? (see	reverse side for details)
07/31/92]Yes ∏No	
If installation of a new tank is being repo	rted, indicate who perform	ned the insta	illation inspection: 3. Other (iden			
Name of Owner or Operator (please prin				Indicate		
KERRY DEKEYSER				¥		Operator
Signature of Owner or Operator:			,	Date Sign K	ned: 8/5/92	

Chain of Custody

E&K HAZARDOUB WASTE BERVICES, INC. GENERAL HAULING, INC.

2905 Palma Avenue P.O. Dox 1249 Sheboygan, WI 53082-1249 Phone (4 H) 458-6030 Fax (4 H) 452-7254

CHAIN OF CUSTODY RECORD

	ect No pling	o: Site: <i>}</i>	echonseh Pr 15602 Jew Holotien, m Sed Hoffman				Ana	hytical Requi				9208083
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763	13:15	9869	TCB Prige M		X			1.40N		Cour	Soral	methanol
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E&K HAZARDOUS WASTE SERVICES, INC. GENERAL HAULING, INC.

CHAIN OF CUSTODY RECORD

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

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CIIAIN OP CUSTODY RECORD LUST PROGRAM Porm 4400-151

11-91

Note: This form	n le require	d by the De	parlmen	it of Nati	ural Resource	s for leaking underground storage t	ank sites in co	mpliance with c	h. NR 500-540,	NR 158 and	NR 419. W	s. Adm. Cod	le.
Property Owner Property Aiklings							1 y , .	. \	nc Weste	Telephone 414	Number (in	clude area co	xle)
						1604 Michigan	Ave. 1	New Hold	len, WI	(4(4		- 57 []	ue)
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Relinquished II	y (Signature	e)	Date	e/l'ima		Received for Laboratory By	(Signature)	of the melt ma	y ho substituted T	for a temper	Sample C	Saulitian	
Field ID Number	Date Collected	Time Collected		nple Device	Preserv. Type	Location/Description (see footnote 2)	Analysia Type	Lab II) Number	No./Type of Containers	Cracked	Improperly	Good	Other
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,	Dispo				In for c	lays		Ассери	cd7 🔲 Yes	☐ No	(Check one)	
	C. 'etur	n	.[Othe	er .	t.	Accepted	By:		Signati	ire.	A	***************************************

Laboratory Results

15602 (Sed) 8-12-92

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 #: 92-08-016 Date: 08/10/92 08:53

Work ID: 15602

Date Received: 08/03/92 Date Completed: 08/10/92 Client Code: E_K_HAZARD

SAMPLE IDENTIFICATION

Sample	Sample	Sample	Sample
Number	<u>Description</u>	Number	Description
01	9806	03	9808
02	9807	04	9809

Laboratory ID Number (Wisconsin DNR): 241369260

Centified By

Order # 92-08-016 08/10/92 08:53

Precision Analytical Lab, Inc TEST RESULTS BY SAMPLE

Page 2

Sample: 01A 9806

Collected: 07/31/92

Test Description Mod. GRO (WDNR)

Result Limit < 5.0

<u>Units</u> <u>Analyzed</u> <u>By</u> mg/kg 08/05/92 SEL

Sample: 02A 9807

Collected: 07/31/92

Test Description Mod. GRO (WDNR)

Result Limit < 5.0

Units Analyzed By mg/kg 08/05/92 SEL

Sample: 03A 9808

Collected: 07/31/92

Test Description Mod. GRO (WDNR)

Result < 5.0

<u>Limit</u>

Units Analyzed By

mg/kg 08/05/92 SEL

Sample: 04A 9809

Result

<u>Limit</u>

Collected: 07/31/92

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

Test Description Mod. GRO (WDNR)

< 5.0

mg/kg 08/05/92 SEL

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 GRO were analyzed by the Wisconsin DNR Modified GRO method.

15602 (IEL) 8-18-42

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 #: 92-08-083

Date: 08/14/92 11:18

Work ID: 15602

Date Received: 08/07/92 Date Completed: 08/14/92 Client Code: E_K_HAZARD

SAMPLE IDENTIFICATION

Sample	Sample	Sample	Sample
Number	Description	Number	Description
01	9865	05	9869
02	9866	06	9870
03	9867	07	9871
04	9868		

Laboratory ID Number (Wisconsin DNR): 241369260

Certified By Jeff Bushner

Jeii Busnner

Mod. GRO (WDNR)

mg/kg 08/12/92 EMC

Sample: 01A 9865 Collected: 08/06/92 Test Description Result Limit Units Analyzed By Mod. GRO (WDNR) < 5.0 mg/kg 08/12/92 EMC Sample: 02A 9866 Collected: 08/06/92 Test Description Limit Result Units Analyzed By Mod. GRO (WDNR) < 5.0 mg/kg 08/12/92 EMC Sample: 03A 9867 Collected: 08/06/92 Test Description Result <u>Limit</u> Units Analyzed By Mod. GRO (WDNR) < 5.0 mg/kg 08/12/92 EMC Sample: 04A 9868 Collected: 08/06/92 Result Test Description Limit <u>Units</u> <u>Analyzed</u> <u>By</u> Mod. GRO (WDNR) < 5.0 mg/kg 08/12/92 EMC Sample: 05A 9869 Collected: 08/06/92 Test Description Result Limit Units Analyzed By Mod. GRO (WDNR) < 5.0 mg/kg 08/12/92 EMC Sample: 06A 9870 Collected: 08/06/92 Test Description Units Analyzed By Result <u>Limit</u> < 5.0 mg/kg 08/12/92 EMC Mod. GRO (WDNR) Sample: 07A 9871 Collected: 08/06/92 Result Test Description <u>Limit</u> Units Analyzed By

< 5.0

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 GRO were analyzed by the Wisconsin DNR Modified GRO method.

All analysis as per approved methods found in one or more of the following:

Standard Methods for the Evaluation of Water and Wastewater, 16th Edition.

Methods for Chemical Analysis for Water and Wastes, Revised March 1983, EPA 600/4-79-020

Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, 3rd Edition 1986 EPA SW846

Analysis performed or certified by Precision Analytical Labs

CORRESPONDENCE MEMORANDUM

STATE OF WISCONSIN

DATE:

November 11, 1992

MOV II 92

TO:

Mark Janowiak - SW/3UREAU OF SOLID-HAZARDOUS WASTE MANAGEMENT

FROM:

Mary Robl - LMD W

SUBJECT:

Tecumseh Products, 1604 Michigan Ave., New Holstein

Possible Clean Closure - Tank TA23

I spoke with you yesterday regarding the above referenced site. I mentioned that E & K Hazardous Waste Service had responded to the Department's denial of clean closure with a letter describing additional site details. I explained that we could either review the case a second time with the additional information or include it in one of the ongoing investigations on-site, this excavation. We decided on the latter option.

However, after a second review of the "Subsurface Investigation" prepared in February 1992, I found additional information which may indicate that this tank area is indeed clean. PID results from two borings near to the tank showed that the area was not impacted. Also, since Tank TA23 is a significant distance upgradient from the East Investigation, future investigation/remediation activities would not necessarily include this portion of the site. Perhaps this case could be reviewed again for clean closure and separated from ongoing site activities. I have enclosed the following correspondence for your information:

October 29th letter to Tecumseh which separates the two main areas of the site into East and West.

October 29th letter to Tecumseh which requests additional investigation for Tank TA23.

November 3rd letter from E & K Hazardous Waste Services explaining incompleteness of original, July 31, 1992 Tank Removal Report

Pages from "Subsurface Investigation", including site map

If you have any questions, please call me at (414)492-5866. Thanks!

ERK HAZARDOUS WASTE SERVICES, INC.

"YOUR WASTE HANDLING ALTERNATIVE"

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

NOV O 1992

November 3, 1992

Ms. Mary Robl WDNR-LMD P.O. Box 10448 Green Bay, WI 54307-0448

Dear Ms. Robl:

I have received the copy of the letter that you sent to Kerry Dekyser of Tecumseh Products Co. in New Holstien, WI. After receiving your letter and discussing it with Liz Stueck, I reviewed the closure report and found it to be insufficient in a couple of areas.

On page 3 of the report in the "Field Activities" section of the report, it should have been noted that overexcavation of the tank was performed. Also in this section, it should have been noted that the groundwater that had originally been present in the excavation appeared to have been due to surface water that was present in the area of the building footings. This water is believed to have been trapped against the building footings because of the slope of the surface toward the building. The small amount of water was removed along with overexcavated soils, and did not recharge.

The analytical data in the report documents samples that were taken of the excavation after overexcavation was completed. The west side of the excavation was extended all the way to the building footings. The bottom of the excavation consisted of poorly sorted stone fill ranging from 1" to 5" in diameter (see photograph in report). Samples were not attainable from either of these locations.

No staining, odor, or groundwater was present in the excavation after overexcavation of the tank bed was complete .

I apologize for the incompleteness of the closure report. If you have any questions pertaining to the report, this letter, or any other matters, please feel free to call me at (414)458-6030.

Sincerely,

Jed Hoffman Project Manager

JH/jh





Carroll D. Besedny Secretary

Lake Michigan District Heedquarters 1125 N. Military Avenue P.O. Box 10448 Green Bay, WI 54307-0448 Telephone #(414)492-5916 Telefax: #(414)492-5859

October 29, 1992

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

RE: Removal of Tank TA23 at Tecumseh Products, 1604 Michigan Ave., New Holstein

Dear Mr. DeKeyser:

The Department received a Site Assessment and Tank Closure Report from E & K Hazardous Waste Service on October 14, 1992. It recommended clean closure of this tank area; however, the Department believes that further investigation is necessary.

*Opp

Although there were no lab detects, petroleum odor and staining were obvious and field screening found contaminated soil. Additional sampling of the contaminated stockpiled soil should be performed. Also, since groundwater was present in the excavation, the Department recommends further groundwater investigation.

Releases from underground storage tanks regulated under Subtitle I of the Resource Conservation and Recovery Act require compliance with the provisions of 40 CFR, Parts 280 and 281. The Environmental Protection Agency (EPA) has the authority to take enforcement action at any time, but will generally not take action against parties cooperating with the state. The WDNR proceeds in LUST cases under the authority of s. 144.76, Wisconsin Statutes, commonly referred to as Wisconsin's Hazardous Substance Spill Law. The definition of "hazardous substance" as found in s. 144.01(4m), Stats., includes petroleum products.

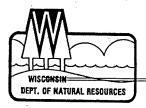
Wisconsin Statute 144.76(2a) states: "A person who possesses or controls a hazardous substance or who causes the discharge of a hazardous substance shall notify the Department immediately of any discharge not exempt under sub. (9)."

Wisconsin Statute 144.76(3) states: "A person who possesses or controls a hazardous substance which is discharged or who causes the discharge of a hazardous substance shall take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of the state."

Because you possess or control a hazardous substance that has been released to the environment, the Department identifies you as the party responsible for taking the actions necessary to restore the environment. You are required to:

- 1. Immediately notify your WDNR project manager, should emergency conditions involving explosive vapors and/or well contamination develop.
- 2. Conduct an investigation to determine the extent of soil and groundwater contamination.
- 3. Remediate all of the environmental impacts caused by this situation.





Carroll D. Besadny Secretary

Lake Michigan District Heedquarte 1125 N. Military Avenue P.O. Box 10448 Green Bay, WI 54307-0448 Telephone #(414)492-5916 Telefax: #(414)492-5859

October 29, 1992

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

RE: Petroleum Contamination Investigations at Tecumseh Products, 1604 Michigan Ave., New Holstein

Dear Mr. DeKeyser:

I have completed a review of the above mentioned case files. To attempt to simplify matters the following two names and ID numbers will be reassigned to the two main areas of investigation on site: (Any previous names/ID#s pertaining to the specific tanks listed below will be deleted from the Department's tracking system.)

1. "Tecumseh Products - East" LMD Unique ID# 08-01070

Will include investigation/remediation of tanks:

TA20 TA23* TA21 TA26 TA22

- * E & K Hazardous Waste Services recommended clean closure of this site in September, 1992. However, since field screening found contaminated soil and groundwater was present in the excavation, the Department believes further investigation is warranted. Please see the attached letter.
- "Tecumseh Products West"
 LMD Unique ID# 08-01071

Will include investigation/remediation of tanks:

TA1 TA18 TA2 TA19*

* Per our conversation yesterday, this tank is scheduled to be removed November 2nd. If further investigation/remediation is necessary, it will be included in "West" site activities.

Based on information provided in a February, 1992 Subsurface Investigation prepared by Dames and Moore, both of these sites have been reassigned to the "High Priority" rank group. However, current workload and staffing levels do not allow us to provide you with review and oversight at this time.

DATE:

October 20, 1992

FILE REF:

TO:

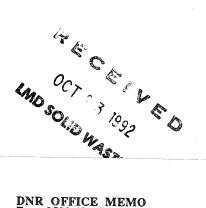
Janis DeBrock - LMD

FROM:

Mark Janowiak - SW/3

SUBJECT: site assessment for Tecumseh Products Company, New Holstein, WI

There was no lab detect in the soil samples but field screening found contaminated soil. I recommend additional sampling of the contaminated stockpiled soil and perhaps groundwater sampling as groundwater was found in the excavation site. Call me at 608 264-6041 if you have any questions.



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EXK HAZARDOUS WASTE SERVICES, INC.

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

RECEIVED

October 12, 1992

OCT 14 1992

DEPARTMENT OF NATURAL RESOURCES

Bureau of Solid and Hazardous Waste Management

Leaking Underground Storage Tank Unit

P.O. Box 7921

Madison, WI 53707

RE: Request for Clean Closure

Enclosed, for your records, is your copy of the closure assessment report from Tecumseh Products Company, New Holstein, Wisconsin.

All copies of this report have been sent to the required individuals in accordance with ILHR 10 regulations.

If you have any questions as to the contents of this letter, please feel free to contact Jed Hoffman or me at 414-458-6030.

Sincerely,

Liz/Stueck

E&K Hazardous Waste Services, Inc.

Enclosure

Closure Assessment Report

2.3.1 Soil Samples

The investigation included two discrete areas of the Tecumseh property, hereafter referred to as the East Section and the West Section. The investigation in the East Section focused on the former tank areas of tanks TA-21 and TA-26 and included installation of soil borings SB-2, SB-3, SB-5, SB-6, SB-12 and SB-13. SB-6, SB-12 and SB-13 were converted into monitoring wells MW-1, MW-4 and MW-5, respectively.

The investigation in the West Section included installation of soil borings SB-7, SB-8, SB-9, SB-10 and SB-11. Soil borings SB-9 and SB-11 were converted into monitoring wells MW-2 and MW-3 respectively.

In general, the samples selected for laboratory analysis were chosen based on PID readings or other in-field observations and were selected to fulfill the objectives of the investigation. One to two soil samples per boring were selected for laboratory analysis. No soil samples were selected for analysis from the following soil borings:

East Section

SB-1, SB-2, SB-4

West Section

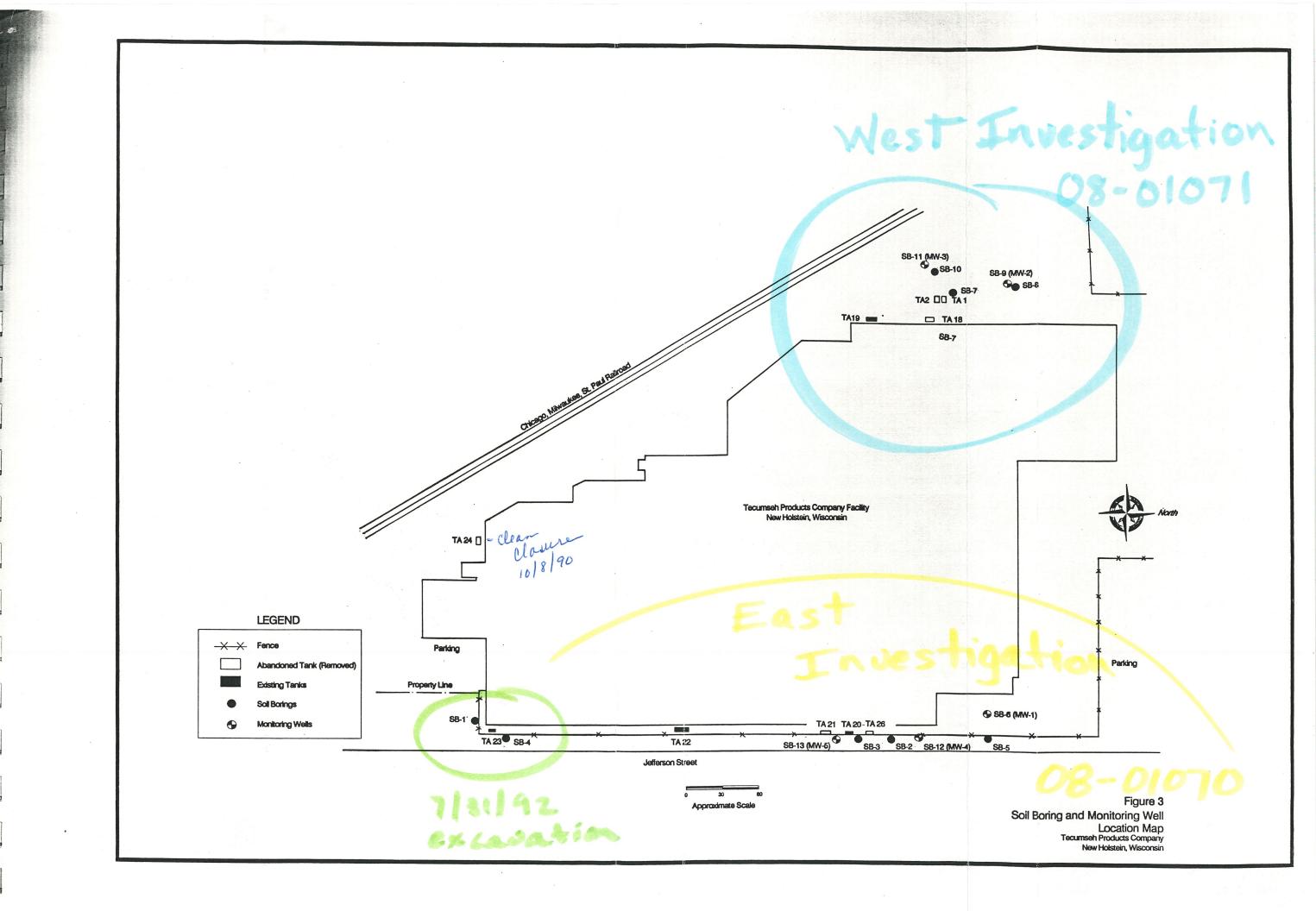
SB-8, SB-10

No samples were submitted from SB-1 or SB-4 because the borings were located significantly far up-gradient from the area of study and did not appear to be impacted, based on PID readings and in-field observations. No samples were submitted from SB-2 because the samples throughout the boring contained above-background concentrations of volatile compounds, based on PID readings and in-field observations, and would not have provided information regarding the boundaries of impact.

No samples were submitted from SB-10 because the samples throughout the boring contained above-background concentrations of volatile compounds, based on PID readings, and would not have provided any information regarding the boundaries of impact. No samples were submitted from SB-8 because samples from SB-9 (MW-2), located within seven feet of SB-8, were submitted. Additional laboratory analysis of samples from SB-8 would not have provided significant additional information.

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1-2	20	19		24'	some chert, moist SAND: top 6" silty, to gravel SILT: sand	, tan, with brown	imesto n and	ne, red	SM			11.5						no odo
1-3	16	12	_ 5	4-6'	mottling, gravel, lim- SILT: sandy, tan, wit saturated, some org	h dark brown silt	t mottle	ed, more	SM			8.8						no odo
1-4	20	9	_	6-8'	at 5' SILT: sandy, tan, so				SM			2.1						no odo
1-5	20	22		8-10'	SILT: sandy, tan, gra tan with red veins (a SILT: sandy, tan, gra	imost shaley) Ne	ext 3" b	ottom	SM			6.3	90			1		
1-6	24	27	10 	10-12'	CLAY: Top 16" silty, Bottom CLAY: silty,	tan.		-	CL			11.3						
1-7	24	36		12-14'	stiff, dry SILT: sandy, greyish pebbles.				SM			3.0						
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This form is authorized by Chapters 144.147 and 162, Wis. Stats. Completion of this report is mandatory. Penalties: Forfeit not less than \$10 nor more than \$5,000 for each violation. Fined not less than \$10 or more than \$100 or imprisoned not less than 30 days, or both for each violation. Each day of continued violation is a seperate offense, pursuant to ss 144.99 and 162.06, Wis. Stats



TECHMSEH PRODUCTS

TA-23 (SE corner)

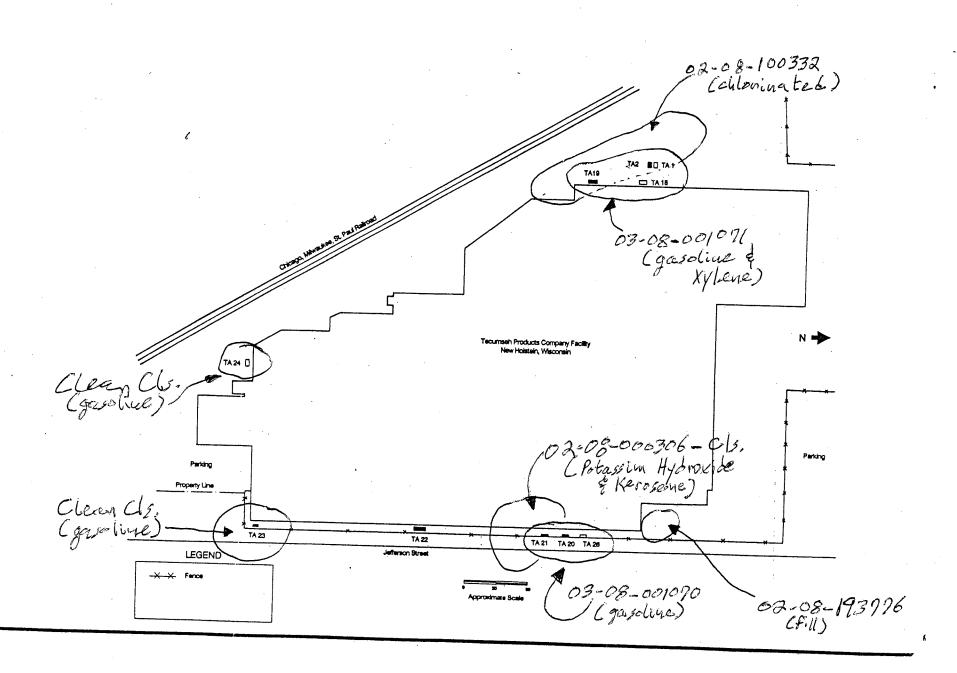
1000 gallon GAS

(SB-I + SB-4 from SI Work

during 10/24/91-11/1/91

TMINIMAL TO NO PIDS)

CLEAN CLOSURE



UNDERGROUND STORAGE TANK IDENTIFICATION

TECUMSEH PRODUCTS CORPORATION NEW HOLSTEIN, WISCONSIN

Tank Identification	Capacity	Product Contained	Date of Installation	Date of Removal		
TA-1 03-08-001091	3,000 gallons	Xylene	1966			
TA-2	3,000 gallons	Xylene (recycled solvent)	1966	10/28/91		
TA-18	2,000 gallons	90% Unleaded Gasoline 10% Isopropyl Alcohol	~1966	7/30/91		
TA-19 ¹	2,000 gallons	Unleaded Gasoline	~1966			
TA-201 03-08-001070	2,000 gallons	90% Unleaded Gasoline 10% Isopropyl Alcohol	~1967	1/29/92		
TA-21	2,000 gallons	90% Unleaded Gasoline 10% Isopropyl Alcohol	~ 1967	10/30/91		
TA-22 ¹	2,000 gallons	Kerosene	~1967	7/29/92		
TA-23 Clean Cli	1,000 gallons	Unleaded Gasoline	~1967	7/31/92		
TA-24 Clean Cls.	1,000 gallons	Unleaded Gasoline	1956	~1989		
TA-26 03-08-001090	300 gallons	Unleaded Gasoline	. 1967∘	7/30/91		

¹ UST essential to operations at Tecumseh New Holstein facility.

