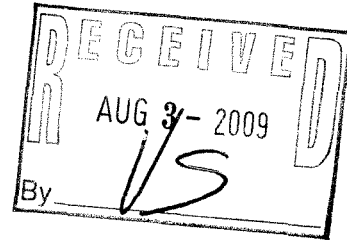


July 29, 2009

Victoria Stovall
Program Assistant
Remediation and Redevelopment
Wisconsin Department of Natural Resources
2300 Martin Luther King Jr. Drive
Milwaukee, WI 53212



Dear Ms. Stovall,

I have enclosed a \$500 technical review fee for the enclosed July 29, 2009 work plan to perform an investigation of vapor intrusion potential at the Tecumseh, Grafton facility (02-46-000751). The WDNR Project Manager, John Feeney, is aware of this work plan, as is Teresa Evanson, who we met with to discuss the conceptual approach.

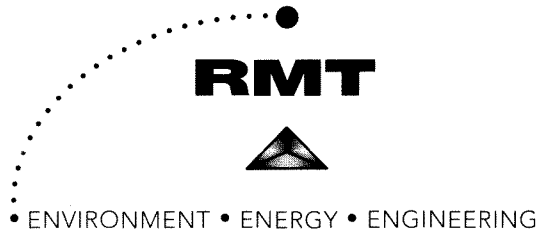
This work plan is being sent to you on behalf of Tecumseh Products, who is seeking approval to proceed with the investigation. Thank you.

Sincerely,


Tom Stolzenburg

enc.

Cc: John Feeney
Teresa Evanson
Jason Smith, Tecumseh



Subslab Vapor Sampling Workplan

July 2009

*Prepared For
Tecumseh Products Company
Grafton, Wisconsin*

Alyssa Sellwood, P.E.
Project Engineer

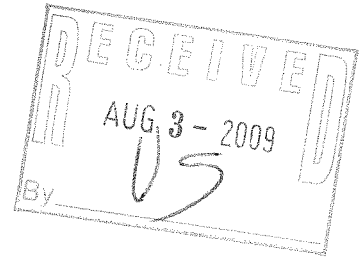
John M. Rice, P.E.
Senior Project Hydrologist

Thomas R. Stolzenburg
Senior Project Manager

RMT, Inc. | Tecumseh Products Company
Final

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Subslab Vapor Sampling Workplan

July 2009

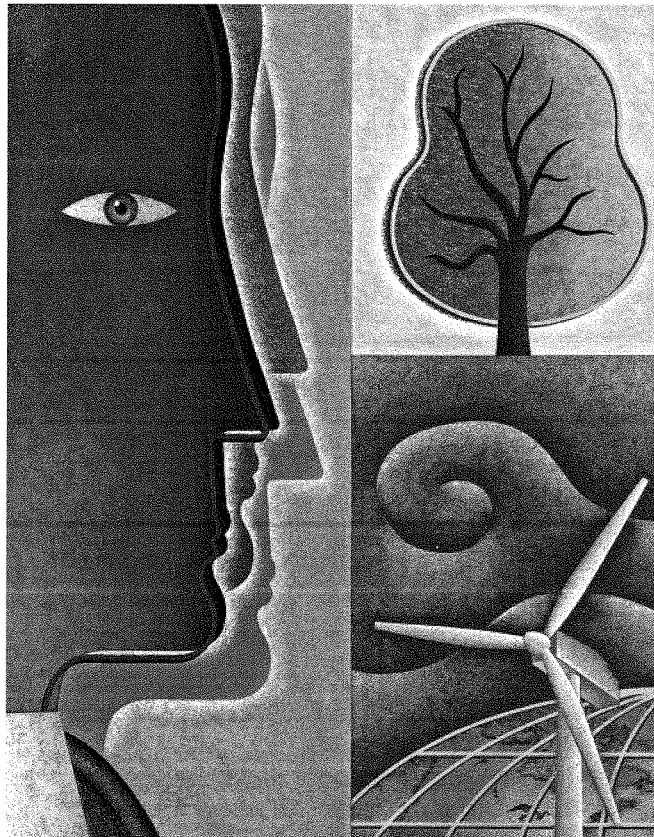


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Section 1

Introduction

1.1 Background

The Tecumseh Products Company (Tecumseh) has operated a manufacturing facility located at 900 North Street in Grafton, Wisconsin, since the mid-1950s (Figure 1). During the late 1980s and early 1990s, eight underground storage tanks (USTs) were removed from the site. During the course of the tank investigations, chlorinated volatile organic compounds (CVOCs) were detected in soil and groundwater at the facility.

Since that time, Tecumseh has performed on-site and off-site investigations to define the extent of the CVOC impacts in soil and groundwater, as part of Tecumseh's voluntary response action under Wisconsin Administrative Code (WAC) NR 700. The on-site investigations identified three main source areas of CVOCs: the West Dock Area, the Recycling Dock/Southeast Degreaser Area, and the TCA Filling/East Parking Lot Area (Figure 2). In 1996, the off-site investigations identified a CVOC plume.

Tecumseh has completed on-site remediation of the source areas. Enhanced bioremediation was implemented between 2002 and 2007 in the West Dock Area and the Recycling Dock/Southeast Degreaser Area, and unsaturated soil was excavated and treated using an *ex situ* process between November 2000 and June 2001 in the East Parking Lot Area.

A "Source Area Remediation Completion Report" was submitted to the Wisconsin Department of Natural Resources (WDNR) on October 24, 2007 (RMT, 2007b). The report summarized the success of the on-site remediation efforts, showed that the NR 700 remedial objectives were met in the source areas, and provided data showing that the CVOC plume is decreasing in both concentration and areal extent.

Subsequently, a "Workplan for Monitored Natural Attenuation (MNA) Demonstration" (RMT, 2007c) was submitted to the WDNR in December 2007. The WDNR approved the MNA approach in a letter dated March 5, 2008, and MNA is ongoing at the site. Tecumseh also received approval (June 3, 2009) of the completion of an off-site vapor intrusion investigation conducted east of the plant. On May 28, 2009, Tecumseh received a case closure letter for historical petroleum contamination from on-site underground tanks.

1.2 Purpose and Scope

Within their March 3, 2008, approval letter for MNA, the WDNR required Tecumseh to conduct a vapor intrusion assessment of the Tecumseh building. RMT and Tecumseh have been evaluating approaches to address this requirement, and have engaged the WDNR in discussions on how to conduct a vapor intrusion assessment at a large footprint industrial facility such as the Tecumseh building in Grafton, which is approximately 325,000 square feet (sf). On July 2, 2009, representatives from RMT met with Ms. Theresa Evanson of the WDNR to discuss a specific approach for completing a monitoring program at the Tecumseh facility that would appropriately assess the vapor intrusion risk at the facility, while also being feasible from a cost and implementation standpoint. During the July 2, 2009, meeting, RMT and the WDNR reached agreement in general terms on how to complete this monitoring program, and on what the next step for Tecumseh would be, which was to submit a formal workplan to the WDNR for approval. This Vapor Intrusion Sampling Plan is being submitted to the WDNR for approval for the Tecumseh site in Grafton, Wisconsin.

This Workplan includes the following:

- A summary of the site setting and historical site characterization
- A discussion of the vapor intrusion monitoring program
- A description of the deliverables to be submitted to the WDNR following the vapor intrusion monitoring program.

Section 2

Site Conditions

The following subsections describe the site conditions that are relevant to the vapor intrusion risk assessment.

2.1 Facility Description

The Tecumseh facility is located at 900 North Street in Grafton, Ozaukee County, Wisconsin (Figure 1). The initial building was constructed by Power Products Company in 1952 and was acquired by Tecumseh Products in 1957. Tecumseh expanded the facility to the north, with major additions in the 1960s and 1970s. The most recent tenant of the building, Tecumseh Power, ceased operations within the facility in spring 2009, and the building is currently vacant.

The footprint of the building covers approximately 325,000 square feet (sf), and is shown on Figure 2. The years during which each addition was constructed and the boundaries of each addition are included on Figure 2 for reference. The southern section of the facility (Buildings No. 6 and 7), has been used for office and administrative purposes since the building's construction. The main operations at the facility were contained to Buildings No. 1, 2, and 4, with some operational work being done in Building No. 3. The remainder of the facility (Buildings No. 4-A and 5) was used as storage warehouses. Given the historical operations and the sequencing of construction at the facility, there is no reason to believe that source areas are present within or below Buildings No. 4-A, 5, 6, and 7. The site investigations that were previously completed at the site, and which are described further below, support this conclusion. Therefore, the vapor intrusion monitoring approach detailed in Section 3 has been developed to reflect that the areas do not pose a potential risk for vapor intrusion.

2.2 Shallow Soil Conditions Under Building

The Tecumseh building is slab-on grade construction, with a floor thickness of 6 inches. Interior footings are present at 40-foot spacings throughout the facility, and are generally 5 feet square, and extend 2.5 feet below the floor surface. Historical boring logs for borings completed within the building indicate that the 6-inch concrete foundation pad of the facility is underlain with 1.5 to 4 feet of granular fill material (silty to clayey sand with some cobbles and gravel). A native lean clay layer is consistently present under the granular fill and generally extends 8 to 16 feet below grade. A sand outwash is present below the clay.

2.3 Groundwater Flow

The water table is typically 8 to 14 feet below ground surface, near where the clay soil is in contact with sand outwash. Groundwater on the site flows to the east/southeast.

2.4 Site Characterization and Remediation

As discussed in the introduction, extensive work has been done to characterize and remediate the soil and groundwater impacts at the site. The on-site investigations identified three main source areas for trichloroethene (TCE) and/or trichloroethane (TCA): the West Dock Area, the Recycling Dock/Southeast Degreaser Area, and the TCA Filling/East Parking Lot Area (Figure 3). Details on the site investigation and subsequent remediation activities for these areas can be found in the relevant documents submitted to the WDNR for each activity (KEY, 2000; KEY, 2002; RMT, 1997; RMT, 1999a; RMT, 1999b; RMT, 2002; RMT, 2003; RMT, 2004a; RMT, 2004b; RMT, 2005; and RMT, 2006). These activities are also summarized in one comprehensive document titled "Source Area Remediation Completion Report" (RMT 2007b). The following discussion highlights the portions of these activities that are critical to understanding the basis for the layout of the proposed vapor intrusion assessment.

2.4.1 West Dock Source Area - TCE Plume Impacts

The West Dock Source Area, which is primarily outside the facility (Figure 3), contained TCE and polycyclic aromatic hydrocarbon (PAH)/petroleum-related compounds in the soil. In 2002, limited soil excavation was completed to remove the PAH/petroleum-impacted soil, and infiltration trenches were constructed adjacent to the facility above the TCE source. The trenches were used to introduce a lactate solution to the subsurface to facilitate removal of the TCE from the soil and to enhance the naturally occurring biodegradation of TCE in the groundwater. The remedial objectives for the lactate infiltration were met; however, groundwater impacts remain, and a groundwater plume containing TCE and its breakdown products extends downgradient (east) from the West Dock Area under the building. The current extent of the plume based on recent VOC data collected from the site is shown on Figure 4. The plume under the building will be targeted as part of the proposed vapor intrusion assessment at the site.

2.4.2 TCA Filling Area/East Parking Lot Area – Source Area Impacts

Significant TCE and TCA impacts were found in the soil to the east of the building in the TCA Filling/East Parking Lot Area. In 2000, Key Engineering Group, Ltd. (KEY), excavated the impacted soil outside the facility, treated the soil *ex situ*, and then replaced the now clean soil into the excavation. Small pockets of impacted soil were left in place for areas near utilities and near the foundation of the building. Soil samples collected

during the site investigation, and as part of the confirmation sampling for the remedial activities, showed that soil impacted with TCA was present beneath the slab on the eastern edge of the facility near the former TCA Filling area. Because of the residual soil impacts present beneath the slab, the TCA Filling Area will be targeted as part of the proposed vapor intrusion assessment at the site.

2.4.3 Recycling Dock/Southeast Degreaser Area Source Area

The Recycling Dock Area contained TCE and TCA impacts; whereas, the Southeast Degreaser Area, which is located just west of the Recycling Dock Area, exhibited low concentrations of TCE and TCA, but elevated concentrations of petroleum hydrocarbons. The commingling of the petroleum hydrocarbons and the TCE and TCA has contributed to biodegradation in this area. Because the Southeast Degreaser Area is located upgradient from, and adjacent to, the Recycling Dock Source Area, it was combined with the Recycling Dock Area for remediation.

Eight underground storage tanks (USTs) were removed from the site between 1988 and 1992. The approximate locations of the historical tanks are shown on Figure 5. Seven of the tanks were located generally within the Recycling Dock/Southeast Degreaser Area, and one tank was located in the West Dock Area. The USTs primarily contained petroleum compounds. RMT, on behalf of Tecumseh, requested closure for these tanks in 2007 (RMT, 2007a), and provided additional information for the closure to the WDNR in December 2008 (RMT, 2008). The WDNR granted closure for the USTs on May 28, 2009.

Three injection wells were constructed outside the facility in the Recycling Dock Area in 2002. A series of injections were completed in these wells to introduce a dilute lactate solution to the subsurface for the purpose of facilitating biodegradation of the TCE and TCA in the groundwater in this area. The remedial objectives for the lactate injections were met; however, the soil in this area remains a potential source for vapor intrusion at the facility. Therefore, the Recycling Dock/Southeast Degreaser Area will be targeted as part of the proposed vapor intrusion assessment at the site.

Section 3

Subslab Vapor Monitoring Workplan

3.1 TCE and Other VOC Screening Levels

The primary constituent of concern at the site, in terms of the risk posed by vapor intrusion, is TCE. To be consistent with the WDNR's intent, a TCE screening value for subslab gas samples of 6,100 $\mu\text{g}/\text{m}^3$ will be used. This is based on the recent toxicity values for TCE published by the United States Environmental Protection Agency (USEPA) (USEPA, 2009), a 1×10^{-5} risk level, and an attenuation factor of 100 between subslab concentrations and indoor air.

The samples collected by RMT will be analyzed for the full list of VOCs included in the TO-14 analysis, as described later in this Section. If VOCs other than TCE are detected in the subslab samples, the detected concentrations will be compared with the target indoor air concentration that satisfies the 1×10^{-5} cancer risk level or hazard index of 1 (for non-carcinogens) for each detected compound (USEPA, 2002). As with TCE, an attenuation factor of 100 will be applied to any subslab air concentrations detected at this industrial site.

3.2 Proposed Subslab Vapor Sampling Points

The proposed subslab vapor sampling points are presented on Figure 6. These sampling points have been strategically located to characterize the vapor intrusion risk that is posed by the potential vapor sources identified during a review of the site investigations and remedial actions completed at the facility, and to provide sufficient data to classify areas of the building as posing no risk for vapor intrusion.

Three discrete areas will be investigated: Transect 1, Source Area 1, and Source Area 2. Transect 1 will have 13 sampling points and will span the length of the building. Eight of the sampling points within the middle of the transect will be on 50-foot spacings, and will be used to characterize the vapor intrusion risk posed by the plume of TCE that originates in the West Dock Area and extends eastward under the building. This location was selected for Transect 1 because it is far enough from the edge of the building to eliminate the potential for drawing in soil gas that is outside the footprint of the building, but close enough to the West Dock Source Area so as to capture the vapor concentrations in the soil overlying the TCE in the groundwater. The other five samples within Transect 1 are on 100-foot spacings, and will be used to clear areas of the building not suspected of posing a risk for vapor intrusion. A sample will not be collected from the offices because of the inability to bring the sampling equipment into this area. However, this area has always been office space, so no source areas

are suspected to be below the offices, and the other samples collected along Transect 1 are expected to bound any areas that may be at risk for vapor intrusion as a result of the TCE plume.

Source Areas 1 and 2 will each have four sampling points set on 50-foot spacings. Source Area 1 is located within the former Recycling Dock/Southeast Degreaser Area. The samples are intended to characterize the vapor intrusion risk posed by any residual soil impacts that may be present in this area. Source Area 2 is located in the former TCA Filling Area. Similarly, the samples are intended to characterize the vapor intrusion risk posed by any residual soil impacts that may be present below the building slab in this area.

3.3 Sampling Point Construction

A conceptual drawing of a proposed sampling point is included on Figure 7. Each sampling point will be constructed using a Geoprobe®, or similar equipment. A 1.5- to 3-inch-diameter hole will be drilled through the concrete slab, and the hole will extend approximately 0.5 foot below the slab into the granular fill. A 0.5-inch-diameter PVC pipe with a slotted screen will be set in the fill, and a 0.5-inch-diameter PVC riser pipe will extend above grade to be connected to a blower. Sand will be placed around the well screen to fill the hole to the bottom of the slab, and concrete grout will be used to provide a firm seal between the slab and the pipe. The concrete grout will be allowed to set and dry prior to pulling a vacuum from each point. Each riser pipe will be capped when not being used for sampling, to eliminate the potential to draw indoor air into samples being collected at adjacent sampling points.

3.4 Sample Collection Method

The sampling approach will be to collect an integrated sample of the subslab air from the void space in the 10- to 20-foot radius around each discrete sampling point. This integrated approach allows us to characterize the subslab air over a broad area (300-1,200 sf), rather than relying on the soil vapor conditions at a discrete point to represent a larger area. This integrated approach minimizes the potential for false-positives or negatives in the sampling, i.e., where the conditions at a discrete sampling point are not representative of the broader subslab conditions.

Our specific procedure for collecting the integrated sample is as follows.

- A sealed regenerative blower will be used to draw a vacuum from each sampling point.
- The airflow rate that can be achieved at each sampling point will be calculated in the field based on the suction seen at the blower. Based on previous experience at the site, the flow rates are estimated to be between 5 and 10 cubic feet per minute (cfm).

- Assuming an air-filled porosity of 25 percent and a fill thickness of 2 feet, we can calculate the air volume in the fill in select radii around each sampling point. On the basis of the flow rate achieved in the field, we will allow the blower to draw a vacuum on each sampling point for the time required to purge the air in the 1- to 2-foot radius around each point.
- After this air has been purged, the collection of the off-gas sample from the blower will be initiated. Specifically, the off-gas will be collected in a Summa canister. Each Summa canister will have a 30-minute regulator set on the intake, such that the sample will be collected over 30 consecutive minutes while the blower is operating on each sampling point. Given the estimated flow rate we expect to see in the field, this will provide a sample from the subslab air within a radius of 10 to 20 feet around each point.
- Each Summa Canister will be analyzed by Pace Analytical for the VOCs in the TO-14 analysis.
- A smoke test will be completed periodically while the blower is pulling a vacuum from each sampling point to look for potential leaks in the slab or in the sampling point components through which indoor air could be drawn into the sample. If a leak is detected, the sampling will be discontinued and action will be taken to correct the problem, if possible. If necessary, a new sample will be collected once the location of the leak has been sealed.

3.5 PID Screening

RMT plans to screen the off-gas from each sampling location using a MiniRAE 3000 Photoionization Detector (PID). PID readings will be taken in the off-gas after approximately 5 minutes and 10 minutes of purge time. The MiniRAE 3000 can detect TCE at the 0.1 ppm level. If the PID screening suggests that the subslab vapor at a given point could exceed the WDNR screening level of 6,100 $\mu\text{g}/\text{m}^3$, RMT may step out at 50-foot spacings from the point with elevated PID readings and construct additional subslab vapor sampling points. The new points will be constructed and the samples will be collected in the same manner described above. RMT will screen these new sampling points with a PID, and will continue the step-out approach to help bound the limits of the area that poses a vapor intrusion risk during a single mobilization. This additional sampling will be completed only if time and logistics allow during this mobilization to the site.

Section 4 Reporting

The results from the proposed sampling event will be evaluated by RMT. These results will be summarized in a report that will be transmitted to the WDNR, along with recommendations for the next course of action to be taken at the site. Depending upon the results, the following courses of action are possible:

- All areas are clear, and the vapor assessment is determined to be complete, with no further action needed.
- A portion of the plume is causing a vapor intrusion risk at the site.
 - The boundaries are sufficiently defined, and a vapor mitigation plan will be developed for the plume.
 - Additional sampling is needed to define the boundaries of the area with risk.
- One or more areas pose a vapor intrusion risk at the site.
 - Develop a vapor mitigation plan to address the risk from the source area(s).
 - Develop an approach to remove the source area(s).

If additional work is needed to address specific areas of vapor intrusion risk at the site, a workplan will be presented to the WDNR for approval.

Section 5 References

- Key Engineering Group, Ltd. (KEY). 2000. Remedial action work plan. Prepared for Tecumseh Products Company, Grafton, Wisconsin. July 2000.
- Key Engineering Group, Ltd. (KEY). 2002. Remedial action report. Prepared for Tecumseh Products Company, Grafton, Wisconsin. March 2002.
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- RMT, Inc. 2007a. Underground storage tank closure request. Prepared for Tecumseh Products Company, Grafton, Wisconsin. April 2007.
- RMT, Inc. 2007b. Source area remediation completion report. Prepared for Tecumseh Products Company, Grafton, Wisconsin. October 2007.

RMT, Inc. 2007c. Workplan for monitored natural attenuation demonstration. Prepared for Tecumseh Products Company, Grafton, Wisconsin. December 2007.

RMT, Inc. 2008. Underground storage tank closure request – addendum 2. Prepared for Tecumseh Products Company, Grafton, Wisconsin. December 2008.

USEPA. 2002. OSWER draft guidance for evaluating the vapor intrusion to indoor air pathway from groundwater and soils (subsurface vapor intrusion guidance). EPA/530-D-02-004. November 2002.

USEPA. 2009. Interim recommended trichloroethylene (TCE) toxicity values to assess human health risk and recommendations for the vapor intrusion pathway analysis. Office of Solid Waste and Emergency Response. January 15, 2009.

**Figure 1
Site Location Map**

**Figure 2
Site Plan**

**Figure 3
Former Source Areas**

**Figure 4
Extent of TCE in the On-Site Groundwater**

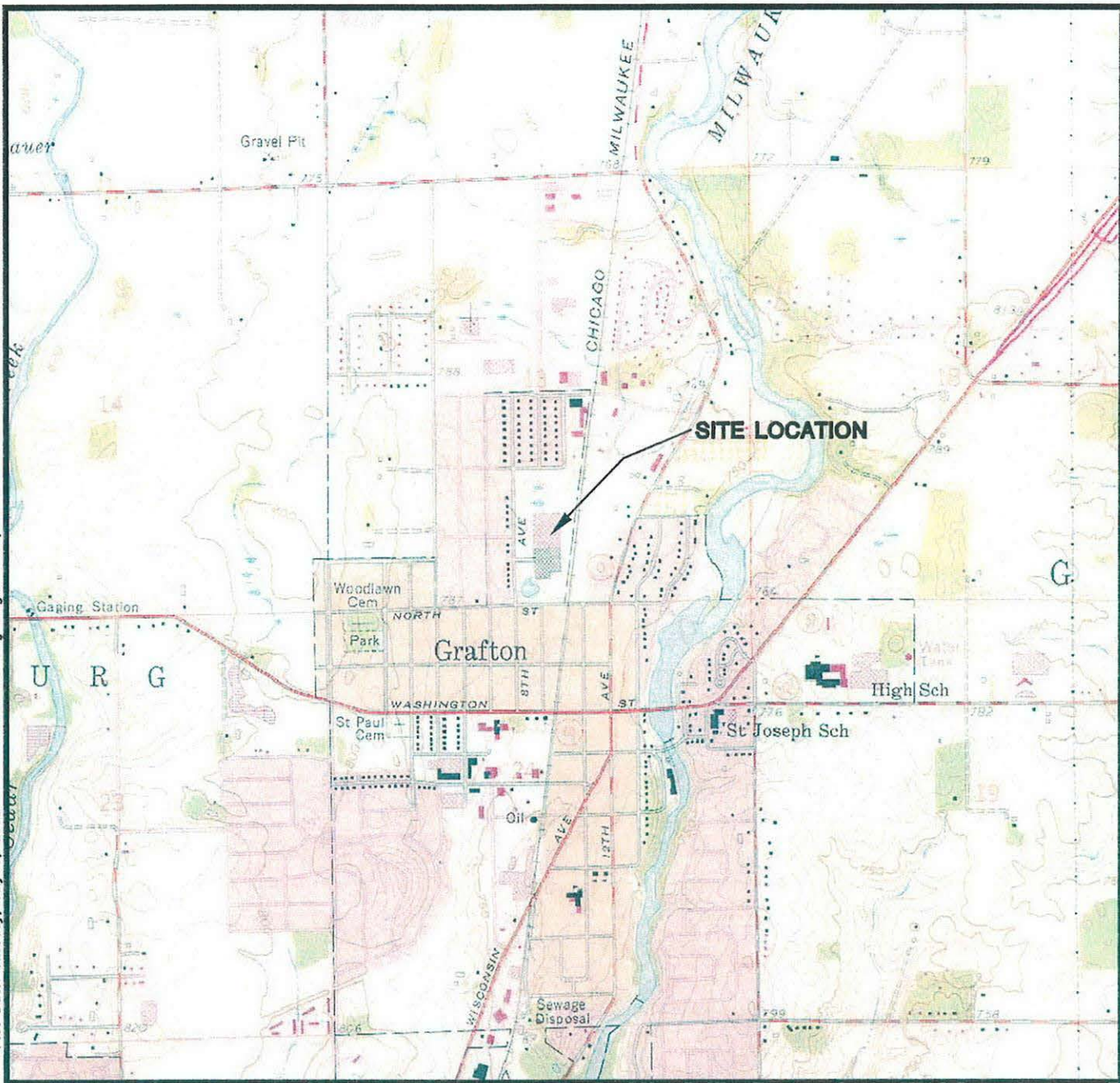
**Figure 5
Former UST Locations**

**Figure 6
Proposed Subslab Vapor Sampling Points**

**Figure 7
Conceptual Vapor Sampling Point**

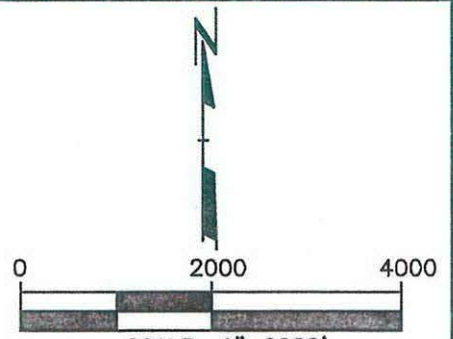
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STATE LOCATION

SOURCE: BASE MAP FROM CEDARBURG, WI.
 7.5 MIN. USGS QUADRANGLE.



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 Operator Name: FITZGERE



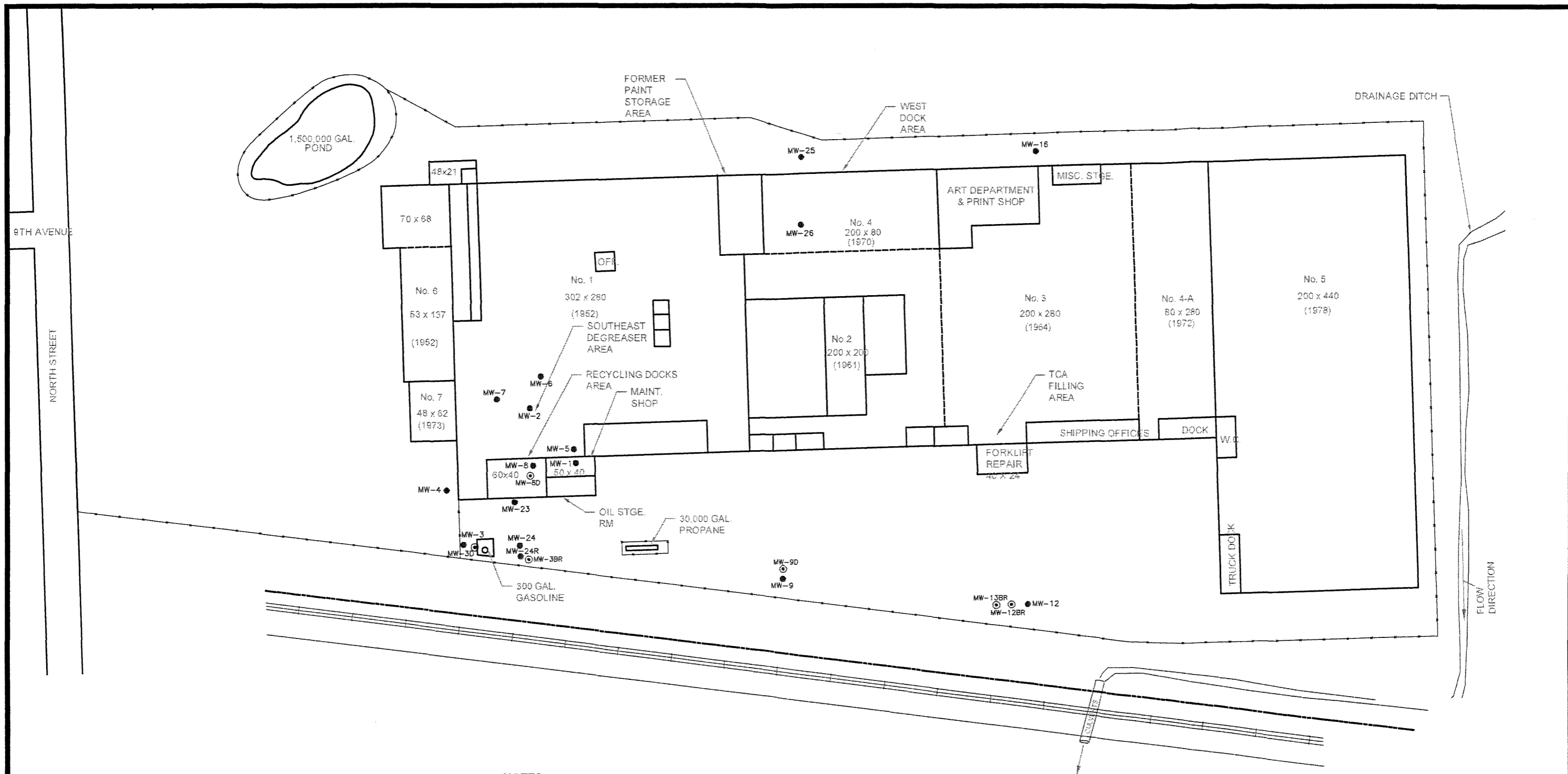
TECUMSEH PRODUCTS COMPANY

GRAFTON, WISCONSIN

SITE LOCATION MAP

DRAWN BY:	FIEBRANT
APPROVED BY:	
PROJECT NO.	07397.10
FILE NO.	73971003.DWG
DATE:	JULY 2009

FIGURE 1

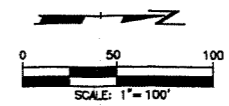


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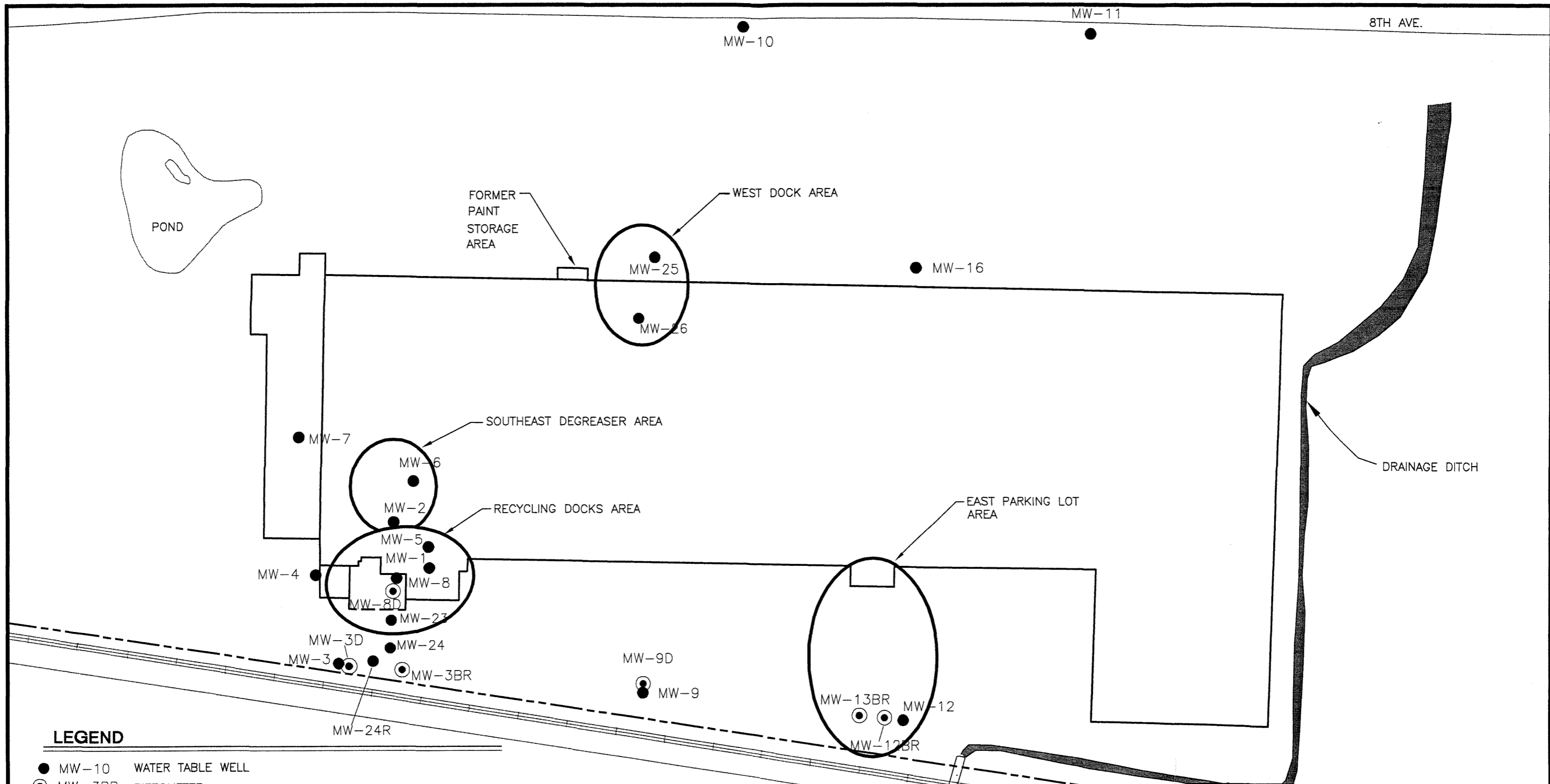
- MW-10 WATER TABLE WELL
- ⊙ MW-3BR PIEZOMETER
- ▬ RAILROAD
- ▬ PROPERTY LINE
- ▬ PIPES BELOW GROUND
- ▬ AISLEWAY
- FD* FLOOR DRAIN
- CO CLEAN OUT

NOTES

1. FACILITY LAYOUT ADAPTED FROM DRAWINGS PROVIDED BY TECUMSEH PRODUCTS COMPANY.
2. MONITORING WELL LOCATIONS AND ELEVATIONS WERE SURVEYED BY RMT INC. ON 12/5/94.



PROJECT:			
TECUMSEH PRODUCTS COMPANY GRAFTON, WISCONSIN			
SHEET TITLE:			
SITE PLAN			
DRAWN BY: FIEBRANT	SCALE: 1"=100'	PROJ. NO. 07397.10	
CHECKED BY:		FILE NO. 73971002.DWG	
APPROVED BY:	DATE PRINTED:	FIGURE 2	
DATE: JULY 2009			
RMT <small>744 Heartland Trail Madison, WI 53717-1934 P.O. Box 8923 53708-8923 Phone: 608-831-4444 Fax: 608-831-3334</small>			

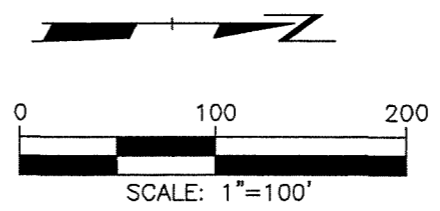


LEGEND

- MW-10 WATER TABLE WELL
- ⊙ MW-3BR PIEZOMETER
- ==== RAILROAD
- - - - PROPERTY LINE
- FORMER SOURCE AREA LOCATIONS

NOTES

1. FACILITY LAYOUT ADAPTED FROM DRAWINGS PROVIDED BY TECUMSEH PRODUCTS COMPANY.
2. MONITORING WELL LOCATIONS AND ELEVATIONS WERE SURVEYED BY RMT INC. ON 12/5/94.

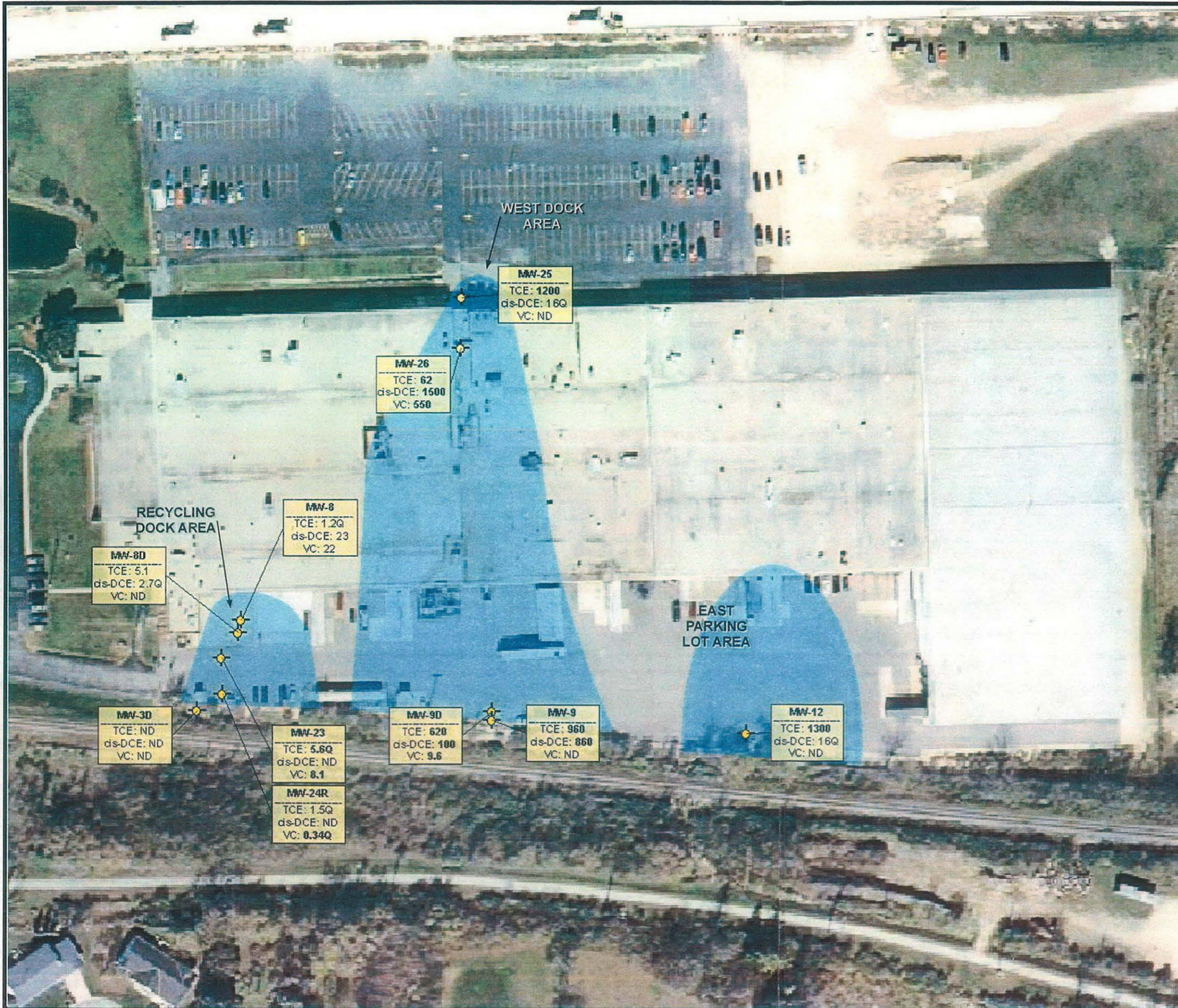


PROJECT:		
TECUMSEH PRODUCTS COMPANY GRAFTON, WISCONSIN		
SHEET TITLE:		
FORMER SOURCE AREAS		
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CHECKED BY:		FILE NO. 73971004.DWG
APPROVED BY:	DATE PRINTED:	FIGURE 3
DATE: JULY 2009		

RMT

744 Heartland Trail
 Madison, WI 53717-1934
 P.O. Box 8923 53708-8923
 Phone: 608-831-4444
 Fax: 608-831-3334

PLOT DATA
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 Operator Name: FIEBRANT
 Scale: 1"=100'



LEGEND

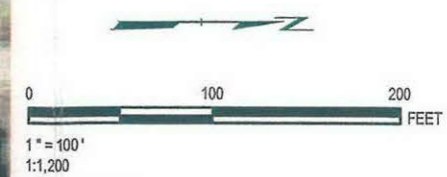
- WELL LOCATION WITH MAY 2007 SAMPLE RESULTS (ug/L)
- APPROXIMATE EXTENT OF SHALLOW TCE IMPACT

TCE = TRICHLOROETHENE
 cis-DCE = cis - 1,2 - DICHLOROETHENE
 VC = VINYL CHLORIDE

BOLD VALUES INDICATE AN NR140 ES EXCEEDENCE.

NOTES

1. BASE IMAGE FROM SOUTHEASTER WISCONSIN REGIONAL LAND INFORMATION, 2005.

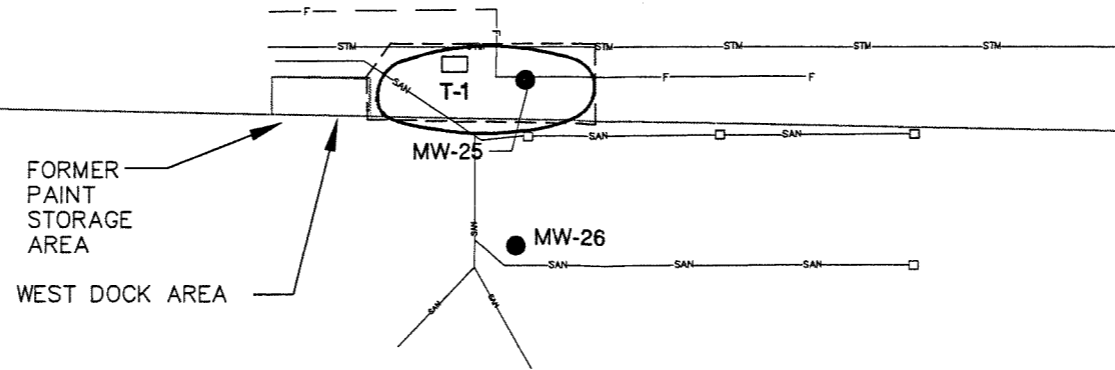


PROJECT: TECUMSEH PRODUCTS COMPANY GRAFTON, WI			
SHEET TITLE: APPROXIMATE EXTENT OF SHALLOW TCE IMPACTS TO ON-SITE GROUNDWATER			
DRAWN BY: PAPEZ J	SCALE: AS NOTED	PROJ. NO. 00-007397.02	
CHECKED BY: SAK		FILE NO. 30843017.mxd	
APPROVED BY: JMR	DATE PRINTED: 7/20/2009	FIGURE 4	
DATE: JULY 2009			

RMT

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UST SUMMARY TABLE			
UST #	SIZE (GAL)	CONTENTS	REMOVAL DATE
T-1	2,000	UNLEADED GASOLINE	10-19-1989
T-2	350	KEROSENE	06-15-1992
T-3	350	STODDARD SOLVENT	06-15-1992
T-4	11,000	MOTOR OIL	06-15-1992
T-5	500	LEADED GASOLINE	10-18-1989
T-6	1,000	UNLEADED GASOLINE	10-18-1989
T-7	300	UNLEADED GASOLINE (NOTE 4)	12-06-1988
T-8	300	UNKNOWN (NOTE 4)	12-06-1988

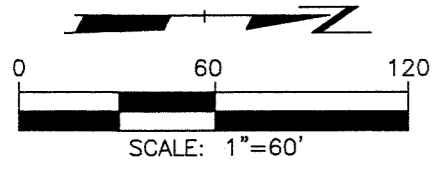
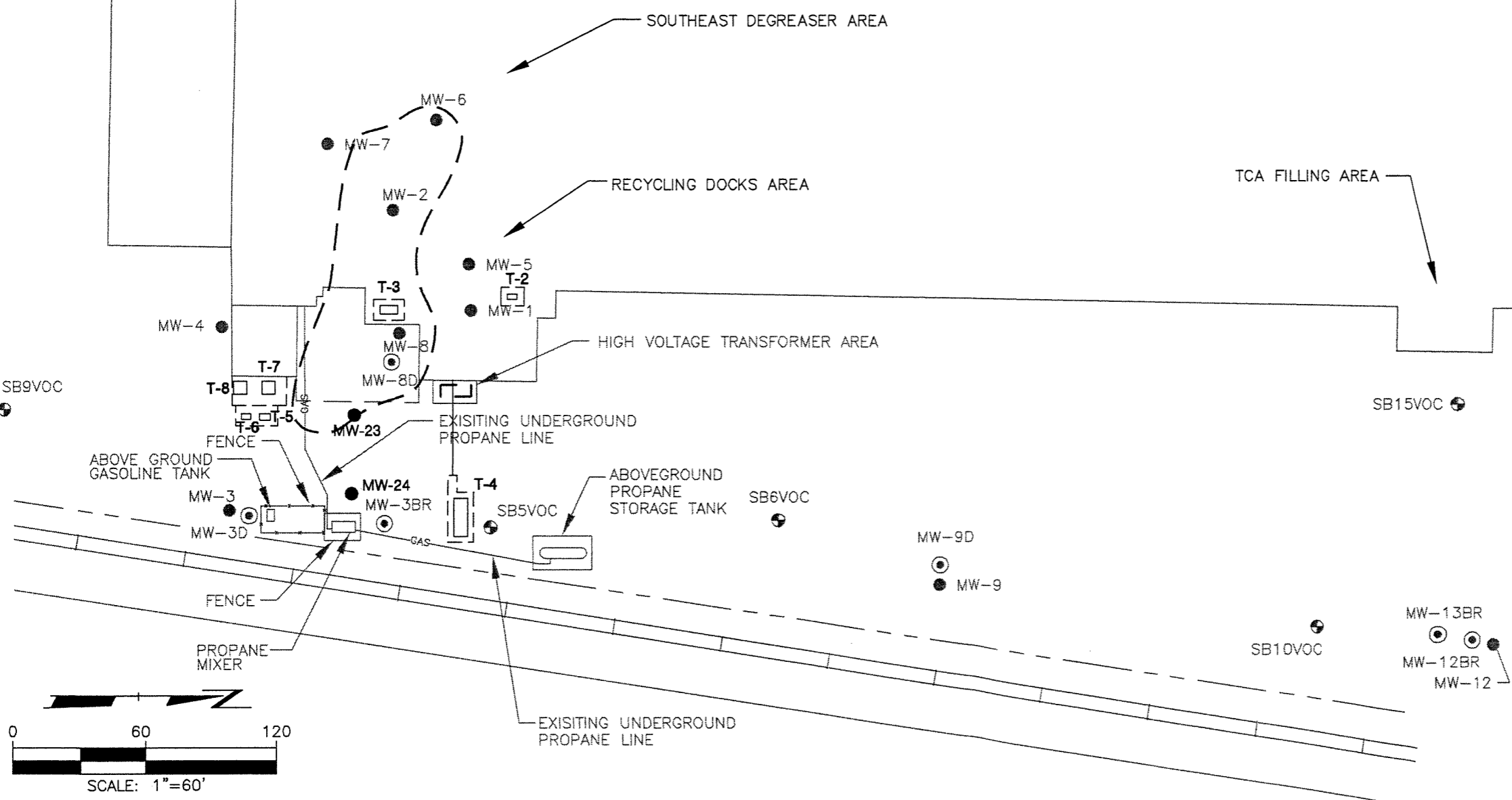


TECUMSEH PRODUCTS COMPANY



- LEGEND**
- MW-10 WATER TABLE WELL
 - ⊙ MW-3BR PIEZOMETER
 - ⊕ SB8VOC SOIL BORING
 - ==== RAILROAD
 - PROPERTY LINE
 - ESTIMATED EXTENT OF RESIDUAL PAH AND PETROLEUM-RELATED SOIL IMPACTS
 - F — FIRE LOOP
 - SAN — SANITARY SEWER
 - STM — STORM SEWER
 - T-3 UST LOCATIONS (REMOVED) (SEE UST REMOVAL CHART - THIS SHEET)
 - APPROXIMATE LIMITS OF SOIL EXCAVATION

- NOTES**
- FACILITY LAYOUT ADAPTED FROM DRAWINGS PROVIDED BY TECUMSEH PRODUCTS COMPANY.
 - THE ESTIMATED EXTENT OF PAH AND PETROLEUM RELATED COMPOUNDS IN SOIL WAS ESTIMATED BASED ON VOC AND PAH DATA COLLECTED BY RMT IN 1994 AND 1995 AND ON DRO DATA COLLECTED BY FOX IN 1993. SEE ATTACHED FIGURES FOR SAMPLE LOCATIONS AND ANALYTICAL DATA.
 - UST TANK LOCATIONS ARE APPROXIMATE.
 - THE CONTENTS OF T-7 AND T-8 MAY BE TRANSPOSED. THE UNKNOWN CONTENT WAS LIKELY AVIATION FUEL BASED ON WRITTEN TEXT IN A LETTER FROM E&K DATED 12/08/88.

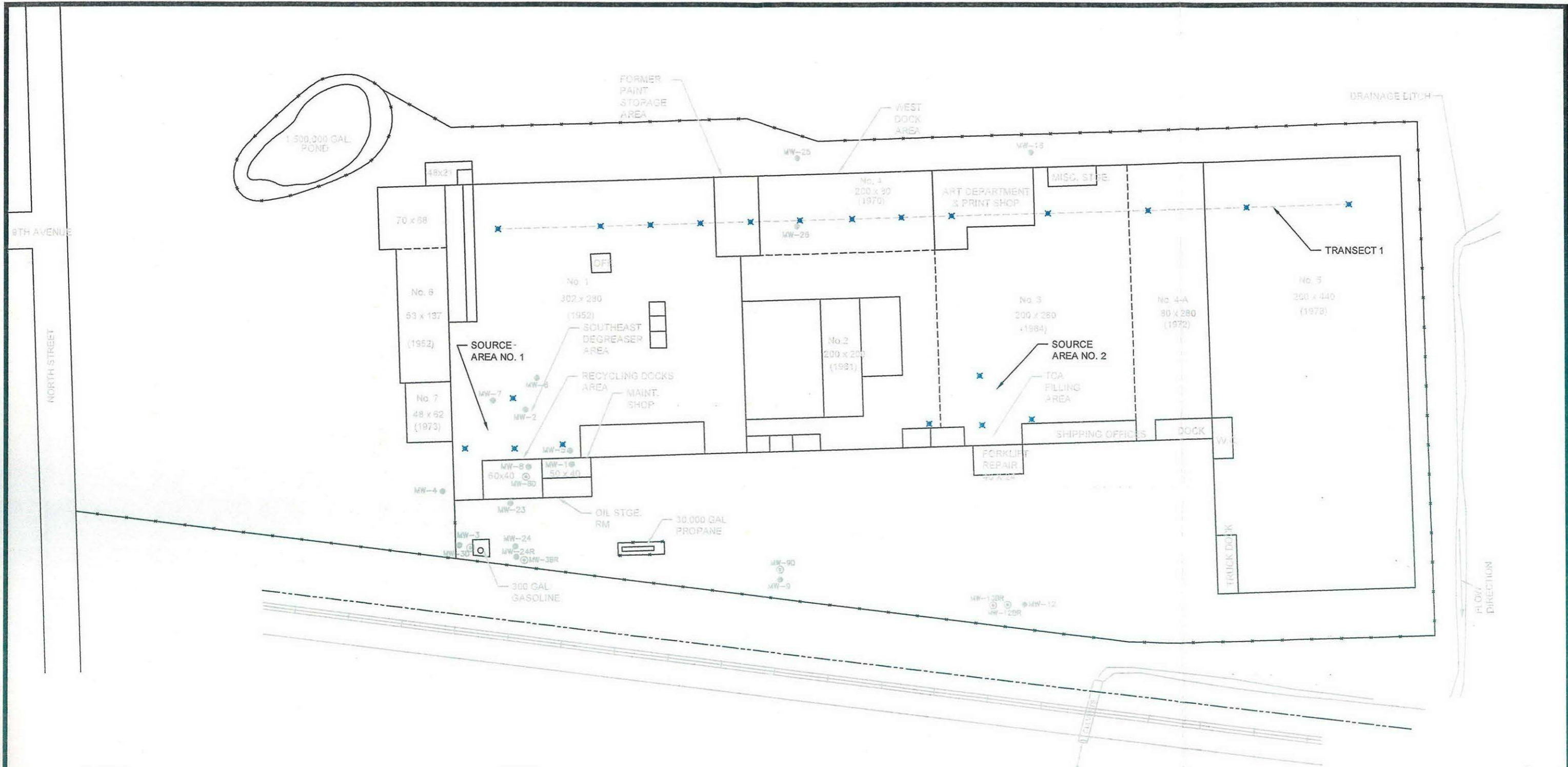


PROJECT: TECUMSEH PRODUCTS COMPANY GRAFTON, WISCONSIN		
SHEET TITLE: FORMER UST LOCATIONS		
DRAWN BY: FIEBRANT	SCALE: 1"=60'	PROJ. NO. 07397.10
CHECKED BY:	DATE PRINTED:	FILE NO. 73971005.DWG
APPROVED BY:	FIGURE 5	
DATE: JULY 2009		

RMT

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PLOT DATA
 Drawing Name: J:\07397\10\73971005.DWG
 Operator Name: FIEBRANT
 Scale: 1"=60'

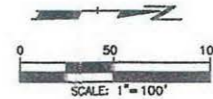


LEGEND

- MW-10 WATER TABLE WELL
- ⊙ MW-3BR PIEZOMETER
- ▬ RAILROAD
- - - PROPERTY LINE
- - - PIPES BELOW GROUND
- - - AISLEWAY
- FD* FLOOR DRAIN
- CO* CLEAN OUT
- * PROPOSED VAPOR SAMPLE POINT LOCATION

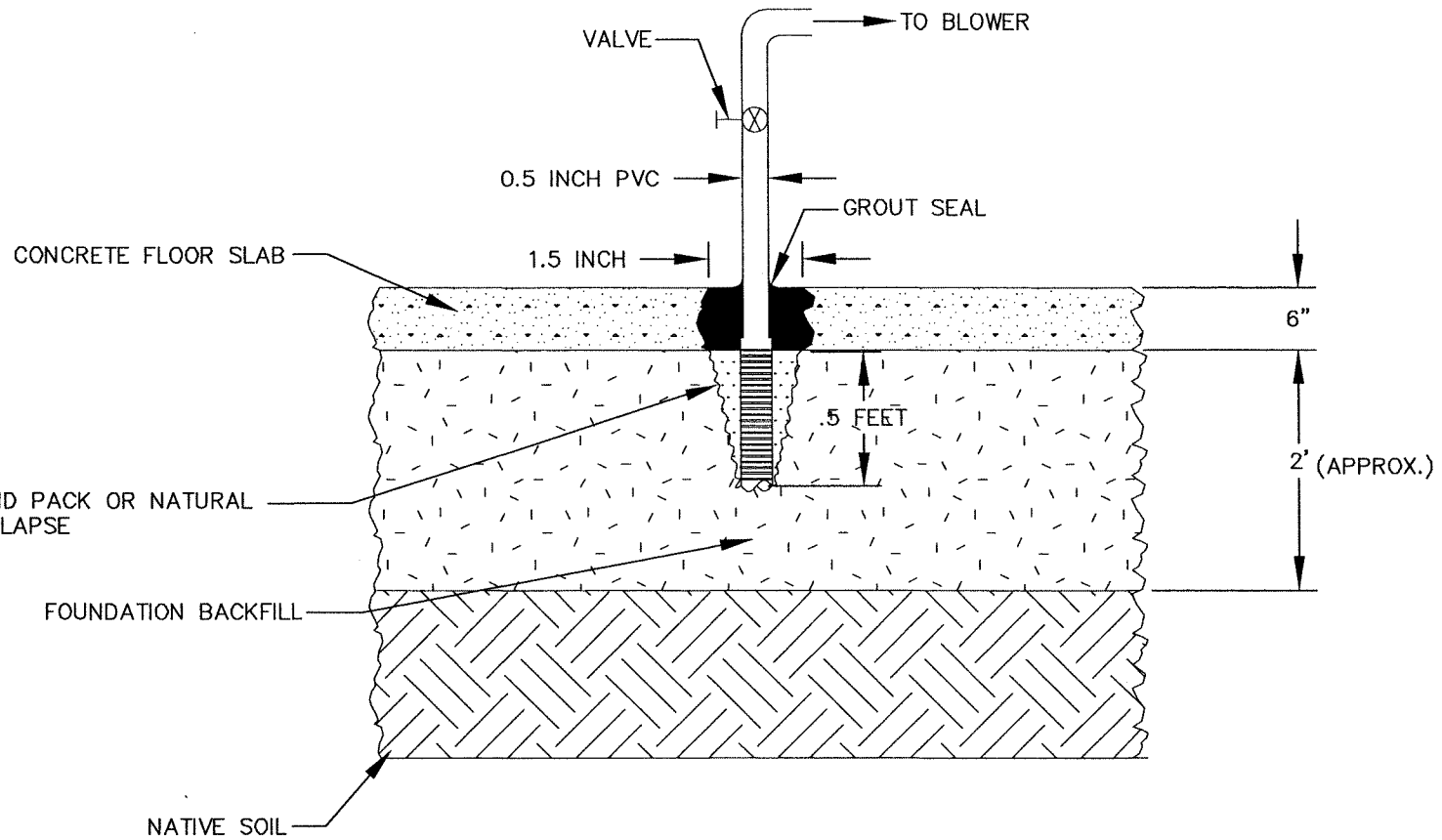
NOTES

1. FACILITY LAYOUT ADAPTED FROM DRAWINGS PROVIDED BY TECUMSEH PRODUCTS COMPANY.
2. MONITORING WELL LOCATIONS AND ELEVATIONS WERE SURVEYED BY RMT INC. ON 12/5/94.



PROJECT: TECUMSEH PRODUCTS COMPANY GRAFTON, WISCONSIN			
SHEET TITLE: PROPOSED SUBSLAB VAPOR SAMPLING LOCATIONS			
DRAWN BY: FIEBRANT	SCALE: 1"=100'	PROJ. NO. 07397.10	
CHECKED BY:		FILE NO. 73971006.DWG	
APPROVED BY:	DATE PRINTED:	FIGURE 6	
DATE: JULY 2009			
RMT		744 Heartland Trail Madison, WI 53717-1954 P.O. Box 8923 53708-8923 Phone: 608-831-4444 Fax: 608-831-3334	

4/15/09
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NOT TO SCALE

RMT

TECUMSEH PRODUCTS COMPANY FACILITY
 GRAFTON, WISCONSIN

CONCEPTUAL VAPOR SAMPLING POINT

DRAWN BY:	FIEBRANT
APPROVED BY:	
PROJECT NO.	07397.10
FILE NO.	73971007.DWG
DATE:	JULY 2009

FIGURE 7

