



August 27, 2015

Tecumseh Products Company  
Attn. Mr. S. Jason Smith  
5683 Hines Drive  
Ann Arbor, MI 48108

Subject: Case Closure Denial for additional Remedial Action  
Tecumseh Products Co-New Holstein (former chrome line)  
1604 Michigan Ave, New Holstein WI  
DNR BRRTS Activity # 02-08-363333

Dear Mr. Smith:

On August 14, 2015, the Northeast Region Closure Committee reviewed your request for closure of the case described above. The Department of Natural Resources reviews environmental remediation cases for compliance with state and federal laws to maintain consistency in the closure of these cases. The purpose of this letter is to inform you of the remaining requirements for obtaining closure. We request that within 60 days of this letter, you provide us with your written response regarding the necessary work and a schedule for completion of this work.

As noted above, additional site work is necessary in order to meet the requirements for site closure because groundwater contaminant trends in the chromium source area are increasing.

#### **Need to Conduct Additional Groundwater Monitoring**

Additional groundwater monitoring is needed in order to establish compliance with the closure criteria of ch. NR 726. If monitored natural attenuation is to be used as a remedial action, you need to determine whether there is a stable or receding plume. Chromium contaminant trends in the source area (MW-E, TEC 3 and TEC-4) under the building are unstable and have been increasing. A brief work plan for additional groundwater monitoring should be submitted to the Department.

#### **Need to Evaluate Additional Remedial Action**

Additional evaluation of the remedial action is needed in order to comply with the closure criteria of ch. NR 726. Additional remedial action should be evaluated to remediate residual chromium in the soil and groundwater in the source area and a report documenting this evaluation be submitted to the Department. This report can be combined with or separate from the groundwater monitoring plan.

A complete closure request should be re-submitted once all the above requirements have been satisfied, together with any required documentation, to let the Department know that applicable requirements have been met. Case closure can be considered once all the above requirements have been satisfied.

**Within 60 days of the date of this letter, please respond in writing with a schedule of your plans**

**to meet these requirements. Until requirements have been met, your site will remain “open” and you will also need to continue to submit the semi-annual progress reports, as required by s. NR 700.11, Wis. Adm. Code.** You will also be responsible for any operation and maintenance activities required under s. NR 724.13, Wis. Adm. Code.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at (920)-662-5120.

Sincerely,



Roxanne N. Chronert  
Team Supervisor, Northeast Region  
Remediation & Redevelopment Program

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