

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

Form 4400-237 (R 12/18)

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Section 1. Contact and Recipient Information

Requester Information

This is the person requesting technical assistance or a post-closure modification review, that his or her liability be clarified or a specialized agreement and is identified as the requester in Section 7. DNR will address its response letter to this person.

Last Name	First	MI	Organization/ Business Name
Harvey	Christopher	D	TRC
Mailing Address			City
230 West Monroe St., Suite 630			Chicago
			State
			IL
			ZIP Code
			60606
Phone # (include area code)	Fax # (include area code)	Email	
(312) 578-0870	(312) 578-0877	charvey@trccompanies.com	

The requester listed above: (select all that apply)

- Is currently the owner
 Is considering selling the Property
 Is renting or leasing the Property
 Is considering acquiring the Property
 Is a lender with a mortgagee interest in the Property
 Other. Explain the status of the Property with respect to the applicant:

Consultant for the responsible party

Contact Information (to be contacted with questions about this request)

Select if same as requester

Contact Last Name	First	MI	Organization/ Business Name
Harvey	Christopher	D	TRC
Mailing Address			City
230 West Monroe St., Suite 630			Chicago
			State
			IL
			ZIP Code
			60606
Phone # (include area code)	Fax # (include area code)	Email	
(312) 578-0870	(312) 578-0877	charvey@trccompanies.com	

Environmental Consultant (if applicable)

Contact Last Name	First	MI	Organization/ Business Name
Harvey	Christopher	D	TRC
Mailing Address			City
230 West Monroe St., Suite 630			Chicago
			State
			IL
			ZIP Code
			60606
Phone # (include area code)	Fax # (include area code)	Email	
(312) 578-0870	(312) 578-0877	charvey@trccompanies.com	

Property Owner (if different from requester)

Contact Last Name	First	MI	Organization/ Business Name
Langenfeld	Casey		City of New Holstein
Mailing Address			City
2110 Washington St.			New Holstein
			State
			WI
			ZIP Code
			53061
Phone # (include area code)	Fax # (include area code)	Email	
(920) 898-5766	(920) 898-5879	clangenfeld@wppienergy.org	

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Section 2. Property Information			
Property Name Tecumseh Products Co. (former) - Chromium Line		FID No. (if known)	
BRRTS No. (if known) 02-08-36333		Parcel Identification Number 18919, 18569, 18921, 18646, 18465, 18450, 18568	
Street Address 1604 Michigan Avenue		City New Holstein	State WI
County Calumet		Municipality where the Property is located <input checked="" type="radio"/> City <input type="radio"/> Town <input type="radio"/> Village of New Holstein	Property is composed of: <input type="radio"/> Single tax parcel <input checked="" type="radio"/> Multiple tax parcels
		Property Size Acres 38	ZIP Code 53061

1. Is a response needed by a specific date? (e.g., Property closing date) Note: Most requests are completed within 60 days. Please plan accordingly.

No Yes

Date requested by: _____

Reason: _____

2. Is the "Requester" enrolled as a Voluntary Party in the Voluntary Party Liability Exemption (VPLE) program?

No. **Include the fee that is required for your request in Section 3, 4 or 5.**

Yes. **Do not include a separate fee.** This request will be billed separately through the VPLE Program.

Fill out the information in Section 3, 4 or 5 which corresponds with the type of request:

Section 3. Technical Assistance or Post-Closure Modifications;

Section 4. Liability Clarification; or Section 5. Specialized Agreement.

Section 3. Request for Technical Assistance or Post-Closure Modification

Select the type of technical assistance requested: **[Numbers in brackets are for WI DNR Use]**

- No Further Action Letter (NFA) (Immediate Actions) - NR 708.09, [183] - **Include a fee of \$350.** Use for a written response to an immediate action after a discharge of a hazardous substance occurs. Generally, these are for a one-time spill event.
- Review of Site Investigation Work Plan - NR 716.09, [135] - **Include a fee of \$700.**
- Review of Site Investigation Report - NR 716.15, [137] - **Include a fee of \$1050.**
- Approval of a Site-Specific Soil Cleanup Standard - NR 720.10 or 12, [67] - **Include a fee of \$1050.**
- Review of a Remedial Action Options Report - NR 722.13, [143] - **Include a fee of \$1050.**
- Review of a Remedial Action Design Report - NR 724.09, [148] - **Include a fee of \$1050.**
- Review of a Remedial Action Documentation Report - NR 724.15, [152] - **Include a fee of \$350**
- Review of a Long-term Monitoring Plan - NR 724.17, [25] - **Include a fee of \$425.**
- Review of an Operation and Maintenance Plan - NR 724.13, [192] - **Include a fee of \$425.**

Other Technical Assistance - s. 292.55, Wis. Stats. [97] (For request to build on an abandoned landfill use Form 4400-226)

- Schedule a Technical Assistance Meeting - **Include a fee of \$700.**
- Hazardous Waste Determination - **Include a fee of \$700.**
- Other Technical Assistance - **Include a fee of \$700.** Explain your request in an attachment.

Post-Closure Modifications - NR 727, [181]

- Post-Closure Modifications: Modification to Property boundaries and/or continuing obligations of a closed site or Property; sites may be on the GIS Registry. This also includes removal of a site or Property from the GIS Registry. **include a fee of \$1050, and:**
 - Include a fee of \$300 for sites with residual soil contamination; and
 - Include a fee of \$350 for sites with residual groundwater contamination, monitoring wells or for vapor intrusion continuing obligations.

Attach a description of the changes you are proposing, and documentation as to why the changes are needed (if the change to a Property, site or continuing obligation will result in revised maps, maintenance plans or photographs, those documents may be submitted later in the approval process, on a case-by-case basis).

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Skip Sections 4 and 5 if the technical assistance you are requesting is listed above and complete Sections 6 and 7 of this form.

Section 4. Request for Liability Clarification

Select the type of liability clarification requested. Use the available space given or attach information, explanations, or specific questions that you need answered in DNR's reply. Complete Sections 6 and 7 of this form. [Numbers in brackets are for DNR Use]

"Lender" liability exemption clarification - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the real Property, and/or the personal Property and fixtures;
- (2) an environmental assessment, in accordance with s. 292.21, Wis. Stats.;
- (3) the date the environmental assessment was conducted by the lender;
- (4) the date of the Property acquisition; for foreclosure actions, include a copy of the signed and dated court order confirming the sheriff's sale.
- (5) documentation showing how the Property was acquired and the steps followed under the appropriate state statutes.
- (6) a copy of the Property deed with the correct legal description; and,
- (7) the Lender Liability Exemption Environmental Assessment Tracking Form (Form 4400-196).
- (8) If no sampling was done, please provide reasoning as to why it was **not** conducted. Include this either in the accompanying environmental assessment or as an attachment to this form, and cite language in s. 292.21(1)(c)2., h.-i., Wis. Stats.:
 - h. The collection and analysis of representative samples of soil or other materials in the ground that are suspected of being contaminated based on observations made during a visual inspection of the real Property or based on aerial photographs, or other information available to the lender, including stained or discolored soil or other materials in the ground and including soil or materials in the ground in areas with dead or distressed vegetation. The collection and analysis shall identify contaminants in the soil or other materials in the ground and shall quantify concentrations.
 - i. The collection and analysis of representative samples of unknown wastes or potentially hazardous substances found on the real Property and the determination of concentrations of hazardous waste and hazardous substances found in tanks, drums or other containers or in piles or lagoons on the real Property.

"Representative" liability exemption clarification (e.g. trustees, receivers, etc.) - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the Property;
- (2) the date of Property acquisition by the representative;
- (3) the means by which the Property was acquired;
- (4) documentation that the representative has no beneficial interest in any entity that owns, possesses, or controls the Property;
- (5) documentation that the representative has not caused any discharge of a hazardous substance on the Property; and
- (6) a copy of the Property deed with the correct legal description.

Clarification of local governmental unit (LGU) liability exemption at sites with: (select all that apply)

- hazardous substances spills - s. 292.11(9)(e), Wis. Stats. [649];
- Perceived environmental contamination - [649];
- hazardous waste - s. 292.24 (2), Wis. Stats. [649]; and/or
- solid waste - s. 292.23 (2), Wis. Stats. [649].

❖ **Include a fee of \$700, a summary of the environmental liability clarification being requested, and the following:**

- (1) clear supporting documentation showing the acquisition method used, and the steps followed under the appropriate state statute(s).
- (2) current and proposed ownership status of the Property;
- (3) date and means by which the Property was acquired by the LGU, where applicable;
- (4) a map and the ¼, ¼ section location of the Property;
- (5) summary of current uses of the Property;
- (6) intended or potential use(s) of the Property;
- (7) descriptions of other investigations that have taken place on the Property; and
- (8) (for solid waste clarifications) a summary of the license history of the facility.

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Section 4. Request for Liability Clarification (cont.)

Lease liability clarification - s. 292.55, Wis. Stats. [646]

❖ **Include a fee of \$700 for a single Property, or \$1400 for multiple Properties and the information listed below:**

- (1) a copy of the proposed lease;
- (2) the name of the current owner of the Property and the person who will lease the Property;
- (3) a description of the lease holder's association with any persons who have possession, control, or caused a discharge of a hazardous substance on the Property;
- (4) map(s) showing the Property location and any suspected or known sources of contamination detected on the Property;
- (5) a description of the intended use of the Property by the lease holder, with reference to the maps to indicate which areas will be used. Explain how the use will not interfere with any future investigation or cleanup at the Property; and
- (6) all reports or investigations (e.g. Phase I and Phase II Environmental Assessments and/or Site Investigation Reports conducted under s. NR 716, Wis. Adm. Code) that identify areas of the Property where a discharge has occurred.

General or other environmental liability clarification - s. 292.55, Wis. Stats. [682] - Explain your request below.

❖ **Include a fee of \$700 and an adequate summary of relevant environmental work to date.**

No Action Required (NAR) - NR 716.05, [682]

❖ **Include a fee of \$700.**

Use where an environmental discharge has or has not occurred, and applicant wants a DNR determination that no further assessment or clean-up work is required. Usually this is requested after a Phase I and Phase II environmental assessment has been conducted; the assessment reports should be submitted with this form. This is not a closure letter.

Clarify the liability associated with a "closed" Property - s. 292.55, Wis. Stats. [682]

❖ **Include a fee of \$700.**

- Include a copy of any closure documents if a state agency other than DNR approved the closure.

Use this space or attach additional sheets to provide necessary information, explanations or specific questions to be answered by the DNR.

Section 5. Request for a Specialized Agreement

Select the type of agreement needed. Include the appropriate draft agreements and supporting materials. Complete Sections 6 and 7 of this form. More information and model draft agreements are available at: dnr.wi.gov/topic/Brownfields/lgu.html#tabx4.

Tax cancellation agreement - s. 75.105(2)(d), Wis. Stats. [654]

❖ **Include a fee of \$700, and the information listed below:**

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description.

Agreement for assignment of tax foreclosure judgement - s.75.106, Wis. Stats. [666]

❖ **Include a fee of \$700, and the information listed below:**

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description.

Negotiated agreement - Enforceable contract for non-emergency remediation - s. 292.11(7)(d) and (e), Wis. Stats. [630]

❖ **Include a fee of \$1400, and the information listed below:**

- (1) a draft schedule for remediation; and,
- (2) the name, mailing address, phone and email for each party to the agreement.

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Section 6. Other Information Submitted

Identify all materials that are included with this request.

Send both a paper copy of the signed form and all reports and supporting materials, and an electronic copy of the form and all reports, including Environmental Site Assessment Reports, and supporting materials on a compact disk.

Include one copy of any document from any state agency files that you want the Department to review as part of this request. The person submitting this request is responsible for contacting other state agencies to obtain appropriate reports or information.

- Phase I Environmental Site Assessment Report - Date: _____
- Phase II Environmental Site Assessment Report - Date: _____
- Legal Description of Property (required for all liability requests and specialized agreements)
- Map of the Property (required for all liability requests and specialized agreements)

Analytical results of the following sampled media: Select all that apply and include date of collection.

- Groundwater
- Soil
- Sediment
- Other medium - Describe: _____

Date of Collection: _____

- A copy of the closure letter and submittal materials
- Draft tax cancellation agreement
- Draft agreement for assignment of tax foreclosure judgment
- Other report(s) or information - Describe: Groundwater Monitoring Report

For Property with newly identified discharges of hazardous substances only: Has a notification of a discharge of a hazardous substance been sent to the DNR as required by s. NR 706.05(1)(b), Wis. Adm. Code?

- Yes - Date (if known): _____
- No

Note: The Notification for Hazardous Substance Discharge (non-emergency) form is available at:
dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf.

Section 7. Certification by the Person who completed this form

- I am the person submitting this request (requester)
- I prepared this request for: _____
Requester Name

I certify that I am familiar with the information submitted on this request, and that the information on and included with this request is true, accurate and complete to the best of my knowledge. I also certify I have the legal authority and the applicant's permission to make this request.


Signature

5/13/2019
Date Signed

Principal
Title

312-578-0870
Telephone Number (include area code)

Section 8. DNR Contacts and Addresses for Request Submittals

Send or deliver one paper copy and one electronic copy on a compact disk of the completed request, supporting materials, and fee to the region where the property is located to the address below. Contact a DNR regional brownfields specialist with any questions about this form or a specific situation involving a contaminated property. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>

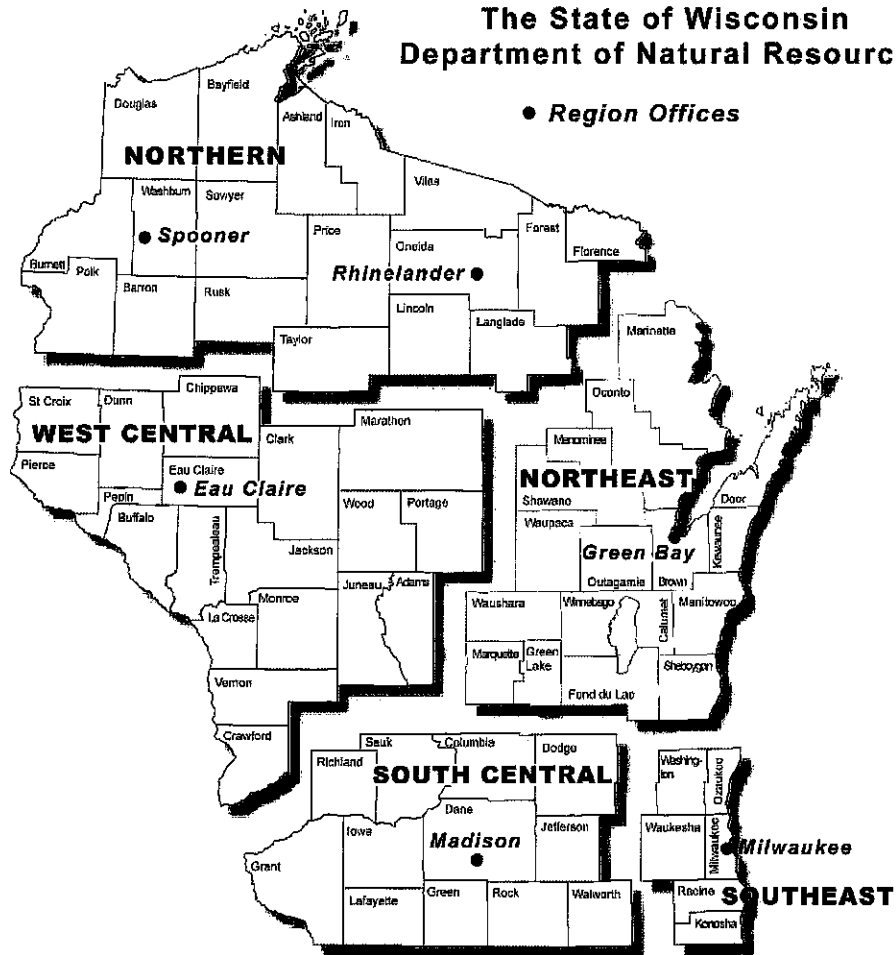
DNR NORTHERN REGION
Attn: RR Program Assistant
Department of Natural Resources
223 E Steinfest Rd Antigo, WI 54409

DNR NORTHEAST REGION
Attn: RR Program Assistant
Department of Natural Resources
2984 Shawano Avenue
Green Bay WI 54313

DNR SOUTH CENTRAL REGION
Attn: RR Program Assistant
Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg WI 53711

DNR SOUTHEAST REGION
Attn: RR Program Assistant
Department of Natural Resources
2300 North Martin Luther King Drive
Milwaukee WI 53212

DNR WEST CENTRAL REGION
Attn: RR Program Assistant
Department of Natural Resources
1300 Clairemont Ave.
Eau Claire WI 54702



Note: These are the Remediation and Redevelopment Program's designated regions. Other DNR program regional boundaries may be different.

DNR Use Only			
Date Received	Date Assigned	BRRTS Activity Code	BRRTS No. (if used)
DNR Reviewer		Comments	
Fee Enclosed? <input type="radio"/> Yes <input type="radio"/> No	Fee Amount \$	Date Additional Information Requested	Date Requested for DNR Response Letter
Date Approved	Final Determination		

May 13, 2019

Mr. Kevin McKnight
Northeast Region
Wisconsin Department of Natural Resources
625 East County Road Y, Suite 700
Oshkosh, WI 54901

**Subject: 2019 Groundwater Monitoring Report
Former Tecumseh Products, Former Plating Line Area
New Holstein, Wisconsin
BRRTS# 02-08-363333**

Dear Mr. McKnight:

TRC is implementing monitored natural attenuation (MNA) and groundwater monitoring specific to the former plating line area at the former Tecumseh Products facility in New Holstein, Wisconsin (BRRTS #: 02-08-363333). On March 21, 2019, TRC completed groundwater sampling at monitoring wells specific to the former plating line area to verify a stable residual chromium plume and confirm that the chromium plume is naturally attenuating. This letter presents the results of the data collected during the groundwater monitoring event, in accordance with the proposed work plan, dated June 21, 2017. A technical review and response from the Wisconsin Department of Natural Resources (WDNR) is requested, and a \$425 check is included for the review, per the State of Wisconsin Chapter NR 749 fee for long-term monitoring plans.

BACKGROUND

Evaluation of the groundwater data through August 2014 indicated that 1) the extent of chromium impacts to groundwater from the former plating line were defined, remains stable, and that natural attenuation is occurring and 2) total dissolved chromium continues to consist of predominantly dissolved hexavalent chromium and future sampling would focus on the total dissolved chromium. Beginning in 2016, only the plume monitoring wells that exceeded the Enforcement Standard (ES) point-of-compliance for total dissolved chromium ($>100 \mu\text{g/L}$) were being monitored. These monitoring wells include MW-A, MW-B, MW-E, MW-8, TEC-3, and TEC-4. During the April and September 2016 sampling events, the wells were sampled for total dissolved chromium to track MNA. At the request of WDNR, the April 2017 sampling event included the six plume monitoring wells, three additional monitoring wells (TEC-1, NH-2, NH-26), and three additional groundwater sample analyses (dissolved hexavalent chromium, ferrous iron, and total organic carbon [TOC]). The additional analyses were included to assess the geochemical composition of the subsurface materials with respect to MNA.

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A Groundwater Monitoring Report, which summarized the above analyses, was submitted to the WDNR on June 21, 2017. The report concluded that 1) the contaminant plume remains stable and has not shown any migration from previous sampling events, 2) the groundwater impacts do not pose a threat to human health or the environment, and 3) that natural attenuation continues to control the migration of chromium impacts and is still a viable remedy for the site. TRC proposed to conduct biennial groundwater sampling beginning in 2019. Samples would be analyzed for only total dissolved chromium. The proposed frequency of sampling is based on the fact that sufficient data has been collected, evaluated and presented to suggest the stable nature of the chromium groundwater impacts.

An additional Groundwater Monitoring Plan was submitted to the WDNR on July 11, 2017. According to the plan, TRC proposed to perform a groundwater sampling event on monitoring wells MW-E, TEC-3, TEC-4, MW-8, NH-26, MW-A, and MW-B.

The WDNR responded with a letter on August 22, 2017 approving the long-term monitoring plan with the following notable stipulations.

- Monitoring well NH-7 had to be added to the monitoring schedule.
- Monitoring wells MW-5, TEC-1, MW-24, and MW-F (at a minimum) should be sampled in the final sampling event prior to submittal of a case closure request.
- If groundwater contaminant trends in source area wells (TEC-3, TEC-4, and NH-26) do not allow for case closure after the 2019 sampling event, evaluation of additional remedial alternatives will need to be conducted to facilitate site closure.

SUMMARY OF GROUNDWATER MONITORING

Groundwater Monitoring Program

On March 21, 2019, TRC completed a groundwater gauging and sampling event at the former Tecumseh chromium line remediation area. Prior to groundwater sampling, water levels were measured at every monitoring well that could be located with an oil-water interface probe.

Groundwater sampling was completed at monitoring wells MW-E, TEC-3, TEC-4, MW-8, NH-7, NH-26, MW-A, and MW-B. In addition, TRC also sampled MW-5, TEC-1 and MW-F in anticipation of being a final groundwater sampling event for submittal of case closure. TRC had intended to sample MW-24 as well, but this monitoring well was destroyed.

Groundwater samples were collected using low-flow sampling techniques with an Alexis peristaltic pump and Horiba U-53 multi-parameter meter and flow cell. During well purging, field parameters (temperature, conductivity, turbidity, dissolved oxygen, pH and oxidation/reduction potential [ORP]) were measured and allowed to stabilize prior to sampling. Low-flow sampling stabilization forms are provided in Attachment A. Groundwater samples were field filtered with a 0.52 micron filter and submitted for laboratory analysis of total dissolved chromium using method EPA 6010. All samples were packaged in a cooler with ice and shipped to Pace Analytical Services, LLC in Green Bay, Wisconsin (Pace) under standard chain of custody procedures.

Purge water was drummed and discharged into the nearest sanitary sewer line, with permission from the City of New Holstein wastewater treatment plant.

Groundwater Elevations

Table 1 presents a summary of water level measurements collected during events between 2009 and 2019 and Figure A presents the groundwater elevation contours for the March 2019 sampling event. The groundwater gradient is oriented from the east/southeast portion of the facility, towards the west. Groundwater elevations were similar to previous groundwater monitoring events. Groundwater continues to exhibit an overall westerly flow direction as illustrated on Figure 1.

Groundwater Quality Assurance/Quality Control Results

TRC performed a Quality Assurance/Quality Control (QA/QC) review of the laboratory report, in regards to analyses, procedures, and protocols performed by Pace. Samples were received by Pace within the mandated timeframe and maintained at the proper temperature. Based on the results, there were no major insufficiencies regarding surrogate recoveries, analyte detections or sample duplicate recoveries. Based on an internal review by TRC, all data were considered acceptable. QC data indicate that measurement data are sufficient to meet method quality objectives, data are defensible, and QC mechanisms were effective in ensuring measurement data reliability.

RESULTS AND DISCUSSION

The groundwater analytical results are summarized in Table 2, which contains total dissolved chromium results from the March 2019 groundwater event, as well as previous analytical results. The low-flow stabilization geochemical results indicate that the dissolved oxygen is ranging between 3 and 10 milligrams per liter (mg/L) and an ORP greater than 200 millivolts (mV). The pH of the groundwater is slightly basic, ranging between 7 and 8 S.U. There is no obvious difference between the geochemistry of the source area as compared to down-gradient. The distribution of total dissolved chromium in groundwater is shown on Figure 2. The monitoring wells with total dissolved chromium exceeding the ES are shown on Figure 2. The laboratory analytical results are provided in Attachment B.

Total dissolved chromium concentrations exceeded the ES in 7 of the 11 monitoring wells in March 2019 (MW-A, MW-E, TEC-1, TEC-3, TEC-4, NH-7 and NH-26). Monitoring wells MW-B and MW-5 exceeded the Preventative Action Limit (PAL) in March 2019, but not the ES. The remaining two monitoring wells MW-F and MW-8 were below the ES and PAL.

In order to assess the current subsurface conditions of the Site, an evaluation of the dissolved chromium concentration trends has been completed. The historic distribution of total dissolved chromium in groundwater is shown on Figure 2. The extent of the total dissolved chromium has receded over time. The northern extent of dissolved chromium is likely not related to migration; dissolved chromium was likely there beforehand, which is supported by the more recent data points. The trend analysis charts were completed on monitoring wells which exceeded the ES. The trend analysis charts are provided in Attachment C. Based on these

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charts, which track dissolved chromium verses time, the following significant points can be made.

Source area monitoring well TEC-4 has remained stable through the last three groundwater sampling events. The overall concentrations of chromium have decreased compared to the 2011 and 2016 results. The high dissolved chromium concentration received during the April 22, 2016 groundwater sampling event appears to be an anomaly.

Dissolved chromium concentrations in source area monitoring well TEC-3 shows a decreasing trend since 2015. Dissolved chromium concentrations in NH-26 show a significant decrease since the last sampling event in 2017.

Dissolved chromium concentrations in down-gradient monitoring wells MW-E and MW-A have had significantly lower concentrations from their maximum concentrations of the last three groundwater sampling events (MW-E maximum concentration 1,290 µg/L in 2014; MW-A maximum concentration 4,100 µg/L in 2007). Dissolved chromium concentrations in down-gradient monitoring well TEC-1 have continued to decline since 2010. The dissolved chromium concentrations in these three monitoring wells has dropped significantly over time from the maximum concentrations which were greater than 1,200 µg/L.

Dissolved chromium concentrations in down-gradient monitoring well NH-7 do not show a definitive trend. The concentration increased during the 2019 groundwater sampling event; however, these concentrations are still relatively low. Monitoring well NH-7 is near to and upgradient of MW-24 and NH-10, both of which have historical chromium results below the PAL and ES.

CONCLUSIONS AND RECOMMENDATIONS

Based on the evaluation of recent groundwater data, the overall extent of the dissolved contaminant plume remains stable compared with previous sampling events. Additionally, monitoring wells MW-B, MW-5, and MW-8 now lie outside of the impacted area above the ES indicating that the dissolved chromium has receded over time near the source area. These results confirm that MNA continues to be effective in controlling and mitigating the migration of residual chromium impacts to groundwater and remains a viable remedy for the site and that no further evaluation of remedial alternatives is necessary.

The groundwater impacts do not pose a threat to human health or the environment. Moreover, there is a deed restriction recorded to the property limiting certain activities and uses that further acts to protect human health and the environment.

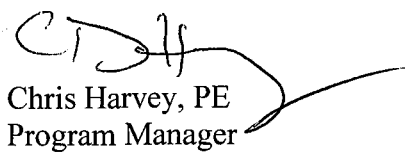
TRC proposes to continue biennial groundwater sampling with the next round scheduled for Spring 2021 to further assess contaminant trends and confirm the effectiveness of MNA as a final remedy. Samples will be collected and analyzed for total dissolved chromium from the same monitoring well network. In addition, TRC proposes to sample monitoring well NH-10 to evaluate low level residual chromium impacts around NH-7. The proposed frequency of

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sampling is based on the fact that sufficient data has been collected, evaluated and presented to confirm the stable nature of the chromium groundwater impacts. If the stable to declining groundwater contaminant trends in source area wells (TEC-3, TEC-4, and NH-26) can be demonstrated after the 2021 sampling event, TRC will evaluate the appropriateness of recommending the site for case closure.

If you have any questions, please contact me at (312) 578-0870, extension 11910.

Sincerely,


Chris Harvey, PE
Program Manager

Enclosures: Check for \$425: Report Fee

TABLES

Table 1. Groundwater Elevations 2009 - 2019

Table 2. Summary of Groundwater Analytical Data

FIGURES

Figure 1. Groundwater Isoconcentration Map – March 2019

Figure 2. Total Dissolved Chromium in Groundwater March 2019

ATTACHMENTS

Attachment A. Low-Flow Sampling Logs

Attachment B. Laboratory Analytical Report (March 29, 2019)

Attachment C. Trend Analysis Charts

cc: Mr. Jason Smith/Tecumseh Products Co. – Paris, TN
Mr. Curtis Toll/Greenberg Traurig, LLP – Philadelphia
Mr. Ron Bock/TRC – Irvine, CA
Ms. Denise Danelski/WDNR – Green Bay, WI

TABLES

Table 1. Groundwater Level Elevations 2009-2019

Location	Top of Casing (TOC) Elevation (ft MSL)	June 8, 2009		September 23, 2009		December 28 & 29, 2009		March 29 & 30, 2010		March 18 & 19, 2011		May 15, 2012	
		Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation
MW-1	932.60	6.13	926.47	8.80	923.80	3.71	928.89	4.98	927.62	4.92	927.68	2.77	929.83
NH-2	935.34	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	932.24	4.32	927.92	7.55	924.69	2.56	929.68	3.77	928.47	3.56	928.68	2.67	929.57
MW-5	931.81	4.30	927.51	7.24	924.57	3.10	928.71	3.27	928.54	2.99	928.82	2.39	929.42
MW-6	931.90	5.23	926.67	8.45	923.45	3.17	928.73	3.72	928.18	3.46	928.44	2.85	929.05
NH-7	935.42	Well installed in 2012		Well installed in 2012		Well installed in 2012		Well installed in 2012		Well installed in 2012		Well installed in 2012	
MW-8	931.89	4.07	927.82	6.73	925.16	2.99	928.90	3.33	928.56	3.11	928.78	2.63	929.26
MW-9	931.54	7.04	924.50	10.65	920.89	4.71	926.83	4.58	926.96	--	--	--	--
NH-10	935.37	--	--	--	--	--	--	--	--	--	--	--	--
NH-25	934.65	Well installed in 2012		Well installed in 2012		Well installed in 2012		Well installed in 2012		Well installed in 2012		Well installed in 2012	
MW-24	931.07	--	--	--	--	--	--	--	--	--	--	--	--
NH-26	934.76	Well installed in 2012		Well installed in 2012		Well installed in 2012		Well installed in 2012		Well installed in 2012		Well installed in 2012	
MW-A	932.83	6.78	926.05	9.38	923.45	4.79	928.04	5.62	927.21	5.57	927.26	4.47	928.36
MW-B	932.58	5.69	926.89	8.60	923.98	3.00	929.58	4.40	928.18	4.22	928.36	3.11	929.47
MW-C	931.89	5.88	926.01	9.24	922.65	3.29	928.60	3.86	928.03	3.64	928.25	2.59	929.30
MW-D	941.90	5.81	936.09	9.96	931.94	5.18	936.72	4.04	937.86	--	--	--	--
MW-E	933.31	7.28	926.03	9.81	923.50	6.20	927.11	6.43	926.88	6.33	926.98	5.32	927.99
MW-F	933.83	8.52	925.31	10.93	922.90	7.31	926.52	7.53	926.30	7.52	926.31	6.71	927.12
MW-G	934.37	7.52	926.85	10.66	923.71	7.02	927.35	7.28	927.09	7.21	927.16	5.98	928.39
MW-H	933.63	8.81	924.82	12.40	921.23	9.06	924.57	8.45	925.18	--	--	--	--
TEC-1	932.51	4.20	928.31	6.67	925.84	3.69	928.82	3.89	928.62	3.46	929.05	3.14	929.37
TEC-1A	932.02	14.29	917.73	18.37	913.65	14.66	917.36	13.58	918.44	13.42	918.60	13.17	918.85
TEC-2	931.90	4.67	927.23	7.47	924.43	3.55	928.35	3.68	928.22	3.40	928.50	2.90	929.00
TEC-3	934.62	6.94	927.68	9.07	925.55	6.51	928.11	6.20	928.42	5.94	928.68	5.38	929.24
TEC-4	934.50	7.15	927.35	9.64	924.86	6.12	928.38	6.33	928.17	5.98	928.52	5.35	929.15

MSL - Mean Sea Level

NA* Well underwater and could not be measured

Table 1. Groundwater Level Elevations 2009-2019

Location	Top of Casing (TOC) Elevation (ft MSL)	June 20 & 21, 2013		August 18, 2014		April 22, 2016		September 7, 2016		April 26, 2017		March 21, 2019	
		Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation	Depth To Water Below TOC	Water Level Elevation
MW-1	932.60	5.13	927.47	6.80	925.80	4.53	928.07	2.97	929.63	--	--	4.12	928.48
NH-2	935.34	--	--	3.68	931.66	4.01	931.33	3.65	931.69	3.82	931.52	3.63	931.71
MW-4	932.24	4.08	928.16	5.62	926.62	3.36	928.88	3.03	929.21	--	--	--	--
MW-5	931.81	3.70	928.11	4.89	926.92	2.87	928.94	3.35	928.46	--	--	2.81	929.00
MW-6	931.90	4.28	927.62	5.91	925.99	3.19	928.71	3.69	928.21	--	--	--	--
NH-7	935.42	8.64	926.78	9.14	926.28	7.77	927.65	8.13	927.29	--	--	7.22	928.20
MW-8	931.89	3.63	928.26	4.74	927.15	2.91	928.98	2.42	929.47	2.33	929.56	1.54	930.35
MW-9	931.54	--	--	--	--	3.96	927.58	4.99	926.55	--	--	--	--
NH-10	935.37	--	--	9.24	926.13	8.23	927.14	8.59	926.78	--	--	7.80	927.57
NH-25	934.65	6.34	928.31	6.73	927.92	5.83	928.82	5.49	929.16	--	--	4.97	929.68
MW-24	931.07	--	--	7.58	923.49	4.94	926.13	6.21	924.86	--	--	Destroyed	
NH-26	934.76	6.76	928.00	6.99	927.77	6.24	928.52	NA*	934.76	5.73	929.03	6.04	928.72
MW-A	932.83	5.72	927.11	7.33	925.50	5.23	927.60	4.56	928.27	3.92	928.91	5.34	927.49
MW-B	932.58	4.58	928.00	6.31	926.27	3.95	928.63	3.57	929.01	2.69	929.89	3.88	928.70
MW-C	931.89	4.57	927.32	6.35	925.54	3.26	928.63	3.63	928.26	--	--	4.19	927.70
MW-D	941.90	--	--	--	--	3.86	938.04	6.59	935.31	--	--	3.58	938.32
MW-E	933.31	6.44	926.87	7.98	925.33	6.01	927.30	5.60	927.71	4.92	928.39	6.16	927.15
MW-F	933.83	7.76	926.07	9.02	924.81	7.21	926.62	7.41	926.42	--	--	7.38	926.45
MW-G	934.37	7.68	926.69	9.29	925.08	7.11	927.26	5.89	928.48	--	--	8.25	926.12
MW-H	933.63	--	--	--	--	7.88	925.75	7.19	926.44	--	--	8.61	925.02
TEC-1	932.51	4.08	928.43	4.95	927.56	3.54	928.97	4.29	928.22	3.29	929.22	3.34	929.17
TEC-1A	932.02	14.18	917.84	15.76	916.26	13.60	918.42	15.17	916.85	--	--	13.90	918.12
TEC-2	931.90	3.97	927.93	4.86	927.04	3.30	928.60	NA*	931.90	--	--	2.98	928.92
TEC-3	934.62	6.23	928.39	6.88	927.74	5.90	928.72	5.78	928.84	5.31	929.31	5.74	928.88
TEC-4	934.50	6.40	928.10	7.43	927.07	5.76	928.74	5.23	929.27	4.88	929.62	5.79	928.71

MSL - Mean Sea Level

NA* Well underwater and could

Table 2
Groundwater Analytical Results - Dissolved Chromium and Lead
Tecumseh Products Co. (Former)-Chromium Line
New Holstein, Wisconsin

WELL ID	Date Sampled	DISSOLVED METALS				UNDISSOLVED METALS	
		Hexavalent Chromium (CrVI)	Total Chromium ¹	Trivalent Chromium ² (CrIII)	Lead	Ferrous Iron	Total Organic Carbon
		(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
NR 140 STANDARD	PAL	--	10	--	1.5	150	--
	ES	--	100	--	15	300	--
TW-1	8/13/2002	5.0	3.6	NM	--	--	--
TW-2	8/13/2002	24	<i>33</i>	8.7	--	--	--
TW-3	8/13/2002	130	<i>110</i>	NM	--	--	--
TW-4	8/13/2002	7,900	8,200	NM	--	--	--
TW-5	8/13/2002	700	640	NM	--	--	--
TW-6	8/13/2002	5	1 U	NM	--	--	--
TW-7	8/13/2002	6.3	1 U	NM	--	--	--
TW-8	8/13/2002	6.3	1.9	NM	--	--	--
TW-9	8/13/2002	8.9	0.44 U	NM	--	--	--
TW-10	8/13/2002	3.6 U	3.6 U	NM	--	--	--
MW-1	8/13/2002	1,900	1,700	NM	--	--	--
	11/16/2005	4,600	4,900	300	--	--	--
	5/24/2007	2,800	2,800	NM	0.24	--	--
	6/9/2009	680	738	58 J	1.7 J	--	--
	9/24/2009	1,700	1,660	200 U	3.3 J	--	--
	12/28/2009	3.90 U	9.2	9.2 J	2.2 J	--	--
	3/29/2010	5.3	<i>57.6</i>	52.3	2.2 J	--	--
	5/18/2011	50	<i>54.1</i>	4.1	--	--	--
	5/15/2012	4.4 J	<i>16.1</i>	11.7 J	--	--	--
6/21/2013	33	<i>54.9</i>	NM	2.3 J	--	--	
8/19/2014	--	4.1 J	--	3 U	--	--	
MW-2	8/13/2002	3.6 U	2.3	3.6 U	--	--	--
	11/16/2005	5.0 U	2.8	NM	--	--	--
NH-2	4/24/2012	--	<2.4	--	<1.4	--	--
	8/19/2014	--	2.1 J	--	3 J	--	--
	4/26/2017	<3.9	3.7 J	NM	NM	<28	3,400
MW-3	8/13/2002	1,900	1,700	NM	--	--	--
MW-4	8/13/2002	3.7	0.44 U	NM	--	--	--
	11/15/2005	5.0 U	2.0	NM	--	--	--
	5/24/2007	3.4 U	0.63	NM	0.26	--	--
	6/9/2009	3.9 U	1.3 J	NM	2.2 J	--	--
	9/24/2009	3.9 U	0.39 U	3.9 U	1.3	--	--
	12/28/2009	3.9 U	1.2 J	3.9 U	1.3	--	--
	3/29/2010	3.9 U	0.82 J	3.9 U	1.4 J	--	--
	5/18/2011	3.9 U	1.6 J	3.9 U	--	--	--
	5/15/2012	3.9 U	2.4 U	3.9 U	--	--	--
	6/20/2013	3.4 U	1.2 U	3.9 U	1.2 U	--	--
	8/19/2014	--	2.1 U	NM	3 U	--	--

Notes:

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PAL = NR140 Preventative Action Limit

ITALICIZE = Detection over NR140 PAL Limit

BOLD = Detection over NR140 ES Limit

U = Analyte not detected at or above reporting limit

J = Estimated value. Analyte detected at a level less than the reporting limit and greater than or equal to the detection limit.

-- = Analyte was not sampled during sampling round

NM Not measured/calculated, due to Cr(VI) result greater than total Cr result.

1 = PAL and ES values are for total chromium.

As such, these values are not applicable for hexavalent chromium.

2 = Trivalent chromium is the difference between total chromium and hexavalent chromium concentrations.

Table 2
Groundwater Analytical Results - Dissolved Chromium and Lead
Tecumseh Products Co. (Former)-Chromium Line
New Holstein, Wisconsin

WELL ID	DATE SAMPLED	DISSOLVED METALS				UNDISSOLVED METALS	
		HEXAVALENT CHROMIUM (CrVI)	TOTAL CHROMIUM ¹	TRIVALENT CHROMIUM ² (CrIII)	Lead	Ferrous Iron	Total Organic Carbon
UNITS		(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
NR 140 STANDARD	PAL	--	10	--	1.5	--	-
	ES	--	100	--	15	--	-
MW-5	8/13/2002	380	390	180 U	NM	--	--
	11/16/2005	330	270	NM	NM	--	--
	5/24/2007	1,100	910	NM	0.19	--	--
	6/9/2009	950	938	9.8 U	3.2 J	--	--
	9/24/2009	3400	3,510	110	2.6 J	--	--
	12/29/2009	240	240	3.9 U	1.5 J	--	--
	3/30/2010	210	202	3.9 U	2 J	--	--
	5/19/2011	140	134	NM	NM	--	--
	5/15/2012	350	339	NM	NM	--	--
	6/20/2013	290	313	NM	1.2 U	--	--
	8/18/2014	NM	318	--	3 U	--	--
	3/21/2019	--	81.6	--	--	--	--
MW-6	8/13/2002	8.9	0.56 U	NM	NM	--	--
	11/15/2005	45	65	20	NM	--	--
	5/24/2007	3.4 U	2.6	NM	0.07	--	--
	6/9/2009	3.9 U	0.39 U	3.9	2.6 J	--	--
	9/24/2009	3.9 U	5.0	5.0	2 J	--	--
	12/28/2009	3.9 U	0.48 J	3.9	1.3 U	--	--
	3/29/2010	3.9 U	0.39 U	3.9	2.3 J	--	--
	5/18/2011	3.9 U	1.2 J	3.9	NM	--	--
	5/15/2012	3.9 U	2.4 U	3.9	NM	--	--
	6/20/2013	3.4 U	1.2 U	NM	1.2 U	--	--
	8/19/2014	NM	2.1 U	NM	3 U	--	--
	NH-7	4/24/2012	NM	261	NM	1.7 J	--
6/20/2013		110	111	NM	1.2 U	--	--
8/19/2014		NM	114	NM	3 U	--	--
3/21/2019		--	279	--	--	--	--
MW-8	8/13/2002	3,100	3,200	720 U	NM	--	--
	11/16/2005	3,000	2,900	NM	NM	--	--
	5/24/2007	1,900	1,600	NM	0.09	--	--
	6/9/2009	7,300	8,730	1400	2.9 J	--	--
	9/24/2009	8,200	8,470	270	2.6 J	--	--
	12/29/2009	5100	5,150	50 J	1.9 J	--	--
	3/29/2010	1,900	1,720	180	2.3 J	--	--
	5/19/2011	320	330	10	NM	--	--
	5/15/2012	3,100	2,940	NM	NM	--	--
	6/20/2013	860	844	NM	1.8 J	--	--
	8/18/2014	NM	1,320	NM	3 U	--	--
	4/22/2016	NM	46.7	NM	NM	--	--
	9/7/2016	NM	725	NM	NM	--	--
	4/26/2017	<3.9	<2.5	NM	NM	<28	4,500
	3/21/2019	--	5.2 J	--	--	--	--

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Table 2
Groundwater Analytical Results - Dissolved Chromium and Lead
Tecumseh Products Co. (Former)-Chromium Line
New Holstein, Wisconsin

WELL ID	DATE SAMPLED	DISSOLVED METALS				UNDISSOLVED METALS	
		HEXAVALENT CHROMIUM (CrVI)	TOTAL CHROMIUM ¹	TRIVALENT CHROMIUM ² (CrIII)	Lead	Ferrous Iron	Total Organic Carbon
UNITS		(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
NR 140 STANDARD	PAL	--	10	--	1.5	--	-
	ES	--	100	--	15	--	-
MW-9	8/13/2002	3.6 U	0.44 U	3.6	NM	--	--
	11/15/2005	5.0 U	1.7	NM	1.8	--	--
	5/24/2007	5.4	0.44	NM	0.06	--	--
	6/9/2009	3.9 U	0.39 U	3.9 U	2.2 J	--	--
	9/24/2009	3.9 U	0.39 U	3.9 U	2.1 J	--	--
	12/28/2009	3.9 U	0.39 U	3.9 U	1.7 J	--	--
	3/29/2010	3.9 U	4.9 J	4.9 J	2.4 J	--	--
NH-10	4/23/2012	NM	4.1 J	NM	1.9 J	--	--
	8/19/2014	NM	2.1 U	NM	3 U	--	--
MW-24	8/19/2014	NM	3.7 J	NM	3 U	--	--
NH-25	4/23/2012	NM	1,220	NM	1.6 J	--	--
	6/20/2013	3,100	3,330	NM	2.8 J	--	--
	8/19/2014	NM	895	--	3 U	--	--
NH-26	4/23/2012	--	470	--	<1.4	--	--
	6/20/2013	480	510	NM	1.2 U	--	--
	8/19/2014	--	284	--	3 U	--	--
	4/26/2017	1,500	1,400	NM	NM	<28	7,400
	3/21/2019	--	763	--	--	--	--
MW-A	5/24/2007	4,000	4,100	100	27.0	--	--
	6/8/2009	1,500	1,510	20 U	2.1 J	--	--
	9/24/2009	3,600	3,710	110	1.5 J	--	--
	12/28/2009	1,900	1,870	20 U	2.1 J	--	--
	3/29/2010	1,500	1,390	110	2.3 J	--	--
	5/18/2011	590	594	4	--	--	--
	5/15/2012	440	417	NM	--	--	--
	6/21/2013	520	484	NM	2.3 J	--	--
	8/19/2014	--	18.1	--	3	--	--
	4/22/2016	--	307	--	--	--	--
	9/7/2016	NM	60.1	NM	NM	--	--
	4/26/2017	330	295	NM	NM	<28	5,800
	3/21/2019	--	458	--	--	--	--
MW-B	5/24/2007	910	780	NM	0.044 U	--	--
	6/9/2009	570	533	20 U	2.2 J	--	--
	9/24/2009	1,300	1,200	100 U	1.6 J	--	--
	12/28/2009	740	649	20 U	2.4 J	--	--
	3/29/2010	270	263	20 U	2.2 J	--	--
	5/18/2011	68	64	NM	--	--	--
	5/15/2012	5.5 J	10.2	4.7 J	--	--	--
	6/20/2013	74	73.8	NM	1.2 U	--	--
	8/19/2014	--	47.1	--	3 U	--	--
	4/22/2016	NM	20.1	NM	NM	--	--
	9/7/2016	NM	585	NM	NM	--	--
	4/26/2017	<3.9	4.7 J	NM	NM	<28	910
	3/21/2019	--	79.6	--	--	--	--

Notes:

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NM Not measured/calculated, due to Cr(VI) result greater than total Cr result.

1 = PAL and ES values are for total chromium.

As such, these values are not applicable for hexavalent chromium.

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Table 2
 Groundwater Analytical Results - Dissolved Chromium and Lead
 Tecumseh Products Co. (Former)-Chromium Line
 New Holstein, Wisconsin

WELL ID	DATE SAMPLED	DISSOLVED METALS				UNDISSOLVED METALS	
		HEXAVALENT CHROMIUM (CrVI)	TOTAL CHROMIUM ¹	TRIVALENT CHROMIUM ² (CrIII)	Lead	Ferrous Iron	Total Organic Carbon
UNITS		(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
NR 140 STANDARD	PAL	--	10	--	1.5	--	--
	ES	--	100	--	15	--	--
MW-C	5/24/2007	3.4 U	1.3	NM	0.07	--	--
	6/9/2009	3.9 U	1.1 J	3.9 U	2.4 J	--	--
	9/24/2009	3.9 U	0.39 U	3.9 U	4.1 J	--	--
	12/28/2009	3.9 U	4.5 J	4.5 J	1.9 J	--	--
	3/29/2010	3.9 U	4.2 J	4.2 J	1.4 J	--	--
	5/18/2011	3.9 U	2.3 J	3.9 U	--	--	--
	5/15/2012	3.9 U	2.4 U	3.9 U	--	--	--
	6/20/2013	3.4 U	1.2 U	NM	1.2 U	--	--
8/19/2014	--	2.1 U	--	3 U	--	--	
MW-D	5/25/2007	3.4 U	1.9	NM	0.1	--	--
	6/9/2009	3.9 U	2.4 J	3.9 U	1.7 J	--	--
	9/24/2009	3.9 U	0.42 J	3.9 U	3 J	--	--
	12/29/2009	3.9 U	1.9 J	3.9 U	2.5 J	--	--
	3/29/2010	3.9 U	1.0 J	3.9 U	1.4 J	--	--
MW-E	6/9/2009	290	268	3.9 U	2 J	--	--
	9/24/2009	340	353	20 U	2 J	--	--
	12/29/2009	870	814	39 U	3.9 J	--	--
	3/30/2010	890	808	39 U	1.9 J	--	--
	5/19/2011	1,000	963	NM	--	--	--
	5/15/2012	1,000	920	NM	--	--	--
	6/20/2013	1,200	1,150	NM	2.9 J	--	--
	8/19/2014	--	1,290	--	3 U	--	--
	4/22/2016	NM	594	NM	NM	--	--
	9/7/2016	NM	507	NM	NM	--	--
	4/26/2017	550	533	NM	NM	<28	6,200
3/21/2019	--	628	--	--	--	--	
MW-F	6/8/2009	3.9 U	0.46 J	3.9 U	2.2 J	--	--
	9/23/2009	3.9 U	0.39 U	3.9 U	2.4 J	--	--
	12/28/2009	3.9 U	1.8 J	3.9 U	1.6 J	--	--
	3/29/2010	3.9 U	1.4 J	3.9 U	2.2 J	--	--
	5/18/2011	3.9 U	1.7 J	3.9 U	--	--	--
	5/15/2012	3.9 U	2.4 U	3.9 U	--	--	--
	6/21/2013	3.9 U	1.2 U	NM	1.2 U	--	--
	8/19/2014	3.9 U	2.1 U	--	3 U	--	--
3/21/2019	--	2.5 U	--	--	--	--	
MW-G	6/8/2009	3.9 U	0.7 J	3.9 U	1.3	--	--
	9/23/2009	3.9 U	0.39 U	3.9 U	4.9 J	--	--
	12/28/2009	3.9 U	0.39 J	3.9 U	1.9 J	--	--
	3/29/2010	3.9 U	0.39 U	3.9 U	3 J	--	--
	5/18/2011	3.9 U	1.1 J	3.9 U	--	--	--
	5/15/2012	3.9 U	2.4 U	3.9 U	--	--	--
	6/21/2013	3.4 U	1.2 U	NM	3.1 J	--	--
	8/19/2014	--	2.1 U	--	3 U	--	--

Notes:

ES = NR140 Enforcement Standard

PAL = NR140 Preventative Action Limit

ITALICIZE = Detection over NR140 PAL Limit

BOLD = Detection over NR140 ES Limit

U = Analyte not detected at or above reporting limit

J = Estimated value. Analyte detected at a level less than the reporting limit and greater than or equal to the detection limit.

"--" = Analyte was not sampled during sampling round

NM Not measured/calculated, due to Cr(VI) result greater than total Cr result.

1 = PAL and ES values are for total chromium.

As such, these values are not applicable for hexavalent chromium.

2 = Trivalent chromium is the difference between total chromium and hexavalent chromium concentrations.

Table 2
 Groundwater Analytical Results - Dissolved Chromium and Lead
 Tecumseh Products Co. (Former)-Chromium Line
 New Holstein, Wisconsin

WELL ID	DATE SAMPLED	DISSOLVED METALS				UNDISSOLVED METALS	
		HEXAVALENT CHROMIUM (CrVI)	TOTAL CHROMIUM ¹	TRIVALENT CHROMIUM ² (CrIII)	Lead	Ferrous Iron	Total Organic Carbon
UNITS		(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
NR 140 STANDARD	PAL	--	10	--	1.5	--	-
	ES	--	100	--	15	--	-
MW-H	6/8/2009	3.9 U	0.89 J	3.9 U	1.3	--	--
	9/23/2009	3.9 U	3.9 U	3.9 U	2.1 J	--	--
	12/28/2009	3.9 U	3.9 U	3.9 U	2.7 J	--	--
	3/29/2010	3.9 U	3.9 U	3.9 U	1.6 J	--	--
TEC-1	8/13/2002	500	490	NM	--	--	--
	11/16/2005	4,300	3,800	NM	1.9	--	--
	5/23/2007	790	670	NM	20	--	--
	6/10/2009	11,400	12,000	600 J	3.5 J	--	--
	9/24/2009	3,000	3,120	120	3.8 J	--	--
	12/29/2009	7,900	7,430	200 U	3.3 J	--	--
	3/30/2010	6,700	6,710	200 U	3.3 J	--	--
	5/19/2011	2,400	2,620	220	--	--	--
	5/15/2012	2,300	2,190	NM	--	--	--
	6/20/2013	2,300	2,250	NM	4.3 J	--	--
	8/18/2014	--	1,250	--	3 U	--	--
	4/26/2017	650	598	NM	NM	<28	2,100
3/21/2019	--	315	--	--	--	--	
TEC-1A	8/13/2002	14	0.52 U	NM	--	--	--
	3/6/2006	5.0 U	2.8	NM	--	--	--
	5/23/2007	3.4 U	0.43 U	NM	0.07	--	--
	6/9/2009	14 J	22.6	9 J	2.2 J	--	--
	9/24/2009	3.9 U	1.1 J	3.9 U	2.1 J	--	--
	12/29/2009	3.9 U	4.3 J	4.3 J	2 J	--	--
	3/29/2010	3.9 U	5.1	5.1	1.5 J	--	--
	5/19/2011	32	38.7	6.7	--	--	--
	5/15/2012	3.9 U	8.2	8.2	--	--	--
	6/20/2013	3.4 U	1.2 U	NM	1.2 U	--	--
	8/18/2014	--	2.1 U	--	3 U	--	--
	TEC-2	8/13/2002	16	0.44 U	NM	--	--
11/16/2005		5.0 U	0.78	NM	--	--	--
5/24/2007		3.4 U	0.94	--	0.13	--	--
6/9/2009		3.9 U	1.2 J	3.9 U	2.5 J	--	--
9/24/2009		3.9 U	0.68 J	3.9 U	3.1 J	--	--
12/29/2009		3.9 U	1.1 J	3.9 U	3.2 J	--	--
3/30/2010		3.9 U	2.7 J	3.9 U	2.3 J	--	--
5/19/2011		3.9 U	1.3 J	3.9 U	--	--	--
5/15/2012		3.9 U	2.4 U	3.9 U	--	--	--
6/20/2013		3.4 U	1.2 U	NM	2.8 J	--	--
8/18/2014		--	2.1 U	--	3.0 U	--	--

Notes:

ES = NR140 Enforcement Standard

PAL = NR140 Preventative Action Limit

ITALICIZE = Detection over NR140 PAL Limit

BOLD = Detection over NR140 ES Limit

U = Analyte not detected at or above reporting limit

J = Estimated value. Analyte detected at a level less than the reporting limit and greater than or equal to the detection limit.

"--" = Analyte was not sampled during sampling round

NM Not measured/calculated, due to Cr(VI) result greater than total Cr result.

I = PAL and ES values are for total chromium.

As such, these values are not applicable for hexavalent chromium.

2 = Trivalent chromium is the difference between total chromium and hexavalent chromium concentrations.

Table 2
 Groundwater Analytical Results - Dissolved Chromium and Lead
 Tecumseh Products Co. (Former)-Chromium Line
 New Holstein, Wisconsin

WELL ID	DATE SAMPLED	DISSOLVED METALS				UNDISSOLVED METALS	
		HEXAVALENT	TOTAL	TRIVALENT	Lead	Ferrous Iron	Total Organic
UNITS		(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
NR 140 STANDARD	PAL	--	10	--	1.5	--	-
	ES	--	100	--	15	--	-
TEC-3	9/23/2003	270	310	40	--	--	--
	11/16/2005	540	490	NM	--	--	--
	5/24/2007	1,000	910	NM	0.17	--	--
	6/10/2009	400	789	390	3.5 J	--	--
	9/24/2009	99	99	20 U	1.8 J	--	--
	12/29/2009	190	201	11 J	2.2 J	--	--
	3/30/2010	470	445	20 U	1.3 J	--	--
	5/19/2011	580	585	5	--	--	--
	5/15/2012	250	227	NM	--	--	--
	6/20/2013	1,200	1,260	NM	1.2 U	--	--
	8/19/2014	--	2,100	--	3 U	--	--
	4/22/2016	NM	5,650	NM	NM	--	--
	9/7/2016	NM	2,820	NM	NM	--	--
	4/26/2017	5,300	5,040	NM	NM	<28	5,800
3/21/2019	--	1,080	--	--	--	--	
TEC-4	9/23/2003	1,200	1,300	100	--	--	--
	11/16/2005	2,800	2,700	NM	0.40 U	--	--
	5/24/2007	4,800	4,000	NM	0.06	--	--
	6/10/2009	13,300	12,500	200 U	2.3 J	--	--
	9/24/2009	5,500	5,220	500 U	2.3 J	--	--
	12/29/2009	5,200	5,360	160 J	3 J	--	--
	3/30/2010	14,300	12,900	390 U	2.5 J	--	--
	5/19/2011	29,000	29,200	200	--	--	--
	5/15/2012	21,300	20,300	NM	--	--	--
	6/20/2013	33,600	32,200	NM	14 U	--	--
	8/19/2014	--	6,880	--	3 U	--	--
	4/22/2016	NM	65,100	NM	NM	--	--
	9/7/2016	NM	33,100	NM	NM	--	--
	4/26/2017	16,200	15,400	NM	NM	<28	13,400
3/21/2019	--	16,900	--	--	--	--	

Notes:

ES = NR140 Enforcement Standard

PAL = NR140 Preventative Action Limit

<i>ITALICIZE</i>	= Detection over NR140 PAL Limit
------------------	----------------------------------

BOLD	= Detection over NR140 ES Limit
-------------	---------------------------------

U = Analyte not detected at or above reporting limit

J = Estimated value. Analyte detected at a level less than the reporting limit and greater than or equal to the detection limit.

-- = Analyte was not sampled during sampling round

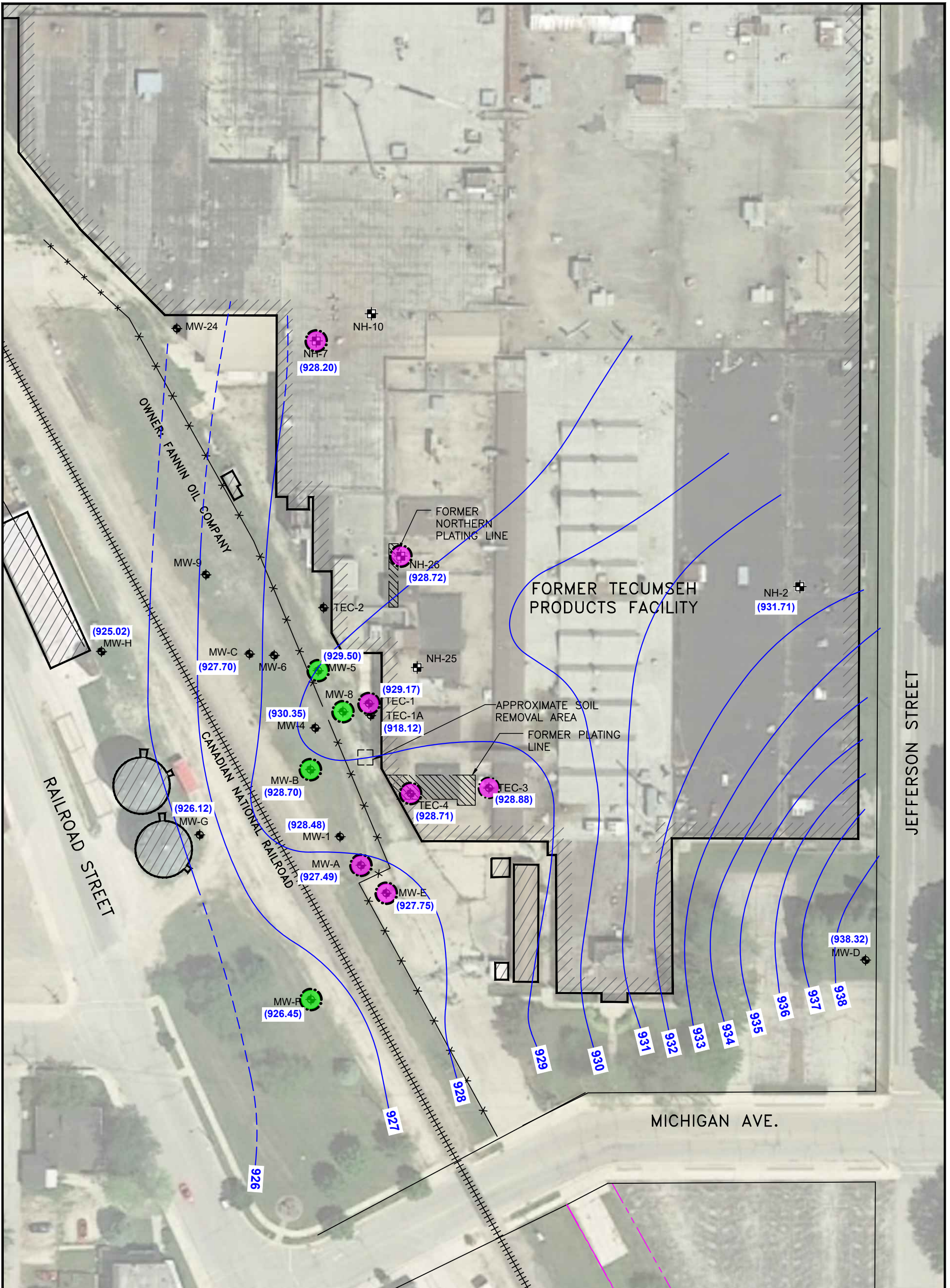
NM Not measured/calculated, due to Cr(VI) result greater than total Cr result.

1 = PAL and ES values are for total chromium.

As such, these values are not applicable for hexavalent chromium.

2 = Trivalent chromium is the difference between total chromium and hexavalent chromium concentrations.

FIGURES



LEGEND:

- MONITORING WELL LOCATION
- MONITORING WELL INSTALLED BY ROBERT E. LEE & ASSOCIATES IN 2012
- RAILROAD TRACKS
- FENCE
- GROUNDWATER ELEVATION
- GROUNDWATER ELEVATION CONTOUR
- GROUNDWATER ELEVATION CONTOUR - ESTIMATED
- TOTAL CHROMIUM BELOW ENFORCEMENT STANDARD
- TOTAL CHROMIUM ABOVE ENFORCEMENT STANDARD
- WELLS SAMPLED IN 2019.

NOTE: MW-24 WAS FOUND TO BE DESTROYED DURING THE MARCH 2019 GROUNDWATER EVENT

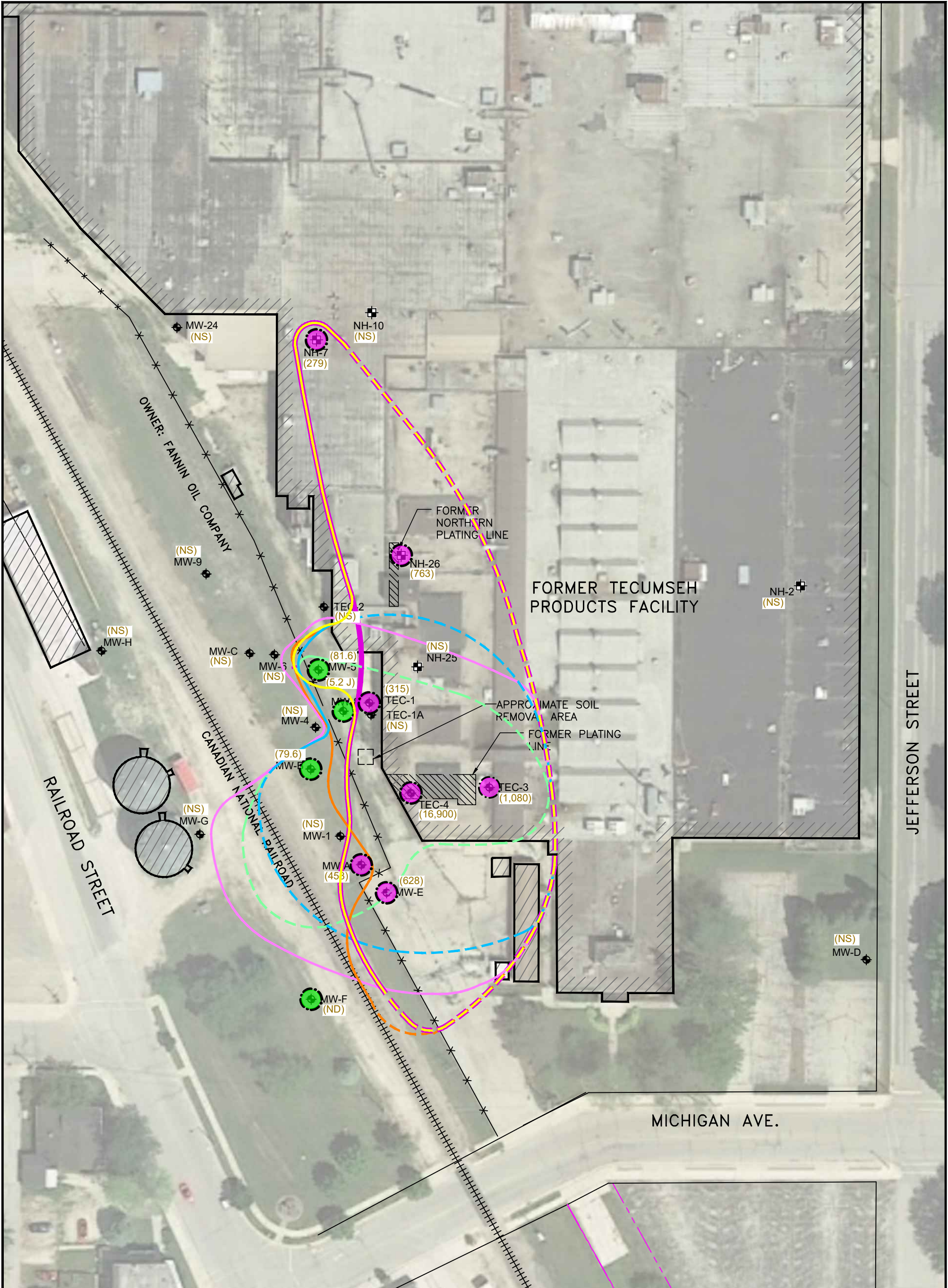
0 60 120
SCALE IN FEET

PROJECT: **BRRTS #02-08-36333**
TECUMSEH PRODUCTS CO. (FORMER) - CHROMIUM LINE
NEW HOLSTEIN, WISCONSIN

TITLE:
GROUNDWATER ISOCONCENTRATION MAP - MARCH 2019

DRAWN BY: S.ALBERTS	SCALE: AS SHOWN	PROJ. NO. 107927
CHECKED BY: T.GOMOLL	DATE PRINTED:	FILE NO. 107927-15(CR LINE).dwg
APPROVED BY: C.HARVEY		FIGURE 1
DATE: APRIL 2019		

230 West Monroe St.
 Suite 630
 Chicago, IL 60606
 Phone: 312.578.0870



LEGEND:

	MONITORING WELL LOCATION
	MONITORING WELL INSTALLED BY ROBERT E. LEE & ASSOCIATES IN 2012
	RAILROAD TRACKS
	FENCE
(65)	TOTAL DISSOLVED CHROMIUM (ug/L)
(NS)	NOT SAMPLED
(ND)	CHROMIUM NOT DETECTED
	TOTAL CHROMIUM BELOW ENFORCEMENT STANDARD
	TOTAL CHROMIUM ABOVE ENFORCEMENT STANDARD

ENFORCEMENT STANDARD POINT-OF-COMPLIANCE FOR TOTAL DISSOLVED CHROMIUM (100 ug/L) BY YEAR DASHED WHERE INFERRED

	2019
	2017
	2014
	2009
	2005
	2003/2002

NOTES:

- SAMPLES COLLECTED MARCH 2019.
- TEC-1A IS A DEEP WELL.



PROJECT: BRRTS #02-08-36333		
TITLE: TECUMSEH PRODUCTS CO. (FORMER) - CHROMIUM LINE NEW HOLSTEIN, WISCONSIN		
TITLE: GROUNDWATER ISOCONCENTRATION MAP BY YEAR		
DRAWN BY: S.ALBERTS	SCALE: AS SHOWN	PROJ. NO. 107927
CHECKED BY: T.GOMOLL	DATE PRINTED:	FILE NO. 107927-16(CR LINE).dwg
APPROVED BY: C.HARVEY	FIGURE 2	
DATE: APRIL 2019		

230 West Monroe St.
 Suite 630
 Chicago, IL 60606
 Phone: 312.578.0870

ATTACHMENT A

ATTACHMENT B

March 29, 2019

Chris Harvey
TRC Environmental
230 W. Monroe St
Suite 630
Chicago, IL 60606

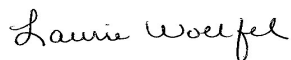
RE: Project: TECUMSEH CR LINE
Pace Project No.: 40184671

Dear Chris Harvey:

Enclosed are the analytical results for sample(s) received by the laboratory on March 23, 2019. The results relate only to the samples included in this report. Results reported herein conform to the most current, applicable TNI/NELAC standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Laurie Woelfel
laurie.woelfel@pacelabs.com
(920)469-2436
Project Manager

Enclosures

cc: Tyler Gomoll, TRC Solutions
Tanner Hess, TRC



REPORT OF LABORATORY ANALYSIS

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CERTIFICATIONS

Project: TECUMSEH CR LINE

Pace Project No.: 40184671

Green Bay Certification IDs

1241 Bellevue Street, Green Bay, WI 54302

Florida/NELAP Certification #: E87948

Illinois Certification #: 200050

Kentucky UST Certification #: 82

Louisiana Certification #: 04168

Minnesota Certification #: 055-999-334

New York Certification #: 12064

North Dakota Certification #: R-150

Virginia VELAP ID: 460263

South Carolina Certification #: 83006001

Texas Certification #: T104704529-14-1

Wisconsin Certification #: 405132750

Wisconsin DATCP Certification #: 105-444

USDA Soil Permit #: P330-16-00157

Federal Fish & Wildlife Permit #: LE51774A-0

REPORT OF LABORATORY ANALYSIS

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SAMPLE SUMMARY

Project: TECUMSEH CR LINE

Pace Project No.: 40184671

Lab ID	Sample ID	Matrix	Date Collected	Date Received
40184671001	TEC-3	Water	03/21/19 09:15	03/23/19 08:15
40184671002	TEC-4	Water	03/21/19 11:20	03/23/19 08:15
40184671003	NH-26	Water	03/21/19 12:00	03/23/19 08:15
40184671004	MW-E	Water	03/21/19 13:51	03/23/19 08:15
40184671005	TEC-1	Water	03/21/19 14:35	03/23/19 08:15
40184671006	DUP-1	Water	03/21/19 00:00	03/23/19 08:15
40184671007	MW-8	Water	03/21/19 14:56	03/23/19 08:15
40184671008	MW-5	Water	03/21/19 15:22	03/23/19 08:15
40184671009	NH-7	Water	03/21/19 16:05	03/23/19 08:15
40184671010	MW-F	Water	03/21/19 17:00	03/23/19 08:15
40184671011	MW-A	Water	03/21/19 17:25	03/23/19 08:15
40184671012	MW-B	Water	03/21/19 18:00	03/23/19 08:15

REPORT OF LABORATORY ANALYSIS

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SAMPLE ANALYTE COUNT

Project: TECUMSEH CR LINE
Pace Project No.: 40184671

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
40184671001	TEC-3	EPA 6010	TXW	1	PASI-G
40184671002	TEC-4	EPA 6010	TXW	1	PASI-G
40184671003	NH-26	EPA 6010	TXW	1	PASI-G
40184671004	MW-E	EPA 6010	TXW	1	PASI-G
40184671005	TEC-1	EPA 6010	TXW	1	PASI-G
40184671006	DUP-1	EPA 6010	TXW	1	PASI-G
40184671007	MW-8	EPA 6010	TXW	1	PASI-G
40184671008	MW-5	EPA 6010	TXW	1	PASI-G
40184671009	NH-7	EPA 6010	TXW	1	PASI-G
40184671010	MW-F	EPA 6010	TXW	1	PASI-G
40184671011	MW-A	EPA 6010	TXW	1	PASI-G
40184671012	MW-B	EPA 6010	TXW	1	PASI-G

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: TECUMSEH CR LINE

Pace Project No.: 40184671

Sample: TEC-3 **Lab ID: 40184671001** Collected: 03/21/19 09:15 Received: 03/23/19 08:15 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved									
Analytical Method: EPA 6010									
Chromium, Dissolved	1080	ug/L	10.0	2.5	1		03/25/19 23:22	7440-47-3	

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: TECUMSEH CR LINE

Pace Project No.: 40184671

Sample: TEC-4 **Lab ID: 40184671002** Collected: 03/21/19 11:20 Received: 03/23/19 08:15 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved									
Analytical Method: EPA 6010									
Chromium, Dissolved	16900	ug/L	10.0	2.5	1		03/25/19 23:25	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH CR LINE

Pace Project No.: 40184671

Sample: NH-26 **Lab ID: 40184671003** Collected: 03/21/19 12:00 Received: 03/23/19 08:15 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved									
Analytical Method: EPA 6010									
Chromium, Dissolved	763	ug/L	10.0	2.5	1		03/25/19 23:27	7440-47-3	

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: TECUMSEH CR LINE

Pace Project No.: 40184671

Sample: MW-E **Lab ID: 40184671004** Collected: 03/21/19 13:51 Received: 03/23/19 08:15 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved									
Analytical Method: EPA 6010									
Chromium, Dissolved	628	ug/L	10.0	2.5	1		03/25/19 23:30	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH CR LINE

Pace Project No.: 40184671

Sample: TEC-1 **Lab ID: 40184671005** Collected: 03/21/19 14:35 Received: 03/23/19 08:15 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved									
Analytical Method: EPA 6010									
Chromium, Dissolved	315	ug/L	10.0	2.5	1		03/25/19 23:32	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH CR LINE

Pace Project No.: 40184671

Sample: DUP-1 **Lab ID: 40184671006** Collected: 03/21/19 00:00 Received: 03/23/19 08:15 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved									
Analytical Method: EPA 6010									
Chromium, Dissolved	319	ug/L	10.0	2.5	1		03/25/19 23:35	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH CR LINE

Pace Project No.: 40184671

Sample: MW-8 **Lab ID: 40184671007** Collected: 03/21/19 14:56 Received: 03/23/19 08:15 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved		Analytical Method: EPA 6010							
Chromium, Dissolved	5.2J	ug/L	10.0	2.5	1		03/25/19 23:37	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH CR LINE

Pace Project No.: 40184671

Sample: MW-5 **Lab ID: 40184671008** Collected: 03/21/19 15:22 Received: 03/23/19 08:15 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved									
Analytical Method: EPA 6010									
Chromium, Dissolved	81.6	ug/L	10.0	2.5	1		03/25/19 23:40	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH CR LINE

Pace Project No.: 40184671

Sample: NH-7 **Lab ID: 40184671009** Collected: 03/21/19 16:05 Received: 03/23/19 08:15 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved									
Analytical Method: EPA 6010									
Chromium, Dissolved	279	ug/L	10.0	2.5	1		03/25/19 23:42	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH CR LINE

Pace Project No.: 40184671

Sample: MW-F **Lab ID: 40184671010** Collected: 03/21/19 17:00 Received: 03/23/19 08:15 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved									
Analytical Method: EPA 6010									
Chromium, Dissolved	<2.5	ug/L	10.0	2.5	1		03/25/19 23:10	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH CR LINE

Pace Project No.: 40184671

Sample: MW-A **Lab ID: 40184671011** Collected: 03/21/19 17:25 Received: 03/23/19 08:15 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved									
Analytical Method: EPA 6010									
Chromium, Dissolved	458	ug/L	10.0	2.5	1		03/25/19 23:45	7440-47-3	

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ANALYTICAL RESULTS

Project: TECUMSEH CR LINE

Pace Project No.: 40184671

Sample: MW-B **Lab ID: 40184671012** Collected: 03/21/19 18:00 Received: 03/23/19 08:15 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP, Dissolved									
Analytical Method: EPA 6010									
Chromium, Dissolved	79.6	ug/L	10.0	2.5	1		03/25/19 23:52	7440-47-3	

REPORT OF LABORATORY ANALYSIS

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QUALIFIERS

Project: TECUMSEH CR LINE

Pace Project No.: 40184671

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above LOD.

J - Estimated concentration at or above the LOD and below the LOQ.

LOD - Limit of Detection adjusted for dilution factor, percent moisture, initial weight and final volume.

LOQ - Limit of Quantitation adjusted for dilution factor, percent moisture, initial weight and final volume.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected at or above the adjusted LOD.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

LABORATORIES

PASI-G Pace Analytical Services - Green Bay

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: TECUMSEH CR LINE

Pace Project No.: 40184671

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
40184671001	TEC-3	EPA 6010	316402		
40184671002	TEC-4	EPA 6010	316402		
40184671003	NH-26	EPA 6010	316402		
40184671004	MW-E	EPA 6010	316402		
40184671005	TEC-1	EPA 6010	316402		
40184671006	DUP-1	EPA 6010	316402		
40184671007	MW-8	EPA 6010	316402		
40184671008	MW-5	EPA 6010	316402		
40184671009	NH-7	EPA 6010	316402		
40184671010	MW-F	EPA 6010	316402		
40184671011	MW-A	EPA 6010	316402		
40184671012	MW-B	EPA 6010	316402		

REPORT OF LABORATORY ANALYSIS

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1241 Bellevue Street, Green Bay, WI 54302

Document Name: Sample Condition Upon Receipt (SCUR)

Document Revised: 25Apr2018

Document No.: F-GB-C-031-Rev.07

Issuing Authority: Pace Green Bay Quality Office

Sample Condition Upon Receipt Form (SCUR)

Project #:

Client Name: TRC

WO#: 40184671

Courier: [X] CS Logistics [] Fed Ex [] Speedee [] UPS [] Waltco [] Client [] Pace Other:



Tracking #: _____

Custody Seal on Cooler/Box Present: [X] yes [] no Seals intact: [X] yes [] no

Custody Seal on Samples Present: [] yes [] no Seals intact: [] yes [] no

Packing Material: [X] Bubble Wrap [] Bubble Bags [] None [] Other

Thermometer Used SR - N/A Type of Ice: [X] Wet Blue Dry None [X] Samples on ice, cooling process has begun

Cooler Temperature Uncorr: RD / Corr: _____

Temp Blank Present: [X] yes [] no Biological Tissue is Frozen: [] yes [] no

Person examining contents: Date: 3.23.19 Initials: PB

Temp should be above freezing to 6°C. Biota Samples may be received at ≤ 0°C.

Table with 13 rows of inspection criteria and checkboxes. Includes items like Chain of Custody Present, Short Hold Time Analysis, and Trip Blank Present.

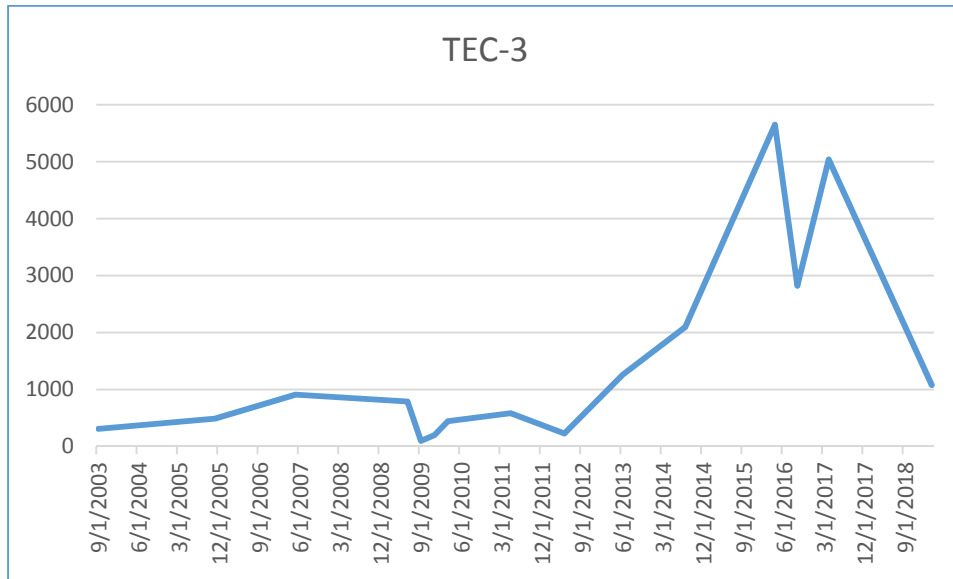
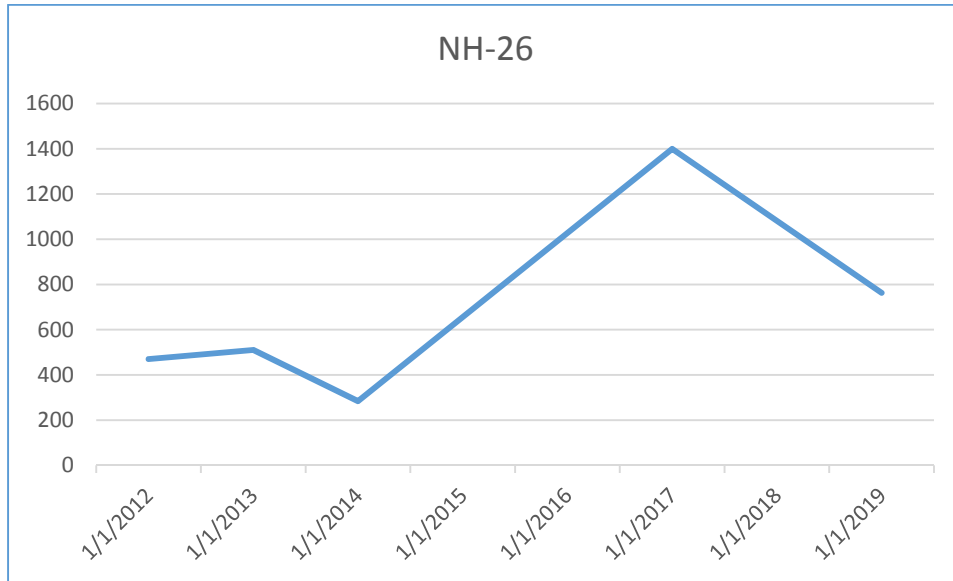
Client Notification/ Resolution: Person Contacted: _____ Date/Time: _____ Comments/ Resolution: Client returned (1) BBN bottle unused. 3.23.19 PB

Project Manager Review: [Signature] Date: 3/28/19

ATTACHMENT C

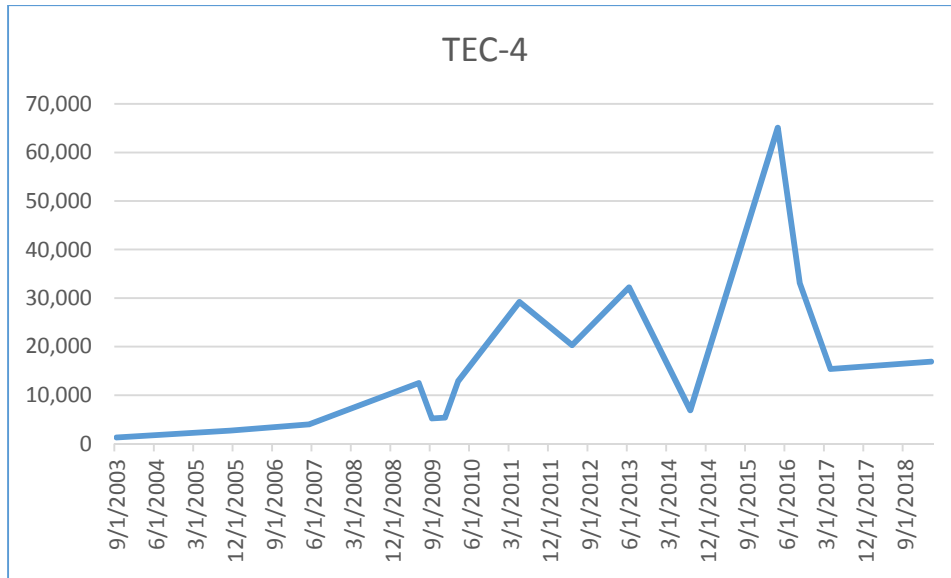
Attachment C – Trend Analysis Charts

Source Area Monitoring Wells

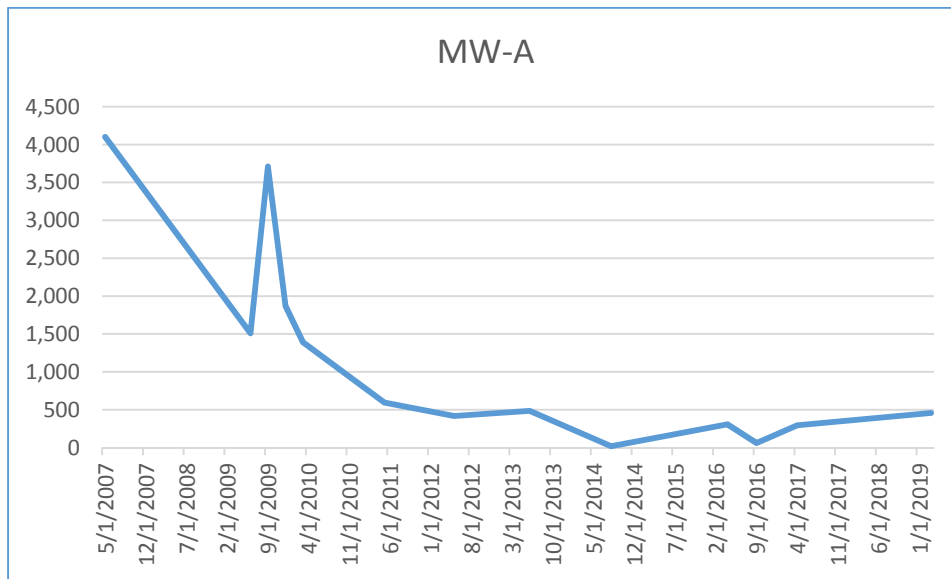


Trends depict sample date versus chromium concentration in micrograms per liter (ug/L)

Attachment C – Trend Analysis Charts

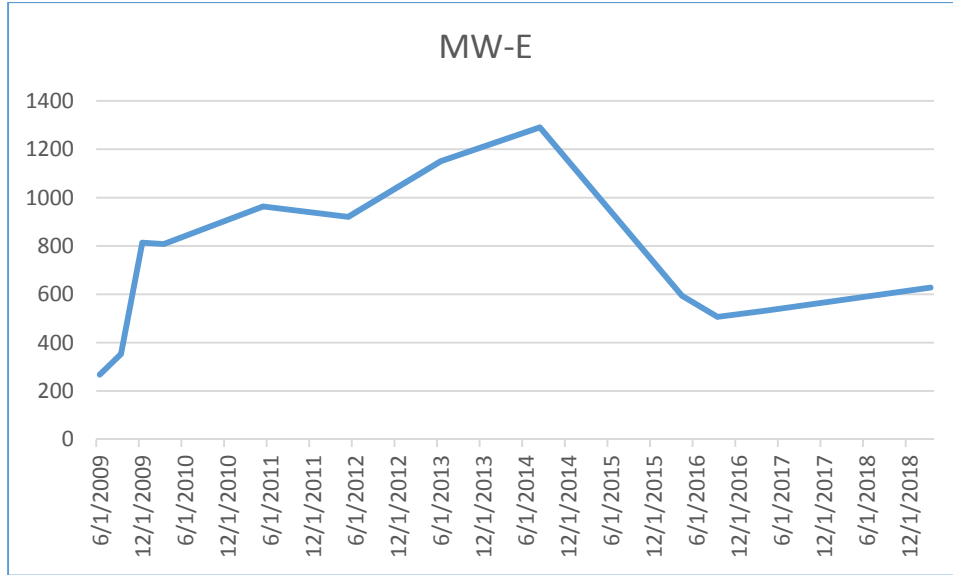


Down-gradient - Southwest

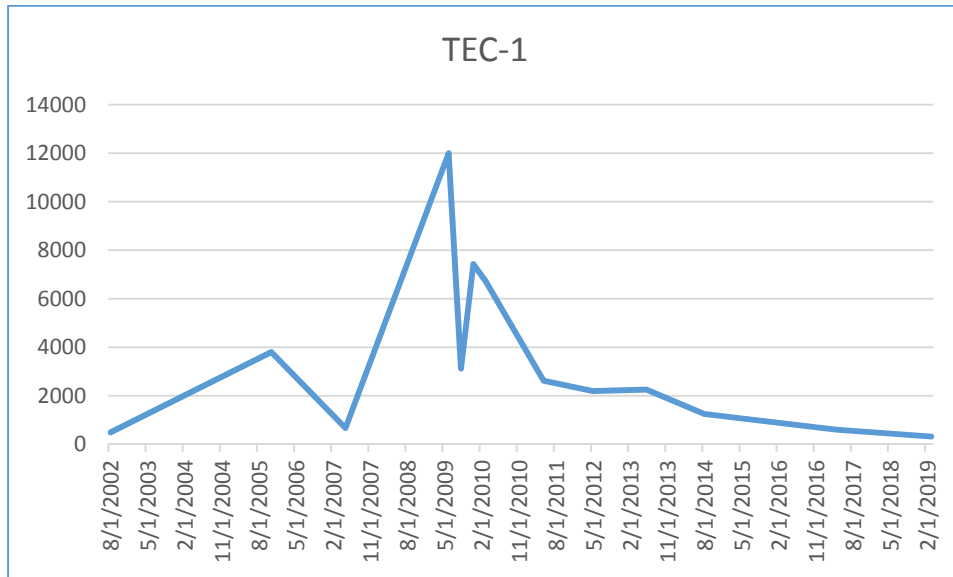


Trends depict sample date versus chromium concentration in micrograms per liter (ug/L)

Attachment C – Trend Analysis Charts



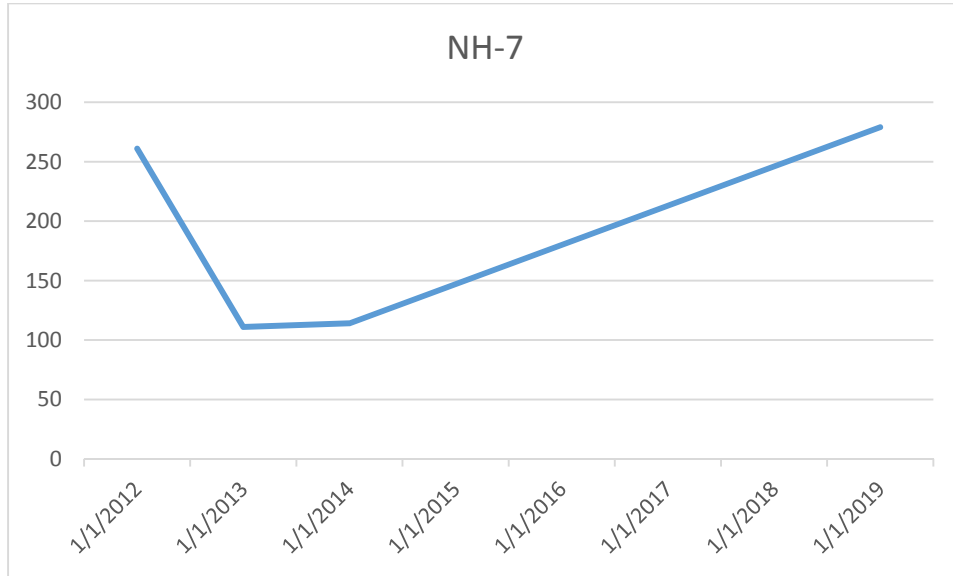
Down-gradient – West



Trends depict sample date versus chromium concentration in micrograms per liter (ug/L)

Attachment C – Trend Analysis Charts

Down-gradient - Northwest



Trends depict sample date versus chromium concentration in micrograms per liter (ug/L)