



July 11, 2019

TRC

Christopher Harvey
230 West Monroe St., Suite 630
Chicago IL 60606
CHarvey@trcompanies.com

Tecumseh Products Company LLC
Mr. Jason Smith
2700 West Wood Street
Paris TN 38242
Jason.smith@tecumseh.com

Subject: Revised: Per-and Polyfluoroalkyl Substances (PFAS) Groundwater Sampling
Requirements
Former Tecumseh Products, Former Plating Line Area
New Holstein WI
BRRTS# 02-08-363333

Dear Mr. Harvey and Mr. Smith:

The Wisconsin Department of Natural Resources (DNR) has identified the Former Tecumseh Products, Former Plating Line Area site as potentially being a source for Per-and Polyfluoroalkyl Substances (PFAS). We believe this emerging contaminant may be present in soil and groundwater on your property identified above. The DNR has regulatory authority to ask responsible parties to evaluate hazardous substance discharges and environmental pollution including emerging contaminants:

- Wis. Stat. § 292.01(3) "Discharge" means, but is not limited to, spilling, leaking, pumping, pouring, emitting, emptying or dumping.
- Wis. Stat. § 292.01 (4) "Environmental pollution" means contaminating ... air, land, or waters of the state or making the same injurious to public health ...
- Wis. Stat. § 292.01(5) "Hazardous substance" means any substance ... which may pose a substantial present or potential hazard to human health or the environment because of its quantity, concentration or physical, chemical or infectious characteristics ...

Background

Chrome plating was a previously documented activity that occurred at this site. The use of PFAS has been documented at plating operations and this site may be a source of PFAS contamination. Soil and groundwater contamination resulted from this activity and an open contamination case exists with the DNR's Remediation and Redevelopment Program and is being tracked as BRRTS# 02-08-363333.

Site Investigation

PFAS Groundwater Sampling
Mr. Chris Harvey and Mr. Jason Smith
Former Tecumseh Products (BRRTS# 02-08-363333)
July 10, 2019

Page 2 of 2

The information previously provided indicates that the facility conducted chrome plating activities that have been historically linked to PFAS use. Site Investigation Scoping (Wis. Admin. Code§ NR 716.07) and the Site Investigation Work Plan (Wis. Admin. Code§ NR 716.09) require an evaluation of the history of the facility, previous discharges, and uses on the Site that may be associated with discharges.

The DNR requires that you submit a Site Investigation Work Plan that includes assessment of PFAS. Per Wis. Admin. Code§ NR 716.07(4), all environmental media affected or potentially affected by the contamination must be evaluated. The work plan should include evaluation of potential PFAS compounds that are most likely to have been produced, handled or stored at the Site. Include in that description the information on all entities responsible for manufacturing PFAS and its use at the Site; the years involved in PFAS manufacture and use; what PFAS was used to manufacture; whether any product containing PFAS was used or tested at the Site; areas of the Site where PFAS was manufactured and/or used. The work plan must include a groundwater sampling program for evaluating PFAS compounds.

Schedule

The DNR is requesting that you submit a "Site Investigation Work Plan for PFAS" by September 30, 2019. The work plan must include sampling for PFAS compounds. Please provide the appropriate Wis. Admin. Code § NR 749 review fee to obtain feedback and DNR approval of the work plan.

In conclusion, DNR has the authority under Wis. Admin. Code NR 700 to require the evaluation of PFAS at this Site. The DNR appreciates your efforts to restore the environment at this Site. If you have any questions regarding anything outlined in this letter, or would like to arrange a meeting, please contact me, the DNR Project Manager, at 920-424-7890, or kevin.mcknight@wisconsin.gov.

Sincerely,



Kevin D. McKnight
Hydrogeologist/Project Manager
Remediation and Redevelopment Program

Cc: file