

**From:** Harvey, Christopher <CHarvey@trccompanies.com>  
**Sent:** Tuesday, June 08, 2021 4:10 PM  
**To:** McKnight, Kevin - DNR  
**Subject:** RE: [EXTERNAL] Tecumseh Products Co New Holstein 02-08-363333

Kevin,

Regarding the post injection groundwater sampling plan:

- Groundwater sampling at monitoring wells MW-E, TEC-3, TEC-4, MW-8, NH-7, NH-26, MW-A, MW-B and MW-F
- Semi-annual for 2 years
- Evaluate the magnitude and trends of Cr and need for additional monitoring

Please let me know if you have any questions or comments. Thank you. Chris

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**From:** McKnight, Kevin - DNR <[Kevin.McKnight@wisconsin.gov](mailto:Kevin.McKnight@wisconsin.gov)>  
**Sent:** Tuesday, June 8, 2021 12:53 PM  
**To:** Harvey, Christopher <[CHarvey@trccompanies.com](mailto:CHarvey@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Tecumseh Products Co New Holstein 02-08-363333

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Chris,

Thank you for the quick response.

The \$700 fee for the injection/infiltration permit is required so sending that in now will keep the process moving. I am hoping the WPDES staff will still take the paper permit request and you do not have to deal with it.

The post injection groundwater sampling plan is not really discussed in the RAP. Can you confirm the monitoring wells and sampling interval chosen for post injection monitoring for the record? I am reviewing based on sampling the same wells currently sampled and changing the frequency to quarterly for the first year and potentially modified to semi-annual after that. Groundwater sampling needs to extend beyond the estimated treatment timeframe to evaluate effectiveness which will require 2-3 years of sampling based on the RAP. We can discuss how much sampling will be required once we have some post injection data. You should consider adding MW-F to the schedule on a semi-annual basis to confirm downgradient extent has not changed.

Regards,

Kevin

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Kevin D. McKnight

Phone: 920-808-0170 (This is the number you should use to contact me from this point forward)

[Kevin.McKnight@wisconsin.gov](mailto:Kevin.McKnight@wisconsin.gov)

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**From:** Harvey, Christopher <[CHarvey@trccompanies.com](mailto:CHarvey@trccompanies.com)>  
**Sent:** Tuesday, June 08, 2021 9:33 AM  
**To:** McKnight, Kevin - DNR <[Kevin.McKnight@wisconsin.gov](mailto:Kevin.McKnight@wisconsin.gov)>  
**Cc:** McKnight, Kevin - DNR <[Kevin.McKnight@wisconsin.gov](mailto:Kevin.McKnight@wisconsin.gov)>  
**Subject:** RE: [EXTERNAL] Tecumseh Products Co New Holstein 02-08-363333

Kevin,

Thanks for the update. Please let me know about the wastewater fee and process, so I can get that taken care of.

Regarding your third point - The soil mixing is intended to add substrate to the unsaturated zone to minimize the potential that infiltration or fluctuating water table could mobilize hexavalent chromium. Adding substrate to the soil through mixing is generally more efficient than injection into the saturated zone and we are able to target the potential former source areas.

Please let me know if you have any additional questions.

Thank you,  
Chris

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**From:** McKnight, Kevin - DNR <[Kevin.McKnight@wisconsin.gov](mailto:Kevin.McKnight@wisconsin.gov)>  
**Sent:** Monday, June 7, 2021 2:38 PM  
**To:** Harvey, Christopher <[CHarvey@trccompanies.com](mailto:CHarvey@trccompanies.com)>  
**Cc:** K M <[Kevin.McKnight@wisconsin.gov](mailto:Kevin.McKnight@wisconsin.gov)>  
**Subject:** [EXTERNAL] Tecumseh Products Co New Holstein 02-08-363333

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Chris,

I am reviewing the RAP for this site and have a couple questions/comments for you. I will be taking this site to peer review next week and a formal response letter will follow. I do not expect any problems with approving the RAP at this time.

1. A \$700 fee for the Injection/Infiltration permit is needed. Unfortunately that fee cannot be combined with another review fee. Please submit the fee with a Form 4400-237 (check Other Technical Assistance in Section 3).
2. The wastewater program recently changed their process for requesting WPDES permits. I will be awaiting a response on whether the submittal request is sufficient or if the new online process needs to be followed. I will let you know if you need to fill out the online request.
3. Regarding the soil mixing at the northern plating line. The site data (in my records) for the limited samples taken in this area do not indicate significant shallow chromium contamination. I expect the soil mixing is recommended due to the limited sampling and likely presence of unsaturated contamination due to groundwater results, or am I missing some sample results confirming its presence? I expect to be asked about this during peer review.

Please get back to me about #3 by phone or email.

Regards,

Kevin

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**Kevin D. McKnight**

Hydrogeologist - Remediation and Redevelopment Program

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Phone: 920-808-0170 (This is the number you should use to contact me from this point forward)

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