



July 2, 2021

Tecumseh Products Company  
Mr. Jason Smith  
2700 West Wood Street  
Paris TN 38242

Subject: Remedial Action Design Report Review – Former Chromium Plating Line  
Tecumseh Products Co – New Holstein, 1604 Michigan Ave, New Holstein  
BRRTS# 02-08-363333

Dear Mr. Smith,

On May 4, 2021, the Department of Natural Resources (DNR) received a Technical Assistance Request for review of the Remedial Action Design Report (RAP) along with the review fee of \$1050.00. Also included in this request was an Injection/Infiltration Permit request and WPDES discharge permit. These items will be addressed in future correspondence. On June 17, 2021, the Northeast Region Peer Review Committee reviewed the submitted RAP and determined it meets the requirements of ch. NR 724.09 Wis. Admin. Code with the following comments and recommendations:

- Monitoring well TEC-1 should be added to the post remediation sampling plan.
- Hexavalent chromium and total chromium analysis should be included in the post remediation soil and groundwater sampling plan.
- Pre-remediation soil samples should be collected in the northern plating line treatment zone.
- A post-remedial soil sampling plan is required to evaluate the effectiveness of the remedial action in shallow unsaturated soil beneath cap in the soil mixing areas.
- Written confirmation (letter or email) from the City of New Holstein is requested confirming their commitment to replace the cap and perform maintenance as described in the RAP.
- Alternate groundwater monitoring locations or an alternative groundwater monitoring schedule may be required based on post-remediation sampling results. Additional sampling may be required to meet requirements of ch. NR 726.05 (6) Wis. Admin Code.
- Any currently accessible monitoring wells that are not part of the post-remedial sampling plan should be maintained for future use if needed.

If you have questions regarding this letter please contact me at 920-808-0170 or [kevin.mcknight@wisconsin.gov](mailto:kevin.mcknight@wisconsin.gov). The DNR appreciates your efforts to protect Wisconsin's natural resources.

Sincerely,

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

CC: TRC Environmental Corporation ([charvey@trccompanies.com](mailto:charvey@trccompanies.com))  
City of New Holstein ([clangenfeld@wppienergy.org](mailto:clangenfeld@wppienergy.org))