



August 13, 2021

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

Subject: Response to July 22, 2021 Letters RE Remedial Action Design Report Review and  
Infiltration/Injection Temporary Exemption Request  
Tecumseh Products Co – New Holstein, 1604 Michigan Ave, New Holstein  
BRRTS# 02-08-363333

Mr. Smith:

The Department (DNR) received two letters from your consultant TRC related to the July 2, 2021 Remedial Action Plan approval and Injection/Infiltration Permit approval. On August 12, 2021, the Northeast Region Peer Review Committee reviewed the requests regarding the Remedial Action Plan approval and made the following determinations:

Remedial Action Plan Review:

- Pre-remedial soil sampling is required in the northern plating line area to meet the requirements of Wis. Adm. Code NR 716.1(3) a.
- Post-remedial soil sampling is required for evaluation of remedial action effectiveness of soil mixing to meet the requirements of Wis. Adm. Code NR 724.07 (2), Wis. Adm. Code NR 725, and NR 726.
  - Sampling is necessary to evaluate the effectiveness of the remedial action in the shallow unsaturated soil zone.
  - Sampling is necessary to delineate the degree and extent of residual soil contamination.
  - Sampling is necessary to evaluate the imposition of continuing obligations based on residual chromium contamination regardless of a continuing obligation already imposed for another contaminant.

On August 13, 2021, the DNR reviewed your requests related to the Injection/Infiltration approval and made the following determinations:

- Baseline monitoring as listed in the July 2, 2021 approval is not required however it is requested that the parameters listed in the permit be performed on a subset of the wells if possible to confirm no unexpected changes to the groundwater conditions have occurred and to collect initial data for analytes not previously reported.
- The first post-remedial groundwater sampling event may be delayed up to 180 days after injection is complete.

Please contact me if you have questions regarding this letter at 920-808-0170 or by email at [Kevin.McKnight@wisconsin.gov](mailto:Kevin.McKnight@wisconsin.gov).

Sincerely,

Kevin McKnight  
Hydrogeologist/Project Manager  
Remediation and Redevelopment Program

Cc: Chris Harvey- TRC ([charvey@trccompanies.com](mailto:charvey@trccompanies.com))  
City of New Holstein ([clangenfeld@wppienergy.org](mailto:clangenfeld@wppienergy.org))