

CORRESPONDENCE/MEMORANDUM

STATE OF WISCONSIN

Date: July 18, 1978

File Ref: 3210-3

To: Stan Kleinert

From: Tom Sheffy *JBS*

Subject: PCB Cleanup at Tecumseh Products Diecast Division, Sheboygan Falls

On July 14, 1978, Renato Millan and I inspected the property at Tecumseh Products Diecast Division, 415 Cleveland Street, Sheboygan Falls, Wisconsin. Pursuant to DNR Order Number 2A-78-1191, Para. 1, (Issued June 21, 1978), Tecumseh Products was to excavate and collect by July 15, all materials on the dike bordering the Sheboygan River which based on visual examination, would appear likely to contain PCBs. The purpose of our inspection was to determine whether or not the order recipient had complied with paragraph 1 of the order.

Prior to issuance of the order, Department testing had indicated that PCB-contaminated waste was present at 10 locations (S-18 through S-27) on the property (see attached map). The company's initial cleanup strategy was to excavate PCB-contaminated materials from these 10 locations on the property.

A summary of the company's cleanup activities is as follows:

1. Cleanup began on or about June 26th, after suitable PCB waste containers (sealable 55-gallon steel drums) were purchased by the company.
2. Cleanup was performed at all 10 sites identified by Department testing; and at 3 additional sites (S-29 through S-31) where suspected PCB waste was discovered. The amount of excavating and thoroughness of cleanup at each site are described below.

Site Number	Estimated Size of Excavation	Approx. Cubic Feet Removed	Comments
S-18	3' x 3' x 1'	9	Cleanup completed
S-19	3' x 4' x .5'	6	Additional cleanup required, oil absorbent material still visible on perimeter of excavation
S-20	25' x 2' x .5'	25	Cleanup completed
S-21	5' x 10' x .5'	25	Cleanup completed
S-22	8' x 5' x .3'	13	Cleanup completed
S-23	2' x 2' x .5'	2	Cleanup completed
S-24	10' x 18' x .5'	90	Additional cleanup required, oil absorbent material still visible, excavate 15 more feet to the east
S-25	5' x 3' x .5'	8	Additional cleanup required, oil absorbent material still visible on perimeter of excavation

Site Number	Estimated Size of Excavation	Approx. Cubic Feet Removed	Comments
S-26 & S-27	15' x 12' x 4'	720	Additional cleanup required, oil absorbent material still visible on perimeter of excavation
S-29	10' x 12' x 1'	120	Cleanup completed
S-30	10' x 15' x 3'	450	Cleanup completed
S-31	20' x 8' x 3'	480	Additional cleanup required, oil absorbent material still visible on perimeter of excavation

3. The company has removed approximately 2,000 cubic feet of PCB wastes. This waste has been containerized in approximately 250 55-gallon steel drums. All the containers are labeled in accordance with federal regulations. Additionally, all barrels are color coded by site. This will aid in accounting for and calculating the amount of PCB waste removed from each site on the property.

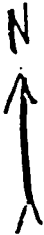
4. Tecumseh Products has proceeded with the cleanup in a responsible and cooperative manner. Cleanup at seven of the thirteen sites is completed. Cleanup at the other six sites is nearly complete. The July 15 cleanup deadline stated in the order was not met entirely because the amount of PCB waste discovered during cleanup greatly exceeded the amount thought to be present at the time the order was issued. However, the company has proceeded with cleanup as well as could be expected under the circumstances. The company should complete cleanup at the six sites where further excavating is required. All visible oil absorbent material should be containerized. Particular attention should be given to the cleaning up of oil absorbent material that has been spilled at barreling sites and in transit to barreling sites. It is recommended that the company be given a 15-day extension to complete cleanup of PCB waste as required.

TBS:lk

cc: Bob Krill - 12
R. Millan - 12

CLEVELAND AVENUE

OUTFALL 003
.65' 110' SANITARY SEWER
TO SHEBOYGAN FALLS WWTP - 6" C.I.



DIE CAST DIVISION
TECUMSEH PRODUCTS
415 CLEVELAND AVENUE
SHEBOYGAN FALLS, WISCONSIN

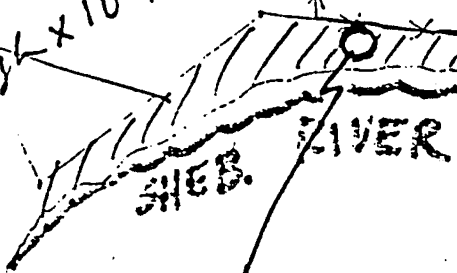
Soil Sampling Locations AT Tecumseh Products

- on 5-11-78:
- 6 samples on Tecumseh Property
- 4 samples on City of Sheb. Falls, Dike

Cyclone fence

12" SEWER

FLOOD CONTROL DIKE
Dike is about 150 yd x 10' high x 10' base

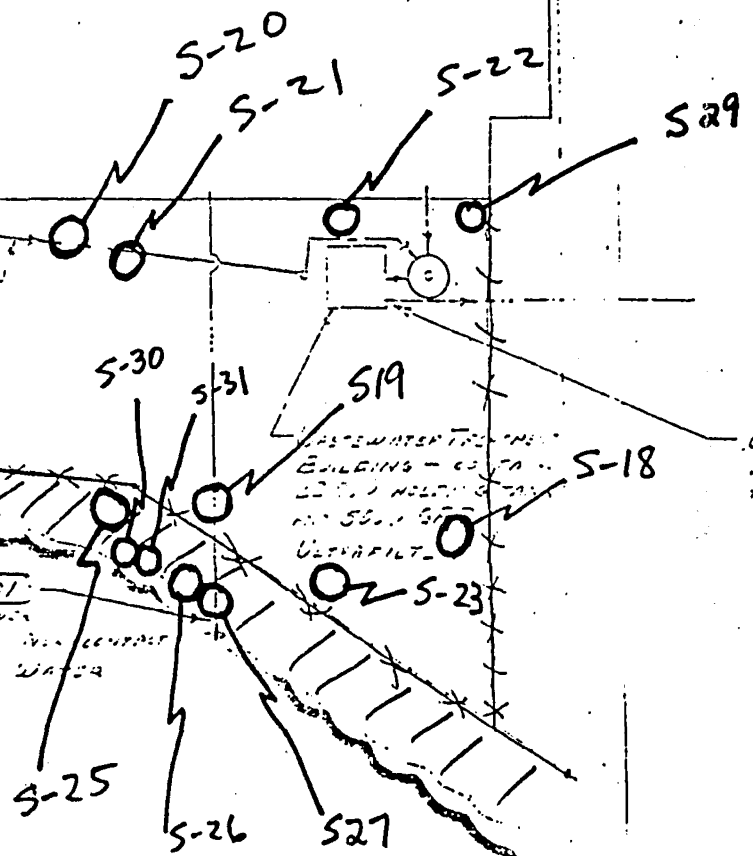


SHEBOYGAN RIVER

OUTFALL 001
2" C.I. SEWER
.097 MGD WASTE WATER
COOLING WATER

WASTEWATER TREATMENT BUILDINGS - 65' x 100' x 15' HOLDING TANKS AND 55' x 55' ULTRAFILT.

OUTFALL 002
.603 MGD TO SANITARY SEWER TO SHEBOYGAN FALLS WWTP



DATE	NO.	REV.
11-15	1	1