

FOLEY & LARDNER
FIRST WISCONSIN CENTER
777 EAST WISCONSIN AVENUE
MILWAUKEE, WISCONSIN 53202
TELEPHONE (414) 271-2400
TELEX 26-819
(FOLEY LARD MIL)



WRITERS DIRECT LINE
(414) 289-3537

April 22, 1982

Mr. Michael J. Walker, Attorney
United States Environmental
Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: TSCA Complaint, Tecumseh Products Company,
Diecast Division, TSCA-V-C054

Dear Mr. Walker:

Thank you for the time which you and Mr. Bremer devoted Monday to our informal settlement conference regarding the above-referenced TSCA Complaint.

We understand that the EPA will be running a retest on the ultra filtrate sludge on which your consultant initially obtained a 130 parts per million result, while Waste Management of Wisconsin, which tested the same material, came up with less than 1 part per million. I understand that you will be reconsidering Count III of the Complaint, associated with that testing, depending on the outcome of your retest.

The Company is proceeding with the testing of its 27 hydraulic systems which at one time utilized pydraul. The consultants have proposed, at least initially, testing these in three groups of nine on a composite basis. If such initial, composite tests result in less than 1 part per million concentration, then the tests would confirm that all of the systems had to have concentrations less than 10 parts per million, and no additional tests would be conducted.

Mr. Michael J. Walker
April 22, 1982
Page Two

As soon as the testing regime has been completed, we will get back to you. The Company is also proceeding with the installation of a curb at the storage facility.

I look forward to hearing from you regarding the retesting.

Very truly yours,



Allen W. Williams, Jr.

cc: Carl Bremer.