



1 North Commerce Park Dr.  
Suite 130  
Cincinnati, OH 45215-3187

T (513) 898-9430

[www.sme-usa.com](http://www.sme-usa.com)

December 7, 2022

Mr. Joseph C. Kelly, P.G.  
Remedial Project Manager  
United States Environmental Protection Agency (USEPA)  
Region 5  
Mail Code: SR-6J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3507

Via E-mail: [kelly.joseph@epa.gov](mailto:kelly.joseph@epa.gov)

RE: SME Serial Letter #81  
2022 Tecumseh Site Inspection and Maintenance  
Sheboygan River and Harbor Site  
Former Tecumseh Products Company Plant  
428 Cleveland Street, Sheboygan Falls, Wisconsin  
SME Project No. 069638.00.070

Dear Mr. Kelly:

SME is providing the results of the 2022 Site Inspection and Maintenance activities at the Former Tecumseh Products Company Plant as required by the *Long Term Monitoring and Operation Plan, Upper River – Phase I* dated May 2008 and the *Operation & Plan, Upper River – Phase I* dated May 2004. In addition to the inspection results, this letter also documents maintenance activities completed on the Site by SME.

## BACKGROUND

Tecumseh Products Company operated a manufacturing plant located adjacent to the Sheboygan River in Sheboygan Falls, Wisconsin (the Site). Hydraulic fluids containing PCBs were used in the manufacturing process from 1959 to 1971. PCBs were found in sewer lines that lead to the river from Tecumseh and in hydraulic fluids used in Tecumseh Products Company's manufacturing processes. Material from the plant including soil from around the plant, was used to construct a dike at the edge of the river. The USEPA placed the Sheboygan River and Harbor Site (including the Tecumseh Site) on the National Priorities List (NPL) in 1986. Previous investigations completed on the Site from the 1970s to the 1990s identified PCBs in the soil and groundwater.

In 2003, Tecumseh entered into a Consent Decree (CD) with USEPA. Tecumseh transferred the Site liability to Pollution Risk Services (PRS) and funded an insurance policy for the work to be performed at the Site in 2004. As a result, USEPA initiated a modification of the 2003 CD to include PRS as the PRP performing the work. The amended CD was finalized in 2006. This Consent Decree was for the work to be performed in the Upper River, the former Tecumseh plant and the floodplains. Remedial Action (RA) work at the Site, off-site floodplains and Sheboygan River was completed in phases.

Phase I Source RA included installation of a groundwater migration interceptor trench (GMIT) and removing contaminated soils at the former Tecumseh Manufacturing Site to reduce potential contaminated groundwater migration to the river. Phase I work was completed in 2004.

As part of the remedial design for the Phase I Source RA, the Long-Term Monitoring and Operation Plan and an Operation & Plan were completed and approved by USEPA. The documents established operation and maintenance actions and schedules for ongoing inspections and maintenance operations on the Site.

The inspection and maintenance activities were divided into three general categories:

- Site Security, Engineered Barrier, Final Cover and Vegetation Maintenance
- Groundwater Monitoring Well Sampling, Inspection and Maintenance
- Groundwater Migration Interceptor Trench (GMIT) and Water Treatment System Operation and Maintenance

The maintenance activities associated with the GMIT System and the GMIT Water Treatment System were necessary following the completion of the remediation; however, based on groundwater results from the downgradient groundwater monitoring wells, the operation of the GMIT system and the Water Treatment System are not necessary at this time. This is further discussed in subsequent sections.

The inspections and maintenance operations for each of the categories are summarized in the attached tables and activities completed in 2022 are discussed in the following Sections.

## **SITE SECURITY, ENGINEERED BARRIER, FINAL COVER, AND VEGETATION MAINTENANCE**

The purpose of these inspection and maintenance activities was generally to restrict the Site from unapproved access from trespassers, to protect approved individuals from direct contact with impacted soil, and limit infiltration of precipitation in areas of potential source areas.

### **REQUIRED INSPECTION AND MAINTENANCE**

This category includes inspection and maintenance regarding: Site Fencing, Engineered Barriers, Cover Soil, Cover Vegetation, and Trees and Brush. Inspection and maintenance activities for this category are discussed in Table 1.

### **2022 INSPECTION AND MAINTENANCE ACTIVITIES**

SME completed inspection and maintenance activities on the Site in August 2022. SME staff evaluated the site security fence for signs of damage. No major damage was noted. Photographs of the site fencing are included in Attachment 1. The site security fence was evaluated by SME to be in sufficient quality to deter and preclude the Site from unapproved access from trespassers.

We observed the areas of the Site with concrete and asphalt that limits direct contact with subsurface soil. A large portion of the Site is covered with concrete or asphalt. The floor slab from the former manufacturing plant (superstructure demolished in 2005) in the central and eastern portions of the site and the former parking lot in the western portion of the Site remain. An asphalt cover with asphalt berms was installed on the central portion of the former floor slab and used as a dewatering pad associated with sediment remedial actions completed from 2005 to 2012. The asphalt and much of the asphalt berms remained present on the Site. Vegetative growth was noted in cracks in the concrete and asphalt across the Site, with the most vegetative growth noted east of the former dewatering pad. Photographs of the concrete and asphalt paved areas of the Site are included in Attachment 1.

Since limited maintenance activities have been conducted on the Site since 2005, vegetative growth in the concrete and asphalt areas is significant and would require additional evaluation and significant maintenance activities. Portions of the concrete slab of the former manufacturing area were planned to be removed during remedial excavation of PCB-impacted soil in this area. Following excavation and backfill of the area, a concrete engineered barrier was planned to be installed in this area; however, this plan is currently on hold while further investigation is conducted in this area. Further assessment and maintenance of this concrete area will be completed if the concrete will not be removed. In the interim, areas of significant vegetative growth could compromise the integrity of the engineering control will be addressed.

We also observed the areas of the Site with vegetative cover. Vegetative growth across the Site was sufficient such that the soil surface is stabilized, and soil erosion was not observed. No significant areas of bare soil or areas of exposed subsurface soil were noted during the August mobilization. Photographs of the grass covered areas of the Site are included in Attachment 1.

## **GROUNDWATER MONITORING WELL SAMPLING, INSPECTION, AND MAINTENANCE**

The purpose of these sampling, inspection and maintenance activities was to evaluate the current concentration of PCBs in groundwater located downgradient of the Site. Groundwater was identified to be impacted with PCBs in the historical assessments completed on the Site in the 1980s and 1990s. Continued groundwater monitoring was included in the ROD as a part of the selected remedy for the Site.

### **REQUIRED SAMPLING, INSPECTION AND MAINTENANCE**

This category includes groundwater sample collection and groundwater monitoring well integrity inspections. These activities are discussed in Table 2.

### **2022 SAMPLING AND INSPECTION ACTIVITIES**

As part of the Long-Term Monitoring and Operation Plan (2004) and Post-Remediation Monitoring Plan (PRMP, 2008), six groundwater monitoring wells located downgradient of the GMIT system have been sampled for PCBs semi-annually for eight years after completion of source removal (2005-2013) and annually since 2013. SME completed annual groundwater sampling of the six (MW-9, MW-10, MW-12, MW-13, MW-16, MW-17) monitoring wells. The results of the most recent sampling event are presented in SME Serial Letter #80 2022 *Groundwater Monitoring Report*. PCBs were detected in five wells in excess of the Limit of Quantitation ( $\approx 0.04 \mu\text{g/L}$ ). As in the past, PCBs were detected in two monitoring wells in excess of the Maximum Contaminant Level (MCL). The concentration of PCBs in MW13 in 2022 was higher than the last three years; however, the concentration of PCBs in MW13 remains significantly lower than the concentrations of PCBs from 2009 to 2015. The average PCB concentration from the previous five years (2017-2021,  $0.44 \mu\text{g/L}$ ) was also significantly less than the five years prior (2012-2016,  $0.75 \mu\text{g/L}$ ) or 10 years prior (2010-2016,  $1.087 \mu\text{g/L}$ ).

During the groundwater sampling activities, we evaluated the condition of the six monitoring wells sampled. Each of the six wells were in good condition and we noted no damage or integrity concerns. During sample collection, the depth to the bottom of each well was measured. We compared the depth to the bottom of the wells as reported in the Upper River Phase I Completion Report (PRS, 2005) to the current depths. The tabulated well depth information is included in Attachment 2. We noted that with the exception of MW13, the depth to bottom of the wells has not changed more than 0.3 feet since 2004. The depth to the bottom of MW13 decreased 1.28 feet since 2004; however, the depth to the bottom of MW13 has not changed more than 0.03 feet based upon review of field data from of the previous five years of sampling. Therefore, the discrepancy is most likely due to a previous transcription error. The monitoring wells are in good condition and the integrity and validity of the monitoring wells have not been jeopardized.

In addition, we also evaluated the condition of the other ten monitoring wells (MW1, MW2R, MW3R, MW4D, MW4R, MW5S, MW5D, MW6S, MW7S, MW7D) present on the Site. We were unable to locate MW1 due to heavy vegetation in the area of the monitoring well and we noted that the protective cover for MW2R was damaged and we did not observe a monitoring well within the cover. The remaining eight other monitoring wells appeared to be in good condition and were secured.

## **GROUNDWATER MIGRATION INTERCEPTOR TRENCH (GMIT) AND WATER TREATMENT SYSTEMS OPERATION AND MAINTENANCE**

The purpose of these inspection and maintenance activities was to inspect and maintain the GMIT and water treatment systems during its operation. As noted above, the GMIT and water treatment system has not operated since its installation in 2005 based on groundwater sampling results.

### **REQUIRED INSPECTION AND MAINTENANCE**

This category includes inspection and maintenance of GMIT System and Water Treatment System components including: Power Supplies, Electronic Controls, Pumps, the Interceptor Pipe and Cleanouts, the Force Main System, and Sand/Carbon Filters and Tanks. Inspection and maintenance activities for this category are discussed in Table 3.

### **2021 INSPECTION AND MAINTENANCE ACTIVITIES**

No inspection and maintenance activities were conducted by SME in 2022 because the GMIT or Water Treatment systems operation has not been necessary.

## **SUMMARY**

SME staff completed site maintenance activities and annual groundwater sampling on the Site. Overall, the site is in satisfactory condition to limit potential exposures to human health and the environment. Site fencing was repaired to deter and restrict the Site from unapproved access from trespassers. The concrete and asphalt direct contact and infiltration barriers on the Site were generally in adequate condition to limit exposure and infiltration; however, significant vegetative growth was noted in cracks in the barrier system. Since limited maintenance activities have been conducted on the Site since 2005, vegetative growth in the concrete and asphalt pavement areas is significant and would require additional evaluation and significant maintenance activities. Further evaluation and maintenance of the concrete and asphalt areas will be completed after remedial planning is completed for these areas.

Annual groundwater sampling activities were completed on the six required monitoring wells. Concentrations of PCBs were detected in five of the monitoring wells. Over the past eight years of groundwater sampling, the concentrations of PCBs in groundwater have generally continued to decline to below the MCL and in most wells, laboratory level of detection. Based on the short-term increases, we will continue to complete annual groundwater sampling. The long-term decreasing trend in PCB concentrations does not indicate the need to operate the GMIT. The monitoring wells are in good condition and the integrity and validity of the monitoring wells have not been jeopardized.

Required inspection and maintenance activities will be included in the schedule and budget for subsequent years.

If you have questions regarding the report, feel free to contact Keith Egan at (513) 319-8919 or via e-mail at keith.egan@sme-usa.com.

Respectfully,

**SME**

**PREPARED BY:**

Aaron J. Lammers, EIT  
Project Engineer

**REVIEWED BY:**

Keith Egan, CP #259  
Chief Consultant

Attachments: Figure C-100: ALTA/NSPS Land Title and Topographic Survey Cover Sheet  
Figure C-101: Topographic Survey  
Figure C-102: ALTA/NSPS Land Title Survey

Table 1: Site Security, Engineered Barrier, Final Cover and Vegetation Maintenance  
Table 2: Groundwater Monitoring Well Sampling, Inspection and Maintenance  
Table 3: Groundwater Migration Interceptor Trench (GMIT) and Water Treatment Systems Operation and Maintenance

Attachment 1: Site Photographs

Attachment 2: Groundwater Monitoring Well Information

Distribution: Mr. Richard Nagle – USEPA via e-mail (nagle.richard@epa.gov)  
Ms. Debbie McMillan – PRS via e-mail (dmcmillan@grhdevelopment.com)  
Mr. Chris Dietrich – Wisconsin Department of Natural Resources via e-mail (christopher.dietrich@wisconsin.gov)  
Mr. Peter Johnson – Johnson-Wright via e-mail (pjohnson@johnsonwright.net)  
Mr. Jason Smith – Tecumseh Products Company LLC via email (jason.smith@tecumseh.com)

## **FIGURES**

**FIGURE C-100: ALTA/NSPS LAND TITLE AND TOPOGRAPHIC SURVEY COVER SHEET**

**FIGURE C-101: TOPOGRAPHIC SURVEY**

**FIGURE C-102: ALTA/NSPS LAND TITLE SURVEY**

# Sheboygan River Superfund Site

## ALTA/NSPS Land Title and Topographic Survey

### Cleveland Street, City of Sheboygan Falls

### Sheboygan County, WI



|             |       |
|-------------|-------|
| Orientation | Scale |
|-------------|-------|

Project  
**SHEBOYGAN RIVER SUPERFUND SITE**

Project Location  
**CLEVELAND STREET, CITY OF SHEBOYGAN FALLS, SHEBOYGAN COUNTY, WISCONSIN**

Sheet Name  
**COVER SHEET**

Surveyor's Seal

| Revisions |            |      |    |
|-----------|------------|------|----|
| REV       | ISSUED FOR | DATE | BY |
|           |            |      |    |
|           |            |      |    |
|           |            |      |    |
|           |            |      |    |
|           |            |      |    |
|           |            |      |    |
|           |            |      |    |
|           |            |      |    |
|           |            |      |    |
|           |            |      |    |

Date

**06/03/2020**

SME Project No.  
**069638.00.051**

Project Manager:  
**J. EVANS**

Field Chief:  
**R. EISS**

CADD:  
**S. PARADISE**

Checked By:  
**R. HARRIS**

Sheet No.  
**C-100**

**SURVEYORS CERTIFICATE:**  
 I, ROBERT J. HARRIS, PROFESSIONAL LAND SURVEYOR, HEREBY CERTIFY THAT THE ABOVE DESCRIBED PROPERTY WAS SURVEYED AND MAPPED IN ACCORDANCE WITH AE-7 OF THE WISCONSIN ADMINISTRATIVE CODE AND IS CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

ROBERT J. HARRIS P.L.S. 1943 DATE: \_\_\_\_\_

**SURVEYOR**

HARRIS AND ASSOCIATES, INC.  
 2718 N. MEADE STREET  
 APPLETON, WI 54911

CONTACT: MR. ROB HARRIS, PS  
 PH: 920.733-8377

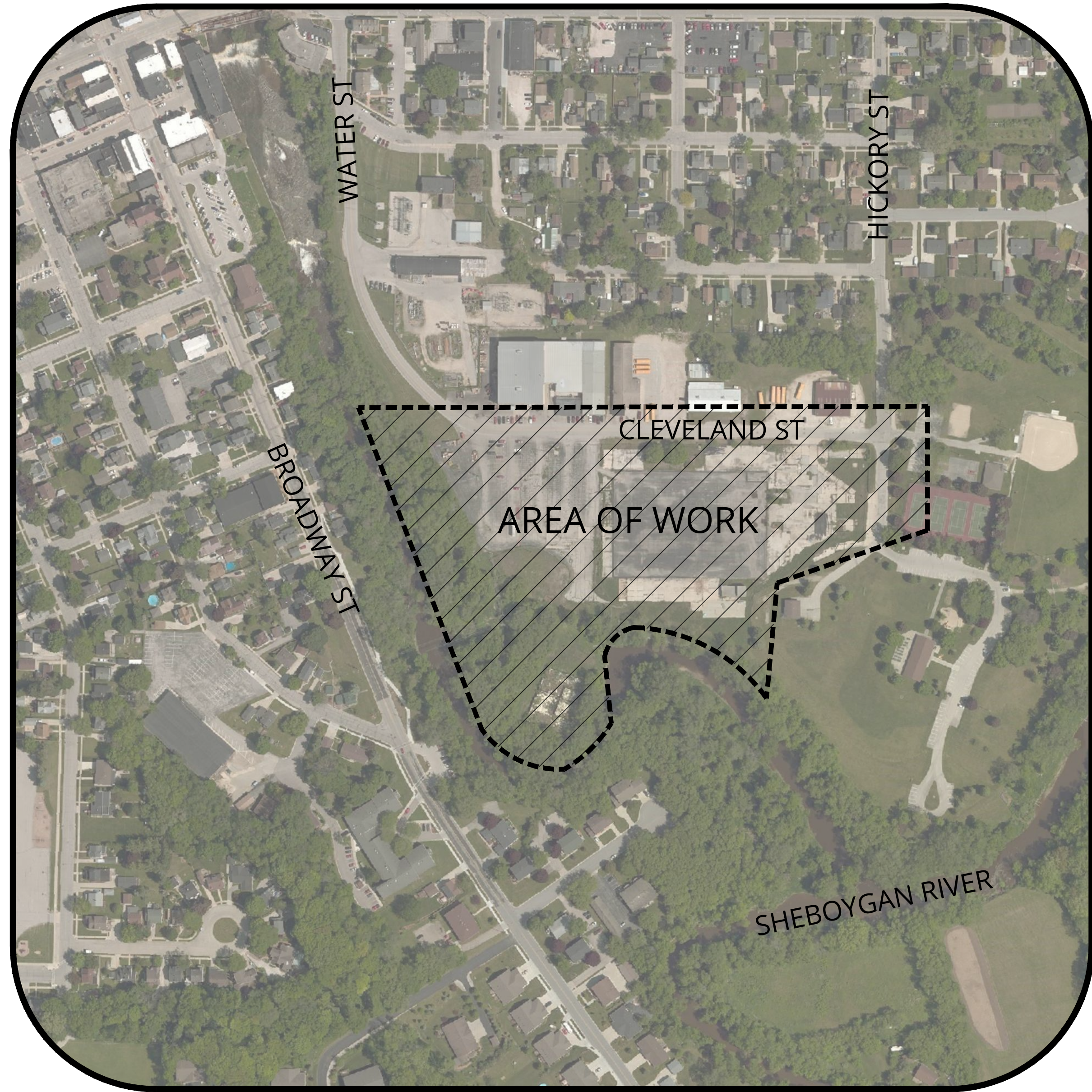
**LIST OF DRAWINGS**

| SHEET No. | SHEET TITLE                 |
|-----------|-----------------------------|
| C-100     | COVER SHEET                 |
| C-101     | TOPOGRAPHIC SURVEY          |
| C-102     | ALTA/NSPS LAND TITLE SURVEY |

**LEGAL DESCRIPTION**

PART OF LOT ONE (1), ALL OF LOTS TWO (2) AND THREE (3), AND PART OF LOT FIVE (5), IN BLOCK FOUR (4), ROCHESTER PARK INDUSTRIAL SUBDIVISION, BEING PART OF THE NORTHEAST 1/4 AND THE SOUTHEAST 1/4 OF SECTION 36, T15N, R22E, CITY OF SHEBOYGAN FALLS, SHEBOYGAN COUNTY, WISCONSIN, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHEAST CORNER OF SAID LOT 3; THENCE S00°25'05"W, ALONG THE WEST LINE OF HICKORY STREET, 213.03 FEET; THENCE S63°22'43"W, 209.71 FEET; THENCE N89°07'58"W, 57.22 FEET TO THE EAST LINE OF SAID LOT 2; THENCE S00°48'02"W, ALONG SAID EAST LINE, 239.15 FEET TO A MEANDER CORNER BEING N00°48'02"E, 48 FEET, MORE OR LESS, FROM THE WATER'S EDGE OF THE SHEBOYGAN RIVER; THENCE N56°04'58"W, ALONG A MEANDER LINE, 219.05 FEET TO A MEANDER CORNER BEING NORTHEASTERLY, 45 FEET, MORE OR LESS, FROM SAID WATERS EDGE; THENCE N82°39'58"W, 220.17 FEET TO A MEANDER CORNER BEING NORTHWESTERLY, 86 FEET, MORE OR LESS, FROM SAID WATERS EDGE; THENCE S10°05'20"W, 311.42 FEET TO A MEANDER CORNER BEING N57°19'16"W, 31 FEET, MORE OR LESS, FROM SAID WATERS EDGE; THENCE N57°19'16"W, 189.98 FEET TO A MEANDER CORNER BEING NORTHEASTERLY, 45 FEET, MORE OR LESS, FROM SAID WATERS EDGE; THENCE N20°44'58"W, 546.55 FEET TO A MEANDER CORNER BEING NORTHEASTERLY, 30 FEET FROM SAID WATER'S EDGE; THENCE N26°29'58"W, ALONG A MEANDER LINE, 106.80 FEET TO A MEANDER CORNER BEING S89°35'58"E, 39 FEET, MORE OR LESS, FROM SAID WATERS EDGE; THENCE S89°35'58"E, ALONG THE SOUTH RIGHT-OF-WAY LINE OF CLEVELAND AVENUE AND IT'S EXTENSION, 1105.50 FEET THE POINT OF BEGINNING, CONTAINING 523,050 SQUARE FEET, MORE OR LESS, AND INCLUDING THE AREA BETWEEN SAID MEANDER LINE AND THE SHEBOYGAN RIVER.



**OVERALL SITE PLAN**  
 NOT TO SCALE



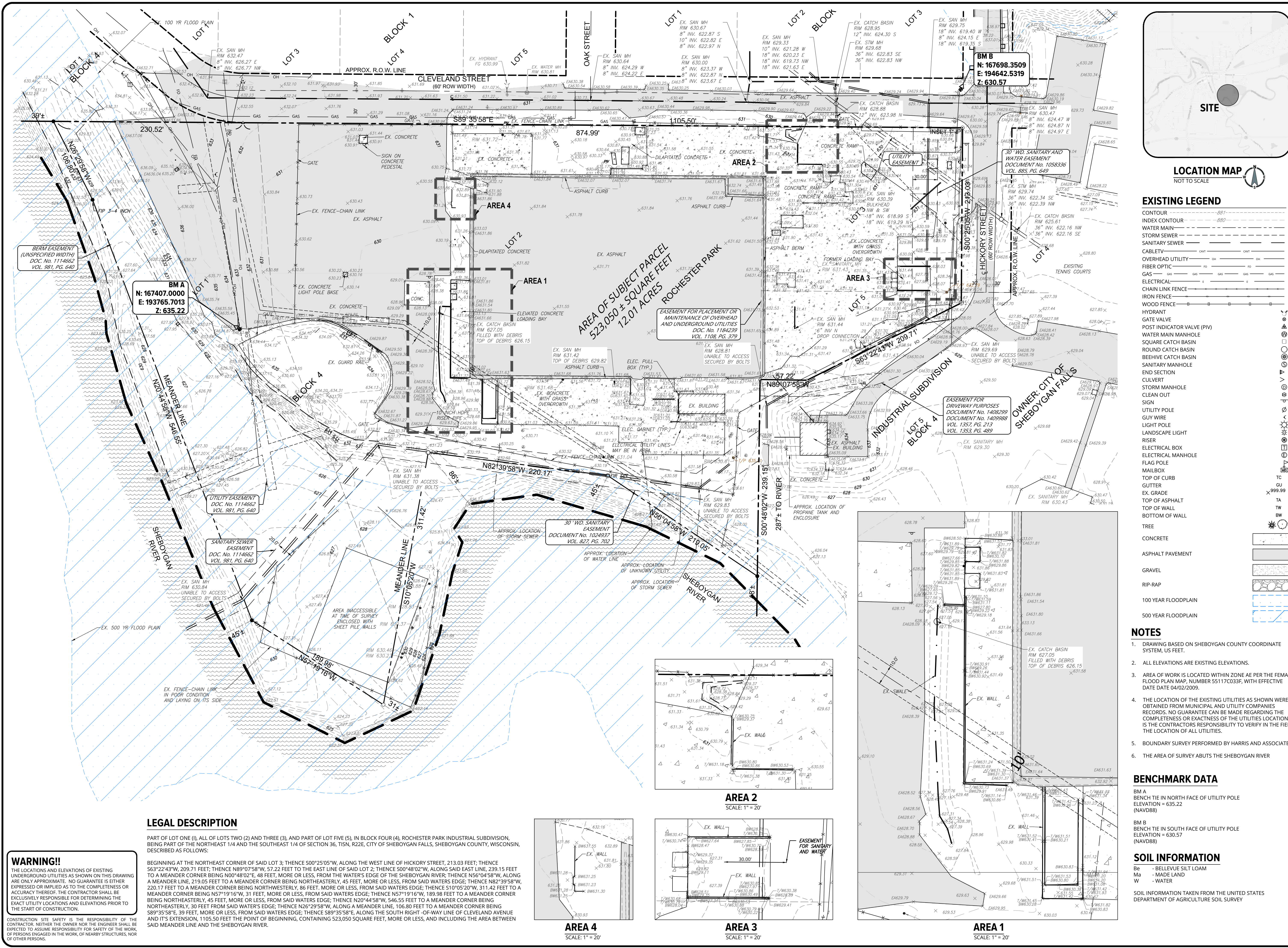
**LOCATION MAP**  
 NOT TO SCALE



**COUNTY MAP**  
 NOT TO SCALE

**WARNING!**  
 THE LOCATIONS AND ELEVATIONS OF EXISTING UNDERGROUND UTILITIES AS SHOWN ON THIS DRAWING ARE ONLY APPROXIMATE. NO GUARANTEE IS EITHER EXPRESSED OR IMPLIED AS TO THE COMPLETENESS OR ACCURACY THEREOF. THE CONTRACTOR SHALL BE EXCLUSIVELY RESPONSIBLE FOR DETERMINING THE EXACT UTILITY LOCATIONS AND ELEVATIONS PRIOR TO THE START OF CONSTRUCTION.

Jun 03, 2020 2:56pm - paradise FILE LOCATION: I:\Sme-hq\p\w\p\069638.00\CADD\069638.00.051\Survey\New\069638.00.TOPD.dwg PLOT DATE:



**WARNING!!**

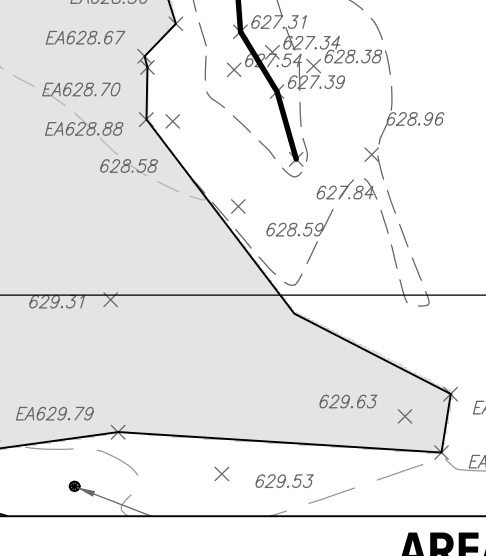
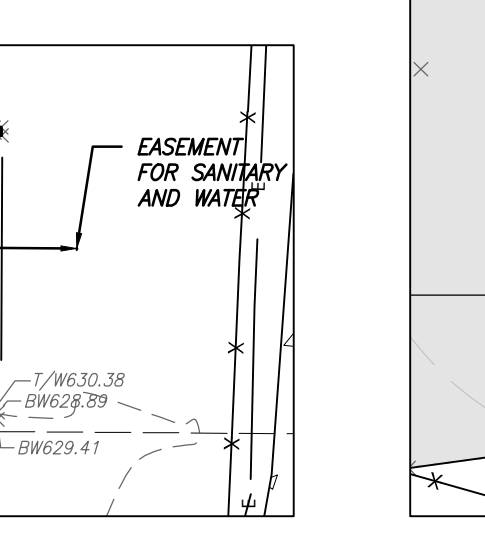
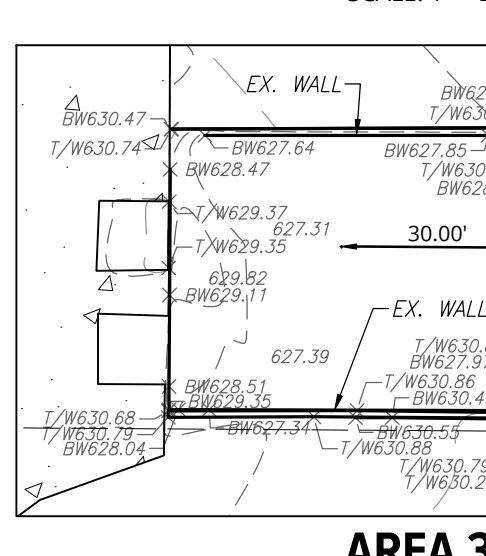
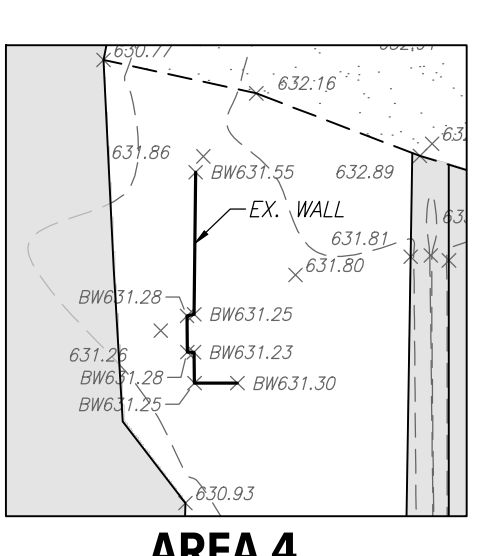
THE LOCATIONS AND ELEVATIONS OF EXISTING UNDERGROUND UTILITIES AS SHOWN ON THIS DRAWING ARE ONLY APPROXIMATE. NO GUARANTEE IS EITHER EXPRESSED OR IMPLIED AS TO THE COMPLETENESS OR ACCURACY THEREOF. THE CONTRACTOR SHALL BE EXCLUSIVELY RESPONSIBLE FOR DETERMINING THE EXACT UTILITY LOCATIONS AND ELEVATIONS PRIOR TO THE START OF CONSTRUCTION.

CONSTRUCTION SITE SAFETY IS THE RESPONSIBILITY OF THE CONTRACTOR. NEITHER THE OWNER NOR THE ENGINEER SHALL BE EXPECTED TO ASSUME RESPONSIBILITY FOR SAFETY OF THE WORK OF PERSONS ENGAGED IN THE WORK OF NEARBY STRUCTURES, NOR OF OTHER PERSONS.

**LEGAL DESCRIPTION**

PART OF LOT ONE (1), ALL OF LOTS TWO (2) AND THREE (3), AND PART OF LOT FIVE (5), IN BLOCK FOUR (4), ROCHESTER PARK INDUSTRIAL SUBDIVISION BEING PART OF THE NORTHWEST 1/4 AND THE SOUTHEAST 1/4 OF SECTION 36, T15N, R22E, CITY OF SHEBOYGAN FALLS, SHEBOYGAN COUNTY, WISCONSIN, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHEAST CORNER OF SAID LOT 3; THENCE S00°25'05"W, ALONG THE WEST LINE OF HICKORY STREET, 213.03 FEET; THENCE S63°22'43"W, 209.71 FEET; THENCE N89°07'58"W, 57.22 FEET TO THE EAST LINE OF SAID LOT 2; THENCE S00°48'02"W, ALONG SAID EAST LINE, 239.15 FEET TO A MEANDER CORNER BEING N00°48'02"E, 48 FEET, MORE OR LESS, FROM THE WATER'S EDGE OF THE SHEBOYGAN RIVER, THENCE N56°04'58"W, ALONG A MEANDER LINE, 219.05 FEET TO A MEANDER CORNER BEING NORTHEASTERLY, 45 FEET, MORE OR LESS, FROM SAID WATER'S EDGE; THENCE N82°39'58"W, 220.17 FEET TO A MEANDER CORNER BEING NORTHWESTERLY, 86 FEET, MORE OR LESS, FROM SAID WATER'S EDGE; THENCE S10°05'20"W, 189.98 FEET TO A MEANDER CORNER BEING N57°19'16"W, 31 FEET, MORE OR LESS, FROM SAID WATER'S EDGE; THENCE S10°05'20"W, 189.98 FEET TO A MEANDER CORNER BEING NORTHEASTERLY, 45 FEET, MORE OR LESS, FROM SAID WATER'S EDGE; THENCE N20°44'58"W, 546.55 FEET TO A MEANDER CORNER BEING NORTHEASTERLY, 30 FEET FROM SAID WATER'S EDGE, THENCE N26°29'58"W, ALONG A MEANDER LINE, 106.80 FEET TO A MEANDER CORNER BEING S89°35'58"E, 39 FEET, MORE OR LESS, FROM SAID WATER'S EDGE; THENCE S89°35'58"E, ALONG THE SOUTH RIGHT-OF-WAY LINE OF CLEVELAND AVENUE AND ITS EXTENSION, 1105.50 FEET OF POINT OF BEGINNING, CONTAINING 523,050 SQUARE FEET, MORE OR LESS, AND INCLUDING THE AREA BETWEEN SAID MEANDER LINE AND THE SHEBOYGAN RIVER.



**EXISTING LEGEND**

|                            |             |
|----------------------------|-------------|
| CONTOUR                    | --- 20' --- |
| INDEX CONTOUR              | --- 80' --- |
| WATER MAIN                 | ---         |
| STORM SEWER                | ---         |
| SANITARY SEWER             | ---         |
| CABLE                      | ---         |
| OVERHEAD UTILITY           | ---         |
| FIBER OPTIC                | ---         |
| GAS                        | ---         |
| ELECTRICAL                 | ---         |
| CHAIN LINK FENCE           | ---         |
| IRON FENCE                 | ---         |
| WOOD FENCE                 | ---         |
| HYDRANT                    | ---         |
| GATE VALVE                 | ---         |
| POST INDICATOR VALVE (PIV) | ---         |
| WATER MAIN MANHOLE         | ---         |
| SQUARE CATCH BASIN         | ---         |
| ROUND CATCH BASIN          | ---         |
| BEEHIVE CATCH BASIN        | ---         |
| SANITARY MANHOLE           | ---         |
| END SECTION                | ---         |
| CULVERT                    | ---         |
| STORM MANHOLE              | ---         |
| CLEAN OUT                  | ---         |
| SIGN                       | ---         |
| UTILITY POLE               | ---         |
| GUY WIRE                   | ---         |
| LIGHT POLE                 | ---         |
| LANDSCAPE LIGHT            | ---         |
| RISER                      | ---         |
| ELECTRICAL BOX             | ---         |
| ELECTRICAL MANHOLE         | ---         |
| FLAG POLE                  | ---         |
| MAILBOX                    | ---         |
| TOP OF CURB                | ---         |
| GUTTER                     | ---         |
| EX. GRADE                  | ---         |
| TOP OF ASPHALT             | ---         |
| TOP OF WALL                | ---         |
| BOTTOM OF WALL             | ---         |
| TREE                       | ---         |
| CONCRETE                   | ---         |
| ASPHALT PAVEMENT           | ---         |
| GRAVEL                     | ---         |
| RIP-RAP                    | ---         |
| 100 YEAR FLOODPLAIN        | ---         |
| 500 YEAR FLOODPLAIN        | ---         |

**NOTES**

- DRAWING BASED ON SHEBOYGAN COUNTY COORDINATE SYSTEM, US FEET.
- ALL ELEVATIONS ARE EXISTING ELEVATIONS.
- AREA OF WORK IS LOCATED WITHIN ZONE AE PER THE FEMA FLOOD PLAN MAP, NUMBER 5517C033F, WITH EFFECTIVE DATE DATE 04/02/2009.
- THE LOCATION OF THE EXISTING UTILITIES AS SHOWN WERE OBTAINED FROM MUNICIPAL AND UTILITY COMPANIES RECORDS. NO GUARANTEE CAN BE MADE REGARDING THE COMPLETENESS OR EXACTNESS OF THE UTILITIES LOCATION. IT IS THE CONTRACTORS RESPONSIBILITY TO VERIFY IN THE FIELD THE LOCATION OF ALL UTILITIES.
- BOUNDARY SURVEY PERFORMED BY HARRIS AND ASSOCIATES.
- THE AREA OF SURVEY ADJUTS THE SHEBOYGAN RIVER

**BENCHMARK DATA**

BM A  
BENCH TIE IN NORTH FACE OF UTILITY POLE  
ELEVATION = 635.22 (NAVD88)

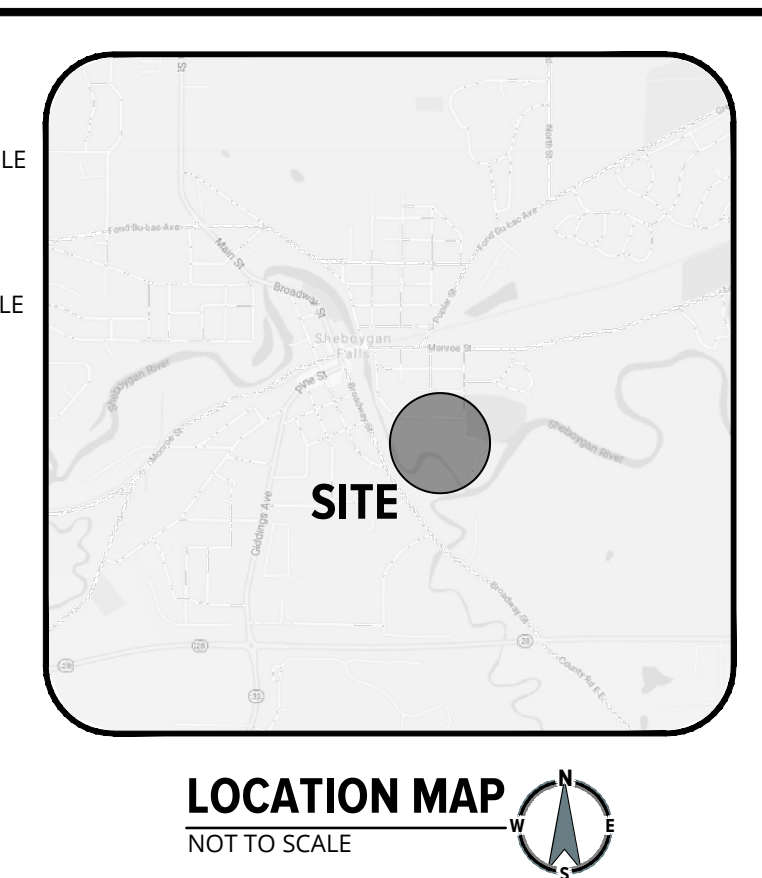
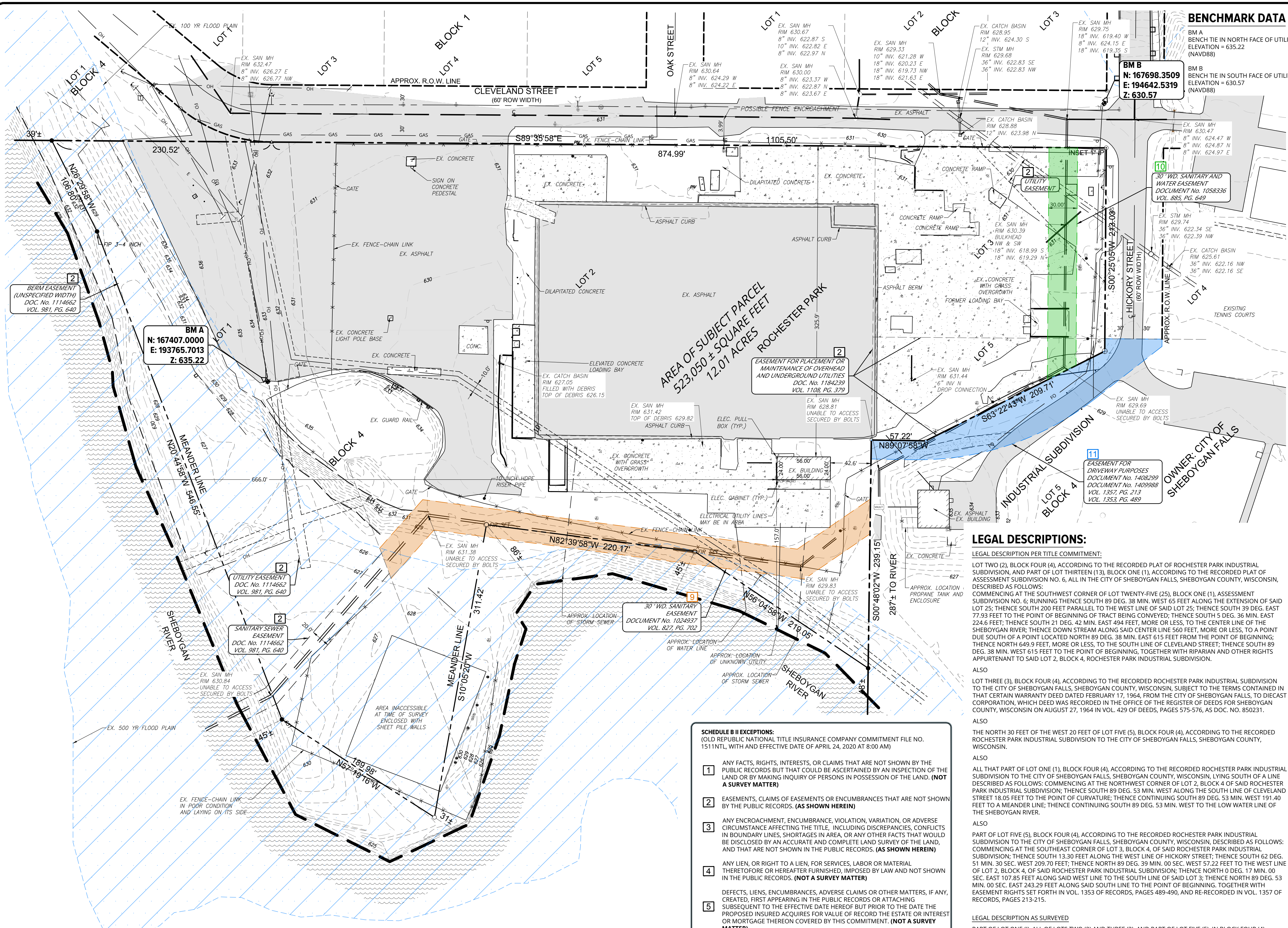
BM B  
BENCH TIE IN SOUTH FACE OF UTILITY POLE  
ELEVATION = 630.57 (NAVD88)

**SOIL INFORMATION**

Be - BELLEVUE SILT LOAM  
Mb - MADE LAND  
W - WATER

SOIL INFORMATION TAKEN FROM THE UNITED STATES DEPARTMENT OF AGRICULTURE SOIL SURVEY





**EXISTING LEGEND**

|                            |      |     |
|----------------------------|------|-----|
| WATER MAIN                 | WTR  | WTR |
| STORM SEWER                | STM  | STM |
| SANITARY SEWER             | SAN  | SAN |
| COMBINED SEWER             | COMB |     |
| CABLETV                    | CMT  | CMT |
| OVERHEAD UTILITY           | OH   | OH  |
| FIBER OPTIC                | FO   | FO  |
| GAS                        | GAS  | GAS |
| ELECTRICAL                 | E    | E   |
| FENCE                      |      |     |
| HYDRANT                    |      |     |
| GATE VALVE                 |      |     |
| POST INDICATOR VALVE (PIV) |      |     |
| WATER MAIN MANHOLE         |      |     |
| SQUARE CATCH BASIN         |      |     |
| ROUND CATCH BASIN          |      |     |
| BEEHIVE CATCH BASIN        |      |     |
| SANITARY MANHOLE           |      |     |
| END SECTION                |      |     |
| CULVERT                    |      |     |
| STORM MANHOLE              |      |     |
| CLEAN OUT                  |      |     |
| SIGN                       |      |     |
| UTILITY POLE               |      |     |
| GUY WIRE                   |      |     |
| LIGHT POLE                 |      |     |
| LANDSCAPE LIGHT            |      |     |
| RISER                      |      |     |
| ELECTRICAL BOX             |      |     |
| ELECTRICAL MANHOLE         |      |     |
| FLAG POLE                  |      |     |
| MAILBOX                    |      |     |
| SAWCUT "X" SET IN CONCRETE |      |     |
| MASONRY NAIL SET           |      |     |
| 3/4" X 24" REBAR SET       |      |     |
| 3/4" X 18" REBAR SET       |      |     |
| 1" IRON PIPE FOUND         |      |     |
| TREE                       |      |     |
| CONCRETE                   |      |     |
| ASPHALT PAVEMENT           |      |     |
| GRAVEL                     |      |     |
| RIP-RAP                    |      |     |
| 100 YEAR FLOODPLAIN        |      |     |
| 500 YEAR FLOODPLAIN        |      |     |

**LEGAL DESCRIPTIONS:**

**LEGAL DESCRIPTION PER TITLE COMMITMENT:**

LOT TWO (2), BLOCK FOUR (4), ACCORDING TO THE RECORDED PLAT OF ROCHESTER PARK INDUSTRIAL SUBDIVISION, AND PART OF LOT THIRTEEN (13), BLOCK ONE (1), ACCORDING TO THE RECORDED PLAT OF ASSESSMENT SUBDIVISION NO. 6, ALL IN THE CITY OF SHEBOYGAN FALLS, SHEBOYGAN COUNTY, WISCONSIN, DESCRIBED AS FOLLOWS: COMMENCING AT THE NORTHWEST CORNER OF LOT 2, BLOCK 4 OF SAID ROCHESTER PARK INDUSTRIAL SUBDIVISION; THENCE SOUTH 89 DEG. 38 MIN. WEST 65 FEET ALONG THE EXTENSION OF SAID LOT 25; THENCE SOUTH 200 FEET PARALLEL TO THE WEST LINE OF SAID LOT 25; THENCE SOUTH 39 DEG. EAST 77.93 FEET TO THE POINT OF BEGINNING OF TRACT BEING CONVEYED; THENCE SOUTH 5 DEG. 36 MIN. EAST 224.6 FEET; THENCE SOUTH 21 DEG. 42 MIN. EAST 494 FEET, MORE OR LESS; TO THE CENTER LINE OF THE SHEBOYGAN RIVER; THENCE DOWN STREAM ALONG SAID CENTER LINE 560 FEET, MORE OR LESS; TO A POINT DUE SOUTH OF A POINT LOCATED NORTH 89 DEG. 38 MIN. EAST 615 FEET FROM THE POINT OF BEGINNING; THENCE NORTH 649.9 FEET, MORE OR LESS; TO THE SOUTH LINE OF CLEVELAND STREET; THENCE SOUTH 89 DEG. 38 MIN. WEST 615 FEET TO THE POINT OF BEGINNING, TOGETHER WITH RIPARIAN AND OTHER RIGHTS APPURTENANT TO SAID LOT 2, BLOCK 4, ROCHESTER PARK INDUSTRIAL SUBDIVISION.

ALSO

LOT THREE (3), BLOCK FOUR (4), ACCORDING TO THE RECORDED ROCHESTER PARK INDUSTRIAL SUBDIVISION TO THE CITY OF SHEBOYGAN FALLS, SHEBOYGAN COUNTY, WISCONSIN, SUBJECT TO THE TERMS CONTAINED IN THAT CERTAIN WARRANTY DEED DATED FEBRUARY 17, 1964, FROM THE CITY OF SHEBOYGAN FALLS, TO DIECAST CORPORATION, WHICH DEED WAS RECORDED IN THE OFFICE OF THE REGISTER OF DEEDS FOR SHEBOYGAN COUNTY, WISCONSIN ON AUGUST 27, 1964 IN VOL. 429 OF DEEDS, PAGES 575-576, AS DOC. NO. 850231.

ALSO

THE NORTH 30 FEET OF THE WEST 20 FEET OF LOT FIVE (5), BLOCK FOUR (4), ACCORDING TO THE RECORDED ROCHESTER PARK INDUSTRIAL SUBDIVISION TO THE CITY OF SHEBOYGAN FALLS, SHEBOYGAN COUNTY, WISCONSIN.

ALSO

ALL THAT PART OF LOT ONE (1), BLOCK FOUR (4), ACCORDING TO THE RECORDED ROCHESTER PARK INDUSTRIAL SUBDIVISION TO THE CITY OF SHEBOYGAN FALLS, SHEBOYGAN COUNTY, WISCONSIN, LYING SOUTH OF A LINE DESCRIBED AS FOLLOWS: COMMENCING AT THE NORTHWEST CORNER OF LOT 2, BLOCK 4 OF SAID ROCHESTER PARK INDUSTRIAL SUBDIVISION; THENCE SOUTH 89 DEG. 53 MIN. WEST ALONG THE SOUTH LINE OF CLEVELAND STREET 18.05 FEET TO THE POINT OF CURVATURE; THENCE CONTINUING SOUTH 89 DEG. 53 MIN. WEST 191.40 FEET TO A MEANDER LINE; THENCE CONTINUING SOUTH 89 DEG. 53 MIN. WEST TO THE LOW WATER LINE OF THE SHEBOYGAN RIVER.

ALSO

PART OF LOT FIVE (5), BLOCK FOUR (4), ACCORDING TO THE RECORDED ROCHESTER PARK INDUSTRIAL SUBDIVISION TO THE CITY OF SHEBOYGAN FALLS, SHEBOYGAN COUNTY, WISCONSIN, DESCRIBED AS FOLLOWS: COMMENCING AT THE SOUTHEAST CORNER OF LOT 3, BLOCK 4, OF SAID ROCHESTER PARK INDUSTRIAL SUBDIVISION; THENCE SOUTH 13.30 FEET ALONG THE WEST LINE OF HICKORY STREET; THENCE SOUTH 62 DEG. 51 MIN. 30 SEC. WEST 209.70 FEET; THENCE NORTH 89 DEG. 39 MIN. 00 SEC. WEST 57.22 FEET TO THE WEST LINE OF LOT 2, BLOCK 4, OF SAID ROCHESTER PARK INDUSTRIAL SUBDIVISION; THENCE NORTH 0 DEG. 17 MIN. 00 SEC. EAST 107.85 FEET ALONG SAID WEST LINE TO THE SOUTH LINE OF SAID LOT 3; THENCE NORTH 89 DEG. 53 MIN. 00 SEC. EAST 243.29 FEET ALONG SAID SOUTH LINE TO THE POINT OF BEGINNING, TOGETHER WITH EASEMENT RIGHTS SET FORTH IN VOL. 1353 OF RECORDS, PAGES 489-490, AND RE-RECORDED IN VOL. 1357 OF RECORDS, PAGES 213-215.

**LEGAL DESCRIPTION AS SURVEYED**

PART OF LOT ONE (1), ALL OF LOTS TWO (2) AND THREE (3), AND PART OF LOT FIVE (5), IN BLOCK FOUR (4), ROCHESTER PARK INDUSTRIAL SUBDIVISION, BEING PART OF THE NORTHEAST 1/4 AND THE SOUTHEAST 1/4 OF SECTION 36, T25N, R22E, CITY OF SHEBOYGAN FALLS, SHEBOYGAN COUNTY, WISCONSIN, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHEAST CORNER OF SAID LOT 3; THENCE S00°25'05"W, ALONG THE WEST LINE OF HICKORY STREET, 213.03 FEET; THENCE S63°22'43"W, 209.71 FEET; THENCE N89°07'58"W, 57.22 FEET TO THE EAST LINE OF SAID LOT 2; THENCE S00°48'02"W, ALONG SAID EAST LINE, 239.15 FEET TO A MEANDER CORNER BEING N00°48'02"E, 48 FEET, MORE OR LESS, FROM THE WATER'S EDGE OF THE SHEBOYGAN RIVER; THENCE N56°04'58"W, ALONG A MEANDER LINE, 219.05 FEET TO A MEANDER CORNER BEING N00°48'02"E, 45 FEET, MORE OR LESS, FROM SAID WATER'S EDGE; THENCE N82°39'58"W, 220.17 FEET TO A MEANDER CORNER BEING NORTHWESTERLY, 86 FEET, MORE OR LESS, FROM SAID WATER'S EDGE; THENCE S10°05'20"W, 311.42 FEET TO A MEANDER CORNER BEING N57°19'16"W, 31 FEET, MORE OR LESS, FROM SAID WATER'S EDGE; THENCE N57°19'16"W, 189.98 FEET TO A MEANDER CORNER BEING NORTHEASTERLY, 45 FEET, MORE OR LESS, FROM SAID WATER'S EDGE; THENCE N20°44'58"W, 546.55 FEET TO A MEANDER CORNER BEING NORTHEASTERLY, 30 FEET FROM SAID WATER'S EDGE; THENCE N26°29'58"W, ALONG A MEANDER LINE, 106.80 FEET TO A MEANDER CORNER BEING S89°35'58"E, 39 FEET, MORE OR LESS, FROM SAID WATER'S EDGE; THENCE S89°35'58"E, ALONG THE SOUTH RIGHT-OF-WAY LINE OF CLEVELAND AVENUE AND ITS EXTENSION, 1105.50 FEET TO THE POINT OF BEGINNING, CONTAINING 523,050 SQUARE FEET, MORE OR LESS, AND INCLUDING THE AREA BETWEEN SAID MEANDER LINE AND THE SHEBOYGAN RIVER.

**SURVEYOR'S NOTES**

- DRAWING BASED ON SHEBOYGAN COUNTY COORDINATE SYSTEM, US FEET.
- ALL ELEVATIONS ARE EXISTING ELEVATIONS.
- AREA OF WORK IS LOCATED WITHIN ZONE AE PER THE FEMA FLOOD PLAN MAP, NUMBER 55117C033F, WITH EFFECTIVE DATE 04/02/2009.
- THE LOCATION OF THE EXISTING UTILITIES AS SHOWN WERE OBTAINED FROM MUNICIPAL AND UTILITY COMPANIES' RECORDS. NO GUARANTEE CAN BE MADE REGARDING THE COMPLETENESS OR EXACTNESS OF THE UTILITIES LOCATION. IT IS THE CONTRACTORS RESPONSIBILITY TO VERIFY IN THE FIELD THE LOCATION OF ALL UTILITIES.
- BOUNDARY SURVEY PERFORMED BY HARRIS AND ASSOCIATES, INC.
- THE AREA OF SURVEY ABUTS THE SHEBOYGAN RIVER.
- THE SITE IS LOCATED AT THE INTERSECTION OF CLEVELAND STREET, AND HICKORY STREET.
- NO EVIDENCE OF RECENT EARTH MOVING, BUILDING CONSTRUCTION, OR BUILDING ADDITIONS WERE OBSERVED.
- NO EVIDENCE OF RECENT STREET OR SIDEWALK CONSTRUCTION OR REPAIRS WERE OBSERVED.

**SURVEYORS CERTIFICATE:**

TO: PALACE ASSOCIATES II, LLC; OLD REPUBLIC NATIONAL TITLE INSURANCE COMPANY; AND THOMAS TIE & ESCROW;

THIS IS TO CERTIFY THAT THIS MAP OR PLAT AND THE SURVEY ON WHICH IT IS BASED WERE MADE IN ACCORDANCE WITH THE 2016 MINIMUM STANDARD DETAIL REQUIREMENTS FOR ALTA/NSPS LAND TITLE SURVEYS, JOINTLY ESTABLISHED AND ADOPTED BY ALTA AND NSPS, AND INCLUDES ITEMS 1, 2, 3, 4, 5, 7(a), 8, 11, 13, 14 AND 16 OF TABLE THEREOF.

THE FIELDWORK WAS COMPLETED ON 5-22-2020.

ROBERT J. HARRIS, P.L.S. 1943      DATE: \_\_\_\_\_

- SCHEDULE B II EXCEPTIONS:**  
(OLD REPUBLIC NATIONAL TITLE INSURANCE COMPANY COMMITMENT FILE NO. 1511NLT, WITH AND EFFECTIVE DATE OF APRIL 24, 2020 AT 8:00 AM)
- ANY FACTS, RIGHTS, INTERESTS, OR CLAIMS THAT ARE NOT SHOWN BY THE PUBLIC RECORDS BUT THAT COULD BE ASCERTAINED BY AN INSPECTION OF THE LAND OR BY MAKING INQUIRY OF PERSONS IN POSSESSION OF THE LAND. **(NOT A SURVEY MATTER)**
  - EASEMENTS, CLAIMS OF EASEMENTS OR ENCUMBRANCES THAT ARE NOT SHOWN BY THE PUBLIC RECORDS. **(AS SHOWN HEREIN)**
  - ANY ENCROACHMENT, ENCUMBRANCE, VIOLATION, VARIATION, OR ADVERSE CIRCUMSTANCE AFFECTING THE TITLE, INCLUDING DISCREPANCIES, CONFLICTS IN BOUNDARY LINES, SHORTAGES IN AREA, OR ANY OTHER FACTS THAT WOULD BE DISCLOSED BY AN ACCURATE AND COMPLETE LAND SURVEY OF THE LAND, AND THAT ARE NOT SHOWN IN THE PUBLIC RECORDS. **(AS SHOWN HEREIN)**
  - ANY LIEN, OR RIGHT TO A LIEN, FOR SERVICES, LABOR OR MATERIAL THEREFOR OR HEREAFTER FURNISHED, IMPOSED BY LAW AND NOT SHOWN IN THE PUBLIC RECORDS. **(NOT A SURVEY MATTER)**
  - DEFECTS, LIENS, ENCUMBRANCES, ADVERSE CLAIMS OR OTHER MATTERS, IF ANY, CREATED FIRST APPEARING IN THE PUBLIC RECORDS OR ATTACHMENT SUBSEQUENT TO THE EFFECTIVE DATE HEREOF BUT PRIOR TO THE DATE THE PROPOSED INSURED ACQUIRES FOR VALUE OF RECORD THE ESTATE OR INTEREST OR MORTGAGE THEREON COVERED BY THIS COMMITMENT. **(NOT A SURVEY MATTER)**
  - THE LIEN OF THE GENERAL TAXES FOR THE YEAR 2020, AND THEREAFTER. (GENERAL TAXES FOR THE YEAR 2019 IN THE AMOUNT OF \$2,182.33 ARE PARTIALLY PAID). **(NOT A SURVEY MATTER)**
  - THE LIEN OF ANY SPECIAL ASSESSMENTS, TAXES OR CHARGES. **(NOT A SURVEY MATTER)**
  - ACCESS AND EASEMENT AGREEMENT DATED OCTOBER 9, 2003, RECORDED DECEMBER 9, 2003 AS DOCUMENT NO. 1717965 **(AGREEMENT ENCOMPASSING ALL DESCRIBED PROPERTIES - NOTHING TO PLOT)**
  - EASEMENT DATED FEBRUARY 14, 1978, RECORDED MARCH 8, 1978 AS DOCUMENT NO. 1024937 **(AS SHOWN HEREIN)**
  - EASEMENT DATED AUGUST 18, 1980, RECORDED AUGUST 20, 1980 AS DOCUMENT NO. 1058336 **(AS SHOWN HEREIN)**
  - EASEMENT FOR DRIVEWAY PURPOSES DATED JUNE 1994, RECORDED JULY 19, 1994 AS DOCUMENT NO. 1409988, RECORDED AUGUST 16, 1994 AS DOCUMENT NO. 1409988 **(AS SHOWN HEREIN)**

**WARNING!!**

THE LOCATIONS AND ELEVATIONS OF EXISTING UNDERGROUND UTILITIES AS SHOWN ON THIS DRAWING ARE ONLY APPROXIMATE. NO GUARANTEE IS EITHER EXPRESSED OR IMPLIED AS TO THE COMPLETENESS OR ACCURACY THEREOF. THE CONTRACTOR SHALL BE EXCLUSIVELY RESPONSIBLE FOR DETERMINING THE EXACT UTILITY LOCATIONS AND ELEVATIONS PRIOR TO THE START OF CONSTRUCTION.

CONSTRUCTION SITE SAFETY IS THE RESPONSIBILITY OF THE CONTRACTOR. NEITHER THE OWNER NOR THE ENGINEER SHALL BE EXPECTED TO ASSUME RESPONSIBILITY FOR SAFETY OF THE WORK OF PERSONS ENGAGED IN THE WORK, OF NEARBY STRUCTURES, NOR OF OTHER PERSONS.

www.sme-usa.com

Orientation: Scale:

Project: **SHEBOYGAN RIVER SUPERFUND SITE**

Project Location: **CLEVELAND STREET, CITY OF SHEBOYGAN FALLS, SHEBOYGAN COUNTY, WISCONSIN**

Sheet Name: **ALTA/NSPS LAND TITLE SURVEY**

Surveyor's Seal:

| REV | ISSUED FOR | DATE | BY |
|-----|------------|------|----|
|     |            |      |    |

Know what's below. Call before you dig. Min. Three Days prior to digging

Date: **06/03/2020**

SME Project No.: **069638.00.051**

Project Manager: **J. EVANS**

Field Chief: **R. EISS**

CADD: **S. PARADISE**

Checked By: **R. HARRIS**

Sheet No.: **C-102**

NO REPRODUCTION SHALL BE MADE WITHOUT THE PRIOR CONSENT OF SME © 2020

FILE LOCATION: I:\sme\encl\wip\069638.00\069638.00.051\Survey\Rev\069638.00\TOP.dwg

## **TABLES**

**TABLE 1: SITE SECURITY, ENGINEERED BARRIER, FINAL COVER AND VEGETATION MAINTENANCE**

**TABLE 2: GROUNDWATER MONITORING WELL SAMPLING, INSPECTION AND MAINTENANCE**

**TABLE 3: GROUNDWATER MIGRATION INTERCEPTOR TRENCH (GMIT) AND WATER TREATMENT SYSTEMS OPERATION AND MAINTENANCE**

**SHEBOYGAN RIVER AND HARBOR SITE  
FORMER TECUMSEH PRODUCTS COMPANY PLANT  
OPERATIONS AND MAINTENANCE ACTIVITIES**

| <b>TABLE 1<br/>SITE SECURITY, ENGINEERED BARRIER, FINAL COVER AND VEGETATION<br/>MAINTENANCE</b> |                                           |                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------------------------------------------------------------------------------------------|-------------------------------------------|--------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>                                                                                      | <b>ACTIVITY</b>                           | <b>FREQUENCY</b>                                                                     | <b>INSPECTION AND MAINTENANCE ACTIVITIES</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Site Fencing                                                                                     | Inspection<br><br>Repairs                 | Quarterly<br><br>As needed                                                           | Inspect site fencing for areas damaged fence components including bent or broken poles and detached or damaged mesh.<br><br>Where needed, repair or replace bent or broken poles and reattach mesh.<br><br>Where needed, repair or replace detached or damaged mesh.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Engineered Barrier                                                                               | Inspection<br><br>Repairs                 | Semi-annual basis (2012-2017)<br><br>Per EPA/WDR discretion (2017+)<br><br>As needed | Inspection of the integrity of engineered barriers will be conducted on an annual basis for a period of five years following completion of the source removal activities (2012). The inspections may continue beyond the initial five years on a frequency to be determined following discussions with the USEPA and WDNR.<br><br>A visual inspection of engineered barriers (such as asphalt caps) will also be conducted for any engineered barriers that may be installed. The inspection will identify the presence of cracks, damaged areas, or vegetation that may jeopardize the integrity of the barrier.<br><br>General maintenance of the engineered barriers may include sealing of cracks, patching or replacement of the engineered barrier in damaged areas, or removal of vegetation. Patching and replacement of engineered barriers will be conducted in a manner consistent with the procedures and materials used during the original installation of the barriers. |
| Cover Soil                                                                                       | Inspection<br><br>Repairs                 | Quarterly<br><br>As needed                                                           | Inspect cover soil quarterly for gullies and erosion.<br><br>Place and compact fill soil in eroded areas (where gullies are deeper than 50% of the final cover thickness).<br><br>Where needed, re-seed the areas of replacement fill soil. Utilize temporary erosion controls (such as straw bales or silt fence) until vegetation is re-established on replacement fill areas.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Cover Vegetation                                                                                 | Inspection<br><br>Reseeding<br><br>Mowing | Quarterly<br><br>As needed<br><br>Annually                                           | Inspect cover vegetation quarterly for areas of vegetative stress.<br><br>Where needed, re-seed the areas with noted vegetative stress.<br><br>Final cover vegetation to be mowed annually.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

# SHEBOYGAN RIVER AND HARBOR SITE FORMER TECUMSEH PRODUCTS COMPANY PLANT OPERATIONS AND MAINTENANCE ACTIVITIES

| TABLE 1<br>SITE SECURITY, ENGINEERED BARRIER, FINAL COVER AND VEGETATION<br>MAINTENANCE |            |           |                                                                                              |
|-----------------------------------------------------------------------------------------|------------|-----------|----------------------------------------------------------------------------------------------|
| ITEM                                                                                    | ACTIVITY   | FREQUENCY | INSPECTION AND MAINTENANCE ACTIVITIES                                                        |
| Trees and<br>Brushes                                                                    | Inspection | Quarterly | Inspect cover soil and vegetation areas quarterly for excess trees and brush growth.         |
|                                                                                         | Removal    | As needed | Chop down and remove saplings and bushes growing within the limits of the final cover layer. |

**SHEBOYGAN RIVER AND HARBOR SITE  
FORMER TECUMSEH PRODUCTS COMPANY PLANT  
OPERATIONS AND MAINTENANCE ACTIVITIES**

| <b>TABLE 2<br/>GROUNDWATER MONITORING WELL SAMPLING, INSPECTION AND MAINTENANCE</b> |                      |                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------------------------------------------------------------|----------------------|---------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>                                                                         | <b>ACTIVITY</b>      | <b>FREQUENCY</b>                                                    | <b>MAINTENANCE ACTIVITIES</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Groundwater Sampling                                                                | Groundwater Sampling | Semi-annual basis (2005-2013)<br><br>Per EPA/WDR discretion (2013+) | Six (6) groundwater monitoring wells (MW-9, MW-10, MW-12, MW-13, MW-16, MW-17) located downgradient of the groundwater monitoring/interceptor trench (GMIT) at the Plant Site shall be sampled for polychlorinated biphenyls (PCBs) on a semi-annual basis for a period of five years following completion of source removal activities (2012). Based on the results of the semi-annual sampling, monitoring may continue beyond the initial five years on a frequency to be determined following discussions with the USEPA and WDNR.                                                                                                                                                                                                                                              |
| Monitoring Well Integrity Inspection                                                | Inspection           | Semi-annual basis (2012-2017)<br><br>Per EPA/WDR discretion (2017+) | Inspection of the integrity of the monitoring wells will be conducted on an annual basis for a period of five years following completion of the source removal activities (2012). The inspections may continue beyond the initial five years on a frequency to be determined following discussions with the USEPA and WDNR.                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                     | Repairs              | As needed                                                           | The integrity of the monitoring wells will be evaluated by visual inspection of the exposed well materials and depth to well bottom measurements during each semi-annual groundwater monitoring event. The information obtained will be compared to initial construction conditions to assess whether the integrity of the wells has been jeopardized.<br><br>Based on the results of the inspections, appropriate activities will be conducted to maintain the integrity of the monitoring wells. Groundwater monitoring wells that appear to have minor damage (such as broken protective pipe covers) will be appropriately repaired. Groundwater monitoring wells determined to be irreparably damaged will be abandoned. If appropriate, the monitoring well will be replaced. |

**SHEBOYGAN RIVER AND HARBOR SITE  
FORMER TECUMSEH PRODUCTS COMPANY PLANT  
OPERATIONS AND MAINTENANCE ACTIVITIES**

| <b>TABLE 3<br/>GROUNDWATER MIGRATION INTERCEPTOR TRENCH (GMIT) AND WATER TREATMENT SYSTEMS OPERATION AND MAINTENANCE</b> |                     |                                                                     |                                                                                                                                                                                                                                                                                                                 |
|--------------------------------------------------------------------------------------------------------------------------|---------------------|---------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>                                                                                                              | <b>ACTIVITY</b>     | <b>FREQUENCY</b>                                                    | <b>MAINTENANCE ACTIVITIES</b>                                                                                                                                                                                                                                                                                   |
| GMIT Inspection                                                                                                          | Inspection          | Semi-annual basis (2012-2017)<br><br>Per EPA/WDR discretion (2017+) | Inspection of the integrity of the GMIT will be conducted on an annual basis for a period of five years following completion of the source removal activities (2012). The inspections may continue beyond the initial five years on a frequency to be determined following discussions with the USEPA and WDNR. |
|                                                                                                                          | Repairs             | As needed                                                           | A visual inspection of the exposed materials of the GMIT will also be conducted during each semi-annual groundwater monitoring event to determine if natural activities or vandalism has damaged the system.                                                                                                    |
| Power Supplies                                                                                                           | Inspection          | During Operation -<br>Annually and/or when malfunction occurs       | When the GMIT system is in operation, inspect the electrical power supply in accordance with the manufacturer's recommendation and/or when malfunction occurs.                                                                                                                                                  |
|                                                                                                                          | Repairs             | As needed                                                           |                                                                                                                                                                                                                                                                                                                 |
| Electronic Controls                                                                                                      | Inspection          | During Operation -<br>Semi-annually and/or when malfunction occurs  | When the GMIT system is in operation, inspect the electronic controls in accordance with the manufacturer's recommendation and/or when malfunction occurs.                                                                                                                                                      |
|                                                                                                                          | Repairs             | As needed                                                           |                                                                                                                                                                                                                                                                                                                 |
| GMIT Pump                                                                                                                | Inspection          | During Operation -<br>Semi-annually and/or when malfunction occurs  | When the GMIT system is in operation, inspect the extraction pump in accordance with the manufacturer's recommendation and/or when malfunction occurs.                                                                                                                                                          |
|                                                                                                                          | Repairs             | As needed                                                           |                                                                                                                                                                                                                                                                                                                 |
| Interceptor Pipe and Cleanouts                                                                                           | Inspection          | During Operation -<br>Annually and/or when malfunction occurs       | When the GMIT system is in operation, inspect interceptor pipes annually.                                                                                                                                                                                                                                       |
|                                                                                                                          | Jetting or Flushing | As needed                                                           | Jet or flush interceptor pipes as needed to remove obstructions;<br><br>Jetting, flushing or camera inspection will be performed when clogging of the pipes results in a reduction of flow rate as indicated by increased head levels in the interceptor's clean-outs.                                          |
| Force main System                                                                                                        | Inspection          | During Operation -<br>Annually and/or when malfunction occurs       | When the GMIT system is in operation, inspect force mains, valves, sump and other fixtures annually and/or when malfunction occurs.                                                                                                                                                                             |
|                                                                                                                          | Repairs             | As needed                                                           |                                                                                                                                                                                                                                                                                                                 |

**SHEBOYGAN RIVER AND HARBOR SITE  
FORMER TECUMSEH PRODUCTS COMPANY PLANT  
OPERATIONS AND MAINTENANCE ACTIVITIES**

| <b>TABLE 3<br/>GROUNDWATER MIGRATION INTERCEPTOR TRENCH (GMIT) AND WATER TREATMENT<br/>SYSTEMS OPERATION AND MAINTENANCE</b> |                                         |                                                                              |                                                                                                                                                                                                                                                                                                                                                                                               |
|------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>                                                                                                                  | <b>ACTIVITY</b>                         | <b>FREQUENCY</b>                                                             | <b>MAINTENANCE ACTIVITIES</b>                                                                                                                                                                                                                                                                                                                                                                 |
| Water Treatment System Sand/Carbon Filters and Tanks                                                                         | Inspection<br><br>Repairs/<br>Replenish | During Operation - Quarterly and/or when malfunction occurs<br><br>As needed | When the GMIT system is in operation, inspect all tanks in accordance with the manufacturer's recommendation and/or when malfunction occurs.<br><br>Clean out Storage Tanks (Influent and Effluent/Backwash Tank) as needed;<br><br>Replace/clean filter in Multimedia Filter as needed based upon use;<br><br>Replenish carbon to the Activated Carbon Units as needed or upon breakthrough. |

**ATTACHMENT 1**  
**SITE PHOTOGRAPHS**





**PHOTO NO. 1: View of fence along the east side of the Site.**



**PHOTO NO. 2: View of fence along the east side of the Site.**

|                 |                                                  |
|-----------------|--------------------------------------------------|
| SME Project No. | 069638.00.070                                    |
| Photographs by: | Megan Schaner                                    |
| Date:           | August 8, 2022                                   |
| Project:        | Sheboygan River and Inner Harbor Superfund       |
| Location:       | 428 Cleveland Street, Sheboygan Falls, Wisconsin |



**PHOTO NO. 3: View of fence along the east side of the Site.**



**PHOTO NO. 4: View of fence along the east side of the Site.**

|                 |                                                  |
|-----------------|--------------------------------------------------|
| SME Project No. | 069638.00.070                                    |
| Photographs by: | Megan Schaner                                    |
| Date:           | August 8, 2022                                   |
| Project:        | Sheboygan River and Inner Harbor Superfund       |
| Location:       | 428 Cleveland Street, Sheboygan Falls, Wisconsin |



**PHOTO NO. 5: View of fence along the east side of the Site.**



**PHOTO NO. 6: View of fence along the north side of the Site.**

|                 |                                                  |
|-----------------|--------------------------------------------------|
| SME Project No. | 069638.00.070                                    |
| Photographs by: | Megan Schaner                                    |
| Date:           | August 8, 2022                                   |
| Project:        | Sheboygan River and Inner Harbor Superfund       |
| Location:       | 428 Cleveland Street, Sheboygan Falls, Wisconsin |



**PHOTO NO. 7: View of fence along the north side of the Site.**



**PHOTO NO. 8: View of fence along the north side of the Site.**

|                 |                                                  |
|-----------------|--------------------------------------------------|
| SME Project No. | 069638.00.070                                    |
| Photographs by: | Megan Schaner                                    |
| Date:           | August 8, 2022                                   |
| Project:        | Sheboygan River and Inner Harbor Superfund       |
| Location:       | 428 Cleveland Street, Sheboygan Falls, Wisconsin |



**PHOTO NO. 9: View of fence along the north side of the Site.**



**PHOTO NO. 10: View of fence along the north side of the Site.**

|                 |                                                  |
|-----------------|--------------------------------------------------|
| SME Project No. | 069638.00.070                                    |
| Photographs by: | Megan Schaner                                    |
| Date:           | August 8, 2022                                   |
| Project:        | Sheboygan River and Inner Harbor Superfund       |
| Location:       | 428 Cleveland Street, Sheboygan Falls, Wisconsin |



**PHOTO NO. 11: View of fence along the north side of the Site.**



**PHOTO NO. 12: View of fence along the west side of the Site.**

|                 |                                                  |
|-----------------|--------------------------------------------------|
| SME Project No. | 069638.00.070                                    |
| Photographs by: | Megan Schaner                                    |
| Date:           | August 8, 2022                                   |
| Project:        | Sheboygan River and Inner Harbor Superfund       |
| Location:       | 428 Cleveland Street, Sheboygan Falls, Wisconsin |



**PHOTO NO. 13: View of fence along the south side of the Site.**



**PHOTO NO. 14: View of fence along the south side of the Site.**

|                 |                                                  |
|-----------------|--------------------------------------------------|
| SME Project No. | 069638.00.070                                    |
| Photographs by: | Megan Schaner                                    |
| Date:           | August 8, 2022                                   |
| Project:        | Sheboygan River and Inner Harbor Superfund       |
| Location:       | 428 Cleveland Street, Sheboygan Falls, Wisconsin |



**PHOTO NO. 15: View of fence along the south side of the Site.**



**PHOTO NO. 16: View of fence along the south side of the Site.**

|                 |                                                  |
|-----------------|--------------------------------------------------|
| SME Project No. | 069638.00.070                                    |
| Photographs by: | Megan Schaner                                    |
| Date:           | August 8, 2022                                   |
| Project:        | Sheboygan River and Inner Harbor Superfund       |
| Location:       | 428 Cleveland Street, Sheboygan Falls, Wisconsin |





**PHOTO NO. 17: View of pavement in the eastern portion of the Site.**



**PHOTO NO. 18: View of pavement in the central portion of the Site.**

|                 |                                                  |
|-----------------|--------------------------------------------------|
| SME Project No. | 069638.00.070                                    |
| Photographs by: | Megan Schaner                                    |
| Date:           | August 8, 2022                                   |
| Project:        | Sheboygan River and Inner Harbor Superfund       |
| Location:       | 428 Cleveland Street, Sheboygan Falls, Wisconsin |



**PHOTO NO. 19: View of pavement in the central portion of the Site.**



**PHOTO NO. 20: View of pavement in the central portion of the Site.**

|                 |                                                  |
|-----------------|--------------------------------------------------|
| SME Project No. | 069638.00.070                                    |
| Photographs by: | Megan Schaner                                    |
| Date:           | August 8, 2022                                   |
| Project:        | Sheboygan River and Inner Harbor Superfund       |
| Location:       | 428 Cleveland Street, Sheboygan Falls, Wisconsin |



**PHOTO NO. 21: View of pavement in the western portion of the Site.**



**PHOTO NO. 22: View of pavement in the western portion of the Site.**

|                 |                                                  |
|-----------------|--------------------------------------------------|
| SME Project No. | 069638.00.070                                    |
| Photographs by: | Megan Schaner                                    |
| Date:           | August 8, 2022                                   |
| Project:        | Sheboygan River and Inner Harbor Superfund       |
| Location:       | 428 Cleveland Street, Sheboygan Falls, Wisconsin |

**ATTACHMENT 2**  
**GROUNDWATER MONITORING WELL INFORMATION**



**2022 GROUNDWATER MONITORING WELL SUMMARY**  
**FORMER TECUMSEH PRODUCTS SITE**  
**SHEBOYGAN FALLS, WISCONSIN**

SME Project No. 069638.00.070

Page 1 of 1

| Well ID | Screened Interval (ft.) | Ground Surface Elevation (elev. ft.) | Top of Casing Elevation (elev. ft.) | Depth to Bottom of Well (ft.) As-Built | Depth to Groundwater (ft.) May 24, 2021 | Depth to Bottom of Well (ft.) May 24, 2021 | Groundwater Elevation (ft.) May 24, 2021 | Depth to Groundwater (ft.) August 18, 2022 | Depth to Bottom of Well (ft.) August 18, 2022 | Groundwater Elevation (ft.) August 18, 2022 | 2004-2022 Well Depth Difference (ft) | 2004-2022 Well Depth Percent Difference | 2021-2022 Well Depth Difference (ft) | 2021-2022 Well Depth Percent Difference |
|---------|-------------------------|--------------------------------------|-------------------------------------|----------------------------------------|-----------------------------------------|--------------------------------------------|------------------------------------------|--------------------------------------------|-----------------------------------------------|---------------------------------------------|--------------------------------------|-----------------------------------------|--------------------------------------|-----------------------------------------|
| MW9     | 12 - 17                 | 628.73                               | 631.11                              | 16.98                                  | 7.40                                    | 16.69                                      | 622.30                                   | 7.98                                       | 16.69                                         | 621.72                                      | 0.29                                 | 1.7%                                    | 0.00                                 | 0.0%                                    |
| MW10    | 12 - 17                 | 631.56                               | 633.98                              | 16.97                                  | 9.82                                    | 16.80                                      | 621.29                                   | 10.28                                      | 16.81                                         | 620.83                                      | 0.16                                 | 0.9%                                    | 0.01                                 | 0.1%                                    |
| MW12    | 10 - 15                 | 629.85                               | 632.21                              | 14.88                                  | 8.13                                    | 14.92                                      | 625.85                                   | 8.53                                       | 14.91                                         | 625.45                                      | -0.03                                | -0.2%                                   | -0.01                                | -0.1%                                   |
| MW13    | 10 - 15                 | 630.81                               | 633.21                              | 15.28                                  | 8.36                                    | 16.55                                      | 623.85                                   | 9.76                                       | 16.54                                         | 622.45                                      | -1.26                                | -8.2%                                   | -0.01                                | -0.1%                                   |
| MW16    | 12 - 17                 | 630.74                               | 633.18                              | 16.92                                  | 9.16                                    | 16.93                                      | 624.05                                   | 9.50                                       | 16.96                                         | 623.71                                      | -0.04                                | -0.2%                                   | 0.03                                 | 0.2%                                    |
| MW17    | 10 - 15                 | 627.20                               | 629.70                              | 15.55                                  | 7.82                                    | 15.58                                      | 625.36                                   | 8.55                                       | 15.55                                         | 624.63                                      | 0.00                                 | 0.0%                                    | -0.03                                | -0.2%                                   |

Notes: 1. Top of Casing and Ground Surface elevations were measured following installation in 2004.  
 2. Monitoring Wells were installed in 2004 by PRS.