



April 9, 2019

Cassandra Langenfeld
City Administrator
City of New Holstein
2110 Washington St.
New Holstein WI 53061

Subject: DNR Certification of Site Investigation Report under
Wis. Stat. § 66.1105(20m)(c), for ER-TID Creation
Former Tecumseh Products, 1604 Michigan Ave., New Holstein WI
Tax ID Nos. 18450, 18464, 18465, 18568, 18569, 18919, 18920, and
18921
BRRTS# 07-08-560410

Dear Ms. Langenfeld:

On April 1, 2019, the Department of Natural Resources (DNR) received a Technical Assistance request with fee to review and certify the site investigation report(s) for the former Tecumseh Products site, identified in the "Subject" section above and throughout this letter (the "Property"), in accordance with Wis. Stat. § 66.1105(20m)(c), as part of the application process at the Department of Revenue (DOR) to create an Environmental Remediation Tax Incremental District (ER-TID). The following documents were submitted by Robert E. Lee & Associates, Inc., on behalf of the City of New Holstein ("City") for DNR review:

- Technical Assistance Request ("Request"), dated March 25, 2019, for a "Department of Revenue letter for ER-TID.
- Phase I Environmental Site Assessment, Robert E. Lee & Associates, Inc., December 11, 2017.
- Summary of past Environmental Investigations, Robert E. Lee & Associates, Inc., March 25, 2019.

The Department has reviewed the site assessment and investigation documents submitted with your request and site investigation reports, remedial action plans and other reports included within the DNR case files for the BRRTS cases listed in this letter and certifies that the site investigation meets the requirements of [Wis. Stat. § 66.1105\(20m\)\(c\)](#).

Site and Project Summary

The Request states: "The Property is located at 1604 Michigan Avenue, Tax ID Nos. 18450, 18464, 18465, 18568, 18569, 18919, 18920, and 18921, City of New Holstein, Calumet County, Wisconsin. The Property consists of approximately 38.7 acres with structures and other improvements and is located about six miles southeast of Chilton (County Seat) and 25 miles northwest of Sheboygan, Wisconsin. The Property has had significant environmental investigation completed over the last 30 years. Numerous Phase I reports, several Phase IIs, and a number of site investigations have been completed."

This Property includes developed and undeveloped land. Multiple site investigations and remedial actions have occurred at this site and are identified on [the DNRs Bureau for Remediation and Redevelopment Tracking System \(BRRTS\)](#) database. The associated BRRTS site numbers include, and may not be limited to, the following: 02-08-000306; 02-08-100332; 02-08-193776; 02-08-281506; 02-08-363333; 03-08-001070; 03-08-001071; 03-08-100390; 04-08-168369; 04-08-229768; 04-08-283169; 06-08-548742; 09-08-292129; and 09-08-292130

Contaminants identified in soil and groundwater at this site include volatile organic compounds (VOCs), chlorinated volatile organic compounds (CVOCs), polycyclic aromatic compounds (PAHs) and metals. Continuing obligations including capping for to minimize infiltration of groundwater and direct contact exposure have been placed on this site as part of past remedial actions. Future development will be required to meet these continuing obligations.

Two open cases (BRRTS# 02-08-363333 & 02-08-281506) related to the chromium plating line and Hayton Mill Pond PCB remediation remain open and are being addressed by the responsible parties Tecumseh Products and their consultant TRC. PCB contamination was not identified on the majority of the property and was limited to Jordan Creek and Outfall 001.

As work proceeds on the Property, the DNR has the following comments for the City and its contractors:

- Since most of the site is under a capping requirement, demolition and redevelopment will need to be carefully planned to comply with the continuing obligation requirements of previous case closures. This could include, for example, requirements to submit post closure modification request(s) under Wis. Admin. Code ch. NR 727.
- City coordination with Tecumseh and TRC is required due to the remaining open BRRTS remediation cases.
- Redevelopment planning must take into account residual soil and groundwater contamination and ensure the planned reuse/redevelopment will be protective of human health. Vapor intrusion evaluations will also be needed for future building projects.
- Proactive, ongoing, consultation with the DNR during the redevelopment process is strongly encouraged.

The DNR looks forward to assisting the City of New Holstein as this project moves forward. [Additional requests for DNR technical assistance can be submitted by using DNR Form 4400-237.](#)

Please feel free to contact me at (920)-424-7890 or by email at kevin.mcknight@wisconsin.gov.

Sincerely,



Kevin D. McKnight
Remediation and Redevelopment Program

cc: Barry Ashenfelter, DNR RR/5 (Barry.Ashenfelter@wisconsin.gov)
Tauren Beggs, DNR (Tauren.Beggs@wisconsin.gov)