



June 22, 2022

TECUMSEH PRODUCTS COMPANY  
ATTN: STAN GILHOOL, GENERAL COUNSEL  
5683 HINES DRIVE  
ANN ARBOR, MI 48108

[Via Electronic Mail Only to [stan.gilhool@tecumseh.com](mailto:stan.gilhool@tecumseh.com)]

Subject: Long-Term Natural Recovery Monitoring Plan for Fish Tissue Monitoring Not Approved  
HARP Site Long Term Monitoring, BRRTS # 02-08-587669

Dear Mr. Gilhool:

The Long-Term Natural Recovery Monitoring Plan for Fish Tissue Monitoring dated December 22, 2021, submitted to the Department of Natural Resources (DNR), as required by the November 2018 Negotiated Agreement for the Hayton Area Remediation Project (HARP) Site Long Term Monitoring, is not approved.

The Natural Recovery Monitoring Plan for Fish Tissue Monitoring does not meet the requirements of Wis. Admin. Code ch. NR 724 and is missing necessary and pertinent information, as referenced in the attached comments. The comments provided are intended to refine the monitoring plan to improve the work product and assist with compliance with the regulations.

The comments should not be interpreted as all the requirements necessary to comply with Wis. Admin. Code ch. NR 724 for a natural recovery monitoring plan and ch. NR 726 for case closure. All relevant information should be included in the revision.

The Natural Recovery Monitoring Plan for Fish Tissue Monitoring must comply with Wis. Stat. ch. 292 and the Wis. Admin. Code ch. NR 700 rule series. As stated in Section XIV of the Negotiated Agreement, “[n]othing herein shall preclude the State from requiring Tecumseh to undertake other or additional environmental response actions at the Site that may otherwise be required of Tecumseh as a responsible party pursuant to Wis. Stats. ch. 292 and the Wis. Admin. Code ch. NR 700 administrative rule series.”

Therefore, within 60 days of the date of this letter, by August 21, 2022, revise and re-submit the monitoring plan with a \$425 long-term monitoring plan review fee.

Please contact me at (920) 510-8277 or by email at [Sarah.Krueger@wisconsin.gov](mailto:Sarah.Krueger@wisconsin.gov) if you wish to discuss this further.

Sincerely

Sarah Krueger, P.G.  
Project Manager, Northeast Region  
Remediation & Redevelopment Program

Attachment: DNR Comments on the Natural Recovery Monitoring Plan for Fish Tissue

Natural Recovery Monitoring Plan for Fish Tissue Not Approved  
HARP Site Long Term Monitoring, 02-08-587669  
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HARP Site Long Term Monitoring, BRRTS # 02-08-587669

cc: Jason Smith, Tecumseh Products Co. – [jason.smith@tecumseh.com](mailto:jason.smith@tecumseh.com)  
Chris Harvey, TRC - [CHarvey@trccompanies.com](mailto:CHarvey@trccompanies.com)  
Phillip Bower, DNR – [Phillip.Bower@wisconsin.gov](mailto:Phillip.Bower@wisconsin.gov)

Number	Section	WDNR Comment
1	1.0	John Rice signed as a PE but provided incorrect NR 712 certification language.
2	3.3	As with the surface water and sediment LTMP, the plan should have specific objective statement(s) that serves as a basis for evaluating the sampling design and identifies a basis for any decisions made of that data. Additional information is necessary in section 5.1 that references the objective and more clearly describes the assessments that will be done in each OU and the system as a whole for each fish species.
3	4.1	In bullet 1, please identify the number of fish to be collected at each location. Neither this text nor Table 4.1 are specific about this aspect. Exhibit G of the Negotiated Agreement indicates that a sound science approach similar to other sites such as the Fox River will be used by Tecumseh.
4	4.1	In bullet 4, identify the edible portions as skin on fillets.
5	4.2	In the discussion about target species, provide an explanation of how and why the size ranges specified in Table 4.1 were selected. For species of creek chub and white suckers YOY, compositing between size ranges is not recommended (i.e. separate composites should be done for specimens in different size classes).
6	4.2	Section 4.2 indicates that only one species will be targeted to assess human health risks, unless sufficient quantity can not be collected.  Exhibit G includes white suckers as a secondary human health indicator; this is interpreted to mean that both rock bass and white suckers will be sampled to assess human health risks. Exhibit G also allows for additional species identified in the Fish Consumption Response Action Goal to be collected. At minimum, two species must be evaluated as a human health indicator.
7	4.4.2	Fish sampling protocols need to be consistent with accepted fisheries practices. Because fish swim freely within a stream, sampling is not typically done at a single point, but rather over a stretch of stream up or down stream of a point, the length of which is based on the stream width and target species.
8	4.4.4	Please include species codes for the alternate species.
9	4.4.6	For clarity, please update the paragraph heading to "Numbering".
10	4.6	Breaking this section into subsections would add clarity (e.g. individual fish, compositing, shipment and laboratory handling).
11	4.6	Data collection is only specified for individual rock bass, carp, adult white sucker and large-mouth bass. Add sex to the list. This data should also be collected for creek chub, white sucker YOY, and any other fish that would be collected. To simplify the text remove the list of species since all fish collected will have the data recorded.

Number	Section	WDNR Comment
12	4.6	This section mixes discussions of operations accomplished in the field and those done in the laboratory e.g. paragraph 2 sentence 2 which discusses bass and sucker fillet preparation at the contracted analytical lab. Clarify how individual bass and suckers will be handled in the field. The text about fillet preparation at the contracted analytical lab should be moved to later in the section after the information about shipment to the laboratory.
13	4.6	Provide additional information pertaining to compositing including as referenced above in comment 10 the data collection for the individual fish, identification of which individuals make up the composite, locational considerations, and when the composite is created, i.e. in the field or laboratory.
14	4.6	The text indicates that every fish will be tagged. For smaller fish that will be composited, include a notification to the laboratory that there are tags which must be removed from the fish prior to homogenization.
15	4.7	Please identify considerations for field replicates of species that are composited.
16	4.7.2	The Equipment Blank section can be eliminated for fish tissue sample collection because it's not applicable for this type of field operation. Alternatively, identify how the equipment blank will be prepared based on the equipment identified in section 4.8.
17	5.1	Include all calculations for any derived values (e.g. total PCBs, lipid normalized values). For statistical testing, identify how non-detected values will be handled. Include discussion as to how the data will be used to assess the ecological endpoints.
18	5.2	Although this section is labeled Data Validation, no validation procedures are described. The text describes laboratory data reporting and limited data review. The corresponding section in the Sediment and Surface Water Natural Recovery Plan is titled "Sediment and Soil Sample Results, Data Management, and Validation". Please update the header to accurately reflect the content.
19	5.1 4th and 7th paragraphs	The section uses 0.95 ppm as the fish tissue goal. Please be aware that this still results in a 1 meal/month advisory which attains only one part of the fish consumption response action goal. Per the Negotiated Agreement the fish consumption response action goal is 1 serving per week of bluegill, crappies, yellow perch, sunfish, bullheads, and inland trout, and 1 serving per month of walleye, pike, bass, catfish and all other species. Ensure that all aspects of the fish consumption response action goal outlined in the Negotiated Agreement will be evaluated as part of this plan.
20	6.2	Section 6.2 of this report, states that a fish tissue monitoring report will be provided "within six (6) months of completing the fish tissue monitoring and receipt of laboratory analytical results." Section III subsection L of the Negotiated Agreement provides that Tecumseh shall provide "a monitoring report by October 1 after each fish tissue sampling event". Please update the text to be consistent with the Negotiated Agreement.
21	Figure 2	The sample locations for OU2 and OU3 are mis-identified, please update the figure.