



November 28, 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]

Subject: Conditional Approval of the Natural Recovery Monitoring Plan for Surface Water and Sediment
HARP Site Long Term Monitoring, BRRTS # 02-08-587669

Dear Mr. Gilhool:

On October 5, 2022, the Department of Natural Resources (DNR) received a Natural Recovery Monitoring Plan for Surface Water and Sediment, as required by the November 2018 Negotiated Agreement for the Hayton Area Remediation Project (HARP) Site Long Term Monitoring. The report was accompanied by the appropriate fee of \$425 required under Wisconsin Administrative Code (Wis. Admin. Code) § NR 749.04(1), for formal DNR review and response.

The Natural Recovery Monitoring Plan for Surface Water and Sediment meets the requirements of Wis. Admin. Code ch. NR 724. The comments provided below are intended to refine the monitoring plan to improve the work product and assist with compliance with the rules. The comments should not be interpreted as including 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 a revised document, provided to DNR prior to implementation, addressing the following conditions.

- The fifth bullet under In-Channel Sediment Sampling in section 4.1 should be removed. Each sampling event should follow the same procedure listed in the first four bullets, which is described in detail in subsequent sections of the plan.
- To the extent practicable, the same type of sediment sampling device should be used at each of the sample locations to have a consistent core diameter and assure similar sediment representativeness throughout the site and over time.
- In section 4.4 addressing Surface Water Sample Collection, please include field measurements of turbidity and some measure of flow to assist in the interpretation of the results.
- In section 4.5.2, please indicate that the outside of the top of the sediment core tube will be marked.
- Provide clarification for how the two background locations will be uniquely identified, e.g. BKG1 and BKG2, or BG1 and BG2, in section 4.6.2.
- Relocate the upstream background surface water sample location on Jordan Creek to Pine Creek to correspond to the upstream fish tissue sampling location. The text, sections 4.2 and 4.6.2, and Figure 2 should be updated to reflect this change.

The Natural Recovery Monitoring Plan for Surface Water and Sediment 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 require[d] of Tecumseh as a responsible party pursuant to Wis. Stats. ch. 292 and the Wis. Admin. Code ch. NR 700 administrative rule series.”

Please provide the DNR with a revised Natural Recovery Monitoring Plan for Surface Water and Sediment within 60 days of this letter, January 27, 2023. The DNR appreciates your efforts to investigate and remediate this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at (920) 510-8277 or by email at Sarah.Krueger@wisconsin.gov.

Sincerely,



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

cc: Jason Smith, Tecumseh Products Co. – jason.smith@tecumseh.com
Chris Harvey, TRC - CHarvey@trccompanies.com
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