From: McKnight, Kevin - DNR
Sent: Wednesday, November 06, 2024 2:18 PM
To: Smith, Jason; Harvey, Christopher
Cc: McKnight, Kevin - DNR
Subject: Tecumseh Products Co - New Holstein (BRRTS# 02-08-363333)
Attachments: Revisions and BMPs.pdf; 20241106_80_Closure_Not_Appr.pdf

Jason,

Attached are the Case Closure Not Approved letter for this case. Also included is a list of revisions/BMP for tables and figures, and the case closure form that were a result of the DNR review. As we discussed yesterday, please review the letter with your consultant and contact me to arrange a call to discuss any questions.

Regards,

Kevin

Kevin D. McKnight
Hydrogeologist - Remdiation and Redevelopment Program
Wisconsin Department of Natural Resources
Oshkosh Service Center
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Oshkosh WI 54901
Phone: 920-808-0170
Kevin.McKnight@wisconsin.gov

dnr.wi.gov
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Please visit our survey to provide feedback on your experience interacting with any DNR employee.

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DEPARTMENT OF NATURAL RESOURCES
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WISCONSIN DEPT. OF NATURAL RESOURCES

November 6, 2024

Tecumseh Products Company
Attn: Mr. Jason Smith
2215 HWY 69 North
Paris, TN 38242
Via Electronic Mail Only to jason.smith@tecumseh.com

City of New Holstein
Attn: Cullen Peltier, City Administrator
2110 Washington Street
New Holstein WI 53061
Via Electronic Mail only to cityofnewholstein@cnhwi.gov

Subject: Case Closure under Wis. Admin. Code ch. NR 726 Not Recommended
Tecumseh Products Co - New Holstein, 1604 Michigan Avenue, New Holstein, WI
BRRTS #: 02-08-363333

Dear Mr. Smith and Mr. Cullen:

On October 3, 2024, the Wisconsin Department of Natural Resources (DNR) reviewed the closure request for the case identified above. As you are aware, the DNR reviews environmental remediation cases for compliance with applicable laws, including Wisconsin Statute (Wis. Stat.) ch. 292 and Wisconsin Administrative (Wis. Admin.) Code chs. NR 700 – 754, and whether any further threat to public health, safety or welfare or the environment exists at the site or facility, per Wis. Admin. Code § NR 726.13 (2) (b). The purpose of this letter is to inform you of the remaining requirements for obtaining closure. We request that within 60 days of this letter, you provide us with the information requested or your written response regarding the necessary work and a schedule for completion of this work.

Additional Requirements Needed for Case Closure Under Wis. Admin. Code ch. NR 726
As noted above, additional work is necessary to meet the requirements for case closure because additional soil and groundwater investigation is required.

Need to Conduct Additional Groundwater Monitoring
Additional groundwater monitoring is needed to establish compliance with the closure criteria of Wis. Admin. Code § NR 726.05 (6). If monitored natural attenuation is to be used as a remedial action, two additional rounds of groundwater sampling at a minimum from monitoring wells TEC-3, MW-A, and MW-E (at minimum) for total and hexavalent chromium are required. This additional work is needed to demonstrate stable or decreasing contaminant trends for the chromium release. in compliance with Wis. Admin. Code §§ NR 726.05 (6) (a) 6., (b), (c) and (d). Groundwater sampling results may be submitted to the DNR after each event for evaluation.

Need to Define the Degree and Extent of Soil Contamination

Additional soil sampling is needed to define the degree and extent of contamination per Wis. Admin. Code § NR 716.11. Based on the available soil sampling results at sampling location PB-1, chromium and lead soil contamination extends onto Fannin Oil parcel # 18566 at levels above the groundwater pathway and non-industrial direct contact residual contaminant levels (RCLs). Additional delineation of lead and

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chromium is also needed:

- In the vicinity of soil sample MW-E on parcel #18568 which is part of the original Tecumseh property
- On the west side of the railroad right-of-way (ROW) since the only samples (MW-F, MW-G, MW-H) in the area exceed RCLs for lead and chromium. TRC Environmental Corporation, the environmental consultant, notes that this may be due to soil fill since the exceedences are primarily shallow.

Need to Evaluate Additional Remedial Action

Additional remedial action may be necessary to comply with the closure criteria of Wis. Admin. Code ch. NR 726. Chromium above both industrial and non-industrial contact RCLs is present off-site and in the railroad ROW. Capping or removal of soils above industrial and non-industrial contact RCLs should be considered. Re-sampling in these areas to confirm initial sampling results and further defining extent of remaining soil contamination requiring remedial action is recommended. Typically, the DNR does not require capping of railroad rights-of-ways but may require action based on degree and extent of contamination and likely exposure pathways. Contact your DNR project manager once the evaluation of this area is complete for further direction.

Schedule

Within 60 days of the date of this letter, respond in writing with a schedule of your plans to meet these requirements. The DNR recommends that a site investigation workplan per Wis. Admin. Code § NR 716.09 (1) is submitted to ensure the additional work will meet code requirements. Submitting the SIWP with fee is recommended for DNR review and response.

Until requirements are met, your site will remain "open" and you are required to submit semi-annual progress reports, per Wis. Admin. Code § NR 700.11. You are also responsible for any operation and maintenance activities required under Wis. Admin. Code § NR 724.13. Once the additional work has been completed, documentation should be submitted to the DNR to demonstrate that the applicable requirements have been met, per the timelines above.

Conclusion

If you have any questions regarding the information in this letter or would like to schedule a meeting to discuss this case, please contact the DNR project manager, Kevin McKnight at 920-808-0170 or Kevin.McKnight@wisconsin.gov. For more information on the closure reconsideration process, please see DNR publication, RR-102, "Wis. Admin. Code ch. NR 726 Case Closure Reconsideration Process" by visiting dnr.wi.gov, search: RR-102, for more information.

The DNR appreciates your efforts to restore the environment at this site.

Sincerely,

Karen L. Campoli

Karen L. Campoli
Team Supervisor, Northeast Region
Remediation & Redevelopment Program

cc: Chris Harvey, TRC (charvey@trccompanies.com)

Tecumseh Products CO – New Holstein

BRRTS# 02-08-363333

Tables and Figures:

-Remove extraneous information from Residual Soil and Groundwater figures as the amount of data makes them difficult to read.

-Figure B.2.a - single isoconcentration line(each) for IDC, NIDC, GW Pathway. Make separate figures for Cr, and Lead.

--Add Chromium Soil to GW pathway RCL to tables and figures. (RR-106)

-Lead identified above the PAL historically on and off site. Lead sampling has occurred since 2010/2014. A Lead isoconcentration figure should be created based on last samples.

-Saturated samples should not be included in Table A.3.

--Residual soil tables should be sorted by on-site, off-site, and ROW for clarity.

-Figures for residual soil and groundwater should clearly identify off-site parcels and ROW for use in notifications and future work.

-B.2.b- remove As@NH60 and As iso line.

Closure Form:

Form: Page1-edit site name - Tecumseh Products Co-New Holstein

Table 5: iii- check ROW/offsite.

iv- uncheck boxes unless there are missing wells.

vi- may be necessary to check offsite/ROW

viii-uncheck, Industrial Zoning Continuing Obligation has not historically been used at this site.

Att. E - check second box for well transfer (Wells to be transferred to BRRTS# 02-08-585623 or abandoned upon closure approval.)