From: Harvey, Christopher <CHarvey@trccompanies.com>
Sent: Thursday, April 24, 2025 1:56 PM
To: McKnight, Kevin - DNR
Cc: Smith, Jason; bwachholz
Subject: RE: [EXTERNAL] Site Investigation Work Plan Review - Tecumseh Products Co-New Holstein, BRRTS# 02-08-363333
Attachments: 2025-04-24_Response to Comments Site Investigation Work Plan_BRRTS 02-08-363333.pdf

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Kevin,

Good afternoon. Attached is a response to the WDNR's comments, dated March 28, 2025, regarding the Tecumseh Products Co. (Former) - Chromium Line Site Investigation Work Plan (SIWP) submitted in December 2024.

If you have any questions, please contact me at 312-909-0043.

Thank you,
Chris

Chris Harvey, PE
M 312.909.0043

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-----Original Message-----
From: McKnight, Kevin - DNR <Kevin.McKnight@wisconsin.gov>
Sent: Monday, March 31, 2025 8:08 AM
To: Smith, Jason <jason.smith@tecumseh.com>; Harvey, Christopher <CHarvey@trccompanies.com>
Cc: McKnight, Kevin - DNR <Kevin.McKnight@wisconsin.gov>
Subject: [EXTERNAL] Site Investigation Work Plan Review - Tecumseh Products Co-New Holstein, BRRTS# 02-08-363333

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Jason,

Attached is the response letter I discussed with you last week. Please contact me with any questions.

Regards,

Kevin

Your message is ready to be sent with the following file or link attachments:

20250328_36_SIWP_appr

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

999 Fourier Dr., Ste. 101
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T 608.826.3600
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April 24, 2025

Kevin McKnight
Hydrogeologist – Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
625 E CTY Y, Suite 700
Oshkosh, WI 54901

Subject: TRC Response and Investigation Work Plan
WDNR Comments on *Site Investigation Work Plan, December 23, 2024*
1604 Michigan Avenue, New Holstein, Wisconsin
BRRTS #: 02-08-363333

Dear Mr. McKnight:

On behalf of Tecumseh Products Company, LLC (Tecumseh), TRC Environmental Corporation (TRC) reviewed the Wisconsin Department of Natural Resources' (WDNR's) comments, dated March 28, 2025, regarding the Tecumseh Products Co. (Former) – Chromium Line *Site Investigation Work Plan* (SIWP) submitted in December 2024. TRC has provided responses to WDNR's comments below.

WDNR Comment: DNR does not agree that impacts on the west side of the railroad tracks are not related to historic site activities. Resampling of previous sample locations for hexavalent chromium and lead is still required to verify impacts in this area. The DNR does agree that while other potential sources of lead are present in this area, hexavalent chromium is not typically associated with these sources.

Response: While Tecumseh does not concur with the WDNR's assertion that further sampling is necessary, Tecumseh is willing to install the confirmation resample borings near the locations of the previous sample locations - contingent on the following conditions:

- Location of borings: The proposed three confirmation resample borings (see attached Figure 1) will be installed immediately adjacent to the railroad right-of-way (ROW) to minimize both the time and cost associated with securing a ROW permit and obtaining railroad authorization, while ensuring the resamples are in close proximity to and representative of the previous sample locations.
- Scope of analysis: Samples collected will be analyzed solely for hexavalent chromium. While lead has been detected in the area, Tecumseh maintains that—based on rationale detailed in the SIWP and with prior acknowledgment from the WDNR—there are other credible and more likely sources of lead contamination. Therefore, we do not consider lead analysis appropriate or necessary for Tecumseh at this time.

  Importantly:

  – No correlation has been observed between chromium and lead impacts at or across the site.
  – The presence of lead, particularly west of the railroad ROW, is more plausibly attributed to numerous nearby off-site operations, including historical and ongoing uses such as railroads, oil storage and distribution, feed supply businesses, waste transfer operations, recycling facilities, and general heavy industry.

  Given this context, we strongly believe that the proposed borings—limited in scope to hexavalent chromium—represent a reasonable and scientifically justified approach.

Additional Scope of Work

TRC will perform the following scope of work (considered an Addendum to the December 2024 SIWP) as part of the proposed confirmation resampling locations to address WDNR comments:

- Update the site-specific Health and Safety Plan for TRC on-Site personnel.
- Soil Sampling:
  - Three additional proposed soil borings will be installed at locations shown in Figure 1. These borings will be direct push borings approximately 8 feet in depth.
  - Up to two samples will be collected at each location based on historic soil analytical results and field screening (staining, olfactory signs, etc.) to evaluate hexavalent chromium. The following table outlines the proposed soil sampling locations:

Boring ID	Sample Interval(s) [ft bgs]	Analyses
GP-200	0-2, 2-4, 6-8*	Hexavalent chromium
GP-201	0-2, 2-4, 6-8*	Hexavalent chromium
GP-202	0-2, 2-4, 6-8*	Hexavalent chromium

* If these intervals are unsaturated, the samples will be held by the laboratory until other sample intervals are analyzed first.

  - Laboratory-provided sample containers will be placed on ice immediately after sample collection for transport to Pace Analytical Laboratories in Green Bay, Wisconsin for hexavalent chromium (USEPA Method 7199).
  - Each location will be logged and mapped through a global positioning system (GPS) once the boring is completed.
- IDW streams generated during this investigation are expected to include soil cuttings/excess sample material, decontamination fluids, monitoring well purge water, and general refuse (e.g., used personal protective equipment, single-use sampling equipment, and trash). Soil cuttings, excess sample material, decontamination fluids, and monitoring well purge water will be containerized, labeled with the date and contents, left on site, and will be disposed by Reworld. General refuse will be collected in trash bags and placed in a waste dumpster.

We appreciate the DNR's consideration and look forward to continuing our collaborative efforts to achieve site closure. Please contact Chris Harvey at (312) 909-0043 if there are any questions or if further discussion is needed to move forward with this plan.

Sincerely,

TRC Environmental Corporation

Chris Harvey, P.E.
VP – Complex Projects

Steve Sellwood, P.G.
Senior Hydrogeologist

Attachments: Figure 1 - Site Map

cc: Jason Smith – Tecumseh Products Company

Figure 1

Site Map

NH-44 (3/12/2012)	
Depth (ft-bgs)	0-2
Chromium	21.8
Lead	81.3

NH-7 (3/12/2012)	
Depth (ft-bgs)	4-8
Chromium	24.1
Lead	114

NH-10 (3/12/2012)	
Depth (ft-bgs)	8-10
Chromium	15.9
Lead	66.5

NH-60 (3/12/2012)		
Depth (ft-bgs)	0-4	4-6
Chromium	23.1	20.2
Lead	171	116

FANNIN OIL COMPANY INC. PARCEL ID: 18566

FORMER TECUMSEH PRODUCTS FACILITY

MW-H (6/1/2009)		
Depth (ft-bgs)	0-2	2-4
Chromium	25.5	14.6
Chromium (VI)	6.4	<2.6
Lead	27	131

GB-14 (11/13/2023)	
Depth (ft-bgs)	2
Chromium	12
Chromium (VI)	0.664 J

GB-15 (11/13/2023)	
Depth (ft-bgs)	2
Chromium	14.4
Chromium (VI)	0.658 J

FORMER NORTHERN PLATING LINE

MW-G (6/1/2009)		
Depth (ft-bgs)	0-2	2-4
Chromium	15.5	25.1
Chromium (VI)	<2.8	4.5
Lead	1180	20.4

SEE INSET MAP

FORMER PLATING LINE/ SOIL MIXING AREA

MW-A (5/23/2007)	
Depth (ft-bgs)	-
Chromium	31
Chromium (VI)	1.3

MW-E (6/1/2009)	
Depth (ft-bgs)	0-2
Chromium	11.7
Chromium (VI)	<2.6
Lead	539

MW-F (6/1/2009)		
Depth (ft-bgs)	0-2	2-4
Chromium	12.2	23.8
Chromium (VI)	7.3	8
Lead	74.3	10

Plymouth Subdivision

INSET MAP

PAVED EXTERIOR

FORMER PLANT BUILDING

FORMER PLATING LINE/ SOIL MIXING AREA

TEC-3

TEC-4

MW-111

1 " = 20 '

20 FEET

GB-6 (11/13/2023)	
Depth (ft-bgs)	2.5
Chromium	346
Chromium (VI)	21.1

GB-12 (11/13/2023)	
Depth (ft-bgs)	3.5
Chromium	49
Chromium (VI)	8.34

GB-7 (11/13/2023)	
Depth (ft-bgs)	3.5
Chromium	859
Chromium (VI)	15.6

GB-13 (11/13/2023)	
Depth (ft-bgs)	2
Chromium	22.3
Chromium (VI)	0.561 J

GB-8 (11/13/2023)	
Depth (ft-bgs)	2.5
Chromium	761
Chromium (VI)	13.1

GP-16 (9/22/2003)	
Depth (ft-bgs)	3-5
Chromium	46
Chromium (VI)	2.8

GB-9 (11/13/2023)	
Depth (ft-bgs)	2.5
Chromium	481
Chromium (VI)	61

GP-17 (9/22/2003)	
Depth (ft-bgs)	3-5
Chromium	34
Chromium (VI)	3.8

GB-10 (11/13/2023)	
Depth (ft-bgs)	2.5
Chromium	258
Chromium (VI)	13.6

GP-18 (9/22/2003)	
Depth (ft-bgs)	3-5
Chromium	480
Chromium (VI)	8.2

GB-11 (11/13/2023)	
Depth (ft-bgs)	2.5
Chromium	979
Chromium (VI)	0.937 J

PB-1 (5/1/2011)	
Depth (ft-bgs)	-
Chromium	16.5
Chromium (VI)	2.1

NOTES

1. BASE MAP IMAGERY FROM CALUMET COUNTY, 2021.
2. THE INDUSTRIAL DIRECT CONTACT RCL FOR HEXAVALENT CHROMIUM IS 6.36 MG/KG AND THE NON-INDUSTRIAL DIRECT CONTACT RCL FOR HEXAVALENT CHROMIUM IS 0.301 MG/KG.
3. THE INDUSTRIAL DIRECT CONTACT RCL FOR LEAD IS 800 MG/KG, THE NON-INDUSTRIAL DIRECT CONTACT RCL FOR LEAD IS 400 MG/KG, AND THE GROUNDWATER PATHWAY RCL FOR LEAD IS 27 MG/KG (BTV = 52 MG/KG).
4. THE INDUSTRIAL DIRECT-CONTACT RCL FOR ARSENIC IS 3 MG/KG (BTV = 8 MG/KG).

LEGEND

- PARCEL BOUNDARY
- SAMPLE LOCATIONS (FADED WHERE NO SOIL DATA AVAILABLE)
- MONITORING WELL (TRC)
- MONITORING WELL (R.E. LEE)
- SOIL BORING
- PROPOSED SOIL BORING LOCATION
- PROPOSED CONFIRMATION SOIL BORING
- GB POINT (TRC, 2021)
- GB POINT (TRC, 2023)
- MONITORING WELL (TRC) - ABANDONED/MISSING
- MONITORING WELL (R.E. LEE) - ABANDONED/MISSING
- SOIL BORING - ABANDONED/MISSING
- SOIL EXCAVATION AREA (CLEAN BACKFILL)
- HEXAVALENT CHROMIUM INDUSTRIAL DIRECT CONTACT RCL EXCEEDANCE
- HEXAVALENT CHROMIUM NON-INDUSTRIAL DIRECT CONTACT RCL EXCEEDANCE (DASHED WHERE INFERRED)
- LEAD GROUNDWATER PATHWAY RCL EXCEEDANCE (DASHED WHERE INFERRED)
- LEAD INDUSTRIAL DIRECT CONTACT RCL EXCEEDANCE
- LEAD NON-INDUSTRIAL DIRECT CONTACT RCL EXCEEDANCE

0 60 Feet

1 " = 60 '

1:720

PROJECT: BRRTS #02-08-363333

FORMER TECUMSEH PRODUCTS CO- NEW HOLSTEIN NEW HOLSTEIN, WISCONSIN

SHEET TITLE: PROPOSED SOIL BORING LOCATIONS

DRAWN BY:	A. FOJTIK	SCALE: 1: 720	PROJ. NO. 471202
CHECKED BY:	M. WAGLER		FILE NO. 471202_Fig1_PSBL.mxd
APPROVED BY:	B. WACHHOLZ	DATE PRINTED:	FIGURE 1
DATE:	APRIL 2025		

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Saved By: AFOJTIK on 4/23/2025, 13:24:13 PM
Path: E:\Projects\Tecumseh\NH_CrLine\2024_471202\MXD\471202_Fig1_PSBL.mxd

Coordinate System: NAD 1983 StatePlane Wisconsin South FIPS 4803 Feet (Foot US)
Map Rotation: 0

TRC - GIS