

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Tecumseh Heus - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** **POLREP #1**  
**Initial/Progress**  
**Tecumseh Heus**  
**B5XP**  
**New Holstein, WI**  
**Latitude: 43.9517523 Longitude: -88.0859015**

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**From:** Kathy Clayton, OSC

**Date:** 2/14/2011

**Reporting Period:** 11/18/2010 - 02/14/2011

**1. Introduction**

**1.1 Background**

<b>Site Number:</b>	B5XP	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	12/22/2010
<b>Response Authority:</b>	CERCLA/OPA	<b>Response Type:</b>	PRP Oversight
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	11/19/2010	<b>Start Date:</b>	11/18/2010
<b>Demob Date:</b>	12/7/2010	<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	WID006116529	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

**1.1.1 Incident Category**

This Site is a PRP oversight time critical voluntary clean-up.

**1.1.2 Site Description**

This Site is an abandoned manufacturing facility privately owned by Mr. Edward Jones. Mr. Jones operated a contract machining facility, Heus Manufacturing, at the Site from 2007-2009. Mr. Jones abandoned the building, including the waste remaining from operations at the facility, in 2010.

Heus Acquisitions purchased the property from Tecumseh Power in June, 2007. The Tecumseh Products Company acquired the Site in 1956. Tecumseh Products transferred the facility to its subsidiary Tecumseh Power Company in 2003. Tecumseh ceased manufacturing operations at the facility in 2007. In November 2007, Snowstorm Acquisition Corporation purchased the Tecumseh Power Company from Tecumseh Products and changed the business name to TecumsehPower Company. Heus leased 350,000 square feet of the facility to Tecumseh for limited operations at the Site related to their business closure. Heus terminated the lease and ordered TecumsehPower to vacate the building in May 2009.

In May, 2010, the City of New Holstein and WDNR conducted an inspection of the Site. Significant quantities of abandoned waste and evidence of trespassing were discovered at the facility. The whereabouts of Mr. Jones were unknown to City and State officials. There are numerous liens on the property, including liens for delinquent taxes. The City took measures to secure the facility, including repairing and locking the perimeter fence. In June, 2010, WDNR requested that U.S. EPA conduct a time critical removal action to mitigate the immediate threat posed by the abandoned waste at the Site.

#### **1.1.2.1 Location**

The Site is located at 1604 Michigan Avenue, New Holstein, Calumet County, Wisconsin. The 38.7 acres property contains a 910,000 square foot building complex. The Site is located in a mixed industrial, commercial, residential, agricultural land use area near the downtown of the City of New Holstein. Residences are located within 70 feet to the east and south and 300 feet to the west of the Site. The nearest surface water body is Jordan Creek, located approximately 1,500 feet east of the property. Records indicate that groundwater is present on Site at depths ranging from 8-12 feet below ground surface. Three public water supplies are located within 0.25 miles of the Site.

#### **1.1.2.2 Description of Threat**

The waste abandoned at the facility poses a direct contact risk and the threat of release to soils and surface water.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

In August 2010, U.S. EPA conducted a site assessment at the facility to quantify and characterize the abandoned waste. The building was in generally good condition, however significant pooling of water on the floor was observed from numerous leaks in the roof. The majority of the material is waste oil, some containing PCBs. Limited quantities of corrosive materials were also identified. Some of the older drums abandoned at the facility were under pressure. Oil had been spilled on the floor in many areas of the building, resulting in very slippery conditions. Numerous open pits filled with liquid waste were observed throughout the facility. There is no power to the building and sources of natural light are very limited. Other than the perimeter fence, the building is unsecured. Conditions in the facility present a significant safety hazard for anyone in the building. Evidence of recent trespassing includes graffiti and empty soda and beer cans.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

In September, 2010, U.S. EPA initiated negotiations with the PRPs to clean-up the abandoned waste at the facility. Due to concerns related to winter weather conditions, Tecumseh Products and TecumsehPower ceased AOC negotiations in November, 2010 and commenced a voluntary clean-up at the Site.

#### **2.1.2 Response Actions to Date and Progress Metrics**

Tecumseh Products and TecumsehPower hired Chief Industrial Services to perform the clean-up and removal activities. Chief and Tecumseh Products' Environmental Manager mobilized to the Site on November 19, 2010. The abandoned waste was segregated into waste streams and disposed of as follows:

- 280 cubic yards of non-hazardous solid waste were shipped to Waste Management Ridgeview Landfill in Whitelaw, WI.
- Approximately 150 pallets and 150 divider pallet boards were recycled by JMB Express in Plover, WI.
- 32 empty totes and 96 empty drums were shipped to the Chief facility in Winneconne, WI for evaluation and further recycling.
- 40,700 gallons of oily wastewater was shipped to the Chief facility in Winneconne, WI for treatment; recovered waste oil went to Beaver Oil and solids to the Waste Management Ridgeview Landfill.
- 16,000 gallons of non-hazardous clarifier water/sludges were shipped to the Chief facilities in Winneconne, WI and Kimberly, WI for further processing.
- 51,000 gallons of non-hazardous wastewater sludges were shipped to Waste Management in Whitelaw, WI; 11,000 gallons of wastewater sludges were shipped to the Chief facility in Winneconne, WI.
- Two pallets of various cleaners were shipped to the Chief facility in Winneconne, WI for further processing.
- 420 pounds of sodium bisulfate was shipped to the Chief facility in Winneconne, WI for use in the wastewater treatment process.
- 1800 pounds of lime was shipped to the Chief facility in Winneconne, WI for use in the wastewater treatment process.
- Approximately 100 gallons of corrosive materials were bulked and shipped to the Chief facility in Winneconne, WI for use in the pretreatment process.
- Approximately 5 cubic yards and two drums of floor sweepings were shipped to the Chief facility in Winneconne, WI for processing.

In addition to the waste removal, Tecumseh and Chief secured all doors and windows at the facility, identified and filled with concrete trenches/sumps that had the potential to release their contents outside the facility, and cleaned the facility to "broom clean" condition.

Chief and Tecumseh demobilized from the facility on December 7, 2010. Winter weather conditions, principally freezing temperatures, prevented the completion of the clean-up. Tecumseh has pledged to remobilize with Chief in the Spring to steam clean the wastewater treatment tanks and pump and clean the former chrome pit. Tecumseh submitted a report to U.S. EPA on January 20, 2011 summarizing the response actions taken to date.

## **2.2 Planning Section**

### **2.2.1 Anticipated Activities**

Tecumseh has pledged to remobilize with Chief in the Spring to steam clean the wastewater treatment tanks and pump and clean the former chrome pit. The City of New Holstein has been awarded a brownfields grant to further study the extent of contamination at the Site from historic operations.

#### **2.2.1.1 Planned Response Activities and Next Steps**

U.S. EPA will conduct oversight of the remaining clean-up activities in the Spring. In the event the PRPs do not return to the Site, U.S. EPA will mobilize ERRS to complete the removal action.

### **2.2.2 Issues**

The roof is in disrepair and in danger of collapsing. Leaks in the roof introduce water into the facility, posing the threat of refilling the pits, trenches, sumps, etc. remaining in the facility. The City of New Holstein, WDNR, and U.S. EPA have notified the property owner of the imminent need to repair the roof and maintain security at the facility.

## **2.3 Logistics Section**

Winter conditions, principally freezing temperatures, forced final steam cleaning of the wastewater treatment tanks and cleaning of the chrome pit to be postponed until Spring.

## **2.4 Finance Section**

### **2.4.1 Narrative**

According to Tecumseh, their costs expended to date are approximately \$130,000. U.S. EPA has sent a demand letter to the RPs for recovery of agency costs expended to date.

## **2.5 Other Command Staff**

### **2.5.1 Safety Officer**

There were no safety incidents during the reporting period. Chief conducted air monitoring throughout the clean-up. Safety attire was required of all workers and visitors.

### **2.6 Liaison Officer**

Not Applicable

### **2.7 Information Officer**

Tecumseh posted notices of their plan to conduct a removal action in the Sheboygan Press, Times Journal, and Tri-County News. Additionally, the City of New Holstein, Calumet County, WDNR, and U.S. EPA were notified of Tecumseh's plans and activities.

## **3. Participating Entities**

### **3.1 Unified Command**

Not applicable.

### **3.2 Cooperating Agencies**

The City of New Holstein, Calumet County Emergency Management, WDNR, and U.S. EPA all participated in Site visits during the removal assessment and/or removal action.

## **4. Personnel On Site**

OSC Kathy Clayton conducted oversight of the voluntary time critical clean-up action, pursuant to the NCP.

## **5. Definition of Terms**

No information available at this time.

## **6. Additional sources of information**

### **6.1 Internet location of additional information/report**

For additional information, visit [www.epaosc.org/Heus](http://www.epaosc.org/Heus)

### **6.2 Reporting Schedule**

Final POLREP expected in the Spring, upon the completion of the remaining work.

## **7. Situational Reference Materials**

Not applicable