

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #3
Final
Tecumseh Heus
B5XP
New Holstein, WI
Latitude: 43.9517523 Longitude: -88.0859015

To: Al Nass, WDNR
Jason Smith, Tecumseh Products Company

From: Kathy Halbur, OSC

Date: 8/6/2011

Reporting Period: 5/12/2011-8/5/2011

1. Introduction

1.1 Background

Site Number:	B5XP	Contract Number:	
D.O. Number:		Action Memo Date:	12/22/2010
Response Authority:	CERCLA/OPA	Response Type:	PRP Oversight
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	11/19/2010	Start Date:	11/18/2010
Demob Date:	6/8/2011	Completion Date:	7/15/2011
CERCLIS ID:	WID006116529	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

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 posed 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 was 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 presented a significant safety hazard for anyone in the building. Evidence of recent trespassing included graffiti and empty soda and beer cans.

2. Current Activities

2.1 Operations Section

2.1.1 Response Actions to Date

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 (owners/operators of the facility prior to Heus Manufacturing) ceased AOC negotiations in November, 2010 and commenced a voluntary clean-up at the Site. Chief Industrial Services was retained to conduct the clean-up. The clean-up was conducted consistent with the National Contingency Plan, with U.S. EPA overseeing the removal. See Initial POLREP for additional information.

A small amount of the work agreed upon could not be completed due to the onset of freezing temperatures in December. On April 8, 2011, OSC Halbur and the WDNR Project Manager returned to the Site to check on Site conditions prior to Tecumseh and Chief returning to the Site. Heavy snow caused a portion of the deteriorating roof to collapse during the winter. Storm water was found in the facility as a result of the opening in the roof. One previously cleaned pit had refilled with water.

Tecumseh and Chief returned to the Site on April 26, 2011 to complete the remaining removal work. The chromium pit was emptied and cleaned; 3,750 gallons of D007 liquid waste was shipped to Envirite of Illinois. Chief also removed 9,450 gallons of non-hazardous liquid waste from the wastewater treatment tanks. Chief attempted to clean the wastewater tanks, but the residual oil did not release well from the still cold concrete. It was determined that the wastewater tanks could not be effectively steam cleaned until the facility was warmer.

Tecumseh and Chief returned to the Site again on June 7, 2011 to clean the wastewater tanks. The tanks were successfully steam cleaned during this visit. Approximately, 2,150 gallons of non-hazardous wastewater was generated during the cleaning process. The wastewater was sent to Chief's facility in Winneconne, WI. The handrails along the raised walkway in front of the wastewater tanks were also cleaned by Tecumseh at the request of OSC Halbur. Site work was completed on June 8, 2011.

U.S. EPA received Tecumseh's Final Report on the Voluntary Cleanup on July 15, 2011. The Final Report is complete and deemed acceptable to close this action.

2.1.2 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The facility is owned by Edward Jones. Mr. Jones has been non-responsive to U.S. EPA's General Notice Letter and Demand Letter. Tecumseh Products and TecumsehPower (owners/operators of the facility prior to Mr. Jones' operation of Heus Manufacturing at the Site) are conducting a voluntary clean-up.

2.1.3 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Chromium Wastewater (D007)	Liquid	3,750 gallons	006319247JJK	LDR submitted	Envirite of Illinois, Harvey, IL
Non-haz oily wastewater	Liquid	40,700 gallons	NA	Stabilization by Chief, then recycling or landfill	Waste Oils to Beaver Oil, Hodgkins, IL; solids to Waste Management Ridgeville Landfill, Whitelaw, WI

Non-haz wastewater (from wastewater tanks)	Liquid	11,600 gallons	NA	Stabilization	Chief, Winneconne, WI
Non-haz clarifier water/sludge	Sludge	16,000 gallons	NA	Stabilization	Chief, Winneconne, WI
Non-haz wastewater sludge	Sludge	51,000 gallons	NA	Landfill	Waste Management Ridgeview Landfill, Whitelaw, WI
Non-haz wastewater sludge	Sludge	11,000 gallons	NA	Stabilization	Chief, Winneconne, WI
Various cleaners	Mixed	Two pallets	NA	Reuse	Chief, Winneconne, WI
Sodium bisulfate	Solid	420 pounds	NA	Reuse	Chief, Winneconne, WI
Corrosive Materials	Liquid	2 drums	NA (neutralized on site)	Stabilization	Chief, Winneconne, WI
Non-haz Solid Waste	Solid	280 cu yds	NA	Landfill	Waste Management Ridgeview Landfill, Whitelaw, WI
RCRA Empty Containers	Solid	32 totes & 96 drums	NA	Recycled	Chief, Winneconne, WI
Pallets	Solid	150	NA	Recycled	JMB Express, Plover, WI
Floor sweepings	Solid	5 cu yds & 2 drums	NA	Stabilization	Chief, Winneconne, WI

2.2 Planning Section

2.2.1 Anticipated Activities

Cleanup is complete. The City of New Holstein and WDNR are planning additional site investigation work with Brownfields funding.

2.2.2 Issues

Heavy snow caused a portion of the deteriorating roof to collapse during the winter of 2010. Storm water is re-entering the facility thru the opening in the roof.

2.3 Logistics Section

Nothing to report.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

There were no safety incidents during the cleanup.

2.6 Liaison Officer

Not Applicable

2.7 Information Officer

Tecumseh notified the City of New Holstein, Calumet County, WDNR and U.S. EPA of their plans throughout the cleanup.

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 monitored the clean-up.

4. Personnel On Site

Cleanup is complete. All personnel demobilized from the Site on June 8, 2011.

5. Definition of Terms

AOC: Administrative Order on Consent

CFR: Code of Federal Regulations

CERCLA: Comprehensive Environmental Response, Compensation and Liability Act

OSC: On-Scene Coordinator

PRP: Potentially Responsible Party

U.S. EPA: United States Environmental Protection Agency

WDNR: Wisconsin Department of Natural Resources

6. Additional sources of information

6.1 Internet location of additional information/report

For additional information, visit www.epaosc.org/Heus

6.2 Reporting Schedule

This is the Final POLREP.

7. Situational Reference Materials

Not applicable