



City of New Holstein  
2110 Washington Street  
New Holstein, WI 53061  
920-898-5766  
cityofnewholstein.org

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**RE: Grant Proposal by the City of New Holstein, Wisconsin to the United States Environmental Protection Agency for a Brownfield Cleanup Grant for the Tecumseh Redevelopment Area 1 Located at 1604 Michigan Avenue; New Holstein, Wisconsin**

The City of New Holstein, Wisconsin is pleased to submit the enclosed proposal to the United States Environmental Protection Agency (USEPA) for a cleanup grant for \$4,000,000 as part of the USEPA Fiscal Year (FY) 2026 Brownfield Grant Competition.

Per grant application requirements, the following identifies the applicant and contact for communication with USEPA:

**1. Applicant Identification**

- a. Name of Applicant: City of New Holstein, Wisconsin
- b. Address of Applicant: 2110 Washington Street; New Holstein, WI 53061

**2. Website URL: *https://cityofnewholstein.org/***

**3. Funding Requested**

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$4,000,000

**4. Location**

- a. City: City of New Holstein
- b. County: Calumet County
- c. State: State of Wisconsin

**5. Property Information**

- a. Property Name: Redevelopment Area 1
- b. Property Address: 1604 Michigan Avenue; New Holstein, Wisconsin

**6. Contacts**

a. Project Director

Name: Scott Depies; City Administrator

Phone: 920-898-5766

Email address: scottd@cnhwi.org

Mailing Address: 2110 Washington Street; New Holstein, WI 53061

b. Chief Executive/Highest Ranking Elected City Official

Name: Richard Snelson; Mayor

Phone: 920-898-5766

Email address: rsnelson@cnhwi.org

Mailing Address: 2110 Washington Street; New Holstein, WI 53061

**7. General Population (2022 US Census Bureau Estimate)**

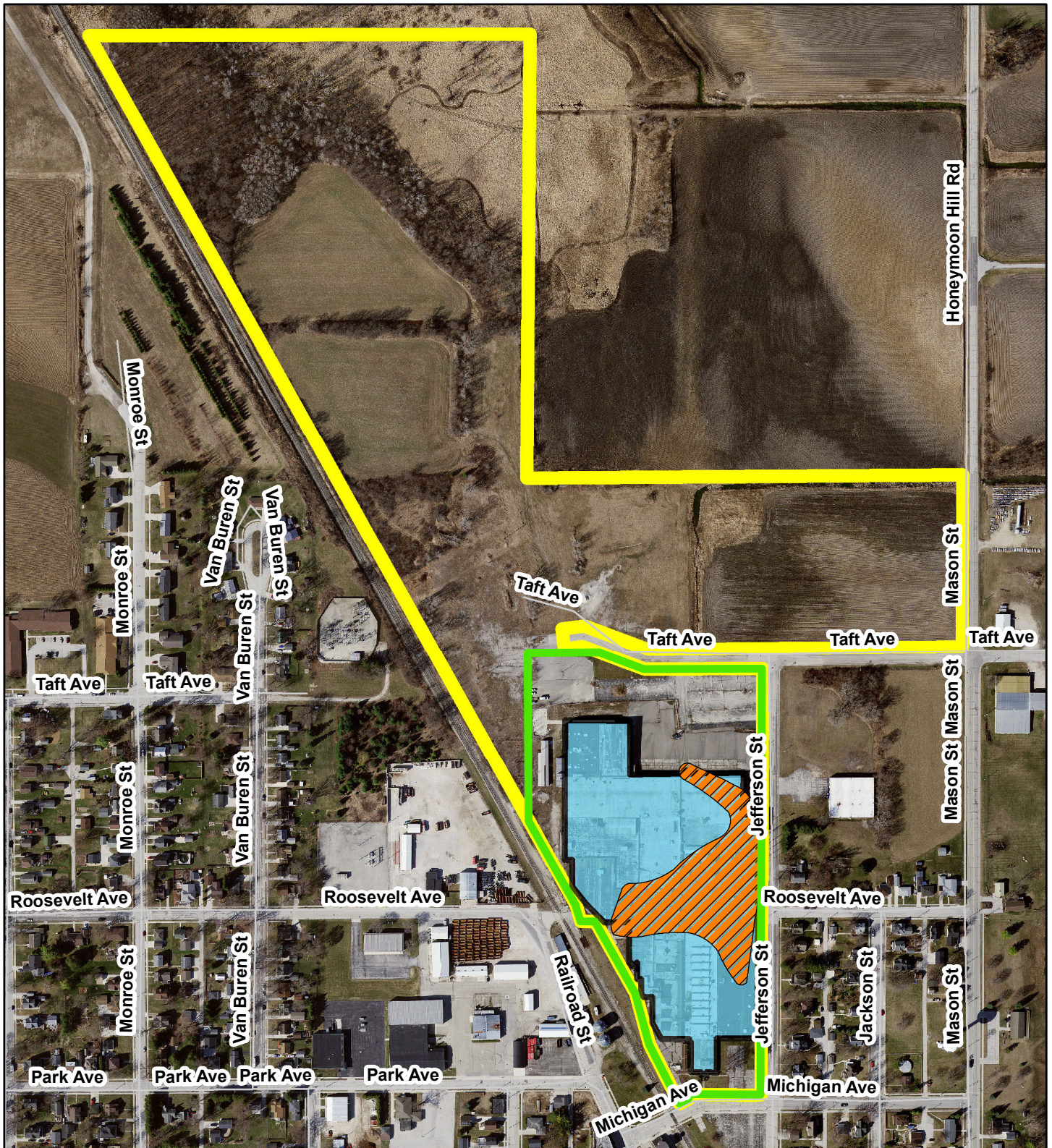
- a. City of New Holstein = 3,195 (source: policymap.com, with subscription)

**8. Other Factors**

<b>Other Factors</b>	<b>Page #</b>
Community population is 15,000 or less.	P.1 and Table 1
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	P.1; Attachment A
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The proposed site(s) is in a federally designated flood plain.	
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	P. 2
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	P. 2
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	

**9. Releasing Copies of Applications**

Not Applicable

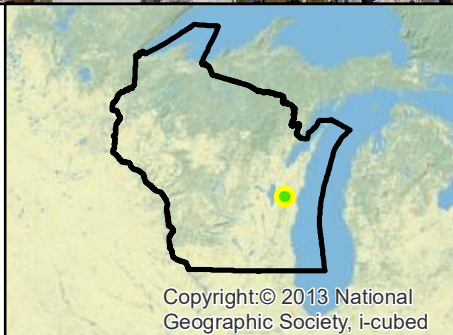


### Target Property and Cleanup Area

Client/Project  
 Tecumseh Redevelopment Area  
 1604 Michigan Avenue  
 New Holstein, Wisconsin



0 195 390 780 Feet



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### Legend

-  Cleanup Area (16.4 Acres)
-  Soil Remediation Area (135,000 sf)
-  Groundwater Remediation Area (9.4 Acres)
-  Tecumseh Redevelopment (Target Brownfield)

## 1. Project Area Description and Plans for Revitalization

**(1.a) Overview of Brownfield Challenges and Description of Target Area.** The City of New Holstein (City; the grant applicant), Wisconsin, population 3,195, is located in east-central Wisconsin between Lake Michigan and the large inland Lake Winnebago. Development in New Holstein began in the mid-1800s by hard-working German settlers. Historically, the area served as a center for flour milling due to fertile cropland and abundant waterpower. Shortly afterwards, industrial development began in Census Tract 550150206002 (CT-206, Block Group 2, the Target Area), shifting the economy from agricultural to heavy metals works. Industrial growth was centered around a machine/repair shop that expanded into manufacturing gasoline powered engines as the Tecumseh plant (Target Property), which generated high-paying jobs to the area for 100 years. Sadly, the Tecumseh manufacturing plant shut its doors for good in 2007, resulting in the loss of nearly 2,000 jobs (60% of the City’s population) and delivering an **immediate loss of \$120,000,000 per year** in income. This catastrophic economic downturn has contributed to the **15% decrease in population and 121% increase in poverty rate in the Target Area** since the year 2000<sup>1</sup>, which is why redevelopment of this area is critical. Additionally, the Target Property’s 440,000 square foot (ft<sup>2</sup>), stained, cracked, slab located adjacent to and in full view of residential areas, and only a block from the main street running through New Holstein (Wisconsin Ave/Hwy 32), serves as a constant reminder of the job loss and resulting economic downturn experienced in the City and is a major source of blight for residents. The migrating contamination plumes originating from the Target Property put local groundwater and surface water resources at significant risk. The long history of various industrial operations in the Target Area has resulted in a dire need for USEPA funding to clean up environmental contamination which exceeds the state cleanup levels for the desired redevelopment plans at the Site. The greatest needs to be addressed with cleanup and eventual redevelopment are (1) poor economic condition through increased workforce and senior housing to support both further industrial development at the Target Property and elsewhere in New Holstein and provide healthy housing for an ageing population and (2) support new modernized industrial and commercial developments to expand careers available within the City, promote economic development, and remove the large, blighted Property from a central part of the City. The cleanup of the Target Property, which will allow for the desired redevelopment, is consistent with community needs identified in multiple studies and will bring improvements to quality of life in the City to address the significant blight, poor economic conditions, and housing needs.

**(1.b) Description of the Proposed Brownfield Site.** The Site targeted for cleanup consists of the southern portion of a currently vacant, nearly 40-acre former Tecumseh plant located in the north central area of New Holstein. The Site was first developed in 1884 by John Lauson as a machine and repair shop. Only a year later, the original building burned down and was subsequently rebuilt as a tractor steam engine repair shop. Soon after, Lauson added manufacturing of the “Uncle Sam” tractor line to his facility. The Aylward Cast Iron Foundry opened concurrently on the Site in 1913 and was purchased by Lauson in 1915, by which time operations shifted to gasoline-powered engines. Eventually, the manufacturing operations occurring at the Site included the machine shop, a blacksmith, a print shop, a warehouse, and an office building. After John Lauson’s death, the Lauson Corporation purchased the company. When the Great Depression and crop failures led to a decline of the tractor industry in the 1930s, Lauson Corporation shifted to producing air-cooled engines, manufacturing the first commercial air-cooled 4-cycle outboard engine. After an acquisition by the Hart-Carter company in 1941, production of small gasoline engines continued at the Site. In 1956, Tecumseh Products acquired the Site, adding a series of buildings between 1956 and 1972 and extending the Site to the north. By the 1960s, Tecumseh Products began adding the production of aluminum casings, and a plastics extrusion department was added in 1978. Chlorinated solvents were used as cleaners at the facility until the early 1990s, and hard chrome electroplating of pistons continued until 2005. The Site ceased manufacturing operations and was sold to Heus Manufacturing, LLC, a local custom metal fabricator, in 2007; Heus utilized the facility briefly before abandoning the Site in 2009. It has been vacant since then, and the City gained control of the Site in 2017. The Site’s buildings were demolished in 2021, leaving behind a large, blighted slab in the center of New Holstein. Soil and groundwater at the Property are known to be impacted by chlorinated volatile organic compounds (CVOCs), petroleum VOCs (PVOCs), semi-volatile VOCs (SVOCs), polychlorinated biphenyls (PCBs), and heavy metals (including hexavalent chromium; Cr<sup>+6</sup>) associated with past uses for small engine manufacturing. The risks to human health from identified contaminants include cancer (lung, bladder, stomach), kidney disease, and reproductive and nervous system damage<sup>2</sup>.

**(1.c) Reuse Strategy and Alignment with Revitalization Plans.** *The City of New Holstein Comprehensive Plan, City of New Holstein Economic Development Strategic Plan, the East Central Wisconsin Regional Planning Commission Tecumseh Site Redevelopment Plan, and the City of New Holstein Former Tecumseh Plant Market Feasibility Study* (collectively referred to herein as the “Plans”) guides the reuse of the Target Property. Input from the affected community and project partners directly informed the Plans, with participation actively encouraged and available via public meetings,

<sup>1</sup> PolicyMap ([policymap.com](https://policymap.com)) with subscription.

<sup>2</sup> Health impacts per <https://www.cdc.gov/TSP/ToxFAQs/ToxFAQsLanding.aspx>

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hearings, and workshops, and resources made available at accessible public locations and online. Participants in public engagement activities identified job opportunities and lack of elderly housing as top weaknesses in New Holstein. Community engagement efforts also identified redevelopment of the Tecumseh site as the highest ranked opportunity, with more than 20% of respondents ranking it the number one priority. However, cleanup funding to address remaining contamination is essential to address remaining contamination to facilitate development that meets community needs and aligns with the *Plans*. Pelton Developers submitted a letter of interest and will enter a development agreement with the City to acquire the Property and begin multi-family development immediately following cleanup (see Attachment A3). Northernstar Companies will construct a \$100MM multi-family residential redevelopment adjacent to the Target Property (see Attachment A4), which also aligns with the reuse strategies of the *Plans*.

**(1.d) Outcomes and Benefits of Reuse Strategy.** This redevelopment will be shovel-ready following cleanup and the Cleanup Area will be rezoned to facilitate the proposed reuse. Following cleanup, Pelton Developers will acquire the Property and construct (2) 46-Unit multi-family apartments and (8) townhomes connected by park/greenspace on the southern portion of the Target Property with continued multi-family and commercial development to follow on the northern portion of the Target Property. The proposed redevelopment is expected to generate approximately **\$25,000,000** in new taxable value generating between **\$500,000 and \$600,000 in annual tax increment revenue**<sup>3</sup>. Multi-family residential redevelopment in the southern portion of the Cleanup Area will provide a total of 60 units of senior housing across two multi-family buildings, one of which would include a small commercial space, along with 27 units of workforce apartment housing, equating to \$7.25 million in assessed tax value and providing much needed and desired senior and workforce housing to the downtown area. Northernstar Companies will construct a \$100MM multi-family residential redevelopment adjacent to the Property, which aligns with the objectives and reuse strategies of the *Plans*. Given the proximity of the Target Property to the expanding sustainable energy businesses in the region and ample rail access, the *Plans* recommend a significant portion of industrial redevelopment focus on the wind and solar industries. Based on the space utilization per job for the proposed reuses<sup>4</sup>, redevelopment at the Target Property is expected to **generate 930 new industrial jobs and 20-30 new jobs operating/maintaining multi-family facilities**. If the elder care facility includes health services, redevelopment could generate an **additional 10-20 new jobs** in the medical field. Based on USEIA’s 2021 employment estimates, the Tecumseh redevelopment is estimated to generate **125 construction jobs** (five jobs per \$1,000,000 investment). These diverse end uses will provide a wide variety of business opportunities to directly mitigate extreme weather events (such as manufacturing alternative energy equipment) and installation of new stormwater infrastructure to improve local resilience by reducing flooding risk. The reuse plan will include a bi-modal trail along the western side of the Target Property to connect New Holstein to the regional bike path and promote recreational opportunities in the community. Energy efficiency measures in the new buildings will include efficient windows, lighting, and high-efficiency HVAC systems.

**(1.e-1.g) Resources Needed for Site Characterization, Remediation, and Reuse.** Leveraging and coordinating public funding has been and will remain a cornerstone of the Tecumseh Redevelopment Area. The City has leveraged **\$2.25 million** in local and state funds to demolish the former buildings at the Site, a key step in promoting proposed reuse of the Site. USEPA cleanup grant funding in addition to the leverage described below **will be sufficient** to complete the proposed reuse of the Target Property. If unexpected environmental impacts are encountered during the cleanup, the City is eligible for and will pursue the following resources.

<b>Name of Resource:</b> Calumet County Assessment Coalition	<b>Purpose:</b> 1.e. Assessment <b>Additional Details:</b> Although not anticipated, if needed, the City could secure additional grant-funded assessment work through the Calumet County Assessment Coalition.	<b>Status:</b> Eligible; Secured; Attach. A1
<b>Name of Resource:</b> WDNR Wisconsin Assessment Monies	<b>Purpose:</b> 1.e. Assessment <b>Additional Details:</b> Although not anticipated, if needed, the City could secure additional grant-funded assessment work through the WDNR Wisconsin Assessment Monies program.	<b>Status:</b> Eligible; Unsecured
<b>Name of Resource:</b> Insurance Recovery	<b>Purpose:</b> 1.e/f. Assessment/Remediation <b>Additional Details:</b> The City is searching old general liability insurance policies issued to a prior operator to confirm if insurance recovery could fund remediation at the Target Property.	<b>Status:</b> Eligible; Unsecured
<b>Name of Resource:</b> City of New Holstein Tax- Increment Financing (TIF)	<b>Purpose:</b> 1.f, 1.g – Remediation and Reuse <b>Additional Details:</b> The City established a \$5MM Environmental TIF to support additional cleanup at the Property, if necessary. Additional TIF funding (up to \$13MM) will be used for infrastructure construction at the Site to facilitate reuse.	<b>Status:</b> Eligible; Secured; Attach. A2

<sup>3</sup> Reuse plans from the [City of New Holstein Former Tecumseh Plant Market Feasibility Study](#)

<sup>4</sup> <https://metro council.org/Handbook/Files/Resources/Fact-Sheet/ECONOMIC-COMPETITIVENESS/How-to-Measure-Employment-Intensity-and-Capacity.aspx>

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<b>Name of Resource:</b> Pelton Builders (Developer)	<b>Purpose:</b> 1.g – Reuse	<b>Status:</b> Pending; Attachment A3
	<b>Additional Details:</b> Pending award of this FY26 Cleanup Grant, Pelton Builders will begin a non-industrial (mixed-use multi-family and commercial) redevelopment at the Target Property. Initial development to include (2) 46-Unit multi-family apartments and (8) townhomes connected by park/greenspace.	
<b>Name of Resource:</b> Northernstar Companies (Developer)	<b>Purpose:</b> 1.g – Reuse	<b>Status:</b> Pending; Attachment A4
	<b>Additional Details:</b> Northernstar Companies, LLC is acquiring a 6.94 acre parcel in the Target Area (adjacent to and immediately north of the Target Parcel). As described in the offer to purchase, Northernstar will invest at least \$10MM in new multi-family construction to create healthy housing for the community.	

**(1.h) Use of Existing Infrastructure.** The majority of the existing concrete slab (440,000 ft<sup>2</sup>) will be retained onsite/stored nearby for future reuse, with only the limited amount of PCB-contaminated concrete slated for offsite disposal at landfill. Reusing concrete vs. offsite disposal **will save \$1,800,000** in hauling and landfill costs plus save on the cost for importing subbase for future construction (**additional savings of \$1,100,000**). The selected remedial approach allows contaminated soil (20,000 cubic yards; yd<sup>3</sup>) to remain onsite, which **saves \$1,700,000** in landfill costs, plus **saves \$500,000** in cost importing replacement soils. The Target Property was previously occupied by a large industrial manufacturing facility; therefore, significant electrical and natural gas infrastructure is present at/near the Property with enough capacity to serve the proposed reuses. As noted in Section 1.g, additional new infrastructure (i.e., roadways, utilities, etc) will be installed using existing/secured TIF funding (see Attachment A2).

## 2. Community Need and Community Engagement

**(2.a) The Community’s Need for Funding.** Key indicators of disproportionately impacted populations in the target area compared to the City, County, the State, and US are summarized on **Table 1** and reflect a steep decline in economic conditions since the beginning of the 21st Century when manufacturing was the City’s economic foundation. Specifically, largely due to the collapse of the Tecumseh Site, the Target Area experienced a **17% decrease in population, 27% decrease in average income, and a 121% increase in the poverty rate.** Therefore, it is not surprising **over 70% of single mothers are living in poverty and 20% of the community is burdened** by the high cost of home ownership, which is why this area is critical for redevelopment to address community needs. Due to its **small population and high unemployment rate** which is attributed to job losses and exacerbated by limited/restricted state and local funding, the City cannot self-fund the necessary cleanup. Cleanup costs of Target property would consume nearly of the City’s annual budget which is already allocated towards existing community needs including police department and airport renovations, street improvements, and a library expansion will cost more than \$4.3 million. Further, the blighted, abandoned site has become a hotspot for trespassing, vandalism, and illegal dumping, leading to police response, extra patrolling, and fence installation, which puts strain on already limited financial resources.

Table 1. Indication of Community Need <sup>5</sup>	Target Area (CT-206, BG2)	City of New Holstein	Calumet County	State of WI	US
Population (change since 2000)	<u>927</u> <b>-17%</b>	3,195 -7%	52,361 +22%	5.9m +8%	331.4m +15%
Percent Poverty Rate (change since 2000)	<b>9.31%</b> <b>+121%</b>	14.08% <b>+134%</b>	5.85% +67%	10.7% +23%	12.5% +14%
Single Mothers in Poverty	<b>71%</b>	0%	27%	30%	na
Median HH Income (change since 2000)	<b>\$52,000</b> <b>-27%</b>	\$58,137 -19%	\$84,151 -4%	\$72,458 -1%	\$75k +7%
House Burdened	<b>20</b>	16	16	18	na
Severe House Burdened	<b>7</b>	2	6	6	na
High School Graduate (only)	<b>54%</b>	40%	31%	30%	na
BS Degree or Higher	<b>18%</b>	15%	23%	21%	21%

Therefore, it is not surprising **over 70% of single mothers are living in poverty and 20% of the community is burdened** by the high cost of home ownership, which is why this area is critical for redevelopment to address community needs. Due to its **small population and high unemployment rate** which is attributed to job losses and exacerbated by limited/restricted state and local funding, the City cannot self-fund the necessary cleanup. Cleanup costs of Target property would consume nearly of the City’s annual budget which is already allocated towards existing community needs including police department and airport renovations, street improvements, and a library expansion will cost more than \$4.3 million. Further, the blighted, abandoned site has become a hotspot for trespassing, vandalism, and illegal dumping, leading to police response, extra patrolling, and fence installation, which puts strain on already limited financial resources.

**Small Population Size.** A limiting economic factor is the City’s lack of “entitlement status”; therefore, the City does not receive an annual allocation of Community Development Block Grants funds that could be a key source of cleanup funding. With a population of only **3,195** and an annual (2023) budget of only **\$4.8MM**, the City cannot reasonably raise capital to self-fund necessary cleanup.

**Loss of Jobs.** New Holstein has experienced many economic challenges over recent decades associated with globalization and its impact on the manufacturing sector, which previously provided the foundation for the City’s prosperity and main source of local jobs. Rising global competitiveness and offshoring to reduce labor costs resulted in major job losses. Before the Target Property closed, it was the largest single employer in Calumet County. The staggering economic impact from plant closure was the immediate loss of 2,000 high-paying manufacturing jobs (which equaled 60% of the City’s population at the time) and an estimated \$123,000,000 in annual wages. Closing the plant resulted in a loss of \$125,000

<sup>5</sup> Data from [policymap.com](http://policymap.com) based on ACS, 2018-2022. **Bold** indicates worse conditions than WI/US; **RED** is worse than or equal to WI/US and the County. *na* = data not available. Select acronyms: Target Area = Census Tract 206; Target Property = Tecumseh Redevelopment Area 1604 Michigan Ave; RAP/MMP = Remedial Action Plan/Material Management Plan; ABCA = Analysis of Brownfield Cleanup Alternatives; CIP = Community Involvement Plan; WDNR = Wisconsin Department of Natural Resources; [blue text](#) are hyperlinks to source material.

in annual property taxes. This loss in economic strength resulted in decreases in local tax revenue that would otherwise be available to assist the necessary cleanup at the Target Property.

**Low Income.** The median household income in the Target Area is 38% less than that of the County and 31% less than that of the country as a whole. Further, while the median household income for the country has increased by 7% since 2000 (in 2022 dollars), the Target Area’s average household income has decreased by 27% in that same period. This stark reduction in income is partially explained by the 50% decrease in the number of manufacturing jobs resulting in a decrease in the average manufacturing wage over the same time period.

**Limited City/State Funding.** To date, the City has spent **\$500,000** on asbestos abatement, building demolition, and environmental assessment work at the Target Brownfield. For scale, this investment is equal to half the **entire** City tax levy for a year; as such, the City simply does not have capacity to self-fund the necessary cleanup to facilitate reuse.

**(2.b) Health or Welfare of Sensitive Populations.** The target area's sensitive populations are outlined in Table 2 and consist of a high proportion of elderly and disabled citizens with a growing child population. More troubling is the high proportion of elderly, disabled, and children all living in poverty compared to the County and State of Wisconsin. There are numerous residential parcels within 500 feet of the Target Property, and the main downtown corridor of New Holstein is located only one block south of the Site. A geospatial mapping tool accessible to communities to assess the potential environmental and economic impacts of a given area indicates the Target Area ranks in the **88<sup>th</sup> percentile in the state for unemployment** rate and 55<sup>th</sup> percentile for low income.<sup>5</sup>

Table 2. Sensitive Population <sup>5</sup>	Target Area (CT-206)	County	State of WI
Elderly (65 and older)	<b>22%</b>	16%	18%
Elderly in Poverty	<b>9.2%</b>	9.2%	8%
Disabled Citizens	<b>11%</b>	9%	12%
Disabled in Poverty	<b>28%</b>	24%	21%
Children (< 5 years)	3%	5%	5.5%
Poverty rate for children	<b>12%*</b>	6%	13%

Target Area ranks in the **88<sup>th</sup> percentile in the state for unemployment** rate and 55<sup>th</sup> percentile for low income.<sup>5</sup>

**Lack of Healthy Housing:** A significant need in the region is healthy workforce and senior housing. Housing stock is very old in the Target Areas (78% of homes constructed prior to 1980; the ban on consumer lead paint occurred in 1978) which impacts children in the area and complicates finding healthy housing. Further, the median home value in CT-5 (\$128k) is more than **\$100k lower** than the State median, confirming that finding healthy housing, especially for single mothers with children in poverty, is an unsurmountable challenge. The Census Bureau estimates that upwards of 15% of homeowners and 80% of renters in New Holstein are burdened by housing costs. This unfortunately forces sensitive populations to residential areas similar to those adjacent to the priority site where lead-based paint is present.

**Ageing Population:** The median age in Block Group 2 is 47, compared to 40 in state and 39 in US, and it falls in the 79<sup>th</sup> percentile for persons over the age of 64 in both the state and the nation. In addition, the Target Area has a higher percentage of elderly individuals in poverty than the state, and the percentage of people over 65 in poverty has nearly doubled in CT-206 since 2000 (**Table 2**).

**Improve Welfare.** Redevelopment of the Target Property by Pelton Developers for residential and green space will improve welfare conditions by increasing healthy housing, protecting human health from contamination, and making the surrounding neighborhoods safe and walkable. Overall well-being increases through recreation in new greenspace areas.

### **(2.c) Greater Than Normal Incidence of Disease and Adverse Health Conditions.**

**Cancer Rates.** The Target Area falls in the 68<sup>th</sup> percentile for low life expectancy and 70<sup>th</sup> percentile for heart disease within the state of Wisconsin. Additionally, CT-206 is in the 87<sup>th</sup> percentile in the state and **90<sup>th</sup> percentile nationally for overall cancer rates**. Further, there is no hospital facility located in New Holstein, burdening sensitive populations with the need to travel to a different town to receive medical care<sup>1</sup>.

**Asthma.** The 2022 USEPA Toxics Release Inventory indicates 471,337 pounds of toxic chemical waste was generated at 9 regulated facilities within a 10-mile radius of the Target Property.<sup>6</sup> Air quality is significant, and although no monitoring locations are located in the County, data from the American Lung Association *State of the Air (2025)* report gives an adjacent county an “F” for air quality due to ozone<sup>7</sup>. Although data is not available for the Target Area, the percentage of children in Calumet County with asthma is slightly less than the National Average<sup>8</sup>; however, the adult rate of asthma is **55% greater** in Calumet County compared to the National average.<sup>9</sup> Undoubtedly, poor air quality has a disproportionate impact on sensitive populations, and with the change in weather patterns in Calumet County due to extreme weather events, poor air quality days are increasing yearly.

<sup>6</sup> <https://www.epa.gov/toxics-release-inventory-tri-program>

<sup>7</sup> <https://www.lung.org/research/sota/city-rankings/states/wisconsin>

<sup>8</sup> <https://www.cdc.gov/asthma/national-surveillance-data/asthma-prevalence-state-classification.htm> and <https://www.cdc.gov/asthma/nhis/default.htm>

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**Childhood Disabilities.** Although data is not available for the City, the US Census Bureau<sup>9</sup> notes the rate of childhood (age <18 years) cognitive disability in the County is more than double (11.3%) the rate in Wisconsin (4.4%) and in the US (4.1%) and the overall rate of disability in the Target Areas (19%) exceeds the rate in Wisconsin (12%). Although the precise cause/source of cognitive disabilities in children is likely due to a multitude of factors, known/suspect contaminants of concern identified at the Target Property (Section 1.b) are known to cause severe neurological damage and birth defects. Children could be exposed to these constituents through consumption of impacted groundwater (in both public and private wells), which is known to be an issue in the County.

**Birth Defects.** Birth defect rates are not available for the Target Area. Wi. Dept of Health County Profile indicates the rate of congenital anomalies in the County is 0.6%, which is greater than the adjacent County. The March of Dimes indicates County is a “maternity desert”<sup>10</sup> as there are no hospitals providing obstetric care, no birth centers, no OB/GYN and no certified nurse midwives in the County, indicating expecting mothers must travel long distances access healthcare.

**Overall Health.** In the past five years, the Population Health Institute at the University of Wisconsin<sup>11</sup> indicates the health of county residents has improved based on characteristics associated with sensitive populations: morbidity (which included self-reported fair or poor health, poor mental health days, and percent of births with low birth weight); social and economic factors (which included measures of education, employment, income, family and social support, and community safety); and physical environment. However, the County still lags behind the State and National averages for disease prevention (i.e., availability of primary care physicians) and mental/social health (i.e., the ability to participate in civic, political, religious, sports and professional organizations). Obesity remains a significant challenge in Calumet County and the City, with 12% of the low-income preschool children considered obese<sup>5</sup> and 32% of the adult population considered obese, which places the County in the highest quartile compared to other counties in the State<sup>12</sup>.

**Reduction of Health Risk.** Cleanup and redevelopment of the Target Property will mitigate these health conditions by decreasing contamination mass and source areas; improving ground water quality; and increasing opportunities for healthy living as summarized in Section 1.d by creation of bike trails, increased healthy housing; and increased income through new manufacturing jobs.

## (2.d) Economically Impoverished / Disproportionately Impacted Populations.

Although the industrial history of the City provided much-needed jobs to residents, heavy industrial activity and associated pollution has resulted in a disproportionate burden to sensitive populations (women, elderly, children) in the Target Area. **Table 3** summarizes disproportionate negative impacts to the community, which has been burdened by an abundance of toxic sites and poor air quality leading to an increased risk for air toxic cancer and respiratory hazards. New Holstein has been identified as having a transportation access burden by a geospatial mapping tool accessible to communities to assess the potential environmental and economic impacts of a given area<sup>5</sup>, highlighting the need for creating opportunities for residents to live and work in a central area that will mitigate this lack of transportation options. In addition, CT-206 ranks in the 91<sup>st</sup> percentile in the state for lack of access to broadband internet and access to parks and walkable/recreational space<sup>13</sup>. The reuse plan for the Target Area will create senior and workforce housing within walking distance to the public library, allowing for existing resources to be utilized and lessening this critical service gap.

Table 3. Indicators of Community Vulnerability <sup>13</sup> (% in US with lower risk vs. target neighborhood)	CT-206
<b>Cumulative Environmental Burden = 61</b>	
Potentially Hazardous & Toxic Sites	<b>78</b>
Risk Management Plan Sites	<b>80</b>
Lack of Walkability and Lack of Parks	<b>88</b>
Treatment, Storage and Disposal Sites	<b>55</b>
Toxic Release Inventory Sites	<b>57</b>
Lack of Parks and Lack of Walkability	<b>88</b>
Wildfire Smoke	<b>91</b>

The frequency of emergency room visits due to carbon monoxide poisoning in the County is double the rate of the adjacent county, due to lack of maintenance of home heating systems resulting from limited personal finances. Given the economic condition of the community (**Table 1**) in combination with the challenges of the sensitive populations (**Table 2** and **Table 3**), the City is clearly an example of a rural community with economically impoverished and disproportionately impacted populations unable to redevelop the Target Property due to high cleanup costs.

**Addressing Economically Impoverished / Disproportionately Impacted Populations.** Cleanup and redevelopment of the Target Property will address the disproportionately impacted population by creating healthy livable/walkable

<sup>9</sup> <https://data.census.gov/cedsci/>

<sup>10</sup> <https://www.marchofdimes.org/research/maternity-care-deserts-report.aspx>

<sup>11</sup> <https://uwphi.pophealth.wisc.edu/>

<sup>12</sup> <https://www.dhs.wisconsin.gov/publications/p45358-21.pdf>

<sup>13</sup> <https://atsdr.cdc.gov/place-health/>; **bold and red** text indicates burden in the target census tract is greater than 60 percent of all census tracts in the US.

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neighborhoods with increased healthy housing and promoting reduced commute times, which will improve air quality by decreasing air toxins. Pelton Developers will construct new housing options to reduce community exposure to lead paint. Increasing housing security and building healthier communities are directly associated with decreased crime rates and increase in quality of life. In addition, the proposed cleanup method (ISCO and reductive dechlorination) at the Target Property is a climate resilient remedial solution and will preserve flood storage while mitigating subsurface impacts to nearby wetlands. Northernstar Companies will construct a new \$100MM multi-family residential building to increase healthy housing options and generate the need for commercial growth. Redevelopment of the Property is targeted to multi-family housing; therefore, displacement of the underserved community/businesses is not anticipated; however, the City will minimize displacement through problem solving meetings and a Community Benefit Agreement (CBA).

**(2.e and 2.f) Project Involvement and Project Roles.** The New Holstein Brownfields Advisory Committee (BAC) will be formally established and approved by City Council immediately upon notice of grant award (estimated June 2026) to provide oversight/input on the City’s Brownfields program. BAC members will bring important community voices to the table and were selected to address needs discussed in Section 2.a. The general public and those affected directly by the Target Property will be engaged through a Community Involvement Plan (CIP) and CBA developed in Q1 FY27 in collaboration with the BAC, as described in 2.g. Members on **Table 4** affirm their commitment to serve on the BAC.

**Table 4. Project Partners and Roles**

Organization	Entity’s Mission	Point of Contact	Partner Role / Specific Expertise
New Holstein Community Development Authority (CDA)	Blight elimination and enters into contracts, acquires land, initiates condemnation proceedings regarding real estate, enters into bond issues/agreements.	Gene Woelfel nhcouncilwoelfel@gmail.com	Facilitate redevelopment by identifying and finding resources to encourage commercial businesses to locate/build at the Property.
New Holstein Economic Development Corporation	Guides current and future businesses in the New Holstein area to continued and greater success	Jon Weir info@nhedc.com	Facilitate redevelopment by providing business planning, consulting, and revitalization services to future Property owners.
New Holstein Revolving Loan Committee	Provide RLF funding to encourage business revitalization for exterior buildings and business growth and expansion.	Brad Grant brad.grant@yourpfcu.com	Provide financial assistance through low interest loans for business development and expansion at and near the Property
Calumet County Community Economic Development	Support business growth through counseling, business planning, permitting, financing, and identifying suitable property.	Jason Pausma jason.pausma@calumetcounty.org	Recruit developers to Property and provide financial and educational assistance to businesses developing/building at the Property
Habitat for Humanity	Organization working on housing insecurity	Amy McGowan [REDACTED]	Provide guidance on redeveloping the Target Property for residential reuse. Possible HH will do a project at Site.
Holy Rosary Catholic Church	House of worship in Target Area serving local community	Fr. Alvan Amadi amadi@cua.edu	Provide meeting space in Target Area in walking distance to Property.
Member at Large	Retired attorney with expertise in env./real estate law and finance	James Burnett: [REDACTED]	Assist developers evaluate funding stack and legal questions
USEPA and WDNR Project Managers	<b>To Be Determined</b> - Provide technical assistance and review of work products in Tasks 1, 2, and 3; outlined in Section 3; (e.g., QAPP, SSSAP, RAP/MMP, Construction Documentation Report)		
The Health Office of the Calumet County Health Department. (Zak Van Ooyen; 920-849-1432) will attend BAC meetings once per quarter and community outreach meetings to answer any health-related questions/concerns related to the cleanup.			

**(2.g) Incorporating Community Input.** Community outreach activities were bolstered during preparation of the *Plans* through workshops, public meetings, stakeholder input, news releases, a web-based public visioning portal, open houses and community events, and public hearings. Within one month of award, the City (grantee) will develop a site-specific CIP to leverage the expertise and networks of the CDA. The CIP will be designed specifically to engage and inform the community members and to provide an avenue for input/feedback from the community. The CIP will also discuss how community input will be considered and responded to. The approved CIP will be implemented in Fall 2026 to integrate community involvement utilizing the CDA to engage the community and local businesses in the assessment, cleanup, and overall redevelopment of the Target Property. The timeline for community meetings will be outlined in the CIP. The City (grantee) will hold at least one meeting per quarter and at key points during the project, including: (A) a meeting after grant award to discuss the project/grant with the community, the project process and expectations, and timeframe

of key activities; (B) a meeting upon posting of the final ABCA; (C) a meeting when cleanup activities begin; (D) periodic meetings during active cleanup; and (E) a final meeting when cleanup is complete.

In-person and virtual outreach options will be provided and are well-accepted by the community. Community meetings will be held in the evenings to accommodate work schedules of stakeholders. In addition, meetings will be held at the New Holstein Public Library, which is within walking distance of the Target Property. The meeting facility will be ADA-compliant to accommodate needs of sensitive populations (i.e., disabled or elderly). Hard copies of all project outputs will be made available at the library and City Hall. As cleanup proceeds, developers are recruited, and renderings are developed, the local newspaper will likely be a significant source of information dissemination. Displays of Target Property renderings at the summer farmer's market will also allow direct, immediate public feedback on the project via QR Codes on posters. Similarly to the *Plans*, physical copies of any associated materials will be made available at City Hall. Although it is anticipated that most communications will be in English, it is important that non-English speaking households are aware of environmental activities that directly impact them. Thus, the City will work with the project partners to develop and distribute information in Spanish, as well as offer translation and interpretation services as needed.

### 3. Task Descriptions, Cost Estimates, and Measuring Progress

**3.a Proposed Cleanup Plan - Contaminated Media to be Addressed:** Hazardous substances (e.g., CVOCs, PVOCs, PCBs, SVOC, and heavy metals) were detected in soil and groundwater at the Target Property at concentrations significantly greater than regulatory health-based standards. Exceptional contamination from CVOCs and PVOCs (estimated contaminant mass greater than 4,000 pounds) remains in soil beneath the former concrete building slab. This contamination is the sole source of the aquifer contamination and is upgradient of the groundwater plume. Remaining soil contamination could quickly leach to groundwater if the slab is removed to facilitate the proposed mixed-use redevelopment, further contributing to the CVOC and PVOC groundwater plume. As required by WDNR, remediation of CVOC and PVOC impacts to soil and to groundwater must be completed before the Target Property can be redeveloped. After removing the slab from the affected area, the selected remedial alternative for reducing CVOC and PVOC contaminant mass in soil is in situ chemical oxidation, which will include directly mixing 150 tons of potassium permanganate into the subsurface. The selected remedial alternative for reducing CVOC and PVOC contaminant mass in groundwater is enhanced reductive dechlorination, which will include injecting a bacteria consortium into the aquifer capable of metabolically breaking down CVOCs and PVOCs without mobilizing Cr<sup>+6</sup> (which would be the case if an oxidant was used to remediate groundwater).

**3.a Proposed Cleanup Plan - Cleanup Method:** Upon award, the ABCA will be finalized, a QAPP prepared, and remedial design sampling (waste characterization sampling and sampling soil and groundwater to confirm current plume characteristics) will be completed. A Post-Closure Modification (PCM), which will include a Remedial Action Plan/Material Management Plan (RAP/MMP) and Cap Modification Request (CMR), will be prepared and submitted to WDNR for concurrence on the proposed cleanup at the Target Property. The RAP/MMP will confirm the selected oxidant (currently presumed potassium permanganate) and describe the soil mixing approach to treat CVOC and PVOCs in soil beneath the slab. The RAP/MMP will include a request to inject a bacteria consortium into the aquifer to reduce CVOC and PVOC impacts to groundwater. The selected remedial approach, to be completed by appropriately licensed/certified remedial contractors with work overseen by the QEP firm and regulatory agencies (USEPA and WDNR), under this grant will likely include: (1) Demolition of 135,000 ft<sup>2</sup> of the existing concrete building slab to access the contaminated soil beneath the former building (2) offsite disposal of 4,100 ft<sup>2</sup> of concrete slab with residual PCB impacts, with the remainder of concrete slab stockpiled onsite for later beneficial reuse; (3) direct mixing of 150 tons of oxidant into CVOC and PVOC impacted soil to reduce contaminant mass; (4) injection of a bacteria consortium into the contaminated aquifer to mitigate existing groundwater contamination (approximately 9.4 acres of treated area); (5) construction of a vegetated topsoil cap over the treated soil area to stabilize the area and mitigate the potential for direct contact with residual soil impacts and reduce the risk for mobilization of soil impacts to groundwater; and (5) post-remediation soil and groundwater monitoring to document the effectiveness of the cleanup. By cleaning up the source area of contamination, this cleanup method will treat and reduce the size of the groundwater plume extending from the Target Property

**3.a Proposed Cleanup Plan - Disposal Requirements:** Concrete will be reused onsite to the greatest extent possible. PCB-impacted concrete will be transported offsite for disposal at a licensed solid waste landfill. Soil cuttings and purged groundwater will be drummed and hauled offsite by a licensed waste hauling contractor for disposal at a solid waste landfill, pending landfill approval.

**3.b – 3.e Description of Tasks/Activities and Outputs.** The City has developed the appropriate tools and procedures to immediately begin implementation of the grant. The City will develop an RFP and hire a QEP per 2 CFR 200.317-200.326 and 2 CFR 1500 in Q1 FY27. This shovel-ready project will be completed within the 4-year grant performance period, as reflected below:

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<b>Task 1 - Activity: Program Management</b>	
b. <u>Project Implementation</u> : Retain and manage QEP, prepare Quarterly Reports, Annual Financial Reports, and MBE/WBE Reports; update ACRES database; prepare Grant Closeout Report	
c. <u>Anticipated Project Schedule</u> : Retain QEP (Q1 FY27). Quarterly progress reports will be submitted by Jan. 30th, Apr. 30th, Jul. 30th, and Oct. 30th of each year, with the first due on Jan 30, 2027. Annual DBE and financial reports will be submitted by Oct. 30th, with the first due on Oct. 30, 2027. Grant closeout by Q1 FY31.	
d. <u>Task/Activity Leads</u> : CDA Project Manager and CDA Project Coordinator (with input from QEP)	
e. <u>Outputs</u> : Admin Records; Contractor Procurement Documentation; (15) Quarterly Reports; (3) Annual Financial Reports; (1) Grant Closeout Report. (# of outputs assumes schedule holds)	
<b>Task 2 - Activity: Cleanup Oversight</b>	
b. <u>Project Implementation</u> : Finalize ABCA, prepare QAPP, and complete remedial design waste characterization and plume dynamics sampling to prepare a post-closure modification request to WDNR, which will include a RAP/MMP and cap modification request. Develop bid specifications, obtain necessary permits, retain remedial contractor, oversee cleanup activities and DBA compliance. Conduct post-cleanup soil and groundwater sampling and prepare Construction Documentation Report.	
c. <u>Anticipated Project Schedule</u> : Finalize ABCA, prepare QAPP, and complete remedial design waste characterization and plume dynamics sampling to prepare a post-closure modification request to WDNR, which will include a RAP/MMP and cap modification request (Q1 FY27). Develop bid specifications, obtain necessary permits, retain remedial contractor (Q2 FY27-Q3 FY27), oversee cleanup activities and DBA compliance (Q4 FY27 - Q4 FY28). Conduct post-cleanup soil (Q3 FY29) and groundwater (Q3 FY29 – Q3 FY30) sampling and prepare Construction Documentation Report summarizing all work under Task 2 (Q4 FY30).	
d. <u>Task/Activity Leads</u> : CDA Project Manager (PM), QEP, with input from WDNR and USEPA PMs	
e. <u>Outputs</u> : ABCA; QAPP; PCM; RAP/MMP; CMR; bid spec; DBA summaries; Const. Doc. Report	
<b>Task 3 - Activity: Cleanup (Remediation Contractor Only)</b>	
b. <u>Project Implementation</u> : Implement cleanup plan described in Section 3.a and the RAP/MMP from Task 2.	
c. <u>Anticipated Project Schedule</u> : Soil remediation (Q4 FY27-Q1FY28); Construct vegetated barrier/soil cap (Q3 FY28) with turf management through Q3 FY29. Groundwater remediation (Q4 FY28)	
d. <u>Task/Activity Leads</u> : CDA PM, Remedial Contractor(s) PM(s) (to be retained by Q3 FY27), and QEP PM	
e. <u>Outputs</u> : Daily construction logs; soil mixing records; injection records	
<b>Task 4 - Activity: Community Outreach</b>	
b. <u>Project Implementation</u> : Prepare and implement a Site-Specific CIP. Host (8)biannual public meetings to discuss Target Property cleanup and redevelopment plans; community events; attend National Brownfield Conference	
c. <u>Anticipated Project Schedule</u> : First quarterly meeting Q1 FY27; Brownfield Conference in 2028 (estimated)	
d. <u>Task/Activity Leads</u> : CDA PM and BAC, with input from QEP	
e. <u>Outputs</u> : CIP, meeting deliverables, reuse plans, presentation materials	

**3.f. Cost Estimates.** Personnel (\$38/hr) and fringe (\$12/hr) are the average of City staff likely to participate in this project. Construction estimates are based on engineering estimates reflective of similar projects completed in 2025 at a nearby Brownfields subject under a USEPA Brownfield Cleanup grant, which was subject to the Davis Bacon Act (DBA).

Budget Categories		Task 1	Task 2	Task 3	Task 4	Administrative Costs	Total
		Program Management	Cleanup Oversight	Cleanup	Community Outreach		
Direct Costs	Personnel	\$6,992	\$3,800		\$2,432	\$0	\$13,224
	Fringe	\$2,208	\$1,200		\$768	\$0	\$4,176
	Supplies				\$1,250	\$0	\$1,250
	Travel				\$2,400	\$0	\$2,400
	Contractual	\$5,000	\$304,400		\$5,000	\$0	\$314,400
	Construction			\$3,658,000		\$0	\$3,658,000
	Other (Conference Fee)				\$700	\$0	\$700
	Other (WDNR Fees)		\$5,850			\$0	\$5,850
<b>TOTAL BUDGET</b>		<b>\$14,200</b>	<b>\$315,250</b>	<b>\$3,658,000</b>	<b>\$12,550</b>	<b>\$0</b>	<b>\$4,000,000</b>

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**Task 1 – Program Management: Total Budget = \$14,200**

**Cost Basis and Assumptions:** Personnel/Fringe Costs of \$9,200 are budgeted for an estimated 184hr (@\$50/hr) of work by the CDA Executive Director (ED) and staff to manage the cooperative agreement as follows: hire (32h) and manage QEP activities (1.5hr/month\*48 months=72hr), preparation of quarterly reports and maintenance of the ACRES database (2.5hr/quarter\*16 quarters=40hr), annual financial and disadvantaged business enterprise reporting (5hr/year\*3 years=15hr), prepare grant closeout report (25hr). Contractual Costs of \$5,000 are budgeted for an estimated 40hr (@ \$125/hr) of work by QEP in providing assistance in completing various required reports.

**Task 2 – Cleanup Oversight: Total Budget = \$315,250**

**Cost Basis and Assumptions:** Personnel/Fringe Costs of \$5,000 are budgeted for an estimated 100 hr (@\$50/hr) of work by the CDA ED and staff for developing and issuing bid specs (40hr); review project deliverables (20hr); and coordination during onsite field work (40hr). Other “WDNR fees” for regulatory oversight reviewing project deliverables is \$5,850. Contractual Costs of \$304,400 are budgeted for the following work to be performed by the QEP: finalize ABCA, prepare QAPP, and complete remedial design waste characterization and plume dynamics sampling (\$32,000) to prepare a post-closure modification request to WDNR, which will include a RAP/MMP and cap modification request (240hr @ \$150/hr). Develop bid specifications and assist the City in bidding (100hr @ \$150/hr), securing appropriate permits (40hr @ \$150/hr); remedial contractor oversight and DBA compliance documentation (85 days @ \$1,500/day); conduct post-cleanup soil (\$20,000) and groundwater (\$51,100) sampling and prepare Construction Documentation Report (112hr @ \$150/hr).

**Task 3 – Cleanup: Total Budget = \$3,658,000**

**Cost Basis and Assumptions:** Construction Costs of \$3,658,000 are budgeted for demolition/crushing/disposal of the remaining building slab over the soil treatment area (135,000 ft<sup>2</sup> concrete demolished and stockpiled @ \$3/ft<sup>2</sup>); 200yd<sup>3</sup> PCB-impacted concrete disposed at landfill @ \$90/yd<sup>3</sup>; in-situ chemical oxidation to remediate CVOC and PVOC in soil (20,000 yd<sup>3</sup>@ \$73/yd<sup>3</sup>); importing clean topsoil and finishing with grass (2,500 yd<sup>3</sup>@ \$30/yd<sup>3</sup>); injection of bacteria to facilitate reductive dechlorination of CVOC and PVOC in groundwater (400,000 ft<sup>2</sup> @ \$4.25/ft<sup>2</sup>).

**Task 4 – Community Outreach: Total Budget = \$12,550**

**Cost Basis and Assumptions:** Personnel/Fringe Costs of \$3,200 are budgeted for the CDA ED and staff to plan/host (8) bi-annual outreach activities (8hr/meeting @ \$50/hr). Supply Costs of \$1,250 are budgeted for printing costs (\$850) and mailing costs for public notices (\$400). Travel Costs of \$2,400 are for (2) City staff to attend the three-day National Brownfield Conferences in 2028 [\$1,560 for meals and for lodging (@\$260/person/night for 3 nights); \$700 for air travel (@\$350/person); and \$140 for ground transportation (@ \$70/person)]. Other (Conference Fee) of \$700 for National Brownfield Conference registration fees for two staff (@\$350/person). Contractual Costs of \$5,000 are budgeted for an estimated 40 hr of work by the QEP (@ \$125/hr) to prepare a site-specific CIP and assist with outreach activities.

**3.g. Plan to Measure and Evaluate Environmental Progress and Results.** Project results/outputs and outcomes will be tracked, and progress measured/evaluated weekly using existing tools developed by the City and summarized in quarterly progress reports and annual financial reports prepared during the project under Task 1, as described in Section 3.b-3.e. Project outputs, progress, and schedule will be tracked continuously using Microsoft Project to ensure the grant funds are expended in a timely and efficient manner to the greatest benefit of the community. For measuring and evaluating progress, outputs will be compared to the project schedule proposed in Section 3.c; if a deviation of more than one fiscal quarter is reached, interventions (ex. increased team meetings) will be implemented to maintain the project schedule. Project outcomes and accomplishments, including project milestones, deliverables, and leveraged resources will further be tracked on a **monthly/quarterly** basis in the ACRES database to further measure progress. Project-specific outcomes will be tracked/quantified in the final progress report by comparing future community demographics/welfare characteristics to current conditions and will include: (1) increase in shovel-ready portions of the Target Property suitable for multi-family residential redevelopment and (2) leveraged investment in the Target Property. Outcomes advancing the City’s Plans and Target Brownfield objectives include: (1) increase in developer interest in other portions of the Target Brownfield, and more broadly, (2) increase in property values in the vicinity of the Target Property. If the timelines for advancing one or more phases of work at the Target Property are not well-aligned with the USEPA grant project period, the City and QEP will work with USEPA and WDNR to adjust the approach to maintain progress on achieving the project outcomes. Outcomes will be tracked long-term on a five-year basis by the City and reported in future brownfield conferences, fact sheets, and/or on the City website.

**4. Programmatic Capability and Past Performance**

**4.a Organizational Structure.** This grant will be managed by much of the same high-performing team of City staff members (the CDA) who timely and successfully expended CDBG-CLOSE and WEDC Idle Sites brownfield cleanup grant funds to demolish the former buildings on the Tecumseh Site through technical, administrative, and financial prowess. The CDA includes seven members that serve on a term basis and is led by an executive director that also serves

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as City Administrator/Clerk-Treasurer. The City will retain a QEP consulting firm per the requirements of 2 CFR 200.317 - 200.326 if the grant is funded. The City will also use the expertise of the WEDC, WDNR, and USEPA to provide guidance and marketing to promote reuse of the Target Property.

#### **4.b Description of Key Staff.**

Mr. Scott Depies (City Administrator/Clerk-Treasurer). Mr. Depies and City staff manage the day-to-day operations of city government in the areas of administration, accounting, development, planning, zoning, personnel, and elections under the general direction and policy of the Mayor and Common Council. Mr. Depies has been involved in the Tecumseh property project since assuming the role of City Administrator and has developed a detailed understanding of the site conditions, project needs, and the financial and regulatory tools available to support redevelopment. Mr. Depies works closely with the City and the Community Development Authority (CDA), for which he serves as Executive Director. In this role, he is able to direct and focus the CDA's efforts on advancing the environmental cleanup and redevelopment of the Tecumseh property, ensuring alignment between City policy objectives, redevelopment strategies, and regulatory requirements. He coordinates City staff, consultants, and partner agencies to support implementation of the project and to maintain momentum toward redevelopment outcomes. Mr. Depies will serve as the Brownfields Project Manager for this grant and will be responsible for overall project performance, coordination with the USEPA, WDNR, and compliance with all technical, administrative, and financial requirements of the grant. He will provide ongoing financial tracking, reporting, and grant documentation to ensure the timely expenditure of funds and adherence to all grant conditions. Mr. Depies has more than 20 years of public-sector leadership and project and financial management experience, including oversight of complex redevelopment initiatives and intergovernmental coordination, and is well-qualified to lead the City's continued brownfield cleanup and redevelopment efforts at the target property.

Ms. Lori Beck (Deputy City Clerk/Deputy Treasurer) will function as the Brownfield Project Coordinator for this project and will support Mr. Depies in coordinating work with the QEP and other City departments. As a lifelong resident of the area, Ms. Beck is deeply committed to the community. Ms. Beck has served as the City Clerk/Treasurer for the past 14 years, and in this role, served as the project manager for the two state brownfield grants previously used by the City to demolish the buildings at the Property.

In the event of future personnel turnover, the planned "team" approach will prevent any interruptions with the implementation of the project. Ms. Beck will be involved in daily grant operations and can immediately step in as either interim or replacement project manager in the case of loss/reassignment of the active Brownfield Project Manager. Mr. Depies and Ms. Beck will be supported by the City administrative support staff.

**4.c Acquiring Additional Resources.** The City routinely hires subcontractors and consultants to support municipal projects and will continue to do so in support of cleanup and redevelopment at Target Property. As a small community, the City does not have a program to specifically promote local hiring/procurement to directly link members of the community to brownfield redevelopment work. However, the City will retain a remedial contractor under this grant per 2 CFR 200.317 - 200.326 and 2 CFR Part 1500. The City will additionally utilize the support of local community members via public meetings, as well as the WEDC and USEPA for guidance throughout the course of the project.

#### **4.e. Past Performance and Accomplishments – Previously Received non-Brownfields Federal/State Assistance Agreements.**

##### (i) CDBG-CLOSE Program Brownfield Cleanup Grant (FY21; \$358K)

**4.e.1. Purpose and Accomplishments:** The City received CDBG funding through the CLOSE program to demolish the remaining buildings at the Target Brownfield. Work included demolishing nearly 450,000 ft<sup>2</sup> of blighted industrial buildings and removal of 8,555 tons of demolition debris resulting in creating nine parcels (10 acres) of land closer to being ready for multi-family (4.5 acres) and commercial/industrial (5.5 acres) reuse.

**4.e.2. Compliance with Grant Requirements:** The City maintained compliance with the workplan/schedule and the terms/conditions of the grant award. The City submitted the required financial reports, progress reports, and project deliverables in a timely manner per both the workplan schedule. The City achieved the anticipated results within the grant timeframe.

##### (ii) WEDC Idle Sites Brownfield Cleanup Grant (FY21; \$160K)

**4.e.1. Purpose and Accomplishments:** This \$160k cleanup grant from WEDC was a supplement to the \$358k CDBG-CLOSE grant (described above) and resulted in creating nine parcels (10 acres) of land closer to being ready for multi-family (4.5 acres) and commercial/industrial (5.5 acres) reuse.

**4.e.2. Compliance with Grant Requirements:** The City maintained compliance with the workplan/schedule and the terms/conditions of the grant award. The City submitted the required financial reports, progress reports, and project deliverables in a timely manner per both the workplan schedule. The City achieved the anticipated results within the grant timeframe.

## ATTACHMENT B: THRESHOLD CRITERIA RESPONSES

**Name of Applicant:** City of New Holstein, Wisconsin

### 1. Applicant Eligibility

The City of New Holstein, Wisconsin (City and grant applicant) is a “general purpose unit of local government” as that term is defined in 2 CFR 200.64 and is therefore eligible to receive a USEPA cooperative assessment agreement.

### 2. Previously Awarded Cleanup Grants

The proposed Target Property has not received funding from a previously awarded USEPA brownfields cleanup grant.

### 3. Expenditure of Existing Multipurpose Grant Funds

The grant applicant does not have an open USEPA Brownfields Multipurpose Grant; therefore, this threshold criteria does not apply.

### 4. Site Ownership

The Target Property was involuntarily acquired by the City (grant applicant) on December 15, 2017 through tax foreclosure for the purpose of blight elimination. If awarded, the City will retain ownership of the Property for the duration of the time in which Brownfield cleanup grant funds are disbursed.

### 5. Basic Site Information

**Property Description:** The Target Property consists of all or portions of five contiguous parcels of land totaling 16.4 acres.

**Property Name:** Tecumseh Redevelopment Area

**Property Address:** 1604 Michigan Avenue; New Holstein, Wisconsin 53061

**Property Coordinates:** 43.952592, -88.085756

### 6. Status and History of Contamination at the Site

(a) Site Contamination: The Target Brownfield Property is impacted by hazardous substances associated with releases of chlorinated volatile organic compounds (CVOC) and petroleum volatile organic compounds (PVOC) in addition to releases of heavy metals (including hexavalent chromium), polychlorinated biphenyls (PCBs), and per- and polyfluorinated alkyl compounds (PFAS) in addition to prior placement of impacted anthropogenic fill to grade the Property.

(b) Operational History and Current Use of the Site:

As described in the REL & Associates (2011) Phase I ESA, the Site was undeveloped until 1884 when John Lauson built a machine/repair shop at the location. The original building

burned down the following year and was rebuilt as a tractor steam engine repair facility that eventually also manufactured a line of tractors. A foundry was added to the Site in 1913, and by 1915 operations at the machine shop had changed to manufacture of gasoline powered engines. In addition to the manufacturing plant and iron foundry, a blacksmith shop, machine shop, warehouse, print shop, and office building were included in the Lauson facility. The facility, owned by the Lauson Corporation after John Lauson's death in the 1920s, pivoted to manufacture of air-cooled engines when the depression and crop failures impacted the tractor industry in the 1930s. A shoe factory operated on the central portion of Site from 1935 until 1965, when the factory building was demolished. The Site was acquired by the Tecumseh Products Company ("Tecumseh") in 1956, after which several additions were made to the building complex through the 1970s (including at the site of the former shoe factory) and additional land acquired through the 1990s. The Tecumseh products Company introduced aluminum castings into the production process starting in the 1960s (production of cast iron components had ceased by the time Tecumseh acquired the Site) and production of plastic components in 1978. Tecumseh continued to operate at the Site until 2007 when they sold it to Heus Acquisitions LLC ("Heus"), a local custom metals fabricator. Heus operated at the Site until 2009 and has since abandoned the Property and subsequently declared bankruptcy. The City involuntarily acquired the Property through tax foreclosure and demolished the former buildings in 2021. The concrete slab remains as a site cap, as required by the WDNR continuing obligations / institutional controls until CVOC and PVOC impacts below the slab can be remediated.

#### **Current Property Ownership and Use.**

Ownership. The Target Property was involuntarily acquired by the City (grant applicant) on December 15, 2017 through tax foreclosure for the purpose of blight elimination.

Current Use. The remaining buildings were demolished in 2021. The concrete slab remains as a site cap, as required by the WDNR continuing obligations / institutional controls until CVOC and PVOC impacts below the slab can be remediated.

(c) Environmental Concerns: Multiple phases of due diligence have occurred at the Site dating back to the late 1990s, and have confirmed the presence of hazardous substances (PAHs, Metals, PCBs, VOCs) at concentrations greater than health-based soil and/or groundwater standards. The following is an abbreviated listing of reports associated with the Property.

- LT Environmental, 2009. Phase I Environmental Site Assessment, Heus Manufacturing LLC, 1604 Michigan Avenue, City of New Holstein, Calumet County, Wisconsin 53061. Dated April, 2009.
- Key, 2000, Case Closure Request / Limited Site Investigation, Tecumseh-East Section Fill Area, March 14, 2000.
- REL & Associates, 2011, Former Tecumseh Property, 1604 Michigan Avenue, Phase I Environmental Site Assessment, September 26, 2011.
- REL & Associates, 2013, Former Heus/Tecumseh Plant, New Holstein, Wisconsin, Phase II Environmental Site Assessment, January 14, 2013.

- Robert E. Lee, 2015. Phase I Environmental Site Assessment, 1604 Michigan Avenue – Former Tecumseh Property, City of New Holstein, Calumet County, Wisconsin. Dated December 16, 2015
- Stadtmueller & Associates, 2015, Tecumseh Site Redevelopment Plan, July 2015.
- TRC Environmental Corporation. 2006. Groundwater Monitoring Report and Investigation Work Plan, Tecumseh Power Company, Former Plating Line, New Holstein, Wisconsin. December 2006.
- TRC. 2009. Site Investigation Report. Former Tecumseh Products, Former Plating Line, New Holstein, Wisconsin. August 2009.
- TRC, 2017, Case Closure Documentation, March 27, 2017.
- TRC. 2019a. Groundwater Monitoring Report, Former Tecumseh Products, Former Plating Line Area, New Holstein, Wisconsin. May 13, 2019.
- TRC, 2019b. Per- and Polyfluoroalkyl Substances (PFAS) Groundwater Sampling Plan, Former Tecumseh Facility, New Holstein, Wisconsin, BRRTS #02-08-363333. Dated September 30, 2019.
- TRC. 2019c. Remedial Action Options Report, Former Tecumseh Products, Former Plating Line Area. October 31, 2019.
- TRC, 2020a. Per- and Polyfluoroalkyl Substances (PFAS) Groundwater Sampling Results, Former Tecumseh Facility, 1604 Michigan Avenue, New Holstein, Wisconsin, BRRTS #02-08-363333. Dated March 30, 2020.
- TRC, 2020b. Per- and Polyfluoroalkyl Substances (PFAS) Groundwater Sampling Results, Former Tecumseh Facility – 1604 Michigan Avenue, New Holstein, Wisconsin, BRRTS #02-08-585623, Dated May 21, 2020.
- TRC. 2021. Remedial Action Plan, Tecumseh Products Company (Former) – Chromium Line. April 27, 2021.
- TRC, 2022, Pre-Remedial Soil sample Data Submittal, Tecumseh Products Co, March 29, 2022.
- TRC. 2023. Site Investigation Report for Per- and Polyfluoroalkyl Substances (PFAS) Per- and Polyfluoroalkyl Substances (PFAS), Former Tecumseh Products Co. 1604 Michigan Avenue, July 11, 2023.
- TRC, 2024, TRC Response and Investigation Work Plan – WDNR Comments on Case Closure Request; Tecumseh Products Co. (Former) – Chromium Line; 1604 Michigan Avenue, New Holstein, Wisconsin, December 18, 2024.
- TRC, 2025, TRC Response and Investigation Work Plan – WDNR Comments on Case Closure Request; Tecumseh Products Co. (Former) – Chromium Line; 1604 Michigan Avenue, New Holstein, Wisconsin, April 24, 2025.
- URS Corporation. 2002. Site Investigation Report for Groundwater Contamination, Tecumseh Products Company, New Holstein Operations, New Holstein, Wisconsin. November 21, 2002
- Stantec, 2025, Analysis of Brownfield Cleanup Alternatives, January 27, 2025.

The Target Property is ideal to combat housing insecurity and expand industrial employment in New Holstein. However, the extraordinary subsurface contamination summarized in the following sections is prompting the current owner to apply for this cleanup grant.

Soil. Some level of soil impacts were detected in nearly every boring with contaminants including PAHs, VOCs, RCRA metals, and PCBs. Most notably, concentrations of several PAHs were detected in excess of the direct contact and/or groundwater pathway RCLs. Concentrations of VOCs (primarily trichloroethene [ICE], tetrachloroethene [PCE], and petroleum compounds) were detected in excess of the direct contact and/or groundwater pathway RCL in more than two dozen borings. Concentrations of arsenic were detected above both the direct contact and the groundwater pathway RCL in numerous borings; however, REL considered arsenic detections of approximately 5 milligrams per kilogram or less to be representative of background levels at the Property. Thus, only arsenic detections in seven borings represent elevated arsenic concentrations in excess of the groundwater pathway and direct contact RCL. In addition, concentrations of lead and/or cadmium were also detected in excess of the groundwater pathway RCL in multiple borings. Concentrations of PCBs (i.e., Aroclor 1254, Aroclor 1248, and Aroclor 1260) in excess of the groundwater pathway were detected in ten borings. TRC (2017-2025) continued assessment work at the Property and delineated the extents of remaining solvents and petroleum to soil beneath the former building slab at the time of closure.

Groundwater. Concentrations of VOCs, PAHs, and RCRA metals were detected in several of the newly installed and existing wells sampled as part of the Phase II ESA at the Property. Most notably, concentrations of PCE, ICE, cis-1,2-dichloroethene, vinyl chloride, benzene, ethyl benzene, xylenes, bromoform, chromium, and/or arsenic in excess of the Chapter NR 140, Wis. Adm. Code ES were detected in 14 newly installed wells and two existing wells. PAH and PCB concentrations did not exceed the ES in any of the wells. TRC (2017-2025) continued assessment work at the Property and delineated the extents of remaining solvents and petroleum in groundwater beneath the former building slab at the time of closure.

Vapor Intrusion. There are currently no structures with human occupancy on the Site; therefore, the vapor intrusion pathway is not currently a pathway of concern. However, future buildings are planned as part of redevelopment, including on the east end of the Site where VOC impacts are documented in soil and groundwater. As a conservative measure, future buildings that will be constructed may include a SSDS that can be made active if post-construction sub-slab vapor sampling indicates the risk for vapor intrusion. Neighboring occupied buildings are not at risk from vapor migration given their distance from VOC impacts, and no vapor intrusion would result from the movement of contaminated soil within the confines of the Site during redevelopment.

As discussed in the Stantec (2025) ABCA, Remedial action activities to be funded in this grant are warranted to facilitate redevelopment at the Property and include:

- Removal of existing concrete slab from the solvent/petroleum source area (135,000 ft<sup>2</sup>). Removed concrete will be stockpiled onsite (and later crushed) for beneficial reuse during planned 2026 redevelopment.
- Reduction of solvent and petroleum impacts remaining in soil through chemical oxidation (20,000 yd<sup>3</sup> of treated soil).
- Importing 6-inches of clean topsoil to stabilize the soil treatment area. Topsoil to be finished with turf grass.

- Reduction of solvent impacts remaining in groundwater through enhanced reductive dechlorination (400,000 ft<sup>2</sup> treatment area).
- Post-construction monitoring of soil and groundwater to confirm the effectiveness of the treatment.

(d) How the Site Became Contaminated and Nature/Extents of Contamination: The Target Brownfield Property is impacted from hazardous substances and petroleum associated with direct releases/spills in combination with the use of impacted anthropogenic fill to grade the Property. The contaminant mass (CVOC and PVOC) remaining in soil is estimated to be 4,000 pounds. The proposed cleanup will remediate CVOC and PVOC impacts to soil beneath 135,000 ft<sup>2</sup> of the building slab by directly mixing 150 tons of oxidant into the subsurface. The proposed groundwater cleanup will address solvent impacts to groundwater beneath a 9.4 acre area.

## **7. Brownfield Site Definition**

Site is real property, the expansion, redevelopment, or reuse of which is being complicated by the presence or potential presence of hazardous constituents associated with previous Site operations. Per CERCLA §§ 101(39)(B)(ii), (iii), and (vii) and Appendix 1, the property targeted for this site-specific assessment is (a) **not** listed or proposed for listing on the National Priorities List; (b) **not** subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and (c) **not** subject to the jurisdiction, custody, or control of the U.S. government.

## **8. Environmental Assessment Required for Cleanup Grant Applications**

Prior to acquisition, multiple phases of investigation were completed before and after the City involuntarily acquired the Property, as documented in the reports outlined in Section 6(e). The REL (2013) Phase II ESA was completed on January 14, 2013 per ASTM E1903-19 with subsequent Site Investigations (i.e., TRC, 2006-2025) conducted under state cleanup program oversight.

## **9. Site Characterization**

A letter from the Wisconsin Department of Natural Resources is provided in **Attachment B1**.

## **10. Enforcement or Other Actions**

There are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

## **11. Sites Requiring a Property-Specific Determination**

The following provides details of the Target Property.

- (a) CERCLA Planned or Ongoing Removal Action: None currently under oversight by USEPA.
- (b-i) Unilateral Administrative Order: No orders are known.
- (b-ii) Court Order: No orders are known.
- (b-iii) Administrative Order on Consent: No orders are known to exist.
- (b-iv) Judicial Consent Decree: No orders are known.
- (b-v) Permit issued under RCRA, FWPCA, TSCA, and SWDA: No permits or corrective actions are known.
- (c) RCRA-Permitted facility on the Site subject to corrective action: No facilities are known.
- (d) Properties that are land disposal units that have submitted a RCRA closure notification: No closure notifications are known.
- (e) PCB Release Subject to Remediation Under TSCA: None currently under oversight by USEPA. PCB impacts to soil will remain under the jurisdiction of WDNR with coordinated approval by WDNR/USEPA per the WDNR/USEPA OCP MOA.
- (f) Assistance for Response Activity at the Site has Been Obtained for A Portion of the Site under Subtitle I of the SWDA from the LUST Trust Fund Established under Section 9508 if the IRS Code 1986: No portions are known.

## 12. (a) Threshold Criteria Related to CERCLA

A brownfield eligibility determination for the Target Property was submitted to USEPA on June 4, 2024 and approved by the agency on August 14, 2024. The following provides additional details on the Property.

i.(3) Exemptions to CERCLA Liability. The City involuntarily acquired the Property on December 15, 2017 through tax foreclosure. Since taking ownership, the City has maintained compliance the required continuing obligations and no records have been identified indicating the City is considered potentially liable or known to be affiliated with any other person that is potentially liable for contamination at the Target Property.

- (a) Circumstances Under Which the Property Was Acquired: Tax Foreclosure
- (b) Date on Which the Property was Acquired: December 15, 2017
- (c) Timing of Hazardous Substances Disposal: Disposal of all hazardous substances at the Target Property occurred before the property was acquired by the City.
- (d) Contribution Toward Hazardous Substances Disposal: The City has not caused or contributed to any release of hazardous substances at the site.

- (e) Arrangement of Disposal. The City has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

### 13. Cleanup Authority and Oversight Structure

- a. The Property is enrolled in the Wisconsin Department of Natural Resources (WDNR) Environmental Repair Program (ERP) and is being tracked in the Bureau for Remediation and Redevelopment Tracking System (BRRTS) under case numbers 02-08-100332 and 03-08-001071. All subsurface environmental assessment work completed at the Site to date by has been reviewed and approved by the WDNR project manager. WDNR will provide oversight of the cleanup proposed under this grant to ensure that the project protects human health and the environment.
- b. As described in the Stantec (2025) ABCA, the proposed cleanup will not directly impact adjacent or neighboring properties.

### 14. Community Notification

- a. Draft ABCA. Revision 0 of the Stantec (2025) ABCA was prepared on December 19, 2025 and made available for public comment on December 19, 2025.
- b. Community Notification Ad. The applicant published a community notification ad in the local newspaper on December 19, 2025 and December 26, 2025.
- c. Public Meeting. A public meeting was held to discuss the draft application and consider public comments. The meeting was held on January 6, 2026.
- d. Community Notification Documents. Per the grant guidelines, the following is attached:
- The draft Stantec (2025) ABCA (**Attachment B2**)
  - A copy of the newspaper ad (**Attachment B3**)
  - A summary of the comments received (**Attachment B4**)
  - The applicant’s response to those public comments (**Attachment B5**)
  - Meeting notes or summary from the public meeting (**Attachment B6**)
  - Meeting sign-in sheet/participant list (**Attachment B7**)

### 15. Contractors

Not Applicable. The City will issue a RFQ to retain a QEP in compliance with 2 CFR Part 200 and 2 CFR Part 1500, if this grant is awarded. The QEP will assist the City in retaining the services of remedial contractors per the requirements of 2 CFR 200.317 through 200.327.



January 16, 2026

Scott Depies  
City Administrator  
City of New Holstein  
2110 Washington St.  
New Holstein, WI 53061  
*Via Email Mail Only to [scottd@cnhwi.org](mailto:scottd@cnhwi.org)*

**Subject: State Acknowledgement Letter for City of New Holstein**  
FY26 EPA Brownfield Cleanup Grant

Dear Scott Depies,

The Wisconsin Department of Natural Resources (DNR) acknowledges the application of the city of New Holstein (the City) for the U.S. Environmental Protection Agency (EPA) brownfield grant identified above.

The DNR is fully committed to a collaborative partnership with the City and is able to support your brownfield assessment and remediation efforts in many ways, including:

- The DNR can identify key state and federal contacts for your specific project and coordinate Green Team meetings with individuals in your community to answer questions and discuss local plans, options and best practices.
- The DNR can assist you in identifying and obtaining additional financial assistance from state-managed grant and loan programs.

Obtaining U.S. EPA funding for this grant application is consistent with community needs, is vital to the local economy and will help bring needed improvements to the quality of life for residents. Federal funding will also help initiate cleanup activities, create jobs and leverage local investments in brownfield redevelopment.

**FY26 Cleanup Grant: Site(s) Eligibility, Characterization, and Readiness for Remediation**

For FY26, EPA requests that certain applicants for cleanup grants submit a letter from the state describing property eligibility and whether there is a sufficient level of site characterization from the environmental site assessment for the remediation work to begin on the property(ies).

- **Eligibility.** This property is undergoing cleanup under Wisconsin's cleanup program and its governing administrative code, Wis. Admin. Code chs. NR 700-799, and statute, Wis. Stat. ch. 292. The state cleanup program is regulatory and nonvoluntary. This property is eligible for the Voluntary Party Liability Exemption (VPLE) program under Wis. Stat. § 292.15; the City has / has not enrolled this project in the VPLE program.
- **Site assessment and characterization status.** Site characterization is sufficient to allow remediation work to begin on the site. For the property described in the attached request, dated November 21, 2025, the applicant included a table of 16 associated BRRTS cases.
  - The applicant stated that the listed cases are closed with the exception of two cases (02-08- 363333 and 02-08-585623), for which the former owner/operator is completing assessment and cleanup work.

- The applicant stated that significant residual impacts to soil and groundwater remain beneath the former concrete building slab, and that residual solvent impacts to soil and groundwater will be addressed through active remediation before the remaining concrete building slab can be removed to facilitate non-industrial reuse of the property. The applicant intends to submit a remedial action plan and a post-closure modification request regarding removal of the slab and subsequent remedial action.

Based on the information provided by the applicant, the DNR believes site characterization is complete to an extent that allows remediation work to begin at this site.

Sincerely,



Roxanne N. Chronert, Policy and Program Operations Director  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources

Attachment:

Request dated November 21, 2025

cc:

Kevin McKnight, DNR NER – [Kevin.McKnight@wisconsin.gov](mailto:Kevin.McKnight@wisconsin.gov)

Tauren Beggs, DNR NER – [Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)

Denise Danelski, DNR NER – [Denise.Danelski@wisconsin.gov](mailto:Denise.Danelski@wisconsin.gov)

Harris Byers, Stantec – [Harris.Byers@stantec.com](mailto:Harris.Byers@stantec.com)