



230 W Monroe St., Suite 1840
Chicago, IL 60606

T 312.578.0870
TRCcompanies.com

May 5, 2023

Ms. Sarah Krueger, P.G.
Contaminated Sediment Specialist
Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313-6727

[sent electronically]

**Re: WDNR Response to Remedial Action Standards Documentation Report - Revision 1
Hayton Area Remediation Project
BRRTS 02-08-281506**

Dear Ms. Krueger:

On behalf of Tecumseh Products Company LLC ("Tecumseh"), this responds to the Wisconsin Department of Natural Resources ("WDNR" or the "Department") April 21, 2023, response to the *Remedial Action Standards Documentation Report - Revision 1* ("Documentation Report") for the Hayton Area Remediation Project ("HARP") prepared by TRC Environmental Corporation ("TRC"). The WDNR response letter provided two options from which Tecumseh may choose to proceed: prepare a Remedial Action Options Report (RAOR) or proceed with the mutually agreed upon long-term monitoring of sediment, surface water, and fish tissue. Tecumseh is informing the Department that it chooses to proceed with the mutually agreed upon long-term monitoring of sediment, surface water, and fish tissue. This letter also responds to some of the comments in the WDNR letter for completeness.

Significant polychlorinated biphenyls (PCB) source removal and remedial actions has been successfully completed from OU1 through OU4 of HARP, no further action (NFA) letters have been received from WDNR concerning these actions, and the site is in the monitored natural recovery stage; therefore, Tecumseh will proceed with long-term monitoring of sediment, surface water, and fish tissue as previously agreed to with the Department in the 2018 Negotiated Agreement.

All remedial actions were completed under WDNR oversight in accordance with Department-approved work plans and met applicable Remedial Action Levels (RALs) agreed to by the Department. Each OU was methodically remediated in consideration of the investigation results, full removal of soft sediment in most of the OUs and reaches, impacts to wetland, net environmental benefit, post-remediation sediment monitoring results and surface weighted average concentration (SWAC) evaluation (in accordance with the Three Tier Closure Process, Negotiated Agreement, Ex. D). More than 140,000 tons of sediment and soil was removed and disposed. The majority of soft sediment was completely excavated and confirmed with post-excavation samples (RAL of 1 mg/kg was attained) and/or visual documentation of removal to native material.

The Department's response notes that residual PCBs exceeding 1 mg/kg exists "in approximately 280 of the 687 sediment samples" collected. However, sediment samples exceeding 1 mg/kg include: 1) those used to calculate the applicable SWAC and to establish a declining trend pursuant to the Three-Tier Closure Process (Negotiated Agreement, Ex. D); 2) historical characterization samples collected at isolated locations that, with Department approval, were not excavated due to consideration of impacts to wetlands and the native habitat; and, 3) samples that were collected from the overbank that are now classified as sediment given intervening changes to State law and the subsequently interpreted OHWM. The response discusses a relatively limited number (approximately 15%) of

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individual discrete sediment sampling points which, of course, have limited relevance given the application of SWAC and the Three-Tier Closure Process.

Regarding residual soil analytical results, only two samples out of a population of more than 2,750 samples not excavated (high concentration of 9.1 mg/kg) were identified above the OHWM that exceeded 5 mg/kg. As with certain of the sediment samples noted above, these isolated locations were approved by WDNR/USEPA to remain in place based on logistics, geomorphology, distance from the creek and restoration considerations.

As noted in prior submittals, only low-level residual PCB concentrations are evident throughout OU1 – OU4. Additionally, OU1 – OU4 do not serve as an on-going source and no “hot spots” or areas of uncharacteristically high PCB concentrations were identified which would justify further investigation or removal. Based on the results summarized in the Documentation Report and the significant source removal achieved, Tecumseh is confident continued natural recovery of sediment will occur on the entire creek system and mill pond over time. As such, Tecumseh will proceed with mutually agreed upon long-term monitoring of sediment, surface water, and fish tissue to assess the effectiveness of the remedial actions and to evaluate natural recovery of the creek system in the long-term.

If you have any questions, please contact me at (312) 909-0043 or via e-mail at charvey@trccompanies.com.

Sincerely,

TRC Environmental Corporation



Chris Harvey, P.E.
Vice President – Complex Projects

cc: Audra Felix/WDNR – Madison, WI
S. Jason Smith/Tecumseh Products Co. LLC – Paris, TN
Curtis Toll/Greenberg Traurig LLP – Philadelphia, PA
Marc Faecher/TRC – New Providence, NJ