

CORRESPONDENCE/MEMORANDUM

Date: October 12, 1990

File Ref: 3500

To: Gloria McCutcheon

From: Frank Trcka



Subject: Sheboygan Superfund Project Update

As you know Tecumseh Products Company recently signed a consent order with EPA to conduct an emergency removal action on the Sheboygan River. This action will address contaminated sediments originally targeted by the pilot study of the Alternative Specific Remedial Investigation (ASRI) for removal and placement in a Confined Treatment Facility (CTF). PCB contamination of the five areas to be removed ranges from 838 to 1100 ppm and the volume is approximately 3,000 cubic yards. These areas were not removed during implementation of the pilot study due to an underestimation of sediment volumes which resulted in insufficient CTF capacity. The sediment targeted for removal by the emergency action is deemed necessary by EPA to eliminate the potential human health hazard posed by dermal contact with sediments containing PCB's in concentrations exceeding 868 ppm as identified in the endangerment assessment conducted by Tecumseh's consultant (Blasland and Bouck).

The draft workplan for the emergency removal was received in this office last week. The consultant is proposing to temporarily store the dredged sediments in capsules constructed on the Tecumseh parking lot in Sheboygan Falls. This location is very near the existing CTF (see attached diagram). The storage capsules would be constructed 6 feet below existing grade and would have a double liner and leak detection system. The sediments would be stored in this manner to await future management consistent with the Record of Decision (ROD) for the Sheboygan River and Harbor Superfund Project.

As you may be aware all five of these sediment areas to be removed during the emergency action are located within Kohler property. EPA is now very close to an agreement with Kohler for access to these sites having taken over the access negotiations from Tecumseh. Three access areas would be constructed as indicated on the attached access plan. The proposed schedule calls for construction on the access sites this fall and winter with dredging to begin in late spring once weather conditions permit.

The Department is in the process of reviewing the proposal and will comment to EPA before the proposal is finalized. I will coordinate a District response to the Central Office for incorporation into the overall Department response.



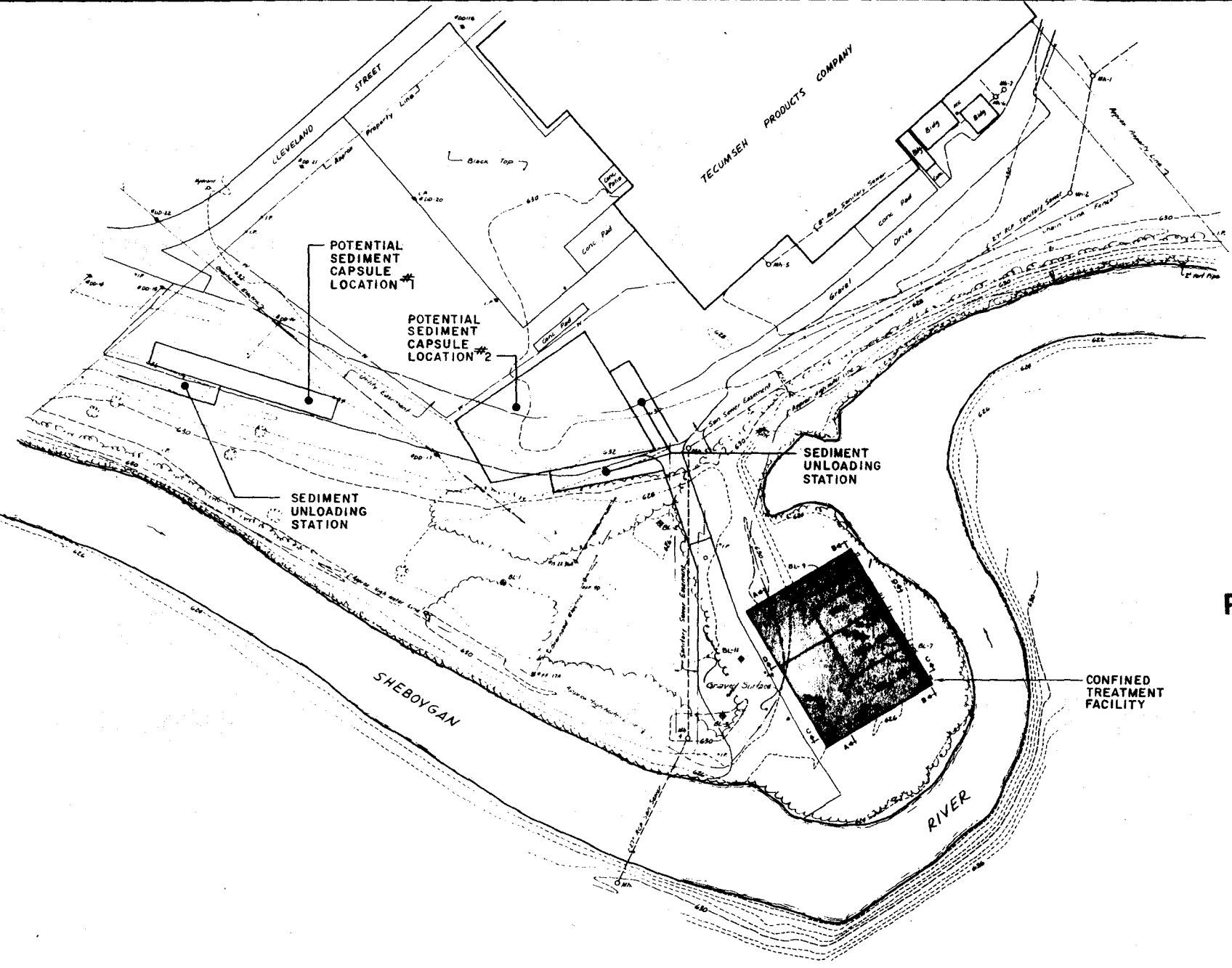
Some concerns which will arise include the following:

1. Location of the capsules with respect to the 100 year floodplain.
2. Location of the capsules with respect to the groundwater table which would be only 4 to 6 feet below the base of the capsule if they are excavated 6 feet below grade as proposed.
3. Potential requirement of groundwater monitoring wells to ensure that any leakage which escapes the capsule is detected.

If you have any questions on the emergency removal action or wish to discuss the action in more detail, see me.

FJT:jmw

c: Robin Schmidt - SW/3
Ron Kazmierczak - SED
Don Tills - SED
Frank Schultz - SED
Jim Schmidt - SED
Neal O'Reilly/Tom Aartila - SED
Linda Talbot - WR/2
John Nelson/Dale Katsma - Plymouth



LEGEND
 (Symbol) Existing Outbar Elevation
 (Symbol) Boring Location

PRELIMINARY

SEP 28 1990

- NOTES:**
1. Approx. High Water Line Based On Donahue Property Survey 1989
 2. Elevations To MSLD of 1989
 3. BL-5 is Location of Surface Soil Sample Only.

No.	Date	Revisions	WJL
1	11/15/89	Additional Borings, Revised Boring Site Information	

IN EXCEPT TO SUBDIVISION ACTING LAW

In charge of *JWS/TJR*
 Designed by *JWS/TJR*
 Drawn by *JWS*
 Checked by *JWS*

BLASLAND & BUCK ENGINEERS, P.C.
 Syracuse, New York
 White Plains, New York

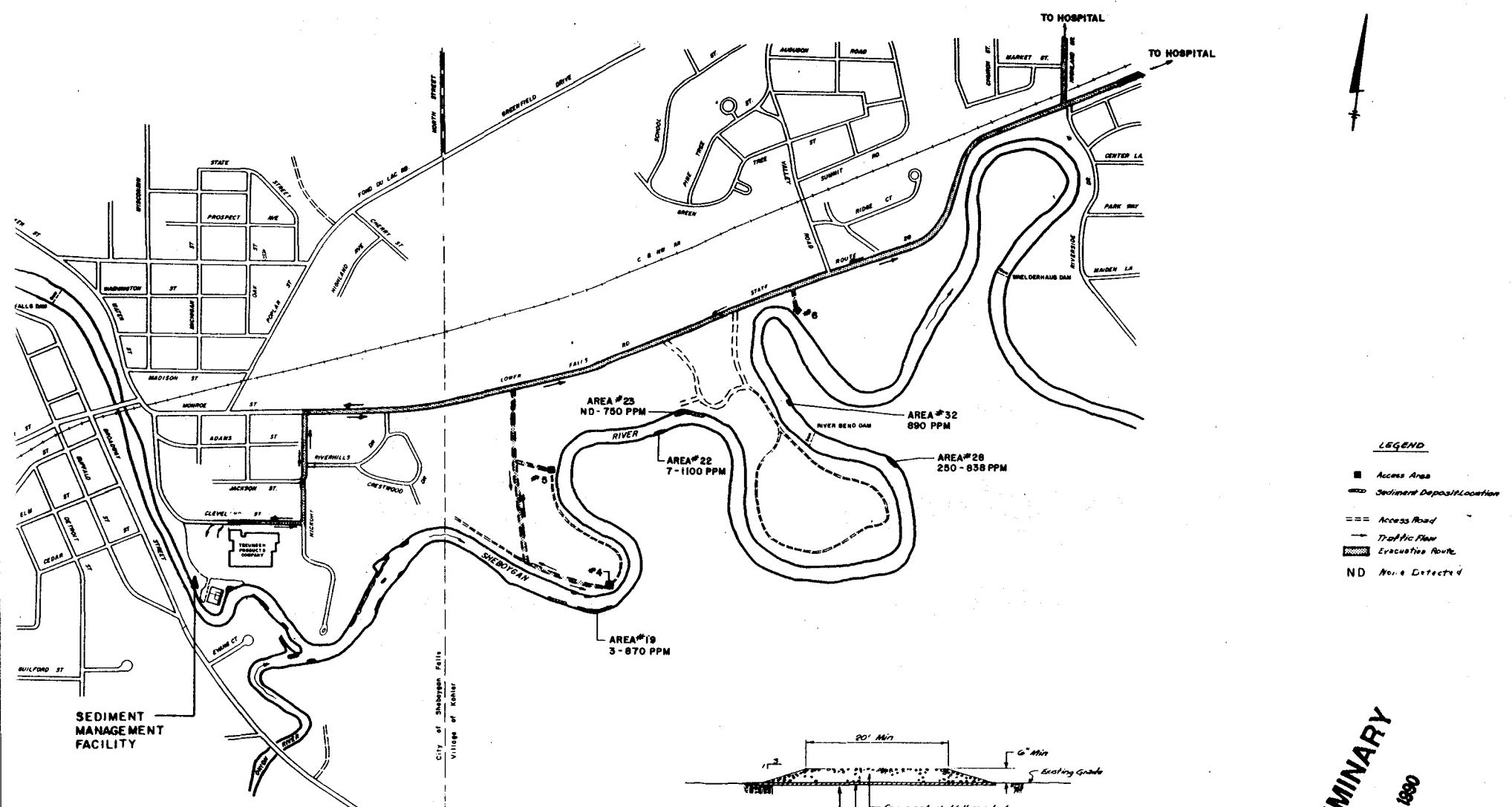
SHEBOYGAN RIVER AND HARBOR
REMOVAL ACTION
SEDIMENT CAPSULE LOCATION PLAN

CONTRACT NO 3

Plot Number
176-18-07

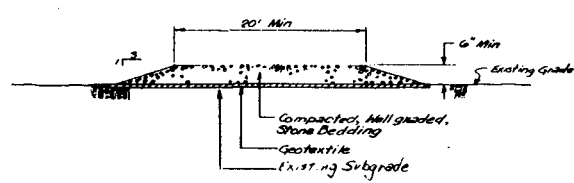
Date
SEPT. 1990

3-1



LEGEND

- Access Area
- Sediment Deposit Location
- == Access Road
- Traffic Flow
- Evacuation Route
- ND None Detected



PROPOSED ACCESS ROAD DETAIL
N.T.S.

PRELIMINARY
SEP 28 1990

NO.	DATE	REVISIONS	BY
1		Change of	TWD
2		Design of	
3		Drawn by	
4		Checked by	

BLASLAND & BOUCK ENGINEERS, P.C.
SYRACUSE, NEW YORK
WHITE PLAINS, NEW YORK

SHEBOYGAN RIVER AND HARBOR
REMOVAL ACTION
ACCESS ROAD DETAIL AND
TRANSPORTATION / EVACUATION ROUTES

File Number	178.12.03
Date	SEPT. 1990
Sheet	2-1