



BLASLAND & BOUCK ENGINEERS, P.C.

ENGINEERS & GEOSCIENTISTS

6723 Towpath Road, Box 66, Syracuse, New York 13214-0066 (315) 446-9120
FAX: (315) 449-0017

June 19, 1992

Ms. Bonnie L. Eleder
On-Scene Coordinator
USEPA Region V
77 West Jackson Boulevard
Chicago, IL 60604

Re: Sheboygan River and Harbor
Removal Action Construction
Documentation Report

File: 884.02 #2

Dear Ms. Eleder:

This letter serves as an addendum to the above-referenced document, and discusses the restoration of Access Areas 4 and 5.

As you know, three Access Areas numbered 4, 5, and 6, were constructed to facilitate the dredging and transportation of sediment from Sheboygan River under the Removal Action. Following removal activities in November 1991, gravel was removed from Access Area 6 and the underlying soil was sampled and analyzed for PCBs. However, inclement weather resulting in significant frost penetration precluded gravel removal and subsequent soil sampling at Access Areas 4 and 5. These activities were then deferred to Spring 1992.

In May 1992, gravel was removed from Access Areas 4 and 5 (per our agreement with the landowner) and the areas were sampled on May 7. Sample locations within both access areas are presented on Figures 2-5 and 2-6 of the Removal Action Construction Documentation Report. The sample locations (re-established by surveying) were the exact ones from where pre-construction samples were taken. The data collected during sampling of Access Areas 4 and 5 are presented in the attached Tables A1 and A2, respectively.

The pre- and post-construction PCB concentrations in the soil at Access Areas 4 and 5 (Table A3) were compared to determine whether the soil had been affected by removal activities. The agreed upon acceptability criterium for post-construction PCB concentrations at the access areas was established as 1.42 times the pre-construction PCB concentration for a given area. Although three composite samples, AC4PST-1, AC5PST-1, and AC5PST-2, did not meet the pre-established acceptability criteria, they were accepted by the US Environmental Protection Agency (EPA) without further action. Consequently, fences were

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reinstalled at the access areas, rough grading was completed, and the areas were returned to the conditions agreed upon with the landowner.

The following tables and supplemental information are attached for inclusion with the already submitted report:

Table A1 Access Area 4 Post-Construction Sampling Information;
Table A2 Access Area 5 Post-Construction Sampling Information;
Table A3 Pre- and Post-Construction Sampling Results;

This submission constitutes the final activity of the Removal Action which hereby completes Tecumseh Product Company's obligations under the Administrative Consent Order. Post-construction sampling results for Access Areas 4 and 5 were also presented to EPA in the final project Progress Report dated May 8, 1992.

Finally, this letter also serves as my affidavit that the information contained in the Removal Action Construction Documentation Report is true, accurate and complete to the best of my knowledge and belief.

Very truly yours,

BLASLAND & BOUCK ENGINEERS, P.C.

Dawn S. Foster /lak

Dawn S. Foster, P.E.
Associate

KJ/nlg

cc: Mark A. Thimke, Esq., Foley & Lardner
Robin R. Schmidt, Wisconsin Department of Natural Resources
Tom Wentland, Wisconsin Department of Natural Resources
Scott Anderson, P.E., Black & Veatch Waste Science Technology
Joseph A. Detor, P.E., Blasland & Bouck Engineers, P.C.

TABLE A1

SHEBOYGAN RIVER AND HARBOR
REMOVAL ACTION CONSTRUCTION DOCUMENTATION REPORT

ACCESS AREA 4 POST-CONSTRUCTION SAMPLING

Sample ID	Date	Time	Location	Sample Depth (in)	Description	Composite* PCB Results (ppm)
Composite I - Existing access road between the pastures. The following 10 samples were composited* and reported as AC4PST1.						0.59
AC4PST1-1	5/7/92	14:00	Gravel road 53' ± South County Trunk PP	0-3	Light brown sand and gravel, trace silt.	
AC4PST1-2	5/7/92	14:15	Gravel road 222' ± South County Trunk PP	0-3	Light brown sand and gravel, trace wood chips, trace silt.	
AC4PST1-3	5/7/92	14:30	East side gravel road, 3' West of fence 393' ± South County Trunk PP	0-3	Dark brown peat, wood chips, silt with sand, and some gravel.	
AC4PST1-4	5/7/92	14:45	Gravel road 563' ± South County Trunk PP	0-3	Light brown sand with gravel, trace silt.	
AC4PST1-5	5/7/92	15:00	West side gravel road at SE corner transformer pad 703' ± South County Trunk PP	0-3	Brown silt with sand, roots.	
AC4PST1-6	5/7/92	15:15	West side gravel road, 30' south transformer, 733' South County Trunk PP	0-3	Brown silt with sand, and trace of gravel.	
AC4PST1-7	5/7/92	15:30	East side gravel road, 905' ± South County Trunk PP 35' ± Southwest Corner of barn	0-3	Brown sand and silt with gravel.	

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ACCESS AREA 4 POST-CONSTRUCTION SAMPLING

Sample ID	Date	Time	Location	Sample Depth (in)	Description	Composite* PCB Results (ppm)
Composite 1 - AC4PST1 Continued.						
AC4PST1-8	5/7/92	15:45	Gravel road 1075' \pm South County Trunk PP, 43' \pm Southwest Corner of barn	0-3	Light brown sand and gravel, trace silt.	
AC4PST1-9	5/7/92	16:00	West side gravel road, 1245' \pm South County Trunk PP. 170' North intersection gravel road and constructed access road.	0-3	Brown silt with sand.	
AC4PST1-10	5/7/92	16:15	43' \pm South Northwest corner of fence. 50' \pm west southeast corner of fence.	0-3	Dark brown silt with sand.	
Composite 2 - Constructed Road Leading From Existing Road to Access Area 4. The following 10 samples were composited* and reported as AC4PST2.						7.4
AC4PST2-1	5/7/92	11:30	Access road 73' \pm east intersection existing road. 13' \pm South Wood fence.	0-3	Brown silt with sand.	
AC4PST2-2	5/7/92	11:35	Access road 150' \pm east intersection existing road. 18' \pm South Wood fence.	0-3	Brown silt with trace sand.	
AC4PST2-3	5/7/92	11:40	Access road 225' \pm east intersection existing road 18' \pm South Wood fence.	0-3	Brown silt with sand.	

TABLE A1 (Cont'd)

SHEBOYGAN RIVER AND HARBOR
REMOVAL ACTION CONSTRUCTION DOCUMENTATION REPORT

ACCESS AREA 4 POST-CONSTRUCTION SAMPLING

Sample ID	Date	Time	Location	Sample Depth (in)	Description	Composite* PCB Results (ppm)
Composite 2 - AC4PST2 Continued.						
AC4PST2-4	5/7/92	11:45	Access road 300' \pm east intersection Existing road. 21' \pm South Wood fence.	0-3	Brown silt with sand.	
AC4PST2-5	5/7/92	11:50	Access road 375' \pm east intersection Existing road 20' \pm South Wood fence.	0-3	Brown silt with trace sand.	
AC4PST2-6	5/7/92	11:55	Access road 450' \pm east intersection Existing road 18' \pm South Wood fence.	0-3	Brown silt with sand.	
AC4PST2-7	5/7/92	12:00	Access road 525' \pm east intersection Existing road 20' \pm South Wood fence.	0-3	Brown silt with sand.	
AC4PST2-8	5/7/92	12:05	Access road 600' \pm east intersection existing road 21' \pm South Wood fence line.	0-3	Brown silt with sand.	
AC4PST2-9	5/7/92	12:10	73' \pm West, South gate post Access Area Four. 26' \pm South Wood fence line.	0-3	Brown silt with sand.	
AC4PST2-10	5/7/92	12:15	7' \pm Southwest corner north gate post. 15' \pm North of south gate post Access Area 4.	0-3	Brown silt with sand.	

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ACCESS AREA 4 POST-CONSTRUCTION SAMPLING

Sample ID	Date	Time	Location	Sample Depth (in)	Description	Composite* PCB Results (ppm)
Composite 3 - Access Area Site. The following 10 samples were composited* and reported as AC4PST3.						48(49)[46]
AC4PST3-1	5/7/92	12:20	14' ± NE corner trailer, 47' south chainlink fence.	0-3	Brown silt with fine sand.	
AC4PST3-2	5/7/92	12:25	78' ± West, Northeast corner Chainlink fence. 76' ± East Northwest corner chainlink fence.	0-3	Brown silt with fine sand.	
AC4PST3-3	5/7/92	12:30	38' ± West, Northeast corner chainlink fence 126' ± East, South gate post	0-3	Brown silt with fine sand.	
AC4PST3-4	5/7/92	12:35	52' ± Southeast of Northeast corner trailer. 52' ± Northeast of southeast corner of trailer.	0-3	Brown silt with fine sand.	
AC4PST3-5	5/7/92	12:40	45' ± Northeast of southwest corner chainlink fence. 13' ± South of southeast corner trailer.	0-3	Brown silt with fine sand.	
AC4PST3-6	5/7/92	12:45	17' ± Northeast of southwest corner chainlink fence. 46' ± south of southeast corner trailer.	0-3	Brown silt with fine sand.	

TABLE A1 (Cont'd)

SHEBOYGAN RIVER AND HARBOR
REMOVAL ACTION CONSTRUCTION DOCUMENTATION REPORT

ACCESS AREA 4 POST-CONSTRUCTION SAMPLING

Sample ID	Date	Time	Location	Sample Depth (in)	Description	Composite* PCB Results (ppm)
Composite 3 - AC4PST3 Continued.						
AC4PST3-7	5/7/92	12:50	36' \pm Northeast Sheboygan River 39' \pm North of Southwest corner chainlink fence.	0-3	Brown silt with fine sand.	
AC4PST3-8	5/7/92	12:55	15' \pm North of Sheboygan River. 42' \pm East of Southwest corner chainlink fence.	0-3	Brown silt with fine sand.	
AC4PST3-9	5/7/92	13:00	40' \pm North Sheboygan River 80' \pm Northeast, southwest corner chainlink fence.	0-3	Brown silt with fine sand.	
AC4PST3-10	5/7/92	13:05	13' \pm North Sheboygan River 65' \pm east of southwest corner chainlink fence.	0-3	Brown fine sand with trace of silt.	

Notes:

- * Samples were composited by equal weights at Hazleton Laboratories.
- () Indicates result of duplicate analysis.
- [] Indicates result of triplicate analysis.

TABLE A2

SHEBOYGAN RIVER AND HARBOR
REMOVAL ACTION CONSTRUCTION DOCUMENTATION REPORT

ACCESS AREA 5 POST-CONSTRUCTION SAMPLING

Sample ID	Date	Time	Location	Sample Depth (in)	Description	Composite* PCB Results (ppm)
Composite I - Road Leading From Existing Road to Access Area 5. The following 10 samples were composited* and reported as AC5PST1.						0.16
AC5PST1-1	5/7/92	17:20	5' east of existing road. Center of constructed road.	0-3	Fine brown sandy silt.	
AC5PST1-2	5/7/92	17:25	60' east of existing road. Center of constructed road.	0-3	Fine brown sandy silt.	
AC5PST1-3	5/7/92	17:30	120' east of existing road. Center of constructed road.	0-3	Fine brown sandy silt.	
AC5PST1-4	5/7/92	17:35	180' east of existing road. Center of constructed road.	0-3	Fine brown sandy silt.	
AC5PST1-5	5/7/92	17:40	240' east of existing road. Center of constructed road.	0-3	Fine brown sandy silt.	
AC5PST1-6	5/7/92	17:45	300' east of existing road. Center of constructed road.	0-3	Fine brown sandy silt.	
AC5PST1-7	5/7/92	17:50	320'± east of existing road. 25' south of existing north fence.	0-3	Fine brown sandy silt.	
AC5PST1-8	5/7/92	17:55	40'± south of existing north fence. 280'± east of existing road.	0-3	Fine brown sandy silt.	

See Notes on Page 3 of 3

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ACCESS AREA 5 POST-CONSTRUCTION SAMPLING

Sample ID	Date	Time	Location	Sample Depth (in)	Description	Composite* PCB Results (ppm)
Composite 1 - AC5PST1 Continued.						
AC5PST1-9	5/7/92	18:00	312'± east of existing road.	0-3	Fine brown sandy silt.	
AC5PST1-10	5/7/92	18:05	105'± south of existing north fence. 280'± east of existing road.	0-3	Fine brown sandy silt.	
Composite 2 - Access Area Site. The following 10 samples were composited* and reported as AC5PST2.						1.0
AC5PST2-1	5/7/92	16:30	Northwest corner of Decon Trailer on dirt road.	0-3	Fine brown sandy silt.	
AC5PST2-2	5/7/92	16:35	West side of trailer.	0-3	Fine brown sandy silt.	
AC5PST2-3	5/7/92	16:40	5'± south of NE corner of tank location on dirt road.	0-3	Fine brown sandy silt.	
AC5PST2-4	5/7/92	16:45	45'± south of SW of trailer. Edge of dirt road.	0-3	Fine brown sandy silt.	
AC5PST2-5	5/7/92	16:50	57'± south of NE corner of tank. N edge of dirt road.	0-3	Fine brown sandy silt.	

See Notes on Page 3 of 3

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ACCESS AREA 5 POST-CONSTRUCTION SAMPLING

Sample ID	Date	Time	Location	Sample Depth (in)	Description	Composite* PCB Results (ppm)
Composite 2 - AC5PST2 Continued.						
AC5PST2-6	5/7/92	16:55	15'± north of crane pad south edge. 60'± west of river bank. Edge of dirt road.	0-3	Fine brown sandy silt.	
AC5PST2-7	5/7/92	17:00	22'± NE of SW corner of crane pad.	0-3	Fine brown sandy silt.	
AC5PST2-8	5/7/92	17:05	15'± SW of SW corner of decon pad.	0-3	Fine brown sandy silt.	
AC5PST2-9	5/7/92	17:10	25'± SE of SW corner of decon pad.	0-3	Fine brown sandy silt.	
AC5PST2-10	5/7/92	17:15	25'± SE of NW corner of crane pad.	0-3	Fine brown sandy silt.	

Notes:

* Samples were composited by equal weights at Hazleton Laboratories.

TABLE A3

SHEBOYGAN RIVER AND HARBOR
REMOVAL ACTION CONSTRUCTION DOCUMENTATION REPORT
PRE- AND POST-CONSTRUCTION SAMPLING RESULTS

Access Area 4		
Composite*	Sample Number	PCB Concentration (ppm)
Composite 1		
pre-construction	AC4PR1	0.38
post-construction	AC4PST1	0.59
Composite 2		
pre-construction	AC4PR2	5.9
post-construction	AC4PST2	7.4
Composite 3,		
pre-construction	AC4PR3	45(48)[48]
post-construction	AC4PST3	48(49)[46]
Access Area 5		
Composite 1		
pre-construction	AC5PR1	0.082(0.074)[0.085]
post-construction	AC5PST1	0.16
Composite 2		
pre-construction	AC5PR2	0.580
post-construction	AC5PST2	1.0

Notes:

- * Samples were composited by equal weights at Hazleton Laboratories.
() Indicates result of duplicate analysis.
[] Indicates result of triplicate analysis.