

From: Van Donsel, Terese <VanDonsel.Terese@epa.gov>
Sent: Thursday, April 2, 2020 2:11 PM
To: Wentland, Thomas A - DNR
Subject: FW: Preliminary questions for Tecumseh SAP
Attachments: Preliminary questions for SAP.docx

Tom,

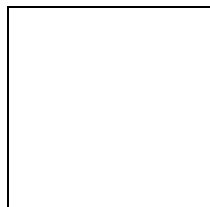
SME is putting together their plan for expanding sampling on the Tecumseh property. He has some questions (see attached). Would you be available to talk these through tomorrow (just you and me), maybe around 1pm. Other than a call from 9-10, my day is very flexible.

Thanks,
Terese

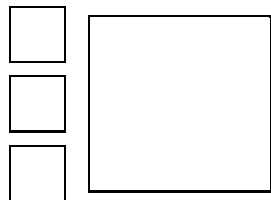
From: Keith Egan <Keith.Egan@sme-usa.com>
Sent: Thursday, April 2, 2020 12:08 PM
To: Van Donsel, Terese <VanDonsel.Terese@epa.gov>
Subject: Preliminary questions for Tecumseh SAP

I don't think we will have the data gap report out this week. CAD is only working 32 hour weeks and many of the admin were furloughed. We have started on the SAP and would like to submit a draft soon but need some feedback on the attached.

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PRELIMINARY QUESTIONS FOR SAP

- Borings coverage
 - We will plan on using VSP to determine locations for the data gap areas. For the western part of the Property, we propose assessing based on the 20 x 20 hotspot found west of building.
 - For the park we propose a grid based on a specific number of samples and some judgmental samples. We would use VSP to determine # of grid samples to collect using variability of existing data. We would use the alpha and beta's we used in the Post Remedial Monitoring Plan for fish sampling. That is, I want to be 95% sure I don't have a false negative but a 35% chance of a false positive if I assume park is contaminated. The false positive will be the chance we remediate if we don't have to. At the moment, if I assume the composite worker risk concentration (SL) is = to the recreator (they usually are very close) and the gray area is 1/8 of the SL, we need 24 samples. While we have 20, I propose we collect 24 more and collect on a grid.
 - For the park, we propose to also have some judgement in the park area of former landfill due to different sampling target depth and potential parameters
- Soil boring depth
 - How deep are you wanting us to evaluate?
 - We propose to target sample depths to the depth of identified PTW soil (4 - 6 feet) for delineation borings on the Site
 - We propose 4 feet for grid samples in the parking lot area of the Site unless field readings at 4 feet indicate going deeper.
 - We propose 4 feet for grid samples in the offsite park area that was not a former landfill unless field readings at 4 feet indicate going deeper.
 - We propose 8 feet for grid samples in the offsite park area that was a former landfill unless field readings or fill materials at 8 feet indicate going deeper.
- Sampling depths/Intervals
 - Sample intervals – Should we assume similar sample intervals to the previous SAP or can we adjust the sample intervals as such?
 - 0 to 0.5 foot interval;
 - 2 foot intervals to 4 feet bgs (0.5-2, 2-4),
 - 2 foot intervals to 8 feet bgs (as applicable)
- Sample analysis
 - PCBs – Analysis for Site and off-site samples (not delineation borings)
 - Can we use tiered approach to sample analysis to intervals below 2 feet bgs based on concentration at 2'. That is analyze all samples up to 2' and then wait on results before analyzing deeper.
OR
 - Do we need to plan on analysis of all intervals?
 - PAH analysis
 - Can we analyze a subset of the sampling locations (say 50%) based on field screening since PAHs were limited on the Site and since there was a historical fire on the Site (non-release source of PAHs)?
 - VOCs analysis
 - Can we analyze sample for VOCs based on field screening (PID) only? (on the Site / offsite park area / offsite park area of former landfill)
OR
 - Do we need to assume a minimum number of required samples for VOC analysis if we don't have any detection? We previously had PID reading above 5 ppm but did not have any detected VOCs in those samples or any analyzed samples.
- Soil evaluation criteria
 - During the previous assessments the WDNR Risk-based Screening level of 8.66 ppm was used for evaluating the soil PCB results. In your March 25, 2020 letter, you indicated

that the 100 ppm Principal Threat Wastes (PTW) was appropriate for evaluating the remedial actions at the Site. Should we be evaluating the data and potentially re-mobilizing for step-out borings based on the PTW criteria or the WDNR criteria?