



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

S-6J

**Via Electronic Mail Only**

April 7, 2021

Mr. Keith Egan  
Chief Consultant  
SME  
One N. Commerce Park Dr.  
Suite 318  
Cincinnati, OH 45215-3187  
keith.egan@sme-usa.com

RE: SME Serial Letter #68  
Resolution of Outstanding Issues  
Sheboygan River and Harbor Superfund Site

Dear Mr. Egan:

On March 10, 2021, SME provided a letter to the U.S. Environmental Protection Agency (EPA) summarizing discussion points and follow-up requests concerning next steps in the Engineering Evaluation/Cost Analysis (EE/CA) at the former Tecumseh Products Company property in Sheboygan Falls, Wisconsin. EPA has provided responses below.

Item 1: The written Approval Memorandum for the EE/CA has not been issued but verbal approval has been provided. This approval allows the PRP to move forward under the EE/CA process rather than the RI/FS process.

EPA Response: The EPA-approved EE/CA Approval Memorandum is attached.

Item 2: SME wanted to confirm the next step in the EE/CA process is to submit the revised SAP and QAPPs and once approved, perform the work and document our findings in a report. It was confirmed that this is the next step.

EPA Response: EPA anticipates a revised SAP that incorporates comments submitted to SME on January 11, 2021. A response to comments letter should accompany the revised SAP if PRPs and SME disagree with any of EPA's recommendations. The revised QAPP should reflect anticipated activities and sample analyses identified in the SAP. EPA has granted PRPs and SME an extension for revised SAP and QAPP due date (currently May 5, 2021).

Item 3: The previous investigation of the Tecumseh site was based on a SAP where cleanup levels were proposed and accepted. These levels were used in our 2017 Phase II report and the Remedial Action Plan (RAP) we were requested to submit by the agency. The last RPM, Ms. Terese Van Donsel, rejected the use of any cleanup levels although they were needed for Visual Sample Plan (VSP). She had previously directed us to use VSP to prepare the new SAP.

The USEPA document, *Guidance on Conducting Non-Time Critical Removal Actions under CERCLA* states that the agency can develop cleanup levels. I requested that the agency develop, at a minimum, PCB cleanup levels to be used in the SAP to help determine if additional sampling is needed following receipt of the first sample results.

Can the USEPA provide cleanup levels for PCBs and PAHs for the site (commercial/industrial) and the park (recreational) prior to preparing the SAP?

EPA Response: EPA reviewed the cleanup goals identified for the Tecumseh site as presented in the Remedial Action Plan, Revision 1 dated November 8, 2018. The cleanup goals identified are acceptable. In addition, a PCB cleanup goal of 25 mg/kg is acceptable for recreational areas.

Item 4: During the EE/CA, the USEPA can review and eliminate remedial approaches for review in the EE/CA. The previous ROD and design documents eliminated some Alternative Remedial Scenarios.

Can the PRP and SME be provided an abbreviated list of Remedial Alternatives based on agency review and our initial efforts at the site?

We discussed if the lengthy and slow design process is needed. The type of process used on the Upper and Lower River required a Remedial Action Work Plan (RAP), 50% Design, 100% Design, and the Remedial Design Plan. I would prefer to use the EE/CA incorporating the previously requested RAP to review the Remedial Alternatives we will have already narrowed down substituting the EE/CA for the Remedial Action Work Plan. If the selected remedial alternative is to remove the Principal Threat Waste soil and cap the rest as Ms. Von Donsel stated, and since the currently approved Upper River Design documents address soil removal, could we move immediately to the 100% Design? In summary, could the design process be the following:

- EE/CA,
- 100% Design, and
- Remedial Design Plan.

EPA Response: The process followed for the Upper and Lower River remediation is not required, as that remediation was performed under the remedial process. This NTCRA will be performed under the removal process. The EE/CA should contain only those data necessary to support the selection of a response alternative, and rely upon existing documentation whenever possible. However, the components of the EE/CA must comply with EPA's "Guidance on Conducting non-Time-Critical Removal Actions Under CERCLA" dated August 1993.

EPA recommends that a focused list of remedial alternatives be developed once the Removal Site Evaluation (RSE) has been completed and all data obtained evaluated. If previous remedial alternatives presented for the site are applicable, they may be used for evaluation. It is anticipated that minimal design documents will be required under the removal process. EPA is willing to streamline the design process, depending on the proposed remedial alternative.

Item 5: We discussed whether a new Administrative Order of Consent is needed. You stated the agency would like to use the existing Consent Decree for the Upper River.

EPA Response: Correct. It is preferred that work to be performed to address contamination at the Tecumseh Products Facility and adjacent Rochester Park (if necessary) be performed under the “Additional Work” provision in the existing Consent Decree.

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If you have any questions, please contact me at 312-886-3543 or [franc.david@epa.gov](mailto:franc.david@epa.gov).

Sincerely,

*David Franc*

David Franc, P.G.  
Remedial Project Manager

cc: Richard Nagle (EPA, via e-mail only)  
Thomas Wentland (WDNR, via e-mail only)

