

From: Franc, David <Franc.David@epa.gov>
Sent: Friday, April 22, 2022 2:00 PM
To: Keith Egan
Cc: Saliaries, Gwen N - DNR; Nagle, Richard; Maihofer, Sara/MKE
Subject: Tecumseh Step-Outs
Attachments: NTCRA_Stepouts_EPA_comments_04122022.pdf

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Hi Keith,

See attached comments on proposed step-outs for the Tecumseh EE/CA investigation. We may be able to talk through most of them.

Dave

David Franc, PG
Remedial Project Manager/Geologist
Remedial Response Branch 1 | Remedial Response Section 6
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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 22, 2022

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

RE: Proposed Step-Out Soil Boring Locations
Sheboygan River and Harbor Superfund Site
Tecumseh Products Company Site, Sheboygan Falls, WI

Dear Mr. Egan:

The U.S. Environmental Protection Agency (EPA) has reviewed the proposed step-out boring locations provided to support the Non-Time-Critical Removal Action (NTCRA), Sheboygan River and Harbor Superfund Site, Tecumseh Site, Sheboygan Falls, Wisconsin. General and specific comments and observations are provided.

Please contact me by phone at 312-886-3543 or email at franc.david@epa.gov if you should have any questions.

Sincerely,

DAVID FRANC
Digitally signed by DAVID
FRANC
Date: 2022.04.22 08:50:22
-05'00'

David Franc, P.G.
Remedial Project Manager

cc: Gwen Saliars, Wisconsin Department of Natural Resources
Rick Nagle, EPA
Sara Maihofer, Jacobs

**TECHNICAL REVIEW OF THE
PROPOSED NTCRA STEP-OUT BORING LOCATIONS, SHEBOYGAN RIVER AND
HARBOR SUPERFUND SITE, SHEBOYGAN FALLS, WISCONSIN**

The following comments were generated based on a review of the Proposed NTCRA Step-Out Soil Boring Locations, Sheboygan River and Harbor Superfund Site, Tecumseh Site, Sheboygan Falls, Wisconsin.

GENERAL COMMENTS

1. ROW sample locations that exceeded the 8.66 milligram per kilogram (mg/kg) industrial-commercial cleanup objective do not include proposed step-out locations. Adjacent Rochester Park exceedances are currently being addressed by the City of Sheboygan Falls under Wisconsin Department of Natural Resources (WDNR) oversight, and the recreational cleanup criteria being applied is much lower than previously anticipated (0.5 mg/kg). Therefore, it is recommended that ROW step-outs be completed and evaluated against the Site industrial-commercial cleanup criteria so that decisions regarding future ROW redevelopment can be evaluated.
2. It would be helpful to include previous sampling results being used to demonstrate delineation on the figures provided. Suggest revising figures so that proposed step-out locations and rationale are clear.
3. Per the sampling rationale stated in the Sampling and Analysis Plan (SAP), sample collection was targeted to depths where groundwater is encountered. This was expected to be in the range of 8 feet below ground surface (bgs). It is not clear if groundwater was encountered within 8 feet of the ground surface at the above locations where vertical delineation was not achieved. Additional sampling is recommended for locations where groundwater was not encountered.

SPECIFIC COMMENTS

1. Western Parking Lot

- a. Please complete proposed step-out locations identified around PL2

2. Dewatering Pad

- a. Vertical delineation of total polychlorinated biphenyls (PCB) exceedance was not achieved at six locations: DP-1, DP-5, DP-12, DP-13, DP-14, and DP-34. Four of the six locations exceed principal threat waste (PTW) criteria in the deepest sample interval.

3. Eastern Portion

- a. Many of the locations exceed industrial-commercial and PTW criteria. However, step-outs are not proposed in accordance with the SAP. For example, SBP22 has no proposed step-outs. SBP23, SBP24, and SBP25 have proposed step-outs inconsistent with the SAP (should have 15-ft step-outs in each cardinal direct not-

delineated yet). Please include step-outs for all sampling locations in accordance with SAP or provide rationale for their exclusion.

- b. Vertical delineation of total PCB exceedance was not achieved at six locations: SBP6-1E, SBP6-1S, SBP-16, SBP-17, SBP-18, and BP3-1S. Two of the six locations exceed PTW criteria in the deepest sample interval.

4. ROW

- a. Please complete step-outs to address exceedances detected at ROW2 and ROW3.
- b. Delineation of PTW may be required between DP1 and ROW2 (unclear if previous sampling in this area is sufficient).
- c. Many of the locations exceed industrial-commercial and PTW criteria. However, step-outs are not proposed in accordance with the SAP. For example, the proposed step-outs along the driveway for ROW7, BP3-1N, and BP3-1S have proposed step-outs inconsistent with the SAP (should have 15-ft step-outs in each cardinal direction not-delineated yet). Please include step-outs for all sampling locations in accordance with SAP or provide rationale for their exclusion.

