



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

June 24, 2022

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

RE: 2022 Tecumseh Site – Revised 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 Revised Proposed Step-Out Soil Boring Locations provided to support the Non-Time-Critical Removal Action (NTCRA), Sheboygan River and Harbor Superfund Site, Tecumseh Site, Sheboygan Falls, Wisconsin. Evaluation of SME responses to EPA's general and specific comments are provided. If a general or specific comment is not listed the response provided is adequate and requires no further discussion.

Please note that EPA is in discussions with Wisconsin Department of Natural Resources (WDNR) regarding the final remediation objective (RO) for polychlorinated biphenyls for the NTCRA at the Tecumseh site, and it will not be established until the action memorandum is finalized. However, it is anticipated that the data obtained from the revised proposed step-out soil boring locations will be sufficient for preparation of the Engineering Evaluation/Cost Analysis (EE/CA) and future decision-making.

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

David Franc, P.G.
Remedial Project Manager

cc: Gwen Saliars, Wisconsin Department of Natural Resources
Susan Prout, EPA
Sara Maihofer, Jacobs



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

The following comments were generated based on a review of the Revised Proposed 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.

SME Response: The updated ROW sample locations include step-out soil borings at each of the ROW sample locations on the north side that exceed 8.66 mg/kg. Step-out sample locations in the roadway will be determined in the field according to safe boring locations between existing utilities (gas main, sanitary sewer and water line). If safe locations are not feasible at the planned distance of 15 feet to the north of the ROW sample cluster, the sample locations may be adjusted to the north side of the existing utilities. Step-out soil borings are planned on the east side of Hickory Street to evaluate soil conditions on the boundary of Rochester Park.

EPA Evaluation of Response: Please clarify whether proposed ROW step-out locations are 5-point composites or if they indicate one aliquot. In addition, SBP23 should have 15 feet and 30 feet step-outs as concentrations exceed the principal threat waste (PTW) criteria of 100 mg/kg. Provide rationale for not proposing 15 and 30 ft step outs to the north, west and east for PTW delineation.

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.

SME Response: The included revised figure includes previous sample locations from 2016 and 2021. Due to the large amount of analytical data and borings on the Site and limited space between borings on the figures, we have included an analytical table with total polychlorinated (PCB) results for each boring location and sample interval. We also included shading for areas with soil with PCBs above 8.66 ppm (surface soil and deeper soil) on Figures 1 and 2 of the Site. Pairing the figures and the data tables provides the boring delineation status. We apologize for this inconvenience.

EPA Evaluation of Response: Several locations in Figures 2 and 3 are shown with a green circle around the boring legend (for example – DP4, DP6, SBP13 in Figure 2). For clarity, please add legend description to indicate what the green circle means.

SPECIFIC COMMENTS

2. Dewatering Pad

- a. Vertical delineation of total 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 PTW criteria in the deepest sample interval.

SME Response: Sample collection was completed to the encountered depth of groundwater at locations DP12 and DP13; therefore, additional sampling at depth at these locations was not targeted. Sample collection was completed to the extent of expected groundwater (8 feet bgs) at soil borings DP1, DP5, DP14 and DP34; however, groundwater was not encountered to 8 feet bgs. We will complete supplemental borings at DP1, DP5, DP14 and DP34 to collect soil samples from 8 feet bgs to the depth of the encountered groundwater.

EPA Evaluation of Response: Per EPA Specific Comment 2(a) and SME response, supplemental borings are proposed at DP1, DP5, DP14 and DP34 to complete vertical delineation of PCB exceedance to encountered groundwater depth. Please show locations to be resampled in Figure 2 and Table 1.

4. ROW

- b. Delineation of PTW may be required between DP1 and ROW2 (unclear if previous sampling in this area is sufficient).

SME Response: Previous borings located north of DP1 identified PCBs at concentrations up to 1,000 ppm. This area of the Site is planned to be excavated to 4 feet bgs. We will complete two additional borings in this area to further evaluate contamination limits.

EPA Evaluation of Response: Per SME response to EPA Specific Comment 4(b) on insufficient characterization between borings DP1 and ROW2, SME plans to collect two additional borings. Please add these borings to Figure 2 and Table 1.