

From: Kelly, Joseph <kelly.joseph@epa.gov>
Sent: Monday, May 8, 2023 12:46 PM
To: Keith Egan
Cc: Prout, Susan; Van Donsel, Terese; Tanaka, Joan (she/her/hers); Fischer, Timothy; Saliars, Gwen N - DNR; Dietrich, Christopher A - DNR
Subject: Sheboygan Harbor and River Superfund site
Attachments: 2023-05-08 Sheboygan delineation letter.pdf

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Mr. Egan,

Attached, please find EPA's request to move forward with additional delineation on the former Tecumseh Products site in Sheboygan Falls, Wisconsin. As we discussed, delineation to lower levels is needed in order to develop an accurate cost estimate for EPA's consideration. Please note that EPA will need to see the alternatives before you move forward to put together the EE/CA. In addition, please let us know if you require additional time to prepare the work plan beyond the proposed date of July 7, 2023.

We discussed that I will out of the office for two weeks, and if anything comes up over the time period before May 22 that requires immediate attention, please reach out to Terese Van Donsel, and copy me and David Franc. Otherwise, feel free to reach out to me and I will respond when I return.

Regards,

Joseph C. Kelly, P.G.
Remedial Project Manager
US EPA Region 5
77 W. Jackson Blvd. (SR-6J)
Chicago, Illinois 60604
ph: (312) 353-2111



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

REPLY TO THE ATTENTION OF:

SR-6J

Via Electronic Mail Only

May 8, 2023

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

RE: Sheboygan River and Harbor Superfund Site – Notice to proceed with delineation

Dear Mr. Egan:

EPA has been in discussion with WDNR on several issues related to the overall direction of the Sheboygan Harbor and River Superfund site in Sheboygan Falls, Wisconsin. Among the topics is whether the State's NR 720 Soil Cleanup Standards is an Applicable or Relevant and Appropriate Requirement (ARAR) for purposes of the Non-Time-Critical Removal Actions (NTCRA) and the Engineering Evaluation/Cost Analysis (EE/CA). The State maintains NR 720 is an ARAR and EPA is taking the State's position into consideration.

The EE/CA will evaluate removal cleanup alternatives relative to their effectiveness, implementability, and cost.¹ In order to support the selection of an appropriate and cost-effective remedy, EPA believes it is appropriate to consider removal alternatives that address exposure at the 1×10^{-4} , 1×10^{-5} , and 1×10^{-6} risk levels. As a result, your upcoming sampling work must delineate contamination at the 1×10^{-4} , 1×10^{-5} , and 1×10^{-6} endpoints in order to collect the necessary information to develop a complete array of alternatives. Additional work should complement the scope of work proposed in the May 26, 2022, *2022 Tecumseh Site – Revised Proposed Step-Out* correspondence and EPA's June 4, 2022, response. Before preparation of a final EE/CA, EPA requests an interim deliverable which presents an associated array of removal cleanup alternatives at these risk endpoints.

The May 12, 2000, Record of Decision (ROD) for the Sheboygan River and Harbor Site described needed work on the Tecumseh property including the investigation and potential

¹ See OSWER Directive PB93-963402 9360.0-32 "Guidance on Conducting Non-Time-Critical Removal Actions Under CERCLA", dated August 1993.

mitigation of groundwater contamination and continuing sources at the former Tecumseh Plant in Sheboygan Falls, and that "...with respect to PCB-contaminated groundwater or other potential sources near Tecumseh's Sheboygan Falls plant, the remediation objective is to investigate and stop all additional PCB sources to the river system." The concentrations of Aroclors in groundwater in certain monitoring wells at the former Tecumseh Plant are 1% of solubility. The groundwater and saturated soils concentrations will need to be properly delineated in order to evaluate cleanup options to achieve the remedial action objective to stop PCB sources to the river system.

Observations from EPA's site visit in late 2022 suggest that certain components of the former plant, and/or treatment system will likely require proper decontamination or decommissioning. Heavy oil staining was observed and many sewers remain in-place adjacent to areas where significant contamination was detected in surrounding soils, which could serve as continuing preferential pathways to the river system.

Please provide to EPA no later than July 7, 2023 draft field sampling plans which address the data needs outlined above. The data will allow for an adequate array of cleanup alternatives to be developed and evaluated.

If you have any questions, please contact me at 312-353-2111 or kelly.joseph@epa.gov.

Sincerely,

Digitally signed
by JOSEPH KELLY
Date: 2023.05.08
12:41:51 -05'00'

Joseph C. Kelly, PG

Remedial Project Manager

Supertund & Emergency Management Division

cc:

Susan Prout, EPA

Joan Tanaka, EPA

Timothy Fischer, EPA

Terese Van Donzel, EPA

Gwen Salares, WDNR

Christopher Dietrich, WDNR