



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

January 11, 2021

Mr. Keith Egan  
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Subject: EPA Response to SME Serial Letter #67, FIELDS Team Recommendations  
Sheboygan River and Harbor Superfund Site, dated December 11, 2020

Dear Mr. Egan:

The U.S. Environmental Protection Agency (EPA) has reviewed SME's December 11, 2020 letter regarding the Field Environmental, Decision Support (FIELDS) Team recommendations for sampling at the former Tecumseh Products Company property in Sheboygan Falls, Wisconsin. Responses to each question are provided below.

**SME Comment #1**

As there is no rationale for the sample locations or number of samples, we find it difficult to evaluate the sampling proposed by the Team. SME provided detailed information on how we derived our Sampling and Analysis Plan to justify the sampling approach. An explanation as to how the locations, depth, and approach were determined would be very helpful.

**EPA Response**

The EPA FIELDS Team recommendations were based on utilization of SME proposed sampling numbers but in different locations to provide more useful data over the proposed sampling areas. See responses below for specific rationale per sampling area.

**SME Comment #2**

There is no information concerning sample depth in the park. Are you requesting just surficial sampling in the park? We note this is also true with the other areas but the way the presentation is worded, it could be construed to include samples at depth.

**EPA Response**

EPA is requesting surficial and subsurface sampling in the park. EPA recommends one composite surface soil sample be collected from 0-0.5 feet (ft) below ground surface (bgs) at each proposed

location (approximate – sample locations may be moved to avoid existing roadways, sidewalks, etc.) to evaluate surface soil risk to park users. Composite soil sampling reduces the number of samples required for analysis while increasing confidence in sample results.

In terms of subsurface sampling, if contamination is found to be present, the full depth of the impact will need to be investigated. This is where Pollution Risk Services (PRS) has discretion in terms of the approach that it would like to take. For the upcoming work, EPA is requiring that, at a minimum, composite samples be collected from the 0.5 to 2-ft bgs interval. If sampling is limited to the 2-ft depth, then costs are reduced; however, there is a risk that EPA may require PRS to remobilize for additional sampling. Therefore, PRS may want to consider collecting discrete samples from deeper intervals and holding those samples for analysis until the 0.5 to 2-ft interval results are available. EPA is looking to PRS to propose an approach that best fits its tradeoffs.

### **SME Comment #3**

There is also no information regarding sample depth in the roadway ROW locations. Are you requesting composite surficial sampling, compositing soil through the full boring depth or composite sampling of different intervals?

### **EPA Response**

See above. In addition, EPA notes that SME should consider existing utilities as potential preferential pathways for contamination. Therefore, minimum discrete sample depths in the ROW should extend to these depths, as necessary.

### **SME Comment #4**

The recommendations do not include biased sampling beneath the foundation slab in areas of former drain lines. The comments in your letter of July 27, 2020, directed us to sample in those areas. The FIELDS Team stated that their recommendation included *A fairly dense number of discrete samples will be required to adequately determine if there are high concentrations under the slab.* The FIELDS Team then presents their approach for a high number of discrete samples. They do not believe additional sampling is needed that what they propose. Is this a correct understanding?

### **EPA Response**

EPA recommends a combined biased/gridded approach beneath the foundation slab. The biased sample locations should be based on known drain lines, with the data used to represent the highest concentrations present beneath the slab. The gridded sample locations are proposed to provide the range of concentrations across the area. Note that the number of samples collected at depth is at the discretion of SME.

### **SME Comment #5**

We initially planned to sample the parking lot via a grid system. As we have no direct evidence such as aerial photographs that show this area has ever been used for manufacturing, storage, or waste disposal, our approach is reasonable. The FIELDS Team appears to take our parking lot idea but then carve out an area in the northwest section of the lot with higher density sampling. There is no rationale for the grid density and for varying it across the parking lot area.

### EPA Response

EPA recommends a higher density of soil samples be collected in the northwest section of the parking lot area because, based on aerial photographs, it appears that this area may not have always been a parking lot. Therefore, historical burning or dumping in that area may have occurred. Note that the number of samples collected at depth is at the discretion of SME based on the tradeoffs discussed in the response to comment #2.

In addition, EPA recommends that approximately 30 percent of the soil samples analyzed from potential burn areas also be analyzed for dioxin/furans. Please see attached figure for proposed dioxin/furan analysis locations.

Please do not hesitate to contact me at 312-886-3543 or email me at [franc.david@epa.gov](mailto:franc.david@epa.gov) if you should have any questions.

Sincerely,

*David Franc*

David Franc, P.G.  
Remedial Project Manager

Attachment

cc: Richard Nagle, EPA  
Aaron Lammers, SME  
Peter Johnson, JWI  
Jason Smith, Tecumseh  
Debbie McMillan, PRS  
Thomas Wentland, WDNR