

From: Saliaries, Gwen N - DNR
Sent: Monday, July 31, 2023 12:18 PM
To: Kelly, Joseph
Subject: RE: Sheboygan

Joe,

See the comment from DNR below:

SME's submittal states that "WDNR was requiring the east-adjointing Rochester Park to be remediated to a "recreation" cleanup goal of 0.5 ppm of PCBs." To date, there is not an approved cleanup level for Rochester Park. WDNR previously provided comments to EPA in response to a Technical Memo prepared by OCH JV, Sheboygan Harbor & River Superfund Site, Former Tecumseh Plant, Preliminary Remediation Goal for Polychlorinated Biphenyls in Recreational Soil, dated March 29, 2022. WDNR proposed modifications to the exposure parameters used in the PRG derivation in the memo, which resulted in a PRG of 0.5 mg/kg for PCBs, and we made a recommendation to EPA that we would consider this a protective PRG for the park. Both the Tech Memo and our comments to EPA are available on BOTW (dated 3/29/2022 and 4/19/2022 respectively). SME/Verdantes can review the information in the memo and in our comments and use them as guidelines while developing site-specific exposure factors and soil cleanup standards for the Tecumseh property based on recreational use. We recommend that you proceed with a site-specific recommendation based on the exposure pathways and receptors as you have outlined in your recent submittal.

Joe – one question for you. I noticed in the letter it mentioned that SME, Chubb, and EPA met in June to discuss the delineation. I don't recall seeing the name Chubb before. Would be able to explain who that group is?

Thank you,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Gwen Saliaries

Phone: (920) 510-4343

gwen.saliaries@wisconsin.gov



From: Kelly, Joseph <kelly.joseph@epa.gov>
Sent: Monday, July 31, 2023 8:05 AM
To: Saliaries, Gwen N - DNR <gwen.saliaries@wisconsin.gov>
Subject: RE: Sheboygan

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OK, thanks Gwen.

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

From: Saliars, Gwen N - DNR <gwen.saliars@wisconsin.gov>
Sent: Friday, July 28, 2023 9:19 AM
To: Kelly, Joseph <kelly.joseph@epa.gov>
Subject: RE: Sheboygan

Joe,

Just wanted to let you know I did not forget about this, I am checking with some other program people that providing the RSL calculator is the right direction. I will send you my comments soon. Thanks,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Gwen Saliars

Phone: (920) 510-4343
gwen.saliars@wisconsin.gov



From: Kelly, Joseph <kelly.joseph@epa.gov>
Sent: Tuesday, July 18, 2023 11:05 AM
To: Saliars, Gwen N - DNR <gwen.saliars@wisconsin.gov>
Subject: RE: Sheboygan

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Gwen,

OK, thanks. Here is the letter/email.

They contracted someone to prepare the risk calculations (I think they mention Verdantas in the letter). I think they were interested in knowing which defaults and exposure assumptions were already used, in order to piggy-back on something that was already considered acceptable, instead of assuming what those assumptions would be, and submitting for approval only to get comments. Keith mentioned he wasn't sure what values were used to calculate the lower numbers, though I assume it is maybe just the use of 10^{-6} in the calcs.

See what you think after looking at the letter, and I can either direct them to the RSL calcs or share anything you think might help. I think we have numbers also, but they are all slightly different, depending on how we look at them.

I'm also attaching an email I sent to SME earlier, in response to some items they sent to me, so you can get a sense for some of the concerns I expressed to them already.

Regards,

Joseph C. Kelly, P.G.
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US EPA Region 5
77 W. Jackson Blvd. (SR-6J)
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From: Saliars, Gwen N - DNR <gwen.saliars@wisconsin.gov>
Sent: Tuesday, July 18, 2023 10:16 AM
To: Kelly, Joseph <kelly.joseph@epa.gov>
Subject: RE: Sheboygan

Good morning Joe,

I don't remember receiving a letter from Aaron on the site. Would you be able to share it with me?

The calculations that go into creating the residual contaminant levels (RCL) found in NR 720 can be found on the DNR website. It is based on EPA's regional screening level web-calculator. The link below

will take them to the webpage that has links to the RCL spreadsheet. I believe the spreadsheet will contain all the parameters they are looking to review.

[Contaminated soil and sediment | Wisconsin DNR](#)

Thanks,

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Gwen Saliaries

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From: Kelly, Joseph <kelly.joseph@epa.gov>

Sent: Monday, July 17, 2023 3:33 PM

To: Saliaries, Gwen N - DNR <gwen.saliaries@wisconsin.gov>

Subject: Sheboygan

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Hi Gwen,

I'm not sure if you had a chance to look at that letter from Aaron Lammers yet on Sheboygan, but he asks if they can get a copy of WDNR's risk calculations to use for their own development of risk values for the Tecumseh site. I am not sure if that is something you would be open to providing or not. I was planning on reaching out to them for clarifications on a few things, and wanted to get your thoughts before issuing anything formal. The values may not be totally relevant to the Tecumseh site, but also might facilitate discussions on some of the input parameters. No rush, but please let me know when you get a moment.

Regards,

Joseph C. Kelly, P.G.

Remedial Project Manager

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