



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

FEB 19 2015

REPLY TO THE ATTENTION OF:  
LU-9J

Graham Crockford  
Project Manager  
TRC  
1540 Eisenhower Place  
Ann Arbor, Michigan 48108

Re: EPA's Request for Further Information Concerning Tecumseh Products Company  
(TPC) Annually Adjusted Cost Estimate

Dear Mr. Crockford:

I have reviewed the 2015 annually adjusted engineering estimate, dated January 30, 2015, that you submitted on behalf of TPC, pursuant to paragraph 25.b. of the Administrative Order on Consent (RCRA-05-2010-0012). In order to assess the sufficiency of the cost estimates you have provided to EPA, I need further information and/or clarification concerning projected costs. For your convenience, I have identified below the information required with a reference to the titled section in your letter where the cost estimate appears.

Interim and Final Corrective Measures

- *\$16,000 to install, as appropriate, a limited number of additional sub-slab depressurization/ventilation (SSDV) systems at residential properties north or west of the site in 2015*

Please indicate the number of SSDS systems TPC intends to install for the anticipated cost of \$16,000. EPA believes TPC may need to account for the installation of a minimum of 12 additional SSDS systems for estimating purposes.

- *\$246,000 to expand the existing SVE systems including \$30,000 to design and document SVE system expansion(s) (costs split between 2015 and 2016) and \$216,000 to install additional extraction wells including the associated conveyance piping*

Please provide information regarding the additional areas that will be targeted for SVE well installations. EPA needs to determine the areas where future soil and groundwater remediation is proposed.

- *TRC anticipates implementing in situ groundwater treatment downgradient of the southern source area. However, the precise nature and extent of groundwater treatment*

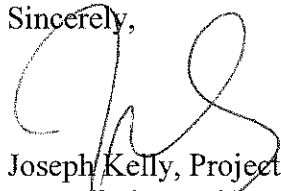
*is uncertain at this time. The estimate for groundwater mitigation includes \$250,000 to supplement the existing permeable reactive barrier, as well as up to \$20,000 per year for 5 years to monitor and maintain the groundwater treatment system.*

Please provide a detailed cost estimate and identify specific activities that will be implemented to stabilize the migration of contaminated groundwater. The costs provided in the estimate appear unchanged from the 2014 estimate that assumed the installation of ART wells to address groundwater contamination; however, the 2014 estimate assumed existing SVE wells would be converted to ART wells for groundwater recovery, and there are no SVE wells currently located within the (southern) groundwater plume.

Separate from the costs identified in your letter, EPA notes that costs may be incurred for the disposal of contaminated building slab and soil during any site redevelopment. Bid specifications for demolition activities by the current owner were limited to above ground activities because the building slabs and underlying soil were not characterized for purposes of removal and/or disposal or reuse at the time of demolition. If impacted building slabs/soil cannot be recycled or reused as clean during redevelopment, it will have to be properly removed, handled, and disposed off-site to allow the reuse of the site. EPA estimates a minimum of three areas of impacted building slabs will require removal, encompassing at least 150,000 sq. ft., based on passive soil gas data and visual observations. The costs for excavation transportation and disposal, and/or other engineering controls, will need to be accounted for in the financial assurance mechanism. Please provide your plans to address contaminated building slab materials as needed for site redevelopment to eliminate potential exposures, and the costs for necessary remediation or engineering controls associated with the building slabs (*see* License Agreement Regarding Environmental Work, paragraph 10).

Thank you for your cooperation and I look forward to receiving your responses.

Sincerely,



Joseph Kelly, Project Manager  
Remediation and Reuse Branch

cc: Jason Smith, Tecumseh Products Company  
Douglas McClure, Conlin, McKenney & Philbrick, PC  
Stacy Metz, TRC Environmental Corporation  
Michael Beedle, LU-9J  
Susan Perdomo, ORC C-14J  
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