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March 2, 2015

Mr. Joseph Kelly
Project Manager
USEPA, Region 5
77 West Jackson Boulevard
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Subject: Response to EPA's Request for Further Information Concerning the 2015 Annually Adjusted Cost Estimate for RCRA 3008(h) Administrative Order on Consent (RCRA-05-2010-0012), Tecumseh Products Company – MID 005-049-440

Dear Mr. Kelly:

Pursuant to Section VIII of the above referenced Administrative Order on Consent (AOC) effective March 29, 2010, TRC, on behalf of Tecumseh Products Company, Inc. (TPC), submitted the 2015 Annually Adjusted Cost Estimate on January 31, 2015. On February 19, 2015 the United States Environmental Protection Agency (EPA) requested additional information concerning project costs. This letter was prepared to address those comments.

Please indicate the number of SSDS systems TPC intends to install for the anticipated to 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.

The cost to evaluate or mitigate each additional residential property is estimated to be between \$1,500 and \$2,000. Current soil gas and groundwater data do not suggest that the final Corrective Measures Proposal would include 12 additional sub-slab depressurization/ventilation (SSDV) systems. As noted and as discussed previously with EPA, the precise number of additional residences that may be targeted for indoor air sampling and/or installation of a SSDV system will be re-evaluated following completion of off-site vertical groundwater profile sampling. The current estimate of \$16,000 is reasonable based on available data and includes some buffer for additional evaluation and/or mitigation based on the results of the off-site vertical groundwater profile sampling. This additional detail has been included in the attached revised Annually Adjusted Cost Estimate.

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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.

As requested by EPA, additional source area investigation is underway. The cost estimate anticipates that some soil treatment will be proposed as a means of source control. The number of extraction wells was estimated using the area over which elevated concentrations of chlorinated volatile organic compounds (CVOCs) in soil are suggested by passive soil gas survey data and/or electron capture detector (ECD) response during the membrane interface probe (MIP) investigation. Based on the currently approved schedule, the final Corrective Measures Proposal will be submitted to USEPA on January 31, 2016. Therefore, as noted in the cost estimate, the system design, including the final location of treatment areas, has not yet been determined.

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.

As requested by EPA, additional on-site and off-site investigation is underway, to further evaluate migration pathways in order to confirm that current human exposures are under control and that migration of contaminated groundwater is stabilized. The cost estimate anticipates that some groundwater treatment will be proposed as a means of source control in the final Corrective Measures Proposal. As is appropriate, various groundwater treatment and mitigation strategies and their associated costs will be evaluated during preparation of the Final Corrective Measures Proposal.

TRC agrees that there are no soil vapor extraction (SVE) wells located within the area of highest concentrations in the southern groundwater plume. This was also true when the 2014 Annually Adjusted Cost Estimate was prepared. In 2014, ART wells were used as an example of a potential groundwater mitigation strategy that could be implemented. The 2014 estimate did not assume that only existing SVE wells would be converted to ART wells. Rather it assumed that any proposed soil and groundwater treatment systems would be designed and installed to work synergistically. This philosophy of using complementary soil and groundwater treatment technologies remains unchanged. As noted in the 2015 cost estimate, the groundwater mitigation system selection and design, including the final location of treatment areas, has not been determined. However, a more specific description of potential activities in this regard is provided in the attached revised Annually Adjusted Cost Estimate, per your request.



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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 Initial Cost Estimate of the "Work to be Performed" under Section VI of the AOC did not include any work in regard to removal of the building slab, nor have any of the Annually Adjusted Cost Estimates. This has not changed in 2015. TPC does not foresee that the Work to be Performed by TPC will include removing the building slab or any associated sub slab soils. Rather, it is still anticipated that the final Corrective Measures Proposal will rely in part on engineering controls requiring the owner to either keep the concrete slab in place or, if owner desires to remove the slab, to replace the slab with a comparable impervious surface. The existing demolition permit (copy attached) provides for the building slab to remain in place, and is therefore consistent with this intended engineering control. We have provided the current owner, and the listing broker Patrick Hoffman of Howard Hanna Realtors, with a First Amendment to Declaration of Restrictive Covenants (copy attached) that ensures compliance with this anticipated engineering control, with instructions that it be signed and recorded. The previously executed License Agreement Regarding Environmental Work requires the owner to execute this Amendment so that it can be recorded with the register of deeds, and further provides that if the owner at any time intends to perform construction or modifications to the Property which may impact the investigation, remediation or response to the contamination, the owner must timely communicate and reasonably cooperate with TPC to determine how to eliminate or mitigate any such potential impacts.

If you have any additional questions about the responses provided above or the project activities documented in the attached revised 2015 Annually Adjusted Cost Estimate or require additional information, please contact me.

Sincerely,

TRC Environmental Corporation



Graham Crockford
Project Manager



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Attachments: Attachment A – Revised 2015 Annually Adjusted Cost Estimate
Attachment B – Demolition Permit
Attachment C – First Amendment to the Declaration of Restrictive Covenants

cc: Chris DeWetter, Tecumseh Products Company
Jason Smith, Tecumseh Products Company
Douglas McClure, Conlin, McKenney & Philbrick, PC

