



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

REPLY TO THE ATTENTION OF:  
LU-9J

April 17, 2014

Jason Smith  
Tecumseh Products Company  
2700 West Wood Street  
Paris, Tennessee 38242

Re: Revised Scope of Work, dated March 27, 2014  
Tecumseh Products Company, 100 East Patterson, Tecumseh, Michigan 49286  
EPA ID#: MID005049440

Dear Mr. Smith:

I have reviewed the Revised Scope of Work, dated March 27, 2014 that TRC prepared in anticipation of a face-to-face meeting between Tecumseh Products Company (TPC) and the U.S. Environmental Protection Agency to discuss the investigative deficiencies identified in EPA's January 31, 2014 correspondence. I am encouraged that TPC is proposing to perform some additional source area characterization; however, I remain concerned about TPC's tentative commitment to install a permanent monitoring network within the containment plume. The ultimate goal of the work in the SOW should be to establish permanent monitoring points within the contaminant plume in order to determine the position of the plume mass. The collection of superfluous data will not be beneficial if TPC insists on conducting monitoring only at the perimeter of the plume. Permanent monitoring wells within the plume are also necessary to demonstrate to EPA's satisfaction that human exposures are under control. The information you have provided to EPA already indicates that the plume is expanding, contrary to TPC's earlier stability demonstration. As a result, there can be no reasonable expectation that human exposures are under control. Finally, the revised SOW fails to adequately address the vapor intrusion investigation EPA requires at the Martin's Home Center and the residential properties north of the site to ensure the effectiveness of the short-term protection measures implemented and confirm that human exposures are under control within the area of impacts, once it has been identified. Until this information is collected, TPC cannot conclude that human exposures are under control.

EPA firmly maintains that TPC has not fully demonstrated that the limited additional investigation proposed under the revised SOW will result in an adequate identification of the nature and extent of releases of hazardous waste and hazardous constituents at or from the facility, and resulting exposures, as EPA described in its January 31, 2014 letter. Unless TPC addresses the data deficiencies described, TPC cannot successfully demonstrate that current human exposures are under control and that migration of contaminated groundwater is also under

Revised Scope of Work, dated March 27, 2014  
Tecumseh Products Company

control, as required under paragraphs 13.a. and 13.b. of the Administrative Order on Consent (RCRA-05-2010-0012), dated March 30, 2010.


At this point, we believe that it would be productive for the parties to participate in a one-day meeting to discuss the information that EPA requires to be submitted in a work plan to comply with the AOC, rather than continue exchanging written position statements. We expect to discuss with TPC the continuing need to define the extent of contamination before evaluating risk, the need to implement a remedy for the expanding groundwater plume, and the need to collect additional, long-term quarterly monitoring data to demonstrate that interim measures are operating effectively. Specifically, we plan to discuss:

- 1) The expansion of the groundwater plume in the southeast, and the lack of data to demonstrate that human exposures are under control;
- 2) The potential for exposure to contamination at the Martin's Home Center and the requirements for monitoring to demonstrate that human exposures are under control;
- 3) The expansion of the groundwater plume in the northeast, and the lack of data to demonstrate that human exposures are under control;
- 4) The potential for exposure to contamination in the northeast and the requirements for monitoring to demonstrate that human exposures are under control;
- 5) The lack of data to develop a cleanup plan for the expanding plume and confirm that exposure to contamination is being prevented;
- 6) The lack of data to develop an accurate model or cost estimate for cleanup.

At the meeting, we expect to establish sampling locations that EPA requires from TPC so that TPC can prepare a workplan as required by EPA in the January 31, 2014 letter. EPA is available to meet with TPC on May 20, 2014. Please have Doug McClure contact Susan Perdomo with TPC's availability for this meeting.

We look forward to discussing this matter with you in the near future.

Sincerely,



Joseph Kelly, Project Manager  
Remediation and Reuse Branch

cc: Graham Crockford, TRC Environmental Corporation (TPC Project Manager)  
Douglas McClure, Conlin, McKenney & Philbrick, PC  
Tecumseh District Library – Public Repository