



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

December 5, 2011

Mr. Jason Smith
Corporate Environmental Director
Tecumseh Products Company
2700 West Wood Street
Paris, Tennessee 38242

Re: Environmental Indicator Report for
Human Health Under Control

Dear Mr. Smith:

Tecumseh Products Company (TPC) provided to U.S. Environmental Protection Agency an Environmental Indicators Report (EI) dated September 29, 2011 indicating that **all** current human exposure to contamination from the Former TPC Site located at 100 East Patterson Street, Tecumseh, Michigan (TPC site) is under control.¹ However, I believe this report is incomplete because at the time of submittal TPC had not completed sampling at potential sites of exposure and therefore was unable to demonstrate that all exposures from the site had been identified. Specifically, crawl space samples were collected from 502 and 610 Mohawk Lane properties and 505 and 507 South Maumee properties between October 11 and 12, 2011 to determine whether or not a pathway for exposure existed and required mitigation. Additionally, a Sub-Slab Depressurization System was installed at 704 Mohawk Lane, and a sub-slab sample collected between October 11-12, 2011 to mitigate a potential exposure and assess the efficacy of the system, respectively. The results of the sub-slab sample revealed exceedances above soil gas screening criteria triggering a requirement for a follow up indoor air sample that was collected between November 14-15, 2011; results are not yet reported.

In addition, on at least two occasions I have shared with representatives of TPC my concern about the lack of data that exists for residences north of the TPC site and the potential for vapor intrusion at these homes. Specifically residences bounded by Patterson on the south, Pottawatamie on the north, South Evans on the west and South Maumee on

¹ Paragraph 13 of the Administrative Order on Consent (AOC), dated March 30, 2010, requires TPC to demonstrate that human health exposures are under control within 18 months of the effective date of the AOC, i.e. September 30, 2011. In an effort to satisfy this requirement, Tecumseh submitted an internal checklist developed for EPA personnel for logging information on EPA's RCRIS national database to report compliance with AOCs.

the east have very little soil gas data to support a conclusion that a pathway of exposure to VOCs from TPC does not exist. Four of the sample locations TPC selected in this region have never produced any data due to the sample ports being flooded with water. My position has consistently been for TPC to either drill new sample ports, or provide some other documentation that a pathway cannot exist. TPC indicated they had evidence of a clay layer providing an effective barrier to vapor intrusion in that region. However, the updated cross sections TPC provided for the entire site in their September 29 submittal fail to support TPC's conclusion that vapor intrusion is not a matter of concern for homeowners north of the TPC site.

Furthermore, TPC contends that although MW-31 has levels of VOCs above drinking water criteria, and groundwater downgradient of MW-31 may be discharging to the River Raisin at concentrations above risk-based levels for drinking water, those concentrations are expected to be diluted by the river. I disagree that estimates for dilution are an acceptable method for ruling out human exposures at this pathway. As I have previously shared with Graham Crockford of TRC, a spring discharges to the River Raisin at the abandoned Blood Road Bridge, which is immediately downgradient of MW-31. It is common-knowledge that some residents use this spring as a direct source of drinking water during their recreational activities, for example hunters fill up their water bottles from the spring. Therefore, TPC needs to re-evaluate its proposed remedy for VOC contamination observed at MW-31.

Given that the EI report Tecumseh submitted to U.S. EPA had not yet determined and evaluated the extent of contamination at 505 and 507 South Maumee, and 502, 610 and 704 South Mohawk Lane; as well as the homes north of the TPC site, and at the spring discharging to the River Raisin, U.S. EPA requests that Tecumseh amend the September 29th EI report no later than December 31, 2011 to demonstrate that **all** current human exposures to contamination at or from the facility are under control, as required under Paragraph 13 of the AOC.

Please contact me at (312) 353-2470 if you have concerns about this request.

Sincerely,

A handwritten signature in cursive script that reads "Michelle Mullin". The signature is written in dark ink on a white background.

Michelle Mullin,
Project Manager