



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

December 28, 2011

REPLY TO THE ATTENTION OF:

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

LU-9J

RE: Environmental Indicator Report for Human Health Under Control

Dear Mr. Smith:

Tecumseh Products Company (TPC) provided to U.S. Environmental Protection Agency (EPA) 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) are under control. This submittal was an effort to satisfy Paragraph 13 of the Administrative Order on Consent (AOC), dated March 30, 2010, which 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. On December 5, 2011 EPA responded to TPC's submittal, requiring additional supporting material be submitted by December 31, 2011. TPC submitted a response on December 19, 2011. In the interim, EPA re-evaluated its position, recognizing that residential sub-slab and crawl space soil gas monitoring will continue until October, 2012. Therefore, we are now providing an extension for achieving the Human Health EI until December 12, 2012.

On August 25, 2011 EPA and TPC discussed requirements for continued monitoring of the sub-slab air space at 610 and 704 Mohawk Road. If Constituents of Concern (COCs) in the sub-slab samples are ever above EPA approved health risk-based criteria, an indoor air sample will be collected within 30 days. During this same call EPA required ongoing crawl space sample collection at the 502 Mohawk Road, 505 and 507 South Maumee Street properties. At the direction of EPA, TPC incorporated 30-day, 180-day and 360-day air monitoring events into its revised Workplans for the 610 and 704 Mohawk Road properties, dated September 9, 2011. The requirements for crawl space samples collected on the same time-line were incorporated into the access agreements for the 502 Mohawk Road, 505 and 507 South Maumee Street properties, signed by the residents on September 23, 2011.

Given the ongoing EPA requirement for crawl space, sub-slab monitoring, and potentially indoor air monitoring, to ensure that human health is protected, EPA is

granting an extension to the deadline for demonstrating that exposures to Human Health are under control.

Mitigation system installation, initial sub-slab and crawl space sampling were all finalized October 12, 2011. To comply with the EPA requirement for sub-slab and crawl space sampling 360 days after the initial event, TPC will need to take sub-slab and crawl space samples around October 12, 2012. If COCs in the sub-slab samples are detected above health risk-based criteria, an indoor air sample will be collected within 30 days. Therefore, to allow for the possibility of indoor air sampling, receipt of lab data and data validation, a reasonable timeline for the EI is Dec 12, 2012.

If you have any questions, please contact Michelle Mullin of my staff at [mullin.michelle@epa.gov](mailto:mullin.michelle@epa.gov) or (312) 353-2470.

Sincerely,



Jose Cisneros,  
Chief  
Remediation and Reuse Branch

Cc: Graham Crockford, TRC  
Doug McClure, Conlin, McKenney & Philbrick, PC  
Susan Perdomo, ORC