



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

October 30, 2013

Robert J. Karwowski  
Director, Environmental Health and Safety  
Whirlpool Corporation  
2000 North M-63  
Benton Harbor, MI 49022

**RE: Site Assessment Report, Former Whirlpool Park Site, Green Springs,  
Sandusky County, Ohio**

Dear Mr. Karwowski:

EPA reviewed the *Draft Site Assessment Report* (Report) submitted by your contractor (AECOM), on October 4, 2013. EPA has no comments on the report and acknowledges that the site assessment activities were conducted in accordance with the approved *Final Draft VAP Phase II Work Plan* (Work Plan), dated April 17, 2013. EPA's Superfund Technical Assessment and Response Team (START) contractor conducted oversight of the site assessment activities to ensure that the sampling procedures were conducted in accordance with the Work Plan. EPA acknowledges the deviations from the Work Plan listed in Section 3.2 of the Report and does not feel that the deviations had any adverse effect on the outcome of the overall site assessment.

START collected split samples with AECOM to allow for greater full-scan analysis coverage across the Former Whirlpool Park Site and to verify the accuracy of their laboratory analytical data. A comparison of the analytical results indicates that the EPA split sample results are within an order of magnitude of the associated AECOM sample results.

The Site Assessment conducted at the Whirlpool Park property met EPA's requirements. Polychlorinated biphenyls (PCBs) were the only contaminants of concern found to be above regulatory standards.

Waste materials contaminated with PCBs as the result of a spill, an intentional or accidental release or uncontrolled discharges of PCBs, or other unauthorized disposal of PCBs are called TSCA PCB remediation wastes (see 40 CFR §761.3). PCB remediation waste is regulated for cleanup and disposal in accordance with 40 CFR §761.61 (see also 40 CFR 761.50(b)(3)). Section 761 .61 provides several options for cleaning up and disposing of PCB remediation wastes: 40 CFR §761 .61(a) establishes requirements for self-implementing cleanups and disposal; 40 CFR §761 .61(b) establishes requirements for performance-based disposal; and 40 CFR §761 .61(c) establishes a procedure for

applying for a risk-based cleanup or disposal approval where an individual wishes to conduct PCB cleanup or disposal in a manner other than prescribed in either 40 CFR §761.61(a) or (b). EPA will issue a written decision on each risk-based application and will approve an application only when a finding can be made that the method will not pose an unreasonable risk of injury to health or the environment. No person may conduct risk-based cleanup and/or related activities prior to obtaining written approval from EPA.

40 CFR §761.61(a) requires notification in writing to the EPA Regional Administrator at least 30 days prior to the date that the cleanup of a site is anticipated to begin. 761.61(c) requires individuals to submit to the EPA Regional Administrator an application which provides a risk-based demonstration that other procedures or cleanup standards will result in a commensurate level of protection for human health and the environment. A person may also choose to remove all contaminated soil from the site and dispose of it accordance with any of the performance-based options in §761.61(b) without notification to EPA; however, residual soils remaining on site must be below 1 ppm (see January 2009 PCB Q&A Manual page 83 Q5).

Cleanup applications under 40 CFR 761.61(a) or (c) should be sent to:

EPA Regional Administrator  
c/o Peter Ramanuskas  
Regional PCB Coordinator  
Remediation & Reuse Branch  
Land & Chemicals Division  
77 W. Jackson Boulevard (LU-9J)  
Chicago, IL 60604

If you have any questions, please contact me.

Sincerely,



Stephen Wolfe  
On-Scene Coordinator  
U.S. EPA, Region 5