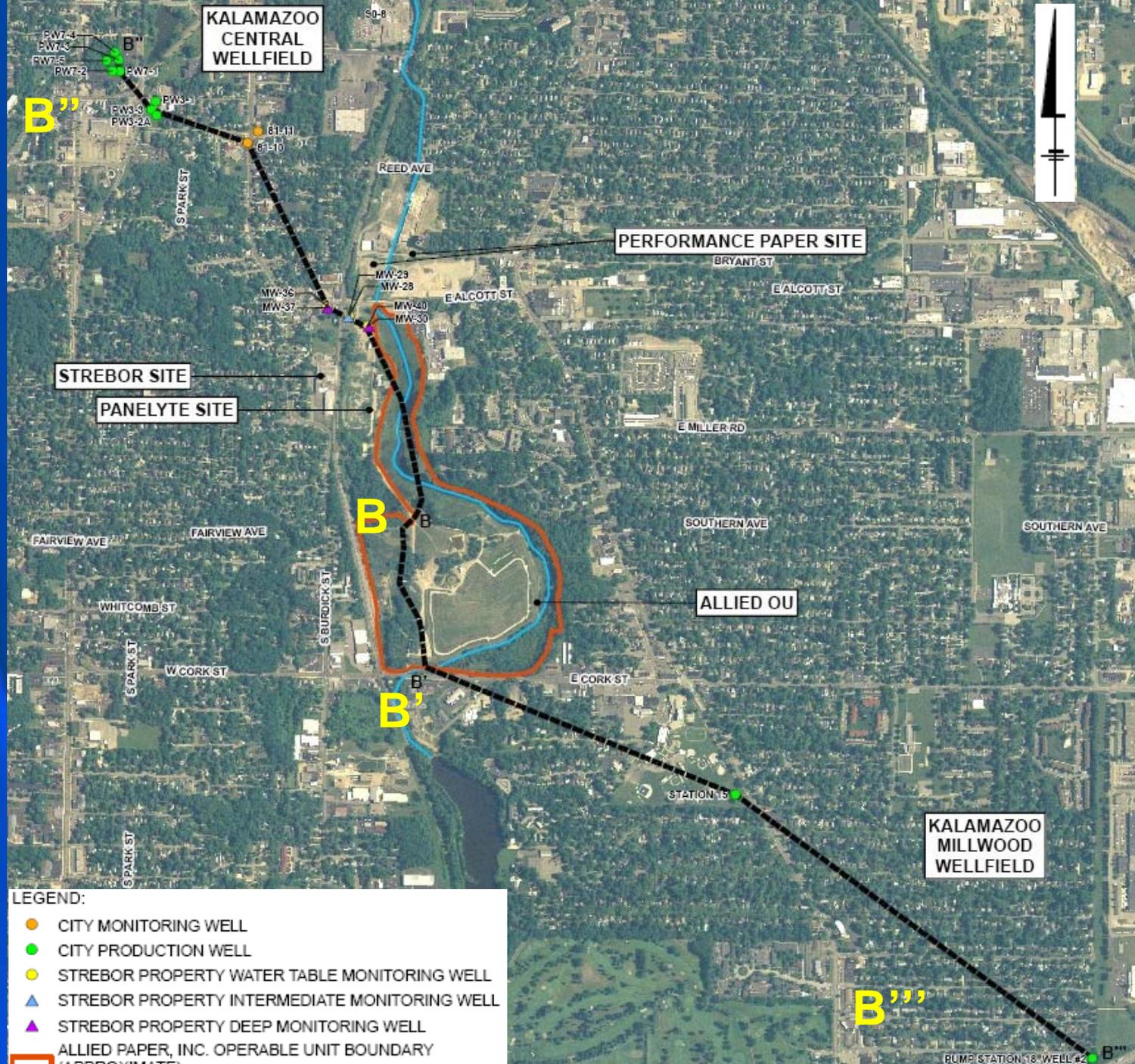


Allied Paper Landfill (OU1) Summer 2009 Update





- LEGEND:**
- CITY MONITORING WELL
 - CITY PRODUCTION WELL
 - STREBOR PROPERTY WATER TABLE MONITORING WELL
 - ▲ STREBOR PROPERTY INTERMEDIATE MONITORING WELL
 - ▲ STREBOR PROPERTY DEEP MONITORING WELL
 - ALLIED PAPER, INC. OPERABLE UNIT BOUNDARY (APPROXIMATE)

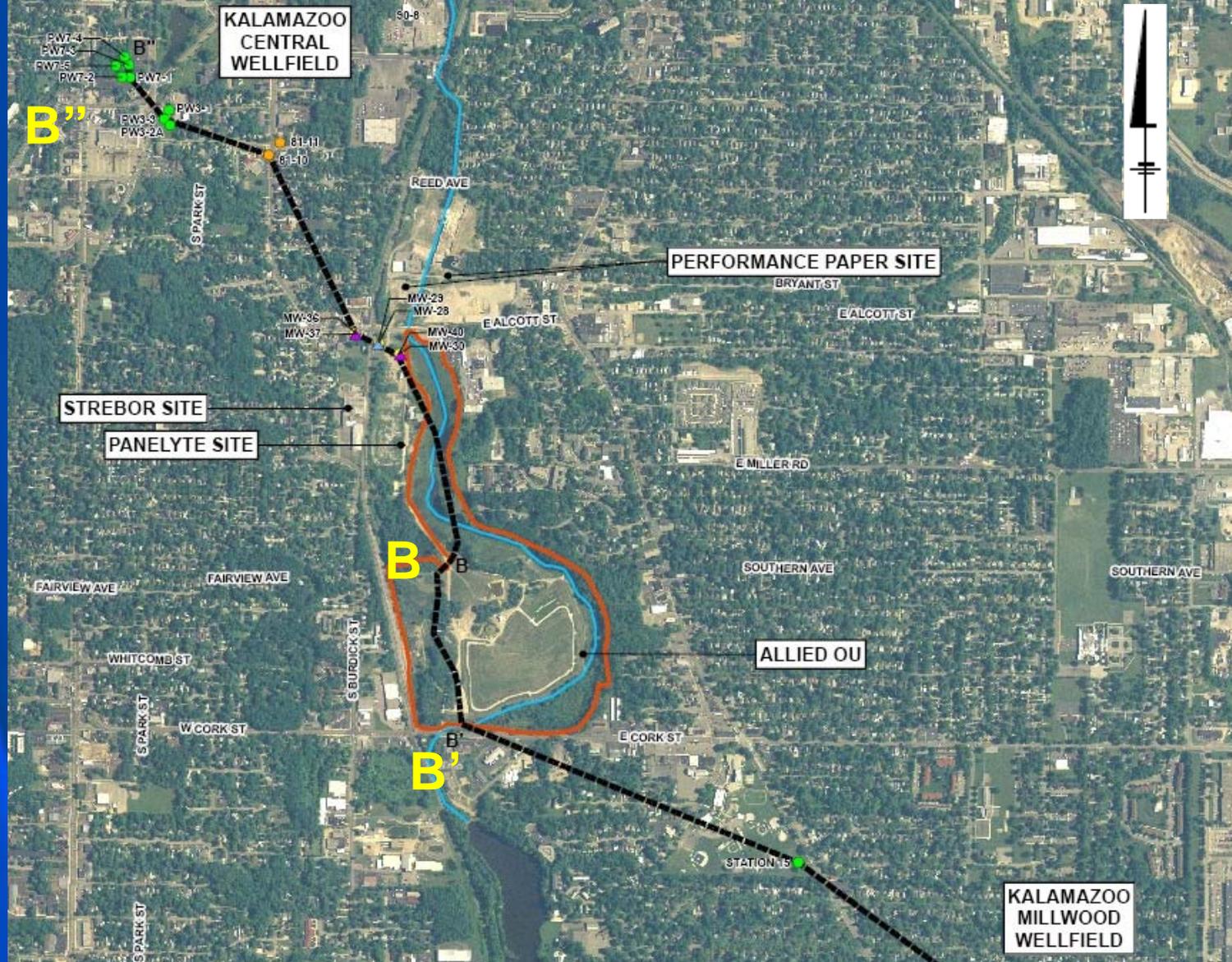
RUMP STATION 18 WELL #2 B''''

Allied Landfill Update Topics

- Groundwater Investigation Preliminary Results
- Millennium: Screening of Remedial Technology
- EPA: Methods for Evaluation of Alternatives
 - 9 Criteria

Groundwater Investigation

- City Concerns
 - Are PCBs from Allied Landfill Reaching City Public Wells?
- City Well Field Data - No PCBs
- Millennium Further Investigated Groundwater



- LEGEND:**
- CITY MONITORING WELL
 - CITY PRODUCTION WELL
 - STREBOR PROPERTY WATER TABLE MONITORING WELL
 - ▲ STREBOR PROPERTY INTERMEDIATE MONITORING WELL
 - ▲ STREBOR PROPERTY DEEP MONITORING WELL
 - ALLIED PAPER, INC. OPERABLE UNIT BOUNDARY (APPROXIMATE)

RUMP STATION 18 WELL #2 B'''

Pre-Feasibility Study

- Identification of Preliminary Remediation Goals
 - EPA Technical Memorandum
- Screen Cleanup Technologies for OU1
 - Millennium

Allied Landfill Preliminary Remediation Goals

- EPA Preliminary Remediation Goal Technical Memorandum
 - Kalamazoo River Risk Assessments
 - Human Health Risk Assessment - 2003
 - Baseline Ecological Risk Assessment - 2003
 - Michigan DEQ regulations - ARARs

Remedial Process

- Feasibility Study
 - September 2009
- Proposed Plan
- Record of Decision (ROD)
- Remedial Design/Remedial Action

Feasibility Study

- Proposal of Remedy Options
- Detailed and Comparative Analysis of Alternatives - 9 Criteria

9 Criteria

Threshold Criteria

- Protection of human health and the environment
- Compliance with Applicable or Relevant and Appropriate Requirements (“ARARs”)

Balancing Criteria

- Implementability
- Long-term effectiveness
- Short-term effectiveness
- Treatment preference
- Cost effectiveness

Modifying Criteria

- State acceptance
- Community acceptance

Threshold Criteria

- Overall protection of human health and the environment
- Compliance with applicable or relevant and appropriate requirements

ARARs

- CERCLA Requires Compliance with applicable or relevant and appropriate:
 - Federal Laws
 - State Laws

Balancing Criteria

- Long-term effectiveness and permanence
- Reduction of toxicity, mobility or volume through treatment
- Short-term effectiveness
- Implementability
- Cost

Modifying Criteria

- State Acceptance
- Community Acceptance
- Public Comment on Proposed Plan

Proposed Plan

- Agency's preliminary recommendation for site cleanup
- Summary of Remedial Investigation and Feasibility Study
- Solicits public input (Formal Public Comment Period)

Record of Decision

- After consideration of public comments on Proposed Plan
 - All substantive comments responded to in Responsiveness Summary
- Summary of investigations
- Administrative Record documents basis for decision
- Agency's final decision

Discussion, questions, etc.



website: <http://epa.gov/region5/sites/kalproject/>

Superfund

11 Risk Management Principles

1. Control sources early
2. Involve community early and often.
3. Coordinate with States, local governments, Tribes and Natural Resource Trustees
4. Develop and refine a conceptual model considering sediment stability

Superfund

11 Risk Management Principles

5. Use iterative approach in a risk-based framework
6. Evaluate assumptions and uncertainties associated with Site characterization data and Site models
7. Select site-specific approaches to achieve risk-based goals

Superfund

11 Risk Management Principles

8. Ensure cleanup levels are tied to risk goals
9. Maximize effectiveness of Institutional Controls and recognize limitations.
10. Design remedies to minimize short-term goals while achieving long-term protection
11. Monitor during after remediation to assess and document remedy effectiveness

Brownfields

- A Grants Programs for Municipalities
- Contaminated Properties Not on the NPL
 - Typically smaller sites
- Allied Paper Landfill Does Not Qualify
- Panelyte Property

Remedial Investigation

(defines problem)

- General background
- Sampling and analysis –extent of contamination
- Determination of Risk: current risks to humans and wildlife

