



United States
Environmental Protection
Agency

More Information about Points Raised at Community Meetings

Allied Paper/Portage Creek/Kalamazoo River Superfund Site
Kalamazoo, Michigan September 2004

Public information meeting

6 to 8 p.m. Wed., Sep. 29
Allegan Public Schools
Administration Office
Leadership Room
550 5th St.

More information on back page.

Contact EPA

For more information or comments about the Kalamazoo River project you may contact these EPA representatives:

Dave Novak

Community Involvement
Coordinator (P-19J)
EPA Region 5
77 W. Jackson Blvd.
Chicago, IL 60604
(312) 886-7478 or (800) 621-8431,
weekdays 10 a.m. to 5:30 p.m.
novak.dave@epa.gov

Shari Kolak

Remedial Project Manager (SR-6J)
EPA Region 5
77 W. Jackson Blvd.
Chicago, IL 60604
(312) 886-6151 or (800) 621-8431,
weekdays 10 a.m. to 5:30 p.m.
kolak.shari@epa.gov

U.S. Environmental Protection Agency held a public meeting in June and a modeling workshop in August to discuss the Allied Paper/Portage Creek/Kalamazoo River Superfund site. During the question-and-answer sessions, audiences raised some points EPA feels should be explained in more detail.

The need for modeling

Several people asked why additional studies are needed when so many studies and investigations have already been conducted by the paper companies and Michigan Department of Environmental Quality since 1990. EPA agrees that many studies have been done, and much of the information from those studies will provide useful data for the modeling.

EPA decided that modeling was necessary because Agency experts could not determine with enough accuracy the amount of contaminated riverbank behind the Plainwell and Otsego city dams that needs to be cleaned to reduce the amount PCB in fish.

Modeling will be carried out by QEA, an engineering firm with expertise in modeling river sediments (mud). The company will take all available data from the Kalamazoo River and put this information into a computer program. In an effort to achieve consensus on the results of the model, and to avoid debates and delays about what the models mean, EPA is working closely with MDEQ, the potentially responsible parties and the Natural Resource Trustees on the development of the model. Using the specifics from the Kalamazoo site, the modeling program will make projections of how long it will take under different cleanup scenarios, with leaving the dams in or taking the dams out, for fish to be safe to eat. Examples of cleanup scenarios include removing some or all river sediment and riverbank, or capping all or some of the floodplain soil. EPA will use the modeling information to decide what cleanup methods it will recommend to the public in order to protect human health and wildlife.

Time frame for modeling

Modeling will be performed on two upstream stretches of the Kalamazoo River first--starting at Morrow Dam and ending at the Otsego City dam. QEA believes it will be able to complete the study for the two upstream stretches of the river in about a year. Modeling may take longer if the modelers identify data gaps that are critical in assuring the accuracy of results. After the model is completed, EPA must conduct a peer review which is estimated to take another year. Peer review is a documented

critical review of a specific major scientific or technical work product. Peer review is conducted by qualified people or organizations which are independent of those who performed the work but are equally qualified in technical expertise. Peer review is conducted to ensure that activities are technically adequate, competently performed, properly documented and satisfy established quality requirements. Modeling will proceed downstream on each stretch of river ending at Allegan (Caukins) dam. EPA will make cleanup decisions on the two upstream stretches of river first, and proceed downstream as modeling results become available and after they are peer reviewed.

Mediated negotiations

EPA began negotiations for additional remedial investigation/feasibility study work with the paper companies in April 2004. (A remedial investigation is an in-depth study of contamination and risks at a Superfund site. The remedial investigation is usually done with the feasibility study, an analysis and comparison of the cleanup options under the criteria provided by the Superfund regulations -- including protectiveness and cost.) EPA believed that the assistance of a professional neutral mediator would be very useful in negotiating the scope of such an RI/FS agreement, and invited the paper companies to participate in such negotiations. MDEQ and the Natural Resource Trustees are also participating in the negotiations. Natural Resource Trustees are government agencies responsible for protection of natural resources such as water and wildlife. These legal negotiations are confidential and are not open to the public.

Two neutral mediators were hired to lead the negotiations. These negotiators successfully co-mediated the Housatonic River case in EPA Region 1. The parties to the negotiations will evaluate whether and what additional information is necessary to fully evaluate dam removal as a possible cleanup option on the River.

Fish Advisories

Some people at recent public meetings expressed concern about the public not being aware of the health risks of consuming Kalamazoo River fish. Although fish advisory signs have been posted along popular fishing spots, some people continue to eat the fish. EPA and MDEQ are aware of the problem. Because

of budget constraints, the Michigan Department of Community Health is no longer distributing fish advisory pamphlets to anglers and is relying on the public to obtain this information by accessing its Web site at <http://www.michigan.gov/mdch>. Once on the Web site, use the search box in the upper right corner of the page by typing in "fish advisories" (without the quotation marks) and pressing go. Finally, click on the link "Michigan Fish Advisory." EPA encourages the public to contact the MDCH directly if you have further concerns at (517) 373-3740 and press 3 or e-mail Jean Chabut, chief administrative officer, Public Health Administration, at chabutj@michigan.gov.

EPA's cleanup estimates

One audience member incorrectly commented that EPA's \$2 billion dollar cost estimate for cleaning up the entire 80 mile River was too high. The audience member went on to comment that the figure is a projection of future costs and the real cost of cleanup would run only in hundreds of millions of dollars if EPA started immediately instead of waiting until more studies are done.

The cost estimate EPA used was based on MDEQ's 2001 estimate for removing all PCB contamination over a concentration of .33 parts per million. Inflation rates have been moderate in the last few years. While sources disagree about the inflation rate, most put it in the range of 8.25 to 8.5 since the end of 2000. Using one source's calculation of 8.35 inflation since December 2000, the estimated cost of removal in 2004 money would be \$2.2 billion, an increase of about \$200 million due to inflation alone.

Public involvement

EPA is working hard to keep the Kalamazoo River community informed about its activities and to allow as much public involvement as possible. Region 5 has pledged to hold community update meetings at least quarterly in addition to workshops on specific topics of interest to the public. Such meetings will allow residents to hear about progress and to raise concerns as EPA moves forward in developing its cleanup plans.

EPA has given a Technical Assistance Grant to a local group, the Kalamazoo River Watershed Council. A TAG provides money for activities that help your community participate in decision-making. As holder of the TAG,

the Watershed Council can hire independent technical staff to review and evaluate EPA's technical documents. The TAG group also has an obligation to keep the community informed of its findings. EPA has invited the TAG people to review and provide comments on the Kalamazoo River model development. EPA also makes its information available through six libraries in major communities along the site as well as through its Internet site. Most of that information now is being supplied on computer disks that can be read on library computers. The library and Internet addresses are at the bottom of this fact sheet.

Bryant Mill cleanup

Residents are concerned about the slow pace of cleanup on the Kalamazoo River. One person said EPA had not removed enough PCB-contaminated sediments to fill a 5-gallon bucket. The Bryant Mill cleanup was a major project that removed some of the most highly contaminated sediment at the Kalamazoo River. The former Bryant Mill Pond, in Kalamazoo at the confluence of Portage Creek and the Kalamazoo River, is a 22-acre site adjacent to residential and commercial areas. At the request of MDEQ, EPA removed about 155,000 cubic yards of sediment, soil and paper residuals contaminated with PCBs with concentrations as high as 1,000 ppm. That removal was completed in May 1999 at a cost of about \$12 million, of which \$7.5 million was paid for by Millennium Holdings, one of the potentially responsible parties. On its Internet information bulletin, MDEQ said: A Time Critical Removal Was An Outstanding Success! Details of the removal action can be viewed at <http://www.michigan.gov/deq> by using the search box in the upper right corner of the page. In the search box type the words "Bryant Mill" (without the quotation marks). The bulletin can be accessed by clicking on the "Allied Paper Operable Unit" link.

City of Allegan water supply

One person expressed concern about the water, especially ground water in the Allegan area. By law, public supply services are required to test water and report the results to their customers. People worried about the quality of a private water supply should get in touch with their local health departments. Allegan County residents may call (269) 673-5411; in

Kalamazoo County the number is (269) 373-5200. If the county health departments are not able to help, residents may call MDEQ Groundwater Investigation Unit or Water Well Construction Unit, both at (517) 241-1355.

Pollution flows to Lake Michigan

One person said that about 800 pounds a year of PCBs are discharging from the Kalamazoo River into Lake Michigan. EPA's Great Lakes National Program Office conducted a study in 1994-1995 to estimate PCB flowing from all major tributaries to the Great Lakes. This study concluded the Kalamazoo River was third highest, annually discharging 84 pounds of PCBs into Lake Michigan. The Fox River in Wisconsin is highest, discharging 475 pounds a year; second highest was Grand Calumet Harbor in Indiana at 88 pounds a year. EPA, in cooperation with MDEQ, is collecting additional data to update loading estimates. Results from this effort will be published in 2007.

Information libraries

The public can read documents related to the Kalamazoo River Superfund site at these places:

Kalamazoo Public Library

315 S. Rose
Kalamazoo

Waldo Library

Western Michigan University
1903 W. Michigan Ave.
Kalamazoo

Charles Ransom Library

80 S. Sherwood
Plainwell

Otsego District Library

219 S. Farmer St.
Otsego

Saugatuck-Douglas Library

10 Mixer St.
Douglas

Allegan Public Library

331 Hubbard St.
Allegan

On the Web: <http://www.epa.gov/region5/sites>



United States
Environmental Protection
Agency

Region 5
Office of Public Affairs (P-19J)
77 W. Jackson Blvd.
Chicago, IL 60604

FIRST CLASS

RETURN SERVICE REQUESTED

ALLIED PAPER/PORTAGE CREEK/KALAMAZOO RIVER SUPERFUND SITE:
Public information meeting scheduled for Kalamazoo River Superfund Project

This fact sheet is printed on paper made of recycled fibers.

Public Information
Meeting Scheduled
**Kalamazoo River
Superfund Project**

U.S. Environmental Protection Agency invites you to meet with us for an update on the Kalamazoo River modeling project and the mediated discussions concerning the project. Following the update we will have an open dialogue.

We will meet:

6 to 8 p.m. Wed., Sep 29

Allegan Public Schools Administration Office
Leadership Room
550 5th St.

More information is available by contacting:

Dave Novak

EPA Community Involvement Coordinator
(800) 621-8431, ext. 67478, weekdays 10 a.m. to 5:30 p.m.
novak.dave@epa.gov

Persons with special needs should get in touch with Dave Novak.