

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Portage Creek Area - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #2
Portage Creek Area
059B05
Kalamazoo, MI
Latitude: 42.2839750 Longitude: -85.5791570

To: Jason El-Zein, U.S. EPA
Charles Gebien, U.S. EPA
Mike Ribordy, U.S. EPA
Michael Chezik, U.S. Dept. of Interior
John Maritote, U.S. EPA
Mark Johnson, ATSDR
Paul Bucholtz, MDEQ
Lisa Williams, U.S. FWS
Todd Goeks, NOAA
Daria Devantier, MDEQ
Bruce Merchant, Kalamazoo City Dept of Public Services

From: Sam Borries, On-Scene Coordinator

Date: 10/28/2011

Reporting Period: October 8, 2011 - November 3, 2011

1. Introduction

1.1 Background

Site Number:	059B05	Contract Number:	EP-S5-09-05
D.O. Number:	0087	Action Memo Date:	7/5/2011
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	NPL	Operable Unit:	05
Mobilization Date:	9/26/2011	Start Date:	8/30/2011
Demob Date:		Completion Date:	
CERCLIS ID:	MID006007306	RCRIS ID:	NA
ERNS No.:	NA	State Notification:	Yes
FPN#:	NA	Reimbursable Account #:	NA

1.1.1 Incident Category

Fund-lead removal action.

1.1.2 Site Description

The Allied Paper Inc./Portage Creek/Kalamazoo River Superfund Site, is located in Allegan and Kalamazoo Counties, Michigan, and is pervasively contaminated with polychlorinated biphenyl (PCB), primarily resulting from historic waste practices associated with several paper mills. The Site was listed on the National Priorities List (NPL) on August 30, 1990, and includes four disposal areas, five former

paper mill properties, an approximately 80-mile stretch of the Kalamazoo River from Morrow Dam to Lake Michigan, and a three-mile stretch of Portage Creek.

This response action will require two or more construction seasons to complete and will result in the removal of approximately 17,000 cubic yards of waste material, containing approximately 2,123 pounds of PCB from the creek. The creek has an average width of approximately 32 feet, an average depth of approximately 2.3 feet and covers a surface area of approximately 8.2 acres. The banks in the Portage Creek Area range in height from approximately 18 inches to 10 feet.

1.1.2.1 Location

This removal action involves what the U.S. EPA Region 5 has designated as the "Portage Creek Area" of the Site. The Portage Creek Area is located in the City of Kalamazoo, Michigan, beginning at East Cork Street and flowing north approximately three miles to the confluence of the Kalamazoo River. Activities associated with this removal action are anticipated to occur in segments along a 1.8 mile stretch of Portage Creek. Work activities will move downstream primarily between Reed Avenue to East Walnut Street bridge, South Pitcher Street bridge to the railroad crossing west of Rochester Street, and the bend in Portage Creek East of Rochester Street to the confluence with the Kalamazoo River.

1.1.2.2 Description of Threat

This response action will mitigate threats to public health, welfare, and the environment presented by the presence of an uncontrolled release of PCB, a hazardous substance, from in-stream sediments, riverbank soils, and floodplain soils located within the Portage Creek Area. This removal action is time-critical in order to address the potential for continuing release of contamination into the food chain and the potential for direct human exposure to the contamination. The proposed response actions include dredging and/or excavation of sediment, riverbank soils and floodplain soils, containment, monitoring, water treatment, stabilization and off-Site disposal of excavated material in accordance with federal PCB regulations at 40 C.F.R. § 761.61.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Twenty nine sample locations from the Portage Creek Area (between E. Alcott Street and the confluence with the Kalamazoo River) have PCB concentrations greater than 50 milligrams per kilogram (mg/kg) ranging in depth from surface sediment to 44 inches deep. The highest sample results from Portage Creek show a concentration of 590 mg/kg and came from a location between E. Walnut Street and E. Dutton Street. Nearly half of the samples with concentrations greater than 50 mg/kg are located in Portage Creek adjacent to the UpJohn Park recreational area. The highest concentration of PCB in Portage Creek adjacent to the UpJohn Park area is 300 mg/kg.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

During this reporting period on October 20-21, the excavation area of SA7 was flooded from a rain event with approximately 1-2 feet of water flooding over the area resulting in work delays. It was also noted that construction activities south of Reed Street diverted Portage Creek flow out of its channel and up onto the surrounding surface around the construction activities and appeared to have raised the surrounding water table. The wetland area in SA7 north of Reed Street appears to be experiencing an elevated water table rising to the surface and preventing excavation activities. Personnel and equipment that were mobilized to complete the excavation activities have been temporarily de-mobed until the water table subsides. It is anticipated that the construction activities south of Reed Street, which appears to be causing the elevated water table, will not be completed until the end of November. EPA will assess conditions at the end of November to determine when personnel and equipment can return to conduct excavation activities in SA7.

2.1.2 Response Actions to Date

The following is a summary of the site activities that took place from October 8, 2011 to November 3, 2011:

From October 8, 2011 to November 3, 2011, U.S. EPA, ERRS and START continued the following activities:

- Construction of the John Street staging/solidification pad with collection sump and installation of liner material;
- Installation of secondary containment for fuel storage at the John Street support area;
- Installation of power pole and lines to office trailers at the John Street support area;
- Sampling of potential soil/rock borrow source material for backfilling activities in SA7;
- Construction of access area, truck wash station, and soil staging/transfer pad in SA7;
- Construction of a temporary access road to excavation areas at SA7;
- Removal and chipping of brush and trees in SA7;
- Installation of temporary construction and silt fence around the SA7 removal area;
- Temporary seeding for erosion control;
- Installation of erosion controls and geotextile filters in storm drains at street entrance to SA7;
- Installation of timber mats for the SA7 haul road;
- Air monitoring in the vicinity of all construction activities for particulates;
- Video and photo documentation of truck route roadway surface to and from SA7 to John Street support area and the John Street support area to I-94 following the route identified in the Traffic Plan; and
- The temporary demob of personnel and equipment brought in to excavate SA7 because of an elevated water table.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The major PRP for this portion of the Allied Paper Inc./Portage Creek/Kalamazoo River Superfund site was dissolved through bankruptcy proceedings in April 2010. Other PRPs are being evaluated.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

A summary of removal activities that will take place in the upcoming weeks include:

Upon re-mobilization of personnel and equipment to excavate SA7 soils after surface water and groundwater recedes the following activities will occur in SA7:

- Complete installation of temporary roadways;
- Excavation, solidification and staging of PCB contaminated soils;
- Transportation and disposal of excavated soils;

Other site activities will include:

- Construction of the John Street staging pad drainage layer and geoweb working surface;
- Construction of permanent and temporary chainlink fencing around the John Street support area;
- Clearing and grubbing activities along Axtell Creek and Portage Creek adjacent to the John Street support area;
- Ongoing efforts to obtain site access from property owners who own land along the project boundaries;
- Development of planning documents and technical memos for SA6 and other areas within the project boundaries;
- Distribution of the Restoration Plan and Existing Vegetation Tech memo to stakeholders for input/suggestions of preferred vegetation plantings of disturbed areas.

2.2.1 Anticipated Activities

The U.S. EPA-funded removal action was initiated on September 26, 2011 and will cover removal activities in Portage Creek slope Areas SA1, SA3, SA5 (includes Axtell Creek), SA6 and SA7. Removal activities on Site will include the proposed response action items identified in the Portage Creek Area Action Memorandum dated July 5, 2011. The proposed response actions are indicated below:

1. Develop and implement site planning documents (e.g. Health and Safety Plan, Sampling and Analysis Plan and Work Plan), site security measures, necessary staging/support areas;

2. As necessary, assess floodplain soils and sediments to define extent of PCB contamination for excavation and dredging;

3. Dredge and/or excavate PCB contaminated sediments and soils with elevated PCB concentrations in those areas specified in a U.S. EPA approved work plan or identified from additional assessment activities;

4. Stabilize the disturbed creek banks and sediments to mitigate exposures to PCB contaminated banks and sediment and potential future erosion;

5. Dewater, solidify, as necessary, and dispose off-site of all PCB contaminated sediment, bank and floodplain soils removed pursuant to proposed actions 2 and 3, above. PCB contaminated material with PCB concentrations equal to or greater than 50 mg/kg will be transported off-site to a chemical waste landfill that is in compliance with all state and federal regulatory requirements. PCB contaminated material with PCB concentrations less than 50 mg/kg shall be transported off-site and disposed in an appropriately licensed and permitted commercial landfill in compliance with all state and local laws.

6. Utilize various engineering controls (e.g. coffer dams, silt fence, silt curtain, etc.) to manage diversion of Portage Creek during dredging/excavation activities, silt curtains and fences or similar devices to help control resuspension/migration of sediment/soils during site operations;

7. Establish a dewatering and water treatment system discharging back to Portage Creek;

8. Monitor and sample during implementation of the response action;

9. Backfill dredged/excavated areas with clean material and topsoil;

10. Restore dredged/excavated areas to prevent potential soil erosion, and

11. Ensure that restoration and re-vegetation (with native plant species) occurs and that appropriate monitoring and maintenance is performed both during and after the response action.

Additional site related information can be found on the project website at www.epaosc.org/portagecreekarea

2.2.1.1 Planned Response Activities

See above.

2.2.1.2 Next Steps

2.2.2 Issues

Flooding on October 20-21, 2011 had major impacts on clearing and grubbing activities in SA7 as well as construction of the SA7 haul road. Excavation, solidification and staging plans are being revised to take into consideration the wet conditions in SA7. See section 2.1.1 above for additional information.

2.3 Logistics Section

The current resources present on site for the removal include:

- Five 1/2 ton pickups
- Three Office Trailers
- One Security Trailer
- Two 45-ton excavators
- One 30-ton front end loader
- One tracked skid steer loader
- 90 kw generator
- One 20-foot storage trailer
- One 'Crawler Carrier' tracked transport/dump vehicle
- One tire/vehicle wash system

2.4 Finance Section

2.4.1 Narrative

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$4,700,000.00	\$415,000.00	\$4,285,000.00	91.17%
TAT/START	\$300,000.00	\$50,000.00	\$250,000.00	83.33%
Intramural Costs				
Total Site Costs	\$5,000,000.00	\$465,000.00	\$4,535,000.00	90.70%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Sam Borries, Craig Thomas, and Paul Ruesch, U.S. EPA FOSCs are serving as the safety officer (s). The HASP was reviewed and signed by all site personnel. Air monitoring is being conducted by START

2.6 Liaison Officer - NA

2.7 Information Officer - NA

2.7.1 Public Information Officer - NA

2.7.2 Community Involvement Coordinator

Don DeBlasio - U.S. EPA CIC

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

U.S. Environmental Protection Agency
 Michigan Department of Environmental Quality
 Michigan Department of Natural Resources
 U.S. Fish and Wildlife Service
 City of Kalamazoo:
 Department of Public Services
 Parks and Recreation Department
 Economic Development Department
 Community Planning & Development
 Public Safety Department
 Fire Department
 Police Department
 Bronson Methodist Hospital
 Kalamazoo Nature Center

4. Personnel On Site

U.S. Environmental Protection Agency
 U.S. EPA Oversight Contractors (Global Remediation Technologies, Inc.)
 U.S. EPA Removal Contractors (Environmental Quality Management, Inc., CMC Incorporated)

5. Definition of Terms

ERRS - Emergency and Rapid Response Services

FOSC - Federal On Scene Coordinator
HASP - Health and Safety Plan
mg/kg - milligrams per kilogram
MDEQ - Michigan Department of Environmental Quality
NA - Not Applicable
NPL - National Priorities List
PCB - polychlorinated biphenyl
PRPs - Potentially Responsible Parties
START - Superfund Technical Assessment and Response Team
U.S. EPA - United States Environmental Protection Agency

6. Additional sources of information

6.1 Internet location of additional information/report

See project website at: www.epaosc.org/portagecreekarea.

6.2 Reporting Schedule

Approximately every 2-4 weeks during the active construction season.

7. Situational Reference Materials

See project website at: www.epaosc.org/portagecreekarea