

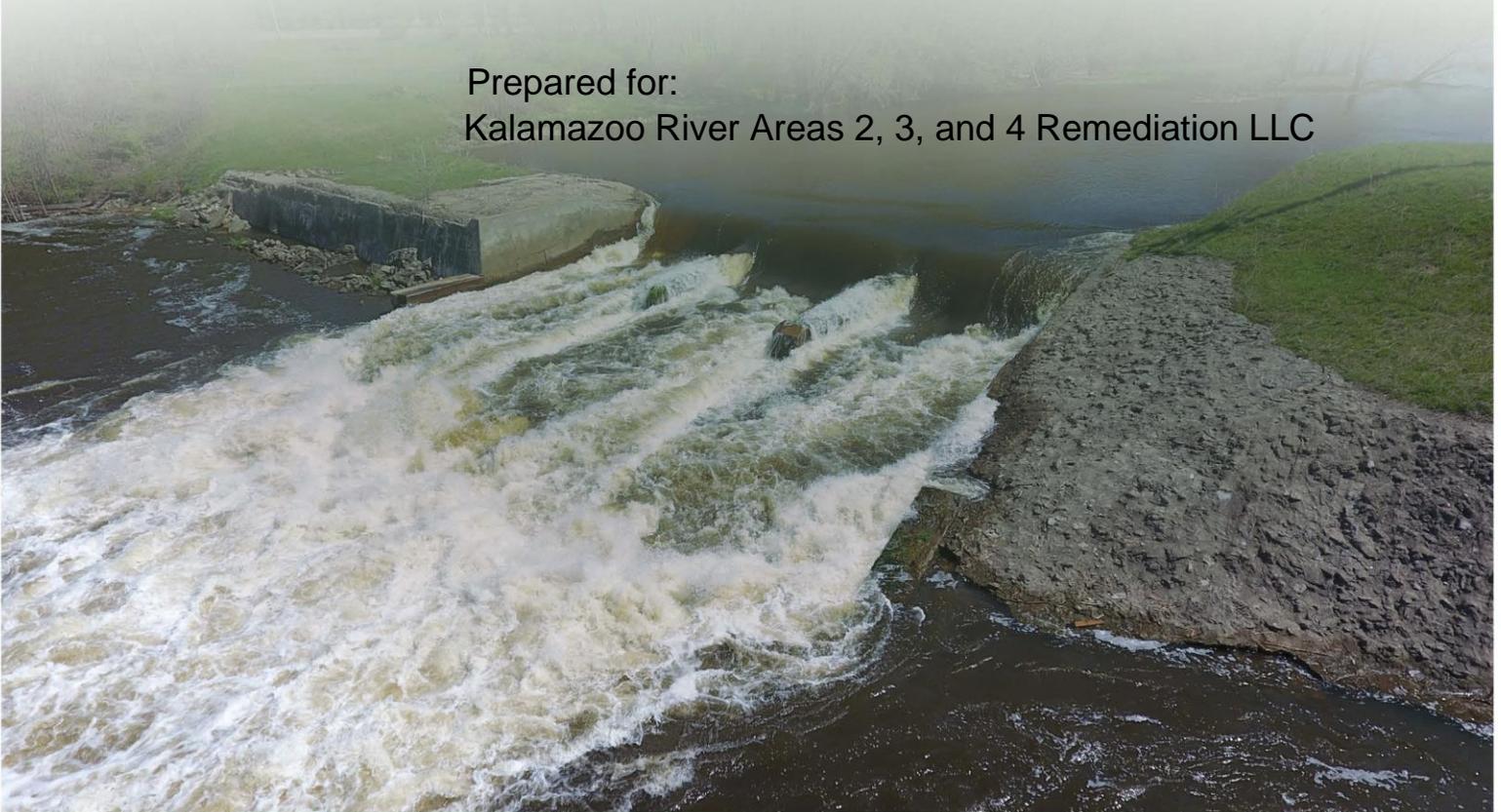


April 1, 2024

## Monthly Report

# OU5 Area 4 Time-Critical Removal Action Allied Paper/Portage Creek/ Kalamazoo River Superfund Site

Prepared for:  
Kalamazoo River Areas 2, 3, and 4 Remediation LLC





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Prepared for:  
Kalamazoo River Areas 2, 3, and 4 Remediation LLC

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A handwritten signature in black ink, appearing to read 'Beth Axtell'.

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A handwritten signature in black ink, appearing to read 'Amber L. Ahles'.

Amber Ahles, PMP  
Program Manager

April 1, 2024  
GEI Project No. 2000273

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## Abbreviations and Acronyms

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CD	Consent Decree
EGLE	Michigan Department of Environment, Great Lakes, and Energy
EPA	United States Environmental Protection Agency
FSP	field sampling plan
LLC	Kalamazoo River Areas 2, 3, and 4 Remediation LLC
MDNR	Michigan Department of Natural Resources
OU5	Operable Unit 5
PCB	polychlorinated biphenyl
PDI	pre-design investigation
TCRA	time-critical removal action

## Introduction

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Reporting Period: March 1 to March 31, 2024. Report #47.

GEI Consultants is pleased to provide this Monthly Report for Area 4 of Operable Unit 5 (OU5) of the Allied Paper/Portage Creek/Kalamazoo River Superfund Site (Site). This work will be performed by GEI on behalf of the Kalamazoo River Areas 2, 3, and 4 Remediation LLC, which NCR Corporation (now NCR Voyix) formed to meet certain requirements of the Consent Decree (CD) between NCR Corporation, the United States Environmental Protection Agency (EPA), and the state of Michigan.

The CD was lodged in December 2019 and entered (approved) by the United States District Court for the Western District of Michigan on December 2, 2020 and modified on October 11, 2023 to include Area 3. The CD requires NCR to conduct response activities in Areas 2, 3, and 4 of Operable Unit 5 of the Allied Paper/Portage Creek/Kalamazoo River Superfund Site. Work activities mandated by the CD include performance of a time-critical removal action (TCRA) in Area 4, and remedial design and remedial action in Areas 2 and 3.

This monthly report provides updates on events pertaining to the Area 4 TCRA as defined in the Area 4 Action Memorandum (EPA, 2020).

# 1. Work Accomplished

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## 1.1 Actions Taken

- A bat roost tree survey was conducted on March 4, 2024. The haul road footprint next to the southern Trowbridge staging area along the LDB, the two northern Trowbridge staging areas, and areas along the RDB were assessed. The survey extended to approximately 20 feet outside the haul road footprint in both directions in case of future modifications. No bat roost trees were removed.
- The March 2024 EPA Fact Sheet for Area 4 was received from EPA on March 12, 2024. EPA posted the updated Fact Sheet on websites and distributed via U.S. mail on March 15, 2024.
- Construction of the haul road extension and temporary bridge on the right descending bank at Schnable Brook was completed on March 21. As-built surveying was completed on March 25, 2024.
- John Jolly is now the project coordinator for NCR Voyix. NCR sent a Notice of Change in Project Coordinator letter to EPA via electronic mail on March 25, 2024. The letter was also sent via U.S. mail to EPA and State representatives on March 27, 2024.
- The LLC sent a letter to EPA requesting clarifications and an extension on the submission date from EPA's February 9 letter for the Part 2 Removal Work Plan and corresponding design drawings on March 27, 2024.

## 1.2 Data

- No data was submitted or received in March.

### **1.3 Deliverables**

- The February monthly update summary was submitted to EPA on March 1, 2024.
- The Removal Work Plan Draft for Part 1 revision and response to comments was submitted to EPA on March 15, 2024.
- EPA and EGLE's comments on the Confirmation Sampling Plan were received on March 24, 2024.
- EPA's comments on the Traffic Control Plan were received on March 24, 2024.

## 2. Problems Encountered

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- In June 2020, the LLC became aware of the release of sediment from Morrow Lake as a result of the Morrow Dam drawdown. Based on available information, the release has accumulated in Area 4 in areas that require remediation.

### **3. Community Relations Activities**

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- An LLC representative attended the Kalamazoo River Superfund Community Advisory Group on March 28, 2024.

## 4. Anticipated Work

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- EPA is expecting their START contractor to begin sediment sampling on Beaver Island.
- LLC is expecting comments from EPA on the Waste Management Plan, Water Treatment System Technical Memorandum, and Removal Work Plan Part 1 Draft revision.
- LLC is expecting a meeting with EPA to discuss comments on the Confirmation Sampling Plan.

## 5. Waste Tracking

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- No waste from Area 4 TCRA was created or removed in March 2024.

## **6. Project Schedule**

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A schedule for the Area 4 TCRA is included as Fig. 1.

## 7. References

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EPA (2020). Approval for a Time-Critical Removal Action at the Trowbridge Dam Area of the Allied Paper, Inc./Kalamazoo River Superfund Site, Allegan County Michigan (EPA ID MID006007306). April 2020.

United States District Court for Western District of Michigan Southern Division (2019). Consent Decree With NCR Corporation. December 2019.

<b>Figure 1. Area 4 TCRA Schedule</b>		<b>Start Date</b>	<b>Finish Date</b>
<b>Work Plans</b>			
	Field Sampling Plan	14-Feb-20	15-May-20
	Supplemental Field Sampling Plans	7-Sep-20	11-Sep-23
	Removal Action Work Plan	1-Apr-20	23-Oct-20
	Area 4 Design Work Plans	1-Aug-20	15-Dec-21
	Programmatic/Investigation Work Plan Revisions	15-May-20	5-Jan-22
	Revise Removal Work Plan Part 1	4-Aug-23	4-Oct-23
	EPA Approval of Removal Work Plan Part 1		1-Nov-23
<b>Preliminary Investigation</b>			
	PDI Procurement & Permitting	4-Apr-20	23-Oct-20
	Sediment and Soil Sampling Phase 1	17-Jun-20	23-Oct-20
	Lab Analysis Phase 1	22-Jun-20	7-Dec-20
	Data Validation Phase 1	6-Jul-20	12-Dec-20
	Water Monitoring (velocity, turbidity, level)	10-Jul-20	27-Nov-25
	Geotechnical Sampling and Analysis	26-Oct-20	7-Jan-21
	Ecological Activity (bat tree, mussel survey, etc.)	1-Jun-20	31-Oct-21
	Area 4 PDI Phase 1 Data transmittal	7-Jan-21	8-Jan-21
	PDI Fieldwork 2021 (Phase 2)	3-May-21	13-Jul-21
	PDI Fieldwork 2022 (Phase 3)	1-Jun-22	15-Aug-22
<b>Design</b>			
	Trowbridge Site Preparation Design & Bid	6-Apr-20	1-Apr-21
	30% TCRA Removal Design Submittal	16-Apr-20	11-May-21
	60% TCRA Removal Design Submittal	7-May-21	8-Nov-21
	Revised TCRA Removal Design Submittal	8-Nov-21	15-Aug-22
	Update Design Drawings to Reflect Part 1 Scope		10-Nov-23
<b>Construction</b>			
	Area 4 Trowbridge Staging Area Clearing and Grading	16-Aug-21	27-Aug-21
	TCRA Part 1 Bid Package Release		15-Nov-23
	Access and Haul Road Stages 1 and 2	15-Jul-22	30-Nov-23
	Part 1 Initial Field Activities Begin (to be determined with EPA)	1-Feb-24	
	General Contractor Selection		1-Mar-24
	Submit to EPA a Detailed Construction Schedule with Contractor Input		15-Apr-24
	TCRA Part 1 Notice to Proceed to General Contractor		15-May-24
	Start Dredging (subject to contractor input)	15-Sep-24	

Note: Schedule is subject to change with contractor input. Changes will be reported in monthly progress reports.