

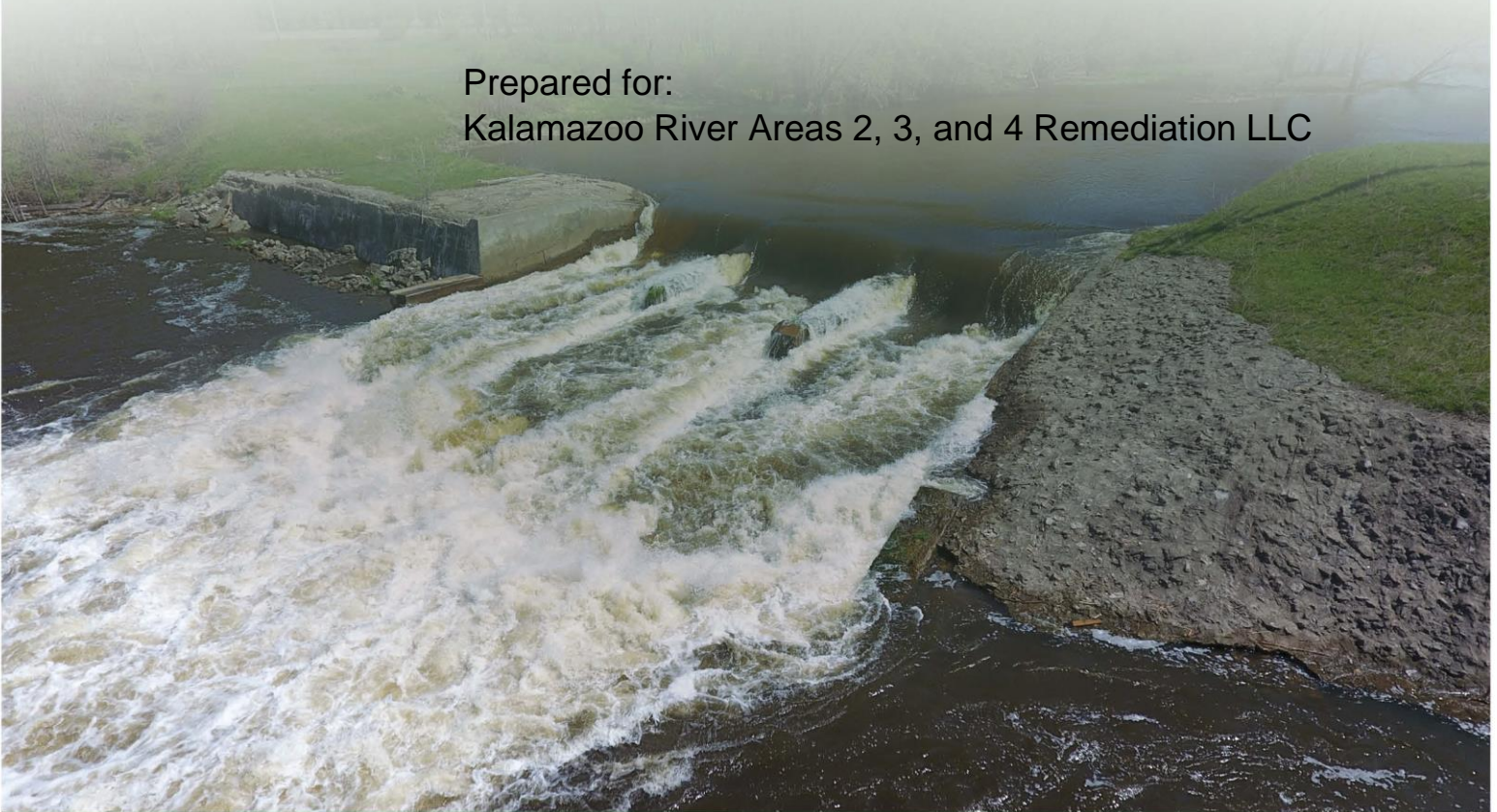


June 4, 2024

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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Abbreviations and Acronyms

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
SOM	State of Michigan
TCRA	time-critical removal action

Introduction

Reporting Period: May 1 to May 31, 2024. Report #49.

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

1.1 Actions Taken

- EPA, LLC, and State representatives met for regularly scheduled coordination calls on May 2 and 23, 2024.
- An annual land use permit application for general site reconnaissance and boat tours was submitted to the Michigan Department of Natural Resources (MDNR) on May 2, 2024. The signed LUP was received from MNDR on May 30, 2024.
- A memo regarding unit rates for Part 1 work was submitted to EPA on May 14, 2024, as requested by EPA.
- A written notice of an intent to award for the Part 1 removal action work was sent to the selected remediation subcontractor on May 15, 2024.
- NCR Voyix's response letter to EPA's conditional approval of the Removal Work Plan Part 1, Draft 3 was sent to EPA on May 15, 2024. EPA granted an extension on May 29, 2024 as requested in the NCR Voyix response letter.
- On May 17, 2024, the informal dispute negotiation period was extended through June 19, 2024 because EPA rescheduled a meeting from May 20 to June 5, 2024.
- LLC and the selected remediation subcontractor met for an administrative kick-off meeting on May 30, 2024.

1.2 Data

- No data was submitted or received in May.

1.3 Deliverables

- The April monthly update summary was submitted to EPA on May 2, 2024.

2. Problems Encountered

- 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

- An LLC representative attended the Kalamazoo River Superfund Community Advisory Group on May 23, 2024.

4. Anticipated Work

- LLC anticipates attending a virtual meeting for EPA to present Part 2 design options on June 5, 2024 (rescheduled from May 20, 2024).
- LLC anticipates submitting the Removal Work Plan Part 1, Draft 4 and response to comments, revised design drawings, and construction schedule design drawings to EPA.
- LLC is expecting EPA's START contractor to begin sediment sampling around Beaver Island. Sample processing is expected to take place in the processing room of the LLC's Command Center.
- LLC anticipates submitting a Baseline Assessment Plan to collect and test soil samples from existing and anticipated staging areas prior to commencement of Part 1 Removal Action.
- LLC anticipates submitting a revised Waste Management Plan, Water Treatment Technical Memo, Confirmation Sampling Plan, and Traffic Control Plan once the remediation subcontractor's input has been incorporated.
- LLC anticipates submitting pre-construction substantive requirement documents and work plans in conjunction with the remediation subcontractor prior to commencement of dredging work.

5. Waste Tracking

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

6. Project Schedule

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

7. References

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.

Figure 1. Area 4 TCRA Schedule

Figure 1. Area 4 TCRA Schedule		Start Date	Finish Date
Work Plans			
	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
Preliminary Investigation			
	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
Design			
	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
Construction			
	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.