

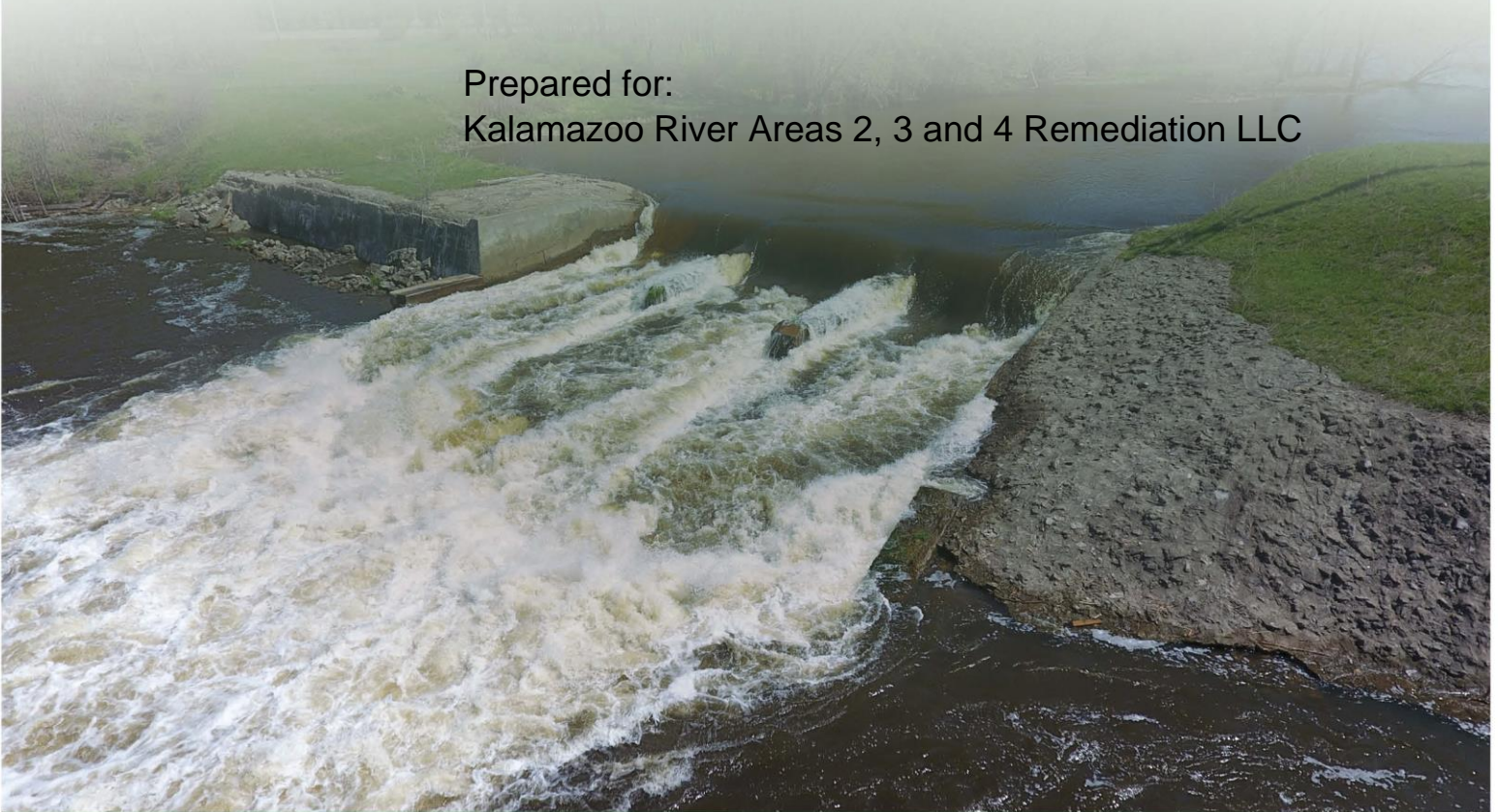


January 8, 2025

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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January 8, 2025
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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
SPA	Sediment Processing Area
TBSA	Trowbridge Staging Area
TCRA	time-critical removal action

Introduction

Reporting Period: December 1 to December 31. Report #56.

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 performance of 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

- Soil Erosion and Sedimentation Control inspections were conducted at the 108th Avenue staging area (Sediment Processing Area) on December 9, 13, 16, 23, and 31, 2024.
- Weekly construction meetings were held with GEI, LLC, JF Brennan, EPA, and State representatives on December 10 and 17, 2024.
- Sheet pile installation in Subareas F and G was completed December 6, 2024.
- Turbidity monitoring in Subareas F and G was conducted daily during active sheet pile installation.
- Land clearing and vegetative debris removal on Osgood spit was completed on December 7, 2024.
- Water treatment system construction/assembly began on December 2 and continued through the month.
- Perimeter fencing installation around the Sediment Processing Area began on December 18, 2024.
- Potential land disturbance extents along the Osgood drain, associated with the proposed restoration design, were marked out on MDNR property adjacent to the Trowbridge Staging Area on December 17, 2024.
- A consent to access the property at 873 26th Street was obtained by EPA, and a copy was sent to GEI on December 20, 2024.
- A property boundary survey was completed on MDNR property adjacent to the Trowbridge Staging Area on December 23, 2024.
- Construction crews demobilized for the December holidays on December 20, 2024.

1.2 Data

- Laboratory Performance Evaluation/Proficiency Testing scoring results were received from EPA on December 10, 2024.

1.3 Deliverables

- The November monthly update summary was submitted to EPA on December 6, 2024.
- Responses to questions and clarifications requested on the Part 2 Removal Work Plan were submitted to EPA on December 16, 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

- A GEI representative attended the Kalamazoo River Superfund Community Advisory Group meeting on December 5, 2024.

4. Anticipated Work

- Construction crews are expected to re-mobilize to the site in early January 2025, depending on weather conditions.
- Installation of electrical power at the Trowbridge Staging Area is expected.
- Pre-dredging site preparations are expected to continue.
- Discharge criteria in response to the National Pollutant Discharge Elimination System (NPDES) Substantive Requirements Document are expected to be received from EPA.
- EPA responses to the revised Traffic Control Plan and Site Security Plan are expected.
- The Construction Quality Assurance Plan is expected to be revised and re-submitted.
- An analytical results summary from TBSA and haul road pre-construction soil sampling is expected to be prepared.
- Pre-construction soil sampling along the right descending bank access roads is expected.

5. Waste Tracking

- One 20-yard roll-off container of non-hazardous waste was removed from the Plainwell command center on December 4, 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 Conditional Approval of Removal Work Plan Part 1		1-Nov-23
	Removal Work Plan Part 1, Draft 2	1-Nov-23	15-Nov-23
	Removal Work Plan Part 1, Draft 3	21-Dec-23	15-Mar-24
	Removal Work Plan Part 1, Draft 4	30-Apr-24	17-Jun-24
	Removal Work Plan Part 2	9-Feb-24	
	Dam Removal and River Stabilization Design Summary	9-Feb-24	
	Post-Removal Site Control Plan		45 days after Notice of Completion of Work
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	Q4 2026
	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	1-Nov-23	15-Mar-24
	Update Design Drawings to Reflect Contractor Input	30-May-24	17-Jun-24
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	1-Feb-24	12-Mar-24
	Intent to Award Notification to General Contractor		15-May-24
	High-Level Construction Schedule with Contractor Input		17-Jun-24
	Sediment Processing Area Construction	Q3 2024	Q1 2025
	Staging and Access Construction	Q3 2024	Q4 2024
	F&G Sheeting Install	Q3 2024	Q4 2024
	Water Treatment Set-up and Operation	Q1 2025	Q4 2026
	Dredging	Q2 2025	Q4 2025
	≥50 mg/kg PCBs T&D	Q3 2025	Q4 2025
	<50 mg/kg PCBs T&D	Q1 2026	Q4 2026
	WCS Installation	Q2 2026	Q3 2026

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

Created by: BA 6-13-2024

Checked by: JC 6-13-2024