

**United States Environmental Protection Agency  
Region V  
POLLUTION REPORT**

**Date:** Friday, October 28, 2011

**From:** Brian Kelly

<b>To:</b> Mark Dumo, U.S. EPA	Shelly Lam, U.S. EPA
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Dana Bradt, EGLE	Lori Kozel, START

**Subject:** Supplemental Update  
Dearborn Refining PRP  
3901 Wyoming Avenue, Dearborn, MI  
Latitude: 42.3164000  
Longitude: -83.1567000

<b>POLREP No.:</b> 5	<b>Site #:</b> B5E7
<b>Reporting Period:</b>	<b>D.O. #:</b>
<b>Start Date:</b> 8/27/2007	<b>Response Authority:</b> CERCLA
<b>Mob Date:</b> 8/27/2007	<b>Response Type:</b> Time-Critical
<b>Demob Date:</b>	<b>NPL Status:</b> Non NPL
<b>Completion Date:</b>	<b>Incident Category:</b> Removal Action
<b>CERCLIS ID #:</b> MI0 005 510 805	<b>Contract #</b>
<b>RCRIS ID #:</b>	

**Site Description**

See POLREP #1 for a full Site Description.

**Current Activities**

- On December 17, 2010, Conestogo-Rovers & Associates (CRA) representatives coordinated and completed the collection of soil samples as stipulated in the Removal Action (RA) Work Plan Addendum 3.
- On January 17, 2011, AKT Peerless (AKT) completed an asbestos survey of the remaining buildings by collecting a total of 27 samples of suspected ACM-containing materials, and providing an Asbestos Survey Update Report on January 24, 2011.
- On February 10, 2011, CRA representatives coordinated and completed the collection of soil samples, as stipulated in RA Work Plan Addendum 4, and submitted the results to U.S. EPA on March 1, 2011 for review.
- On April 5, 2011, AKT performed an additional asbestos survey at the site.
- On April 11, 2011, CRA collected a total of four composite waste characterization soil samples from the prescribed PCB excavation area located at the northeastern corner of the Site.
- In April 2011, CRA completed a Multi-phase Extraction (MPE) Pilot Study associated with the pre-design activities.
- On June 13, 2011, CRA collected a total of ten building material samples and eleven PCB-wipe samples from building materials in order to support the Demolition, Prescribed Excavation, and Cover System Final Report 100% Design.

Summary of Removal Action Work Plan Development (i.e., report submittal, review, and approval)

- On October 27, 2010, representatives from U.S. EPA, Weston Solutions, Inc. (Weston), the City of Dearborn, Ford Motor Company (Ford), Weavertown, Dykema Gossett, and CRA met at the City of Dearborn offices to discuss the principle components of CRA's proposed Removal Action.
- On October 28, 2010, the NPOS Respondents, the potentially responsible parties related to the Site, received a letter from U.S. EPA that approved the RA that was presented on July 16, 2010. However, U.S. EPA added a Due Care Plan to the list of RA components that would need to be consistent with the Part 201 requirements of Michigan Act 451.
- On November 26, 2010, CRA submitted the RA Work Plan and RA Work Plan Addendum 3 to U.S. EPA, Weston, and the City of Dearborn for review. U.S. EPA approved the RA Work Plan Addendum 3 on December 7, 2010.
- In December 2010, CRA prepared and submitted a proposal to the City of Dearborn for CRA to complete an asbestos survey of the existing buildings at the Site.
- On January 14, 2011, CRA submitted RA Work Plan Addendum 4, which also included the RA Work Plan Addendum 3 soil sample results, to U.S. EPA, Weston, and the City of Dearborn for review. U.S. EPA approved the RA Work Plan Addendum 4 on January 21, 2011.
- On March 7, 2011, U.S. EPA approved the November 2010 RA Work Plan and the revised prescribed polychlorinated biphenyl (PCB) excavation area that CRA presented in the RA Work Plan Addendum 4 Results Memorandum.
- On March 21, 2011, CRA submitted a proposed RA schedule to U.S. EPA for review. U.S. EPA submitted comments on the RA schedule to CRA on March 24, 2011.
- On March 30, 2011, CRA submitted a revised RA schedule to U.S. EPA for review, which U.S. EPA approved on March 31, 2011.
- In April, 2011, CRA participated in a conference call with the City of Dearborn to discuss the plans associated with the RA at the Site.
- On May 20, 2011, CRA submitted Pre-Final (95%) Demolition, Prescribed Excavation, and Cover Design Report (95% Design Report) to U.S. EPA for review.
- On June 13, 2011, CRA submitted the Stormwater Management Model (SWMM) to Weston for review.
- On June 15, 2011, CRA received a letter from the Michigan Department of Environmental Quality (MDEQ) regarding Corrective Action Notification to Current Owner, and submitted a response letter to MDEQ, U.S. EPA, and the City of Dearborn on June 30, 2011.
- On June 16, 2011, CRA received a letter from U.S. EPA regarding the Pre-Final (95%) Demolition, Prescribed Excavation, and Cover Design Report (95% Design Report), which CRA responded to on June 24, 2011.
- On June 21, 2011, U.S. EPA, Weston Solutions, Inc., the City of Dearborn, and CRA participated in a meeting to discuss the 95% Design Report.
- On June 30, 2011, CRA participated in a conference call with the City of Dearborn to discuss the 95 % Design Report/NPOS Respondents recommendation to use clay for the grading layer.
- On July 8, 2011, U.S. EPA agreed that the use of clay, as a grading material, meets the Administrative Order of Consent requirements. However, prior to backfilling, CRA will need to provide a memorandum to U.S. EPA that details the compaction techniques that CRA will use during the backfilling and the geotechnical characteristics of the clay that CRA will use for backfill.
- On July 14, 2011, CRA submitted a revised RA schedule to U.S. EPA for review, and received approval of the revised schedule from U.S. EPA on July 20, 2011.
- On July 26, 2011, CRA submitted the Final (100%) Demolition, Prescribed Excavation, and Cover

System Report (Design Report) to U.S. EPA for review. U.S. EPA submitted comments on the Final (100%) Design Report to CRA on August 10, 2011. CRA responded to the U.S. EPA comments on August 29, 2011.

- On August 15, 2011, CRA submitted the Pre-Final (95%) Light Non-Aqueous Phase Liquid Recovery Via High Vacuum Multi-Phase Extraction (MPE) Design Report (95% MPE Design Report) to U.S. EPA for review.
- On September 1, 2011, U.S. EPA provided comments on the 95% MPE Design Report, which CRA responded to on September 19, 2011.
- On September 7, 2011, CRA submitted a proposed RA schedule to U.S. EPA for review, and prepared a revised proposed RA schedule based on comments received by U.S. EPA on September 8, 2011. CRA submitted the revised proposed RA schedule to U.S. EPA on September 8, 2011.
- On September 23, 2011, CRA submitted a Response to Comments regarding the comments that U.S. EPA made regarding the Light Non-Aqueous Phase Liquid (LNAPL) Recovery Via High Volume Multi-Phase Extraction (MPE) 95% Design Report (95% MPE Design Report).
- On September 29, 2011, U.S. EPA confirmed that Environmental Quality Company (EQ) Wayne Disposal Inc. (WDI) satisfies the requirements identified in Section 4.3 of the Demolition, Prescribed Excavation, and Cover System Final (100%) Design Report.
- On October 6, 2011, U.S. EPA requested that CRA submit a Work Plan Amendment for the extended pilot test.

**Planned Removal Actions**

The final removal action was initiated on September 27, 2011.

The resources present, or projected to be, on site for the removal includes:

- Two office trailers
- One excavator (projected)
- One water truck (projected)
- One bulldozer (projected)
- One clay-specific compactor (projected)

**Key Issues**

None

**Estimated Costs \***

	<b>Budgeted</b>	<b>Total To Date</b>	<b>Remaining</b>	<b>% Remaining</b>
<b>Extramural Costs</b>				
START	\$150,000.00	\$104,000.00	\$46,000.00	30.67%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	\$150,000.00	\$104,000.00	\$46,000.00	30.67%

\* 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.

[response.epa.gov/dearbornrefiningprp](http://response.epa.gov/dearbornrefiningprp)