United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Monday, October 20, 2008
From: James Augustyn/Brian Schlieger

Subject: Final Polrep
Tittabawassee River Dioxin-Reach D
Midland, MI
Latitude: 43.6011000
Longitude: -84.2386000

POLREP No.:	17	**Site #:**	B5KF
Reporting Period:	12-03-07 thru 6-10-08	**D.O. #:**	
Start Date:	7/9/2007	**Response Authority:**	CERCLA
Mob Date:	7/9/2007	**Response Type:**	Time-Critical
Demob Date:	6/11/2008	**NPL Status:**	Non NPL
Completion Date:	10/15/2008	**Incident Category:**	Removal Action
CERCLIS ID #:	MID980994354	**Contract #**	
RCRIS ID #:			

Site Description
See POLREP #1

Current Activities
December 3rd – Contractors completed dredge vacuum pass in the North cell and continued vacuum pass work and collected a post dredge sample south of the 36" waterline and west of the historic flume piling in the last cell. Demobilization and winterization of equipment was initiated.

December 4th – Completion of additional vacuum passes and collection of post dredge sample in the last cell. Dow contractors extracted turbidity monitoring equipment from the river channel and began disassembly of air monitoring stations. Demobilization and winterization of project equipment continued. Due to worsening weather conditions and repeated equipment damage caused by freezing temperatures project management determined that active dredging and dewatering operations would cease at the end of the days activities and remaining project activities would be directed towards the demobilization and winterization of site equipment.

February 4th thru 22nd – Contractors begin the load-out, hauling and disposal of dewatered sediment from the Reach D Geotubes within the dewatering facility. During this period, 6500 cubic yards of sediment were disposed of to Dow's Salzburg Landfill and START submitted sediment samples obtained from Geotubes 3 and 4 for laboratory analysis.

April 28th-29th, 2008 – As a result of initial and secondary sampling activities during the 2007 project season, five individual 'target removal areas' were identified within the Bridge and 30" watermain cell. Contractors mechanically excavated residual impacted sediments in these areas and disposed of an additional 130 cubic yards at Dow's Salzburg landfill. Dow contractors collected one post-removal sample from the base of each targeted removal areas and were submitted for laboratory analysis.

June 2nd-June 10th, 2008 – Dow contractors began and finished the stabilization of the eastern shoreline within the Reach D Project Area with the addition of sand and rip-rap.

Next Steps
No further CERCLA removal actions are anticipated for the Reach D Area.

Key Issues
On April 16th, 2008 the Michigan Department of Environmental Quality (MDEQ) submitted notice to Dow requiring additional corrective action in the Reach D area to address any remaining elevated levels of dioxin and furan as well as other contaminants of concern under an IRA work plan approved by MDEQ as the lead agency. Due to this requirement, some of the site restoration activities originally proposed for the Reach D area are not appropriate at this time. Appropriate site restoration activities will be completed

under the the MDEQ approved work plan and MDEQ approved permits.

On July 10th, 2008 the Reach D IRA Workplan was conditionally approved by the MDEQ.

Dow submitted a final draft CERCLA Report to U.S. EPA on August 1st, 2008.

On October 15th, 2008, U.S.EPA OSC approved the final report for the Reach D Removal Action under the AOC. With submission and approval of the final report, no further action under the existing CERCLA AOC is anticipated.

Disposition of Wastes

To date, approximately 398 pieces (average length 10 to 12 feet) of historic flume piling have been extracted from the Reach D project area. The flume piling will be decontaminated and processed for metal reclamation.

Waste consisted of Reach D rip-rap, misc. debris and sediment. A total of 834 loads, estimated at either 12 or 20 cubic yards per load total volume 24,393 estimated cubic yards

7-31-07, 34 loads	8-01-07, 35 loads
8-02-07, 39 loads	8-03-07, 24 loads
8-03-07, 24 loads	8-04-07, 11 loads
9-07-07, 04 loads	9-08-07, 07 loads
9-17-07, 17 loads	9-18-07, 16 loads
9-19-07, 15 loads	9-20-07, 23 loads
9-24-07, 15 loads	9-26-07, 22 loads
9-28-07, 24 loads	10-02-07, 13 loads
10-03-07, 13 loads	10-04-07, 15 loads
10-05-07, 21 loads	10-08-07, 23 loads
10-09-07, 21 loads	10-10-07, 22 loads
10-11-07, 22 loads	10-12-07, 17 loads
10-15-07, 36 loads	10-16-07, 04 loads
10-17-07, 18 loads	10-19-07, 31 loads
10-20-07, 02 loads	10-24-07, 13 loads
10-25-07, 07 loads	10-26-07, 06 loads
10-27-07, 08 loads	10-29-07, 07 loads
10-30-07, 10 loads	10-31-07, 18 loads
11-01-07, 14 loads	11-02-07, 08 loads
11-07-07, 06 loads	11-08-07, 16 loads
11-09-07, 07 loads	11-10-07, 04 loads
11-12-07, 14 loads	11-13-07, 07 loads
11-14-07, 06 loads	11-15-07, 13 loads
11-16-07, 12 loads	11-17-07, 13 loads
11-19-07, 24 loads	11-20-07, 15 loads
11-21-07, 09 loads	11-22-07, 14 loads
11-23-07, 19 loads	11-24-07, 11 loads
11-30-07, 02 loads	2-04-08, 20 loads
2-05-08, 45 loads	2-12-08, 16 loads
2-14-08, 47 loads	2-15-08, 29 loads
2-20-08, 45 loads	2-21-08, 67 loads
2-22-08, 56 loads	4-29-08, 08 loads
5-07-08, 20 (cubic yards)	

From 9-06-07 to 12-02-07 Reach D sediment dewatering activities have conveyed 59,341,028 gallons of water to Dow's waste water treatment plant (WWTP).

response.epa.gov/tittabawasseeDioxinReachD