Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site

Status Update

1/27/2022 CAG Meeting

Discussion Outline

I. Status / planning & development process to date
II. 60% design issues
III. Next steps / timeline

Design Timeline

Activity	Date
Area 4 TCRA Action Memo	April 2020
Consent Decree	June 2020 (signed) December 2020 (entered)
1st DRAFT Removal Work Plan	October 2020
Preliminary Design Investigation	Summer - Fall 2020 (Phase I) Spring - Summer 2021 (Phase II)
'30%' Design Package	May 2021
'60%' Design Package	December 2021
Revised Design Package	April 2022*
2nd DRAFT Removal Work Plan	August 2022*
Final Design Package	January 2023*
Field work / dredging	Spring/Summer 2023*

PRP initiated PDI & submitted RWP before approval by the court of CD to address time critical aspect of project

Schedule has been impacted by pandemic

* tentative

Workplan Tracking

Area 4 TCRA Deliverable Tracking

v1/22/2022 DRAFT

Number	Work Plan	Acronym	CD SOW	AM	Due (days)	Submitted	Reviewed	Re-Submitted	Re-Review	Approved	Status
1	**Removal Work Plan**	RWP	3.2	V.A.1,3,4,5	30-Apr	30-Apr	5-Jun	28-Oct		30-Oct	potential revision?
	Schedule		3.2		30-Apr	30-Apr	5-Jun	28-Oct		10-Jun	
	Contractor List										
2	30% Design Package	DP30				11-May	28-May	NA	NA	NA	
3	60% Design Package	DP60			2-Dec	2-Dec					mtg 12/2, comment submit 12/14
4	90% Design Package	DP90			15-Nov						
5	Staging Area Tech Memo					14-May	20-May	23-Jun	2-Jul		work completed
6	**Health & Safety Plan**	HASP	3.3, 10.7(a)		30-May	24-Apr		27-May		27-May	posted
7	Dam Removal Work Plan			V.A.2							part of 60% design package
8	**Field Monitoring Plan**										
9	**Emergency Response Plan (sitewide)**	ERP	10.7(b)			4-Jun	6-Jul	16-Dec	11-Feb	11-Mar	posted
10	Site Security Plan	SSP				12-Jun	18-Jun	31-Jul	4-Aug	4-Aug	
	Trespasser Plan					21-May		8-Jun			
11	**Field Sampling Plan - Post Removal Confirmatory Sampling**	FSP	10.7(c)								under discussion/development
	Field Sampling Plan - Pre-Design Investigation	PDI				22-May	9-Jun	16-Jun	16-Jun	16-Jun	posted
	Field Sampling Plan - Pre-Design Investigation Phase II	PDI II				5-Apr	16-Apr	27-Apr	27-Apr	27-Apr	posted
	Field Sampling - Waste Charaterization & Embankment Addendum					15-Jul	17-Jul	21-Jul			
	Field Sampling Plan - Turbidity Monitoring					18-Jun	23-Jun	26-Jul			
12	**Data Management Plan**	DMP				26-Aug	22-Sep	2-Dec		2/11/2021	posted
	PDI Summary Report					10-Sep				9/10/2021	posted
13	**Quality Assurance Project Plan**	QAPP	10.7(d)			29-Apr	15-Jun	25-Mar		11-May	posted
14	**Quality Management Plan**	QMP				7-Oct	11-Feb	11-Mar	7-Jul		GEI RTC
15	**Contractor Quality Control**	CQC	10.7(f)								when bid drawings
16	**Waste, Soil & Debris Management Plan**	WSDMP	10.7(g)								
17	IDW Management Plan	WMP				7-Jun	6-Jul	12-Aug	12-Aug	12-Aug	
18	**Traffic Control Plan**	TCP									
19	**Invasive Plant Management Plan**	IPM				19-Aug	22-Sep	1/20/2021			posted
20	**Soil Erosion and Sediment Control Plan**	SECP									SESC permit accepted 7/23
21	**Water Treatment Plan**										
22	**Discovery Plan**					27-Apr		10-Sep			field briefing 8/10
23	**Post-Removal Site Control Plan**		3.5	V.A.6							
24	**Mussel Relocation / Salvage Plan (Initial phase)**	MRSP1				3-Apr	10-Apr	13-Apr	13-Apr	13-Apr	posted
25	**Mussel Salvage Plan (second phase)**	MRSP2				2-Jun	12-Jun			12-Jun	posted
	Mussel Report 2020	MRSP3				20-Jan					
	Mussel Report 2021	MRSP4			30-Dec						
26	Restoration Plan	RP			30-Jun	30-Jun					part of 60% design package
	Monthly Reports		9.1		1-Jan	6-Jan				6-Jan	next one due 2/1
	Final Report		3.4								

Workplan Development Process

1) PRP contractor (GEI) solicits data/info/input/experience/background from EPA, State
2) EPA/START & GEI discuss preliminary draft
3) Preliminary draft proposed/explained on a conference call w/ stakeholders
4) Draft document submitted to EPA
5) EPA distributes for stakeholder comment (template spreadsheet, 30 days)
6) EPA consolidates comments into one spreadsheet and provides to GEI
7) GEI discusses comments w/ EPA and submits RTC (+ column to spreadsheet)
8) EPA provides RTC and offers discussion w/ stakeholders (if warranted)
9) GEI prepares final draft for EPA
10) Final draft document is posted to the website and tracking spreadsheet

Stakeholder Involvement

2020 - present

Meeting/Outreach	Number
In-person planning (prelim, kick-off, 30%, 60%)	4
Data, Sampling, Modeling	24
Dam Removal, construction	22
‘Agency Huddles’	16
Bi-weekly coordination	48
Bi-weekly updates (email)	46

In-person meetings impacted by pandemic

Stakeholders to date have included EGLE, DNR, USFWS, NOAA, consultants

60% Design Package - Comment Categories

Category	Topic	# Comments
1	General Design Issues	64
2	Entrenched Channel, Channel Stability/Dimensions - Floodplain Access	18
3	Hydrodynamic Model / HECRAS	69
4	Alluvial Surface Definition	2
5	Work Sequence	9
6	TSCA vs. Non-TSCA	9
7	Adaptive Management Plan Approach	12
8	Dam Removal & Riffle Construction, Water Control Structure	9
9	Restored Bank Construction	8
10	Tributaries	1
11	Mobilized sediment downstream	8

207 total comments

Area 4 AM & CD References

(excerpts related to scope)

AM Section V.A. Description of the Proposed Action

…. the TCRA will include, but may not be limited to, the following tasks:

1) Dredging and/or excavation of PCB-contaminated instream sediments and riverbank/floodplain soils with elevated PCB concentrations (see estimated excavation area maps in Figures 3 & 4) to meet cleanup standards below;

…

3) Cut-back and stabilization of riverbanks to mitigate exposures to PCB-contaminated riverbank/floodplain soils and future erosion;

…

5) Ensuring that a stable river channel exists post-removal, including backfilling as appropriate and re-vegetation with native plant species; and …

CD Section VI.17.g. post-removal control activities, including restoration.

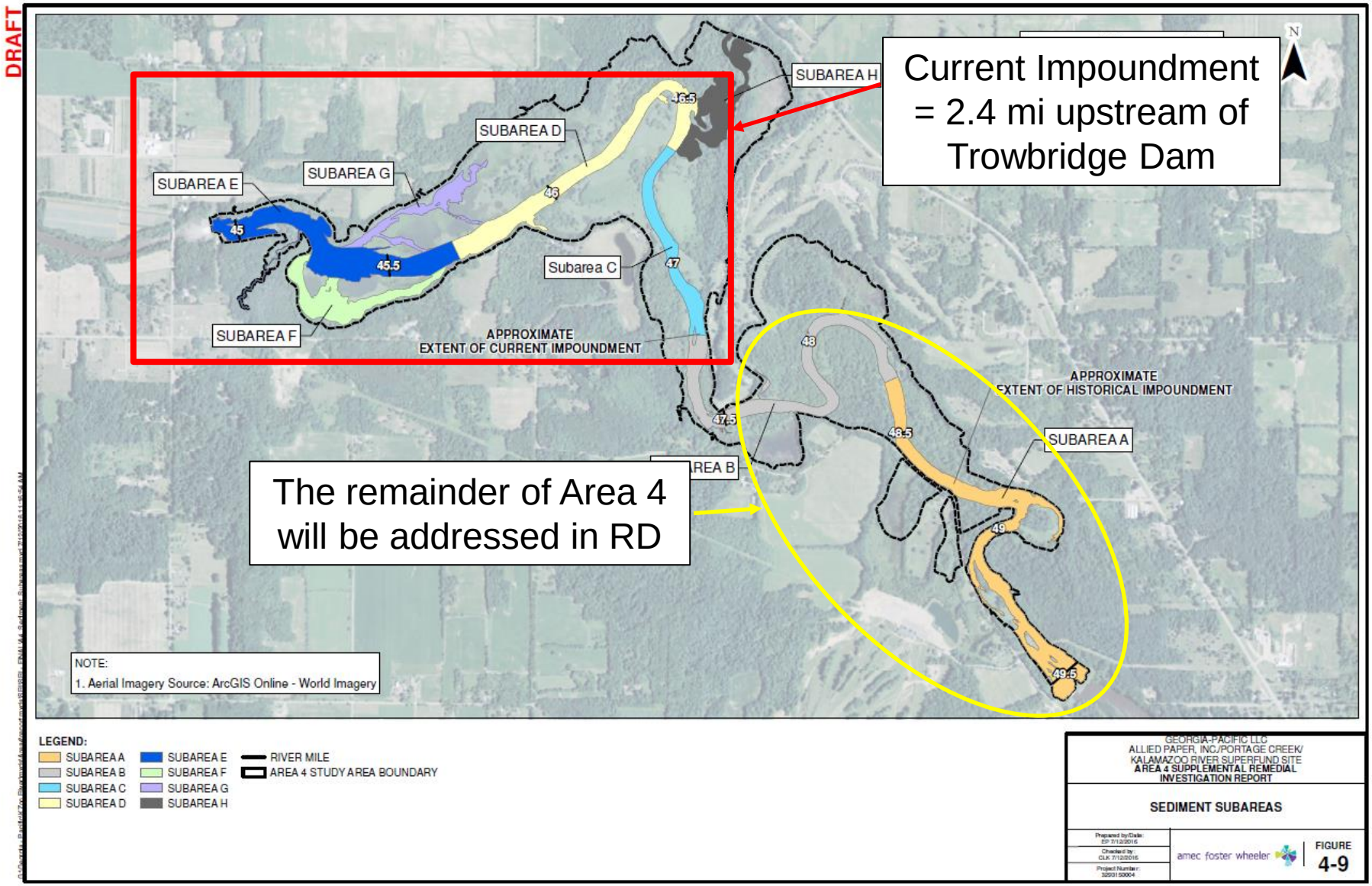
For the avoidance of doubt, SD will not be required to perform restoration work that will be undone by later remedial action in the Area.

CD Section V.14(b).

- Modify AM and/or RWP/deliverables in order to achieve and/or maintain Cleanup Standards of the AM or Area 4 FS

- Dispute resolution under Section XV.

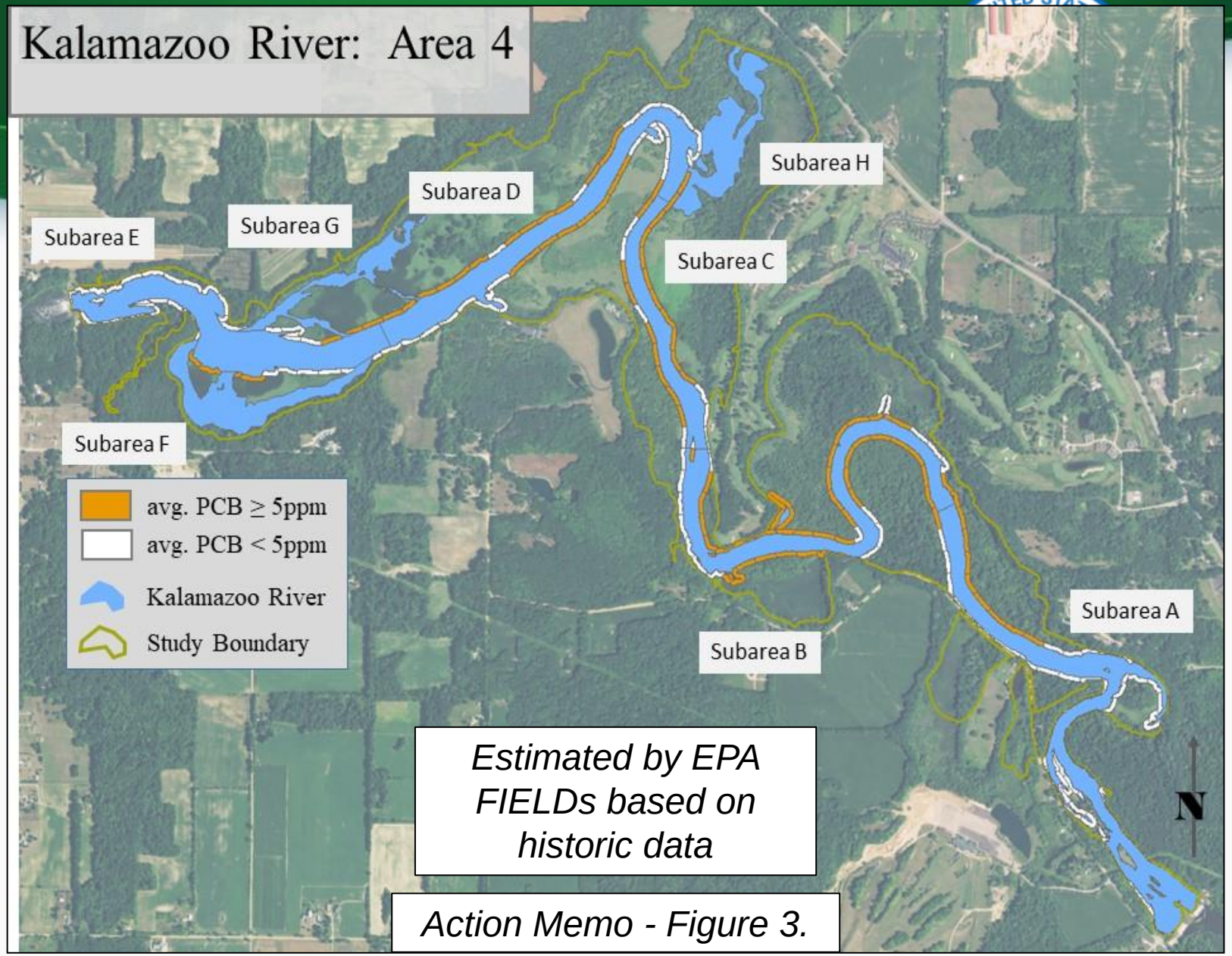
Area 4 TCRA



Current Impoundment = 2.4 mi upstream of Trowbridge Dam

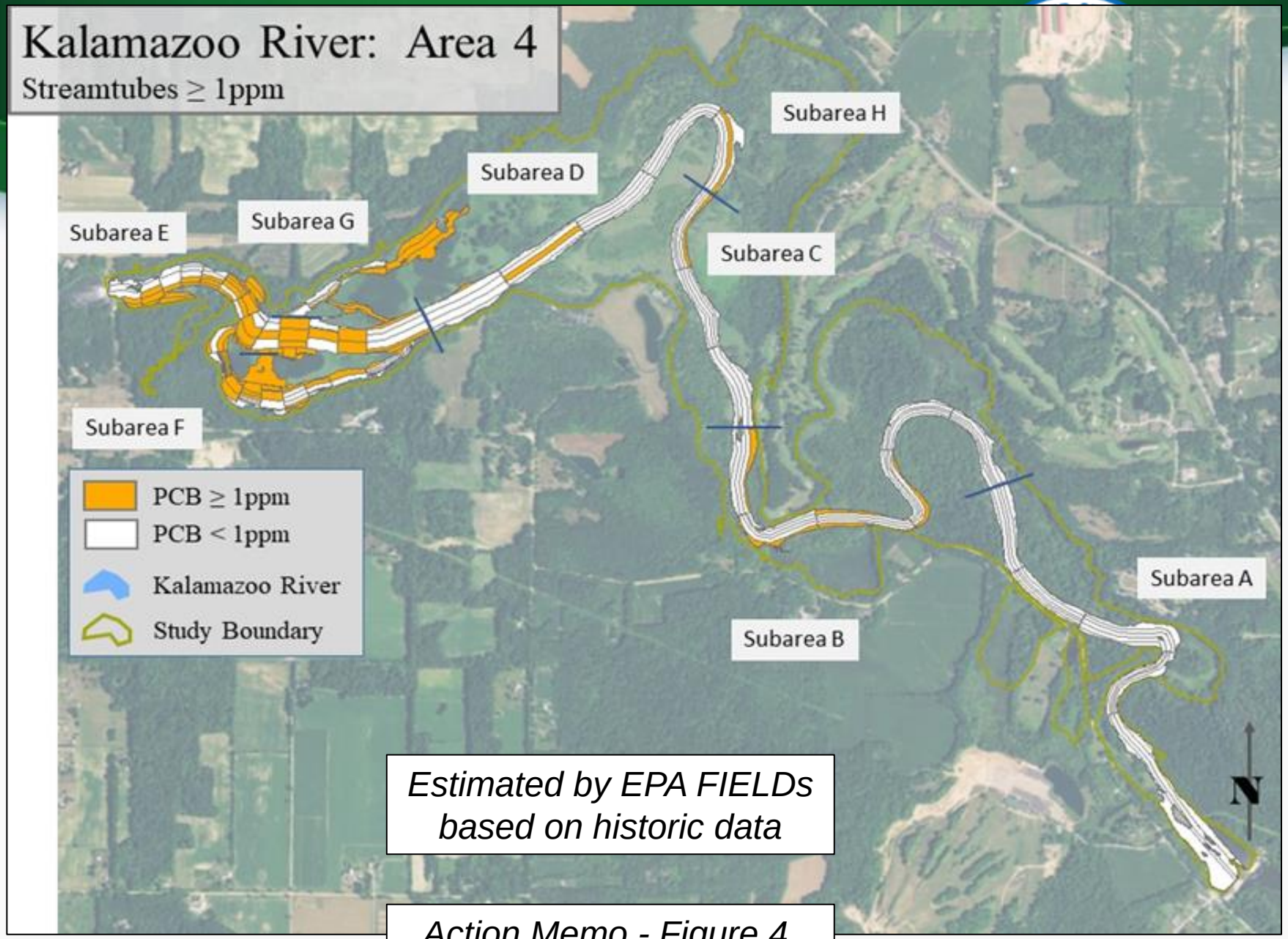
The remainder of Area 4 will be addressed in RD

Subareas E, F & G
Looking upstream



Estimated by EPA FIELDs based on historic data

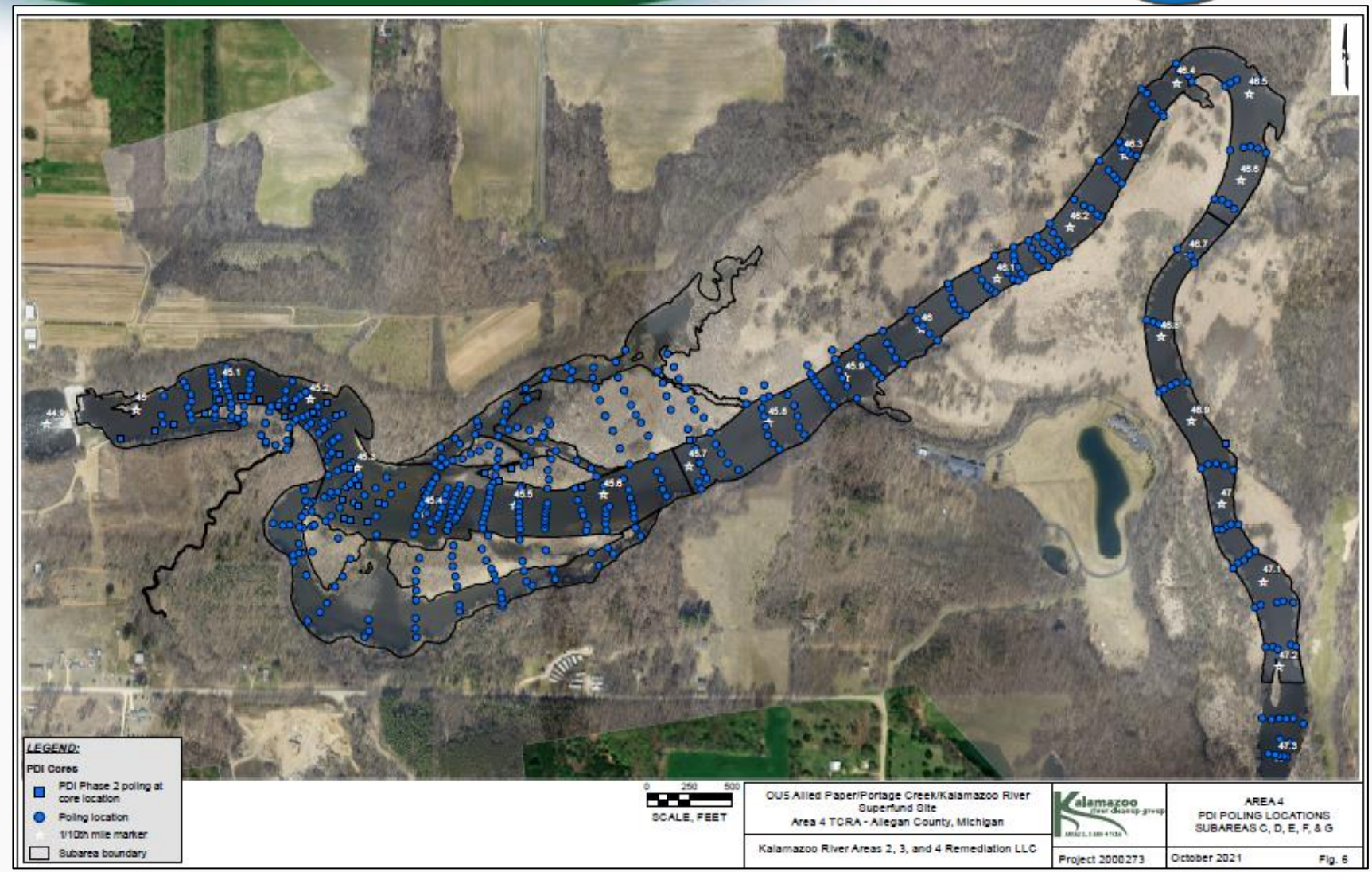
Action Memo - Figure 3.



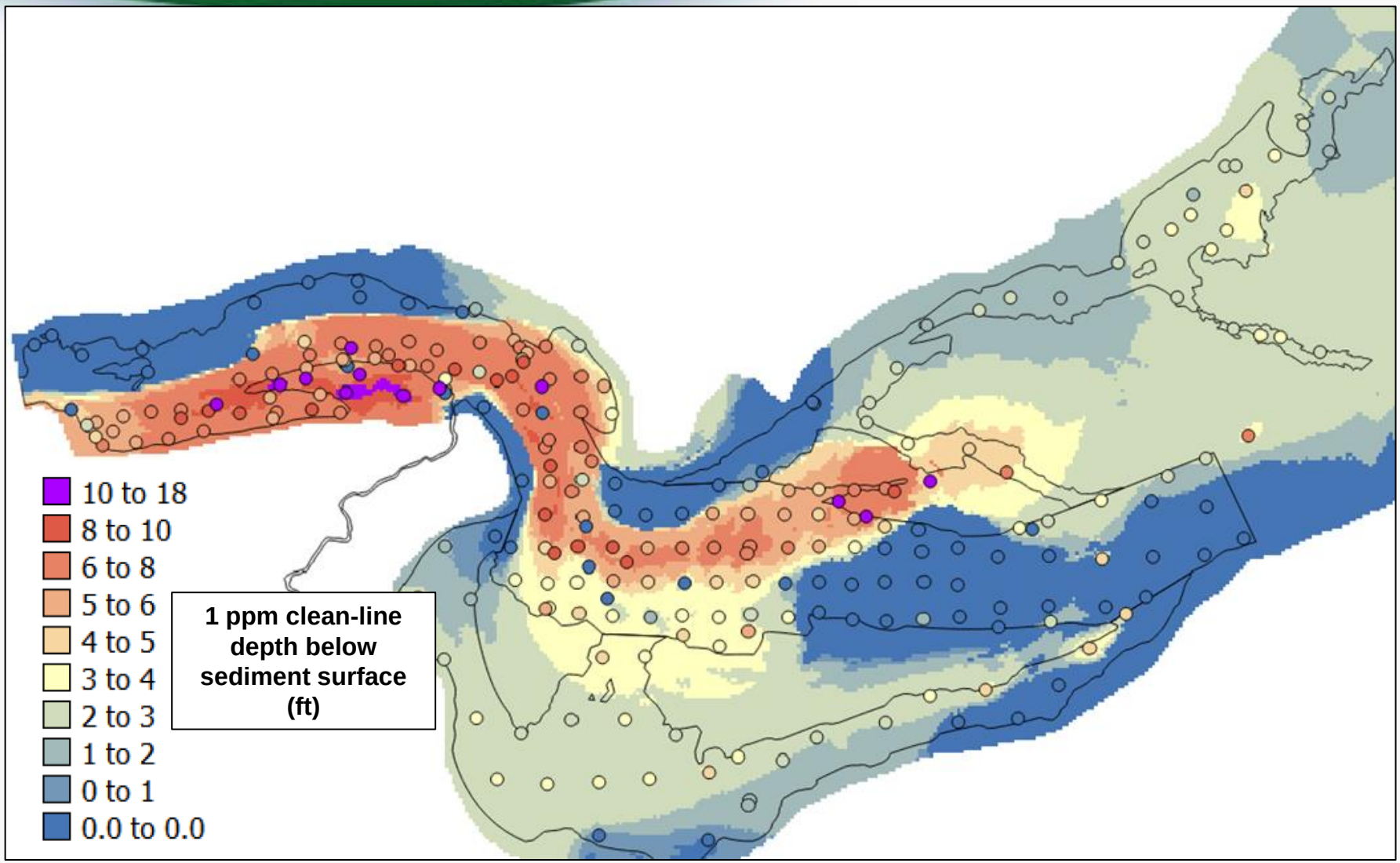
Estimated by EPA FIELDs based on historic data

Action Memo - Figure 4.

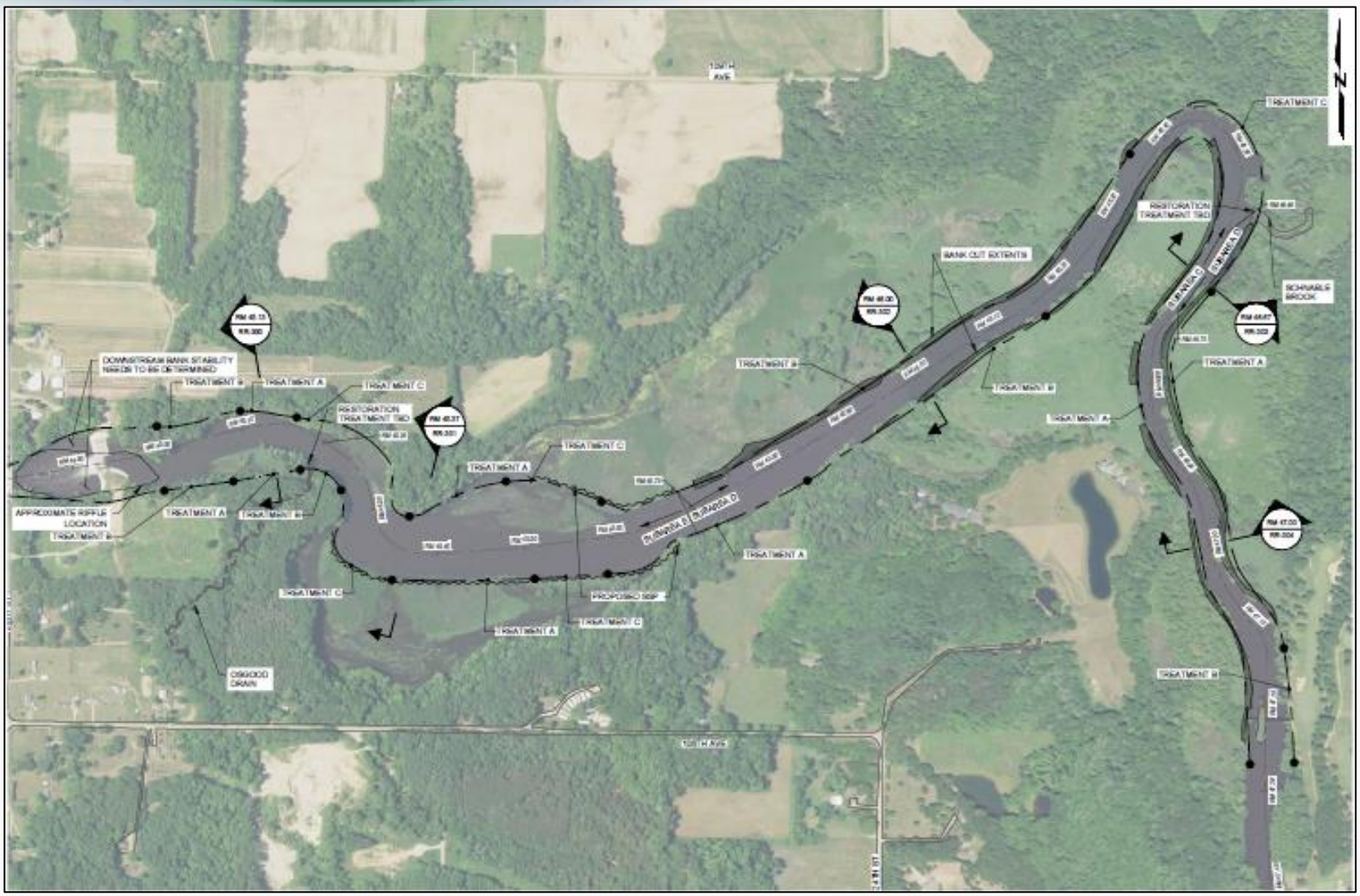
Pre-Design Investigation
'Poling' Locations



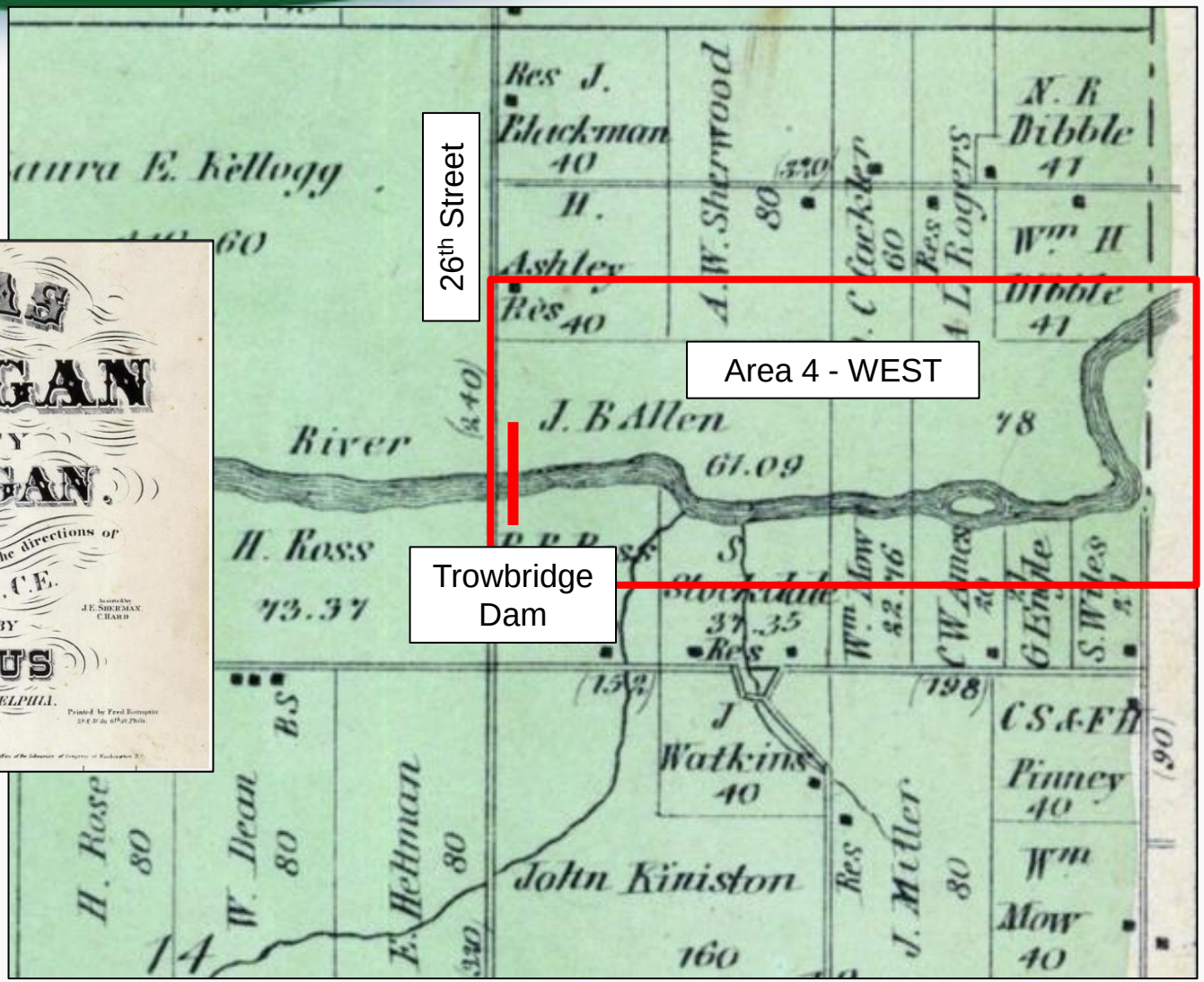
PDI - Phase 1 & 2 data



Potential Removal Footprint



Pre-Dam Channel (cerca 1873)



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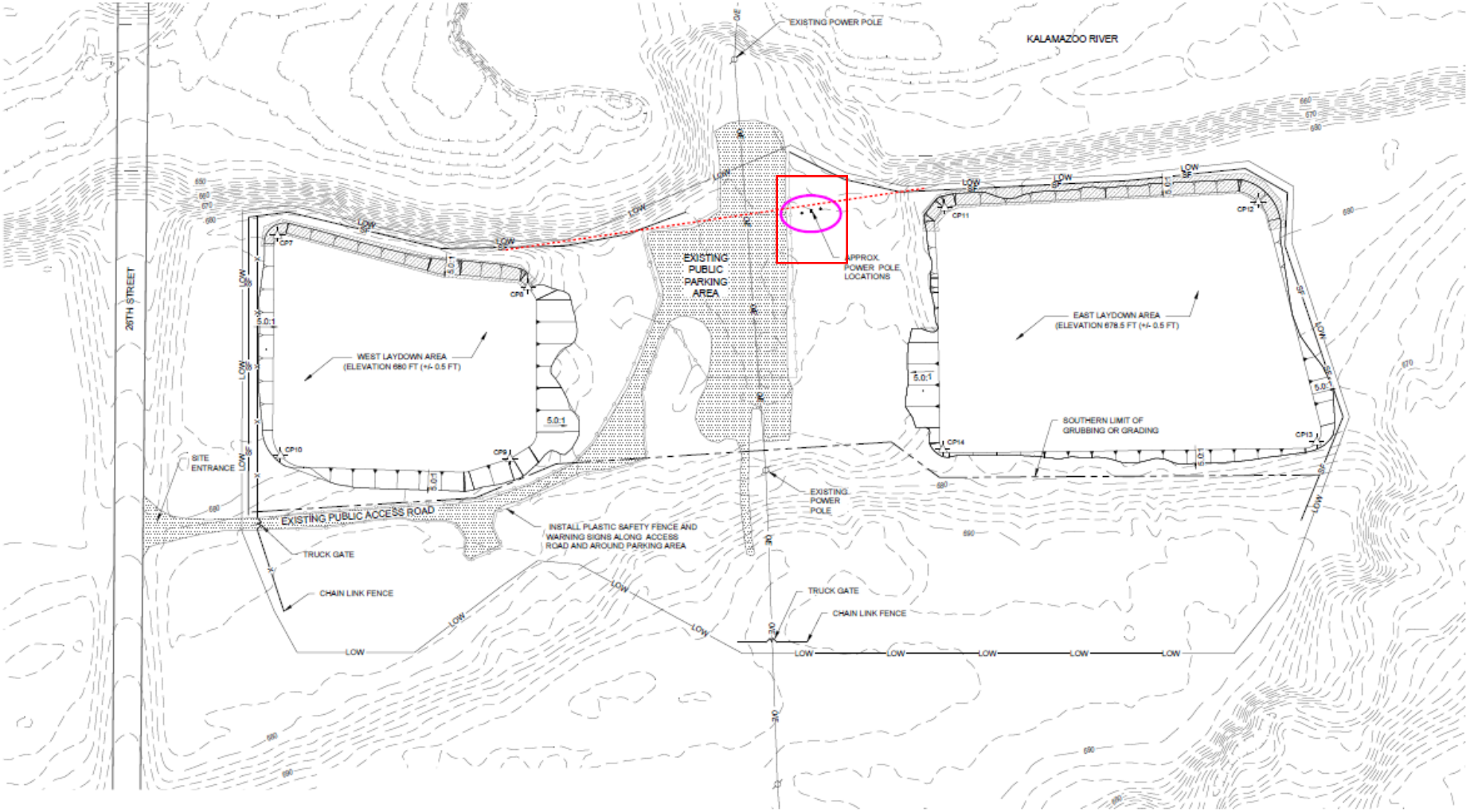
2021 Staging Area Grading Project



Current Condition – 26th St. Staging

Kalamazoo River CAG Input

Kalamazoo River CAG
community advisory group

Recommendations on the Proposed Trowbridge Dam Park

TO: U.S. Environmental Protection Agency

DATE: November 2, 2020

The Kalamazoo River CAG has reviewed the Concepts developed by EPA for a potential park located next to the Trowbridge Dam. The CAG would like to offer our strong support and excitement about the potential for using this land in such a positive way for the community.

We offer the following input as EPA further refines its ideas and approach to the positive restoration of this land:

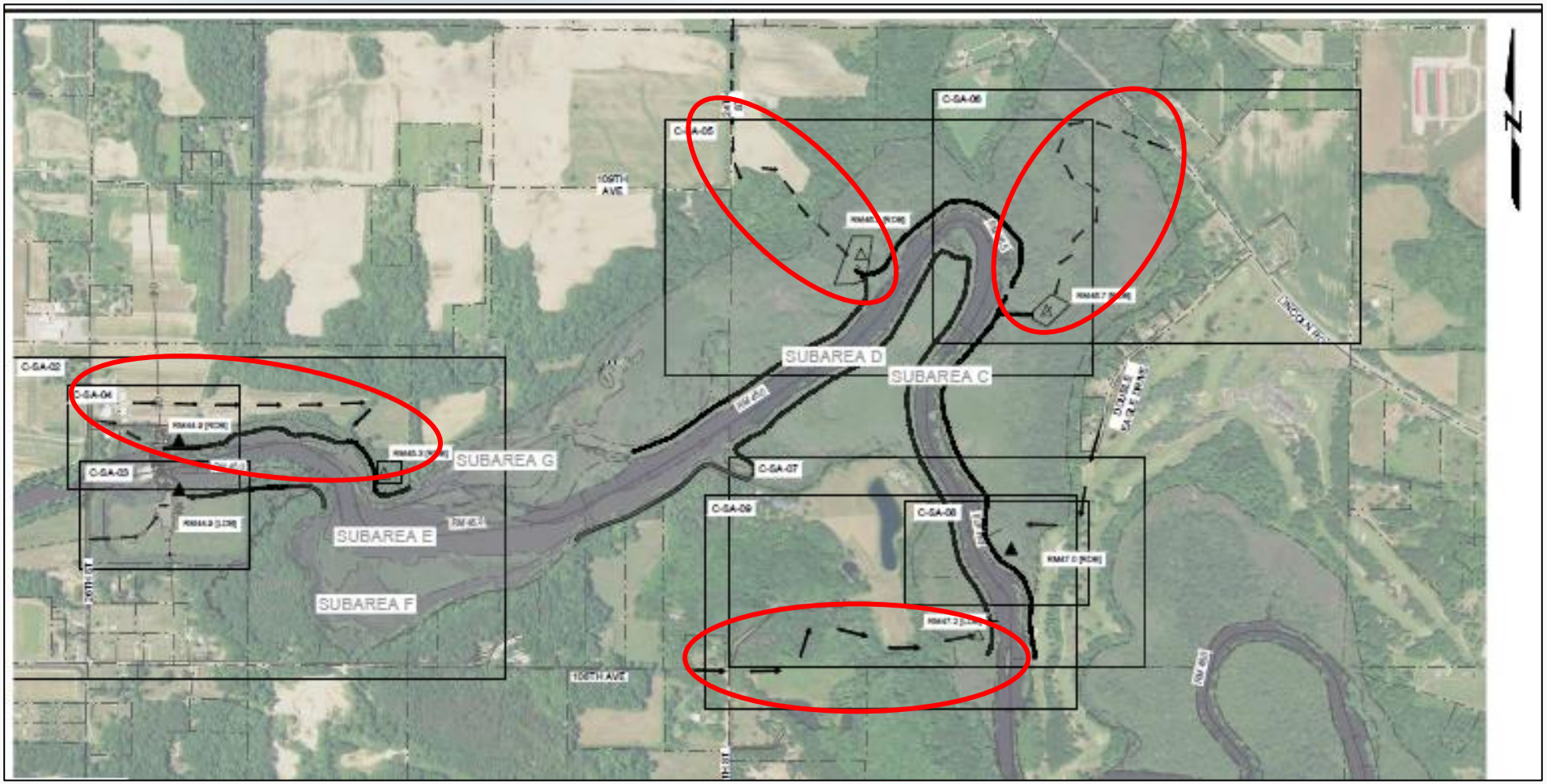
- We envision the best use of the property as a family friendly environment with day-use recreation including picnic areas, walking trails, and access to the river.
- We would like to see a strong focus on restoring wetlands, woodlands, and prairies and promoting native flowers and birds.
- We encourage a strong focus on environment education and like the idea of an additional focus on the history of the site.
- A boat launch is important both for recreation and as a rescue launch for emergency boats, however we do not believe that a separate kayak dock is necessary, as these can use the same launch area.
- We would like to see a focus on access to the river for fishing and hiking, including a fishing pier and a walking trail along the river.
- The CAG does not recommend overnight camping and has strong reservations about how this could be safely managed.

Thank you for the opportunity to provide input to this exciting proposal. We look forward to ongoing conversations with EPA as these concepts are refined and in the ultimately planning and construction of the park.

Staging Area Restoration Workgroup

Potential Access Road / Staging Area

Clearing & Construction - 2022



Trowbridge TCRA Website

https://response.epa.gov/trowbridgedam

EPA United States Environmental Protection Agency

OSC

Profile | Events | Notices | Images | Documents | Pol/SitReps | Contacts | Links | Map | Account

TROWBRIDGE TOWNSHIP DAM AREA

ALLEGAN, MI - REGION V

KML | RSS | location | area map | bookmark

Site Contact:

Paul Ruesch
OSC
ruesch.paul@epa.gov

26th Street & Kalamazoo River
Allegan, MI 49010
response.epa.gov/trowbridgedam

Latitude: 42.5743210
Longitude: -85.7362747

Edit Site Info | Edit Contaminants

This website contains supporting information associated with a time critical removal action in the Trowbridge Township Dam Area, which is located in Area 4 of Operating Unit 5 (OU5) of the Kalamazoo River Superfund Site.

The project involves removal of PCB contaminated in-stream sediments and riverbank soils within an approximate 2.4 mile section of the river immediately upstream of the Trowbridge Township Dam (aka 26th Street Dam) in Trowbridge Township, Michigan.

For additional information, visit the Pollution/Situation Report (Pol/Sitreps) section.

You must have a response.epa.gov account before requesting access to this resource.

To get access, send an email message with your request to Paul Ruesch (ruesch.paul@epa.gov) and provide a description of why you want access to this resource, including your first name, last name, email address, organization, and phone number.

Once you receive communication from Paul Ruesch (ruesch.paul@epa.gov), return to this Web page, and click the button below to open the map.

When prompted to sign in, select the Enterprise Login option.

Kalamazoo Area 4 TCRA Viewer

For additional information, visit the Notices section.

Delete Site

RESOURCES

Events
List All...

Notices
Community/Worker Health & Safety: COVID-19...
List All...

Images
None for this site

Documents
Action Memorandum...
Consent Decree Settlement Fact...
Outreach Presentation...
Resident Outreach Letter - Cts...
List All...

Pol/SitReps
None for this site

Contacts
OSC
ruesch.paul@epa.gov
CIC
russell.diane@epa.gov
Director
ballotti.douglas@epa.gov
List All...

Links
Kalamazoo River Superfund Site...
List All...

Special Notices

Photos

Consent Decree
Action Memo
Fact Sheets
Work Plans
Presentations
Reports

Links

Data/Mapping Viewer

Paul Ruesch
312-919-4382
ruesch.paul@epa.gov

Mark Mills
269-967-5367
millsm@michigan.gov