

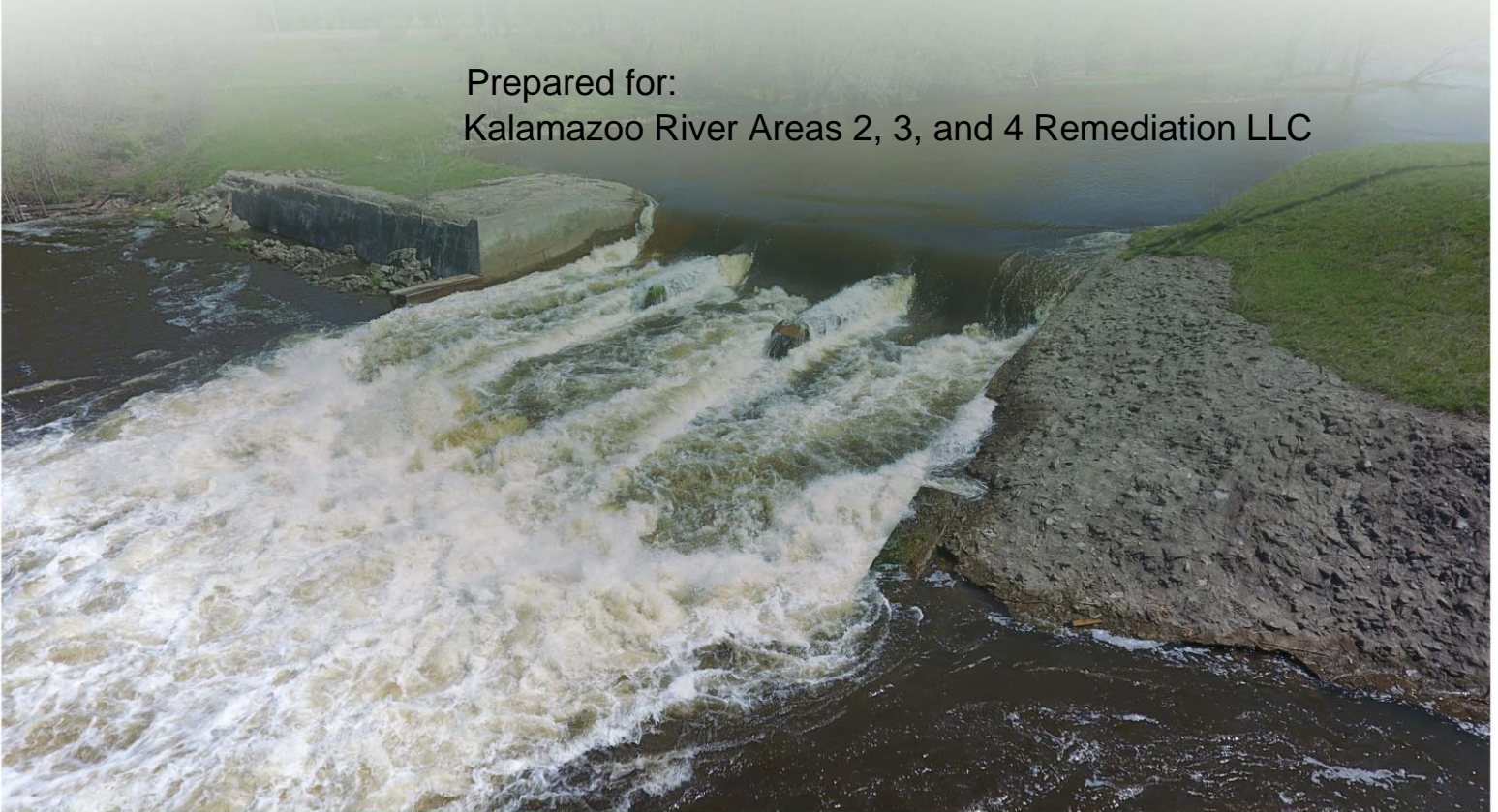


February 29, 2024

## 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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Prepared for:  
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February 29, 2024  
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A handwritten signature in blue ink, appearing to read 'John Jolly'.

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## Abbreviations and Acronyms

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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
TCRA	time-critical removal action

## Introduction

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Reporting Period: February 1 to February 29, 2024. Report #46.

GEI Consultants Inc. 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**

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### **1.1 Actions Taken**

- A letter from NCR regarding outstanding issues and schedule for the Removal Work Plan (RWP) Part 1 resubmission was submitted to EPA on February 7, 2024.
- A signed Land Use Permit (LUP) for haul road work was received from the Michigan Department of Natural Resources (MDNR) and executed on February 6, 2024.
- Haul road extension work began on February 9, 2024.
- A letter from EPA in response to NCR's January 5, 2024 letter regarding the RWP Part 1 resubmission was received on February 8, 2024.
- A letter from EPA in response to NCR's January 5, 2024 letter regarding the scope, target design parameters, and submission date for the RWP Part 2 was received on February 9, 2024.
- A coordination call between EPA, State, and LLC representatives was held on February 22, 2024.
- A call between EPA and LLC representatives to discuss Beaver Island proposed sampling and pre-construction staging area sampling was held on February 26, 2024.

### **1.2 Data**

- No data was submitted or received in February.

### **1.3 Deliverables**

- The January monthly update summary was submitted to EPA on February 2, 2024.
- The Trowbridge Dam Area 2023 Mussel Survey Report was reviewed and accepted by MDNR on February 2, 2024.

## **2. Problems Encountered**

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- 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**

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- No community relations activities took place in February.

## **4. Anticipated Work**

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- LLC is expecting comments from EPA on the Confirmation Sampling Plan, Waste Management Plan, Water Treatment System Technical Memorandum, and Traffic Control Plan.
- LLC is expecting a meeting with EPA to discuss effects of biotoxicity results on TCRA activities.
- LLC is expecting to revise the RWP Part 1 and prepare responses to the EPA's December 21, 2023 and February 8, 2024 letters.

## **5. Waste Tracking**

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

## **6. Project Schedule**

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

## 7. References

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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**

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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.