

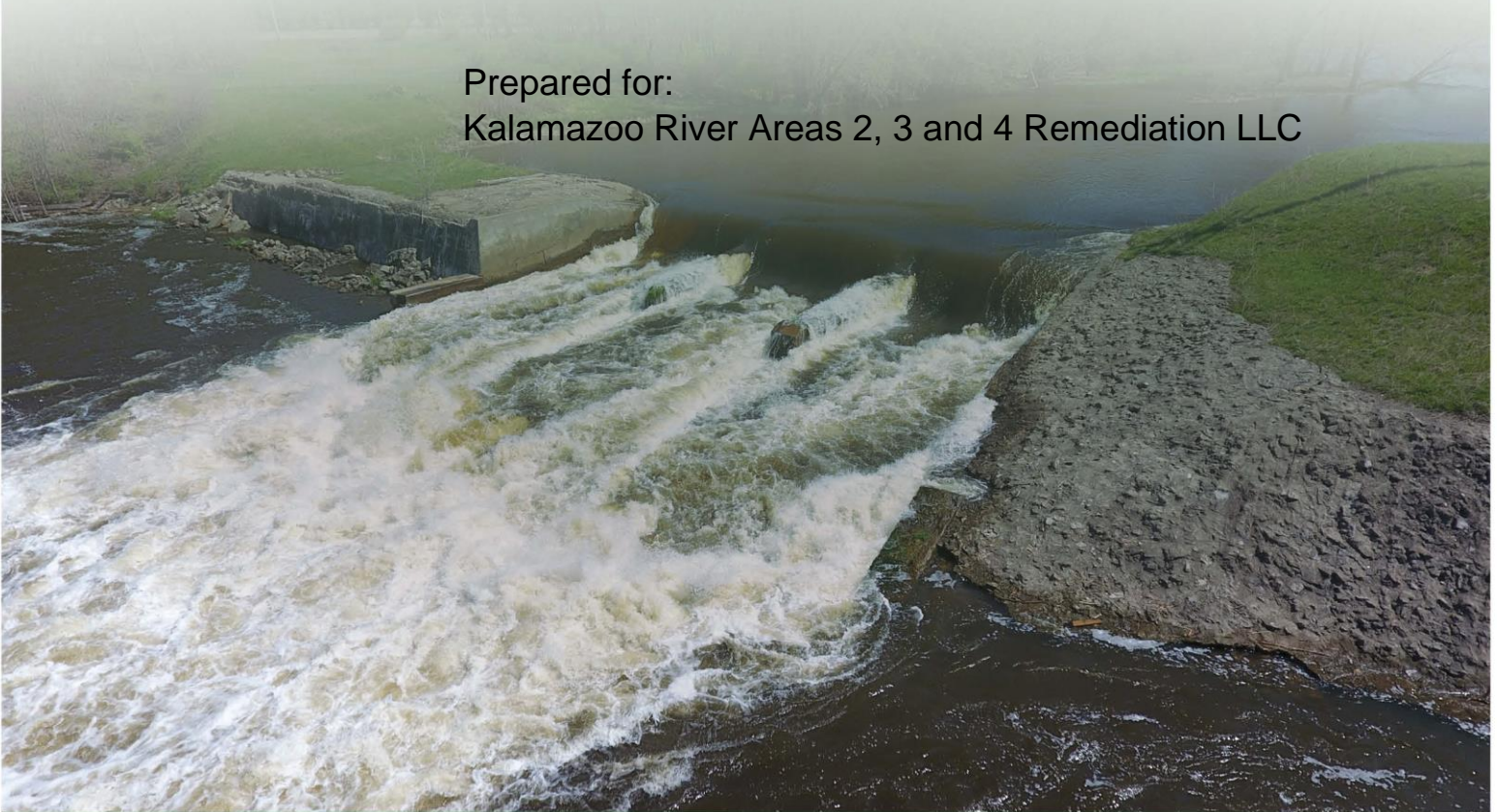


March 5, 2025

## 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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Prepared For:  
Kalamazoo River Areas 2, 3 and 4 Remediation LLC

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March 5, 2025  
GEI Project No. 2000273

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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
SOM	State of Michigan
SPA	Sediment Processing Area
TBSA	Trowbridge Staging Area
TCRA	time-critical removal action
WTS	water treatment system

## Introduction

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Reporting Period: February 1 to February 28, 2025. Report #58.

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**

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## **1.1 Actions Taken**

- Weekly construction meetings were held with GEI, LLC, J.F. Brennan, EPA, and State representatives on February 4, 11, 18, and 25, 2025.
- Mobilization of materials and equipment for the 2025 dredging season began on February 4, 2025 and continued throughout the month.
- Assembly of the Michael B dredge was completed on February 4, 2025.
- Perimeter fencing installation around the perimeter of the SPA was completed on February 11, 2025.
- Pre-construction soil sampling was conducted on MDNR property for an access road from the Trowbridge Staging Area (TBSA) to Osgood Spit and was completed on February 11, 2025.
- The amended Land Use Permit for Area 4 construction was approved by MDNR on February 13, 2025.
- Clearing and grubbing for the access road to Osgood Spit was completed the week of February 17, 2025.
- Excavation of non-impacted overburden soil on Osgood Spit was conducted between February 19 and February 22, 2025. Excavated soil was staged at TBSA on geotextile with future use to be determined.

## **1.2 Data**

- Results from pre-construction sampling conducted prior to installation of access/haul roads on the right descending bank were received, and data validation has been completed.
- No data was submitted to EPA in February 2025.

## **1.3 Deliverables**

- The January monthly update summary was submitted to EPA on February 5, 2025.
- Discharge criteria in response to the National Pollutant Discharge Elimination System (NPDES) Substantive Requirements Document was received from EPA on February 13, 2025. EPA provided guidance to proceed with a water treatment system (WTS) monitoring and sampling plan in alignment with the approved and issued Authorization to Discharge Under the National Pollutant Discharge Elimination System (NPDES) for OU5 Area 1 (EGLE, 2022).
- The 2024 Mussel Relocation Report was submitted to EPA on February 17, 2025. No further mussel survey or relocation efforts are currently anticipated or necessary for the Area 4 TCRA.
- A memo requesting a sitewide (Areas 2, 3, and 4 TCRA) analysis reduction and data validation level revision for PE samples was submitted to EPA on February 20, 2025.
- Field Change Form 1 for a proposed clarification of bank and stream tube turbidity screen protection locations and inspection process/procedure was submitted to EPA on February 25, 2025.
- A revised sand separation memo for Area 4 TCRA Part 1, originally submitted as Appendix C of the Waste Management Plan (dated January 27, 2025), was submitted to EPA on February 27, 2025.

## **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 GEI-led community relations activities took place in February 2025.

## 4. Anticipated Work

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- The 2025 dredge kick-off meeting between GEI, LLC, JF Brennan, EPA, and State representatives is scheduled to be held at the project command center on March 25, 2025.
- EPA responses to the revised Traffic Control Plan, Site Security Plan, Removal Work Plan Part 2 Draft 1, Waste Management Plan, and Field Change Order 1 are expected.
- The Construction Quality Assurance Plan is expected to be revised and re-submitted once an updated Air Monitoring and Sampling Plan is received from EPA.
- An analytical results summary from TBSA and haul road pre-construction soil sampling is expected to be prepared.
- Dredge and marine equipment mobilization, mechanical dredge plan assembly, dredge pipe fusion, and sand wheel assembly are expected to continue.
- WTS mobilization and assembly (e.g., plumbing, fusing HDPE pipe, filling media tanks, installing/connecting polymer frac tanks and start system commissioning) are expected to continue.
- Staging and/or removal of impacted and non-impacted stumps on the right-descending bank in Subarea E is expected to be completed.
- Test pits on Beaver Island to assess lithology (i.e., cobbles and boulder sizing) are expected to be completed.
- Clearing and grubbing at Osgood Spit is expected to be completed during dredging.

## **5. Waste Tracking**

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No waste was removed from the site in February 2025.

## **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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EGLE (2022). Authorization to Discharge Under the National Pollutant Discharge Elimination System. MIU990043. State of Michigan: Water Resources Division, June 22.

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 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