

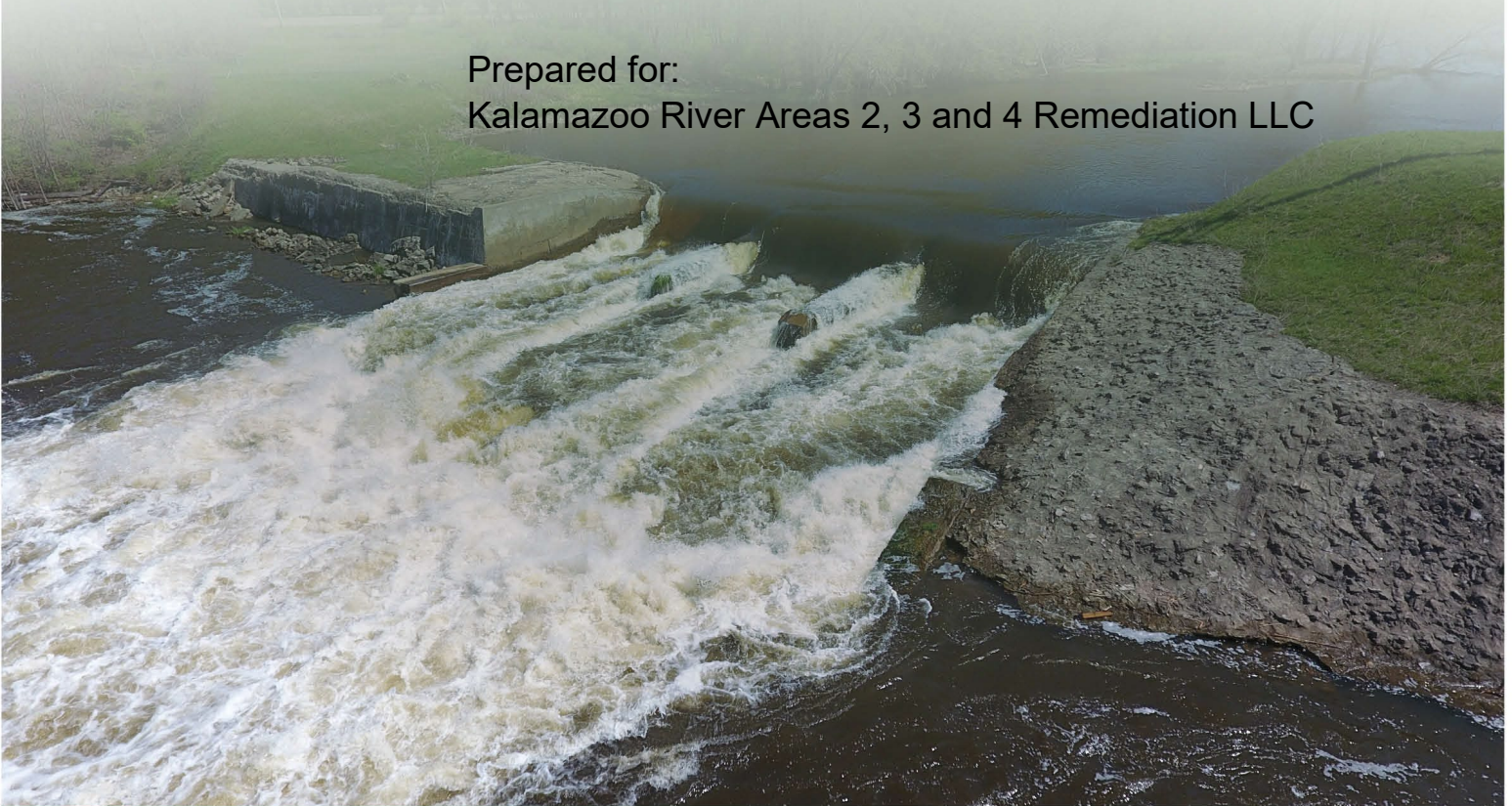


April 1, 2025

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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April 1, 2025
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Abbreviations and Acronyms

| | |
|------|---|
| 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 |
| RDB | right descending bank |
| SOM | State of Michigan |
| SPA | sediment processing area |
| TBSA | Trowbridge staging area |
| TCRA | time-critical removal action |
| WTS | water treatment system |

Introduction

Reporting Period: March 1 to March 31, 2025. Report #59.

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

1.1 Actions Taken

- Held weekly construction meetings with GEI, LLC, J.F. Brennan, EPA, and State representatives on March 4, 11, and 18, 2025.
- Completed clearing and grubbing at Osgood Spit and staged materials at Trowbridge staging area (TBSA).
- Installed erosion control measures at Osgood Spit, areas along the right descending bank (RDB), and east laydown area.
- Continued sediment processing area (SPA) activities, including water treatment system (WTS) mobilization and assembly, dewatering of the SPA sump, repairs to the liner, and construction of a sand wheel pad.
- Completed assembly of utility barge, idler barge, and 470 mechanical excavation barge.
- Completed Area 4 Subarea C and D bank inspections on March 11, 2025 and replaced river mile markers as needed on March 20, 2025.
- Reinstalled buoy line upstream from the Trowbridge Dam.
- Deployed turbidity monitoring barges and began readings on March 21, 2025.
- Mowed and mulched vegetation on G1 island on March 21, 2025.
- Conducted 2025 construction kickoff meeting and site tours with GEI, J.F. Brennan, EPA, and State of Michigan representatives on March 25, 2025.
- Completed baseline pre-dredge survey (bathymetric and topographic) on March 29, 2025.

1.2 Data

- No data was submitted to EPA in March 2025.

1.3 Deliverables

- The February monthly update summary was submitted to EPA on March 5, 2025.
- The revised Construction Quality Assurance Plan was submitted to EPA on March 12, 2025.
- A request for sitewide (Areas 2, 3, and 4 TCRA) analysis reduction and data validation level revision for PE samples was approved on March 12, 2025.
- Comments were received from EPA on March 17, 2025 regarding the Waste Management Plan and Sand Separation Technical Memo.
- Comments were received from EPA on March 17, 2025 regarding Field Change Form #1 (Establish bank and stream tube turbidity screen protection locations and inspection process/procedure).
- A letter and comments were received from EPA on March 17, 2025 regarding the Area 4 TCRA Removal Work Plan, Part 2.
- A letter notifying EPA of the commencement of discharge from the WTS was submitted to EPA on March 21, 2025.
- JF Brennan's Stormwater Pollution Prevention Plan (SWPPP) was shared with EPA on March 21, 2025.
- A letter requesting an extension on the due date for Removal Work Plan, Part 2 revisions was sent to EPA on March 29. A new due date of May 21, 2025 was approved by EPA on March 31, 2025.

2. Problems Encountered

- 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

- GEI attended the Kalamazoo River Community Advisory Group virtual meeting on March 27, 2025.

4. Anticipated Work

- EPA responses to the revised Traffic Control Plan and Site Security Plan are expected.
- An analytical results summary from TBSA and haul road pre-construction soil sampling is expected to be submitted.
- WTS construction and testing, including collection of effluent samples, are expected to be completed.
- Dredge pipe hydrostatic testing is expected to be completed.
- Sample collection, gradation, and analytical testing from the sand separation process is expected to be conducted.
- Bank protection measures in Subareas C and D are expected to be installed.
- Full-scale dredging is expected to begin.
- A revised Confirmation Sampling Plan and a revised Waste Management Plan are expected to be submitted.

5. Waste Tracking

No waste was removed from the site in March 2025.

6. Project Schedule

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

7. References

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 | | 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 | Q4 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 4-1-2025

Checked by: RH 4-2-2025