REMEDIAL ACTION CONTRACT 2 FOR
REMEDIAL, ENFORCEMENT OVERSIGHT, AND
NON-TIME CRITICAL REMOVAL ACTIVITIES
IN REGION 5

SITE MANAGEMENT PLAN
TAR LAKE SITE
MANCELONA, ANTRIM COUNTY, MICHIGAN

Prepared for
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604

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1.0 INTRODUCTION

SulTRAC has prepared this Site Management Plan (SMP) to support the sampling and analysis plan (SAP) for the Tar Lake Site (Site) in Mancelona, Michigan, under the U.S. Environmental Protection Agency (EPA) Remedial Action Contract (RAC) 2 for Region 5, Contract No. EP-S5-06-02, Work Assignment (WA) No. 064-TATA-0571. The purpose of this WA is to address issues and follow-up actions identified in EPA's 2009 Five Year Review (FYR) Report for the site (EPA 2009). This SMP describes the responsibilities of managing field investigations at the Tar Lake site (Site) in Mancelona, Antrim County, Michigan. Activities to be managed include access, security, contingency procedures, connection of utilities, storage and disposal of investigation-derived waste (IDW), and other procedures to be followed in the field.

2.0 SITE INVESTIGATION ACTIVITIES

Field activities specified in the field sampling plan (FSP) in the SAP (SulTRAC 2010) include field investigation, field sampling, and disposal of IDW. The quality assurance project plan (QAPP) in the SAP (SulTRAC 2010) describes project organization and discusses management responsibilities.

The field investigation is anticipated to require four to six weeks. The field team leader is responsible to ensure that the tasks proceed according to the specified standard operating procedures. Site investigation activities related to this SMP include:

- Obtain additional data to determine whether smoke tunnel tar is causing unacceptable levels of groundwater contamination. Develop cost estimates to expand the biosparge system in order to address smoke tunnel groundwater contamination and/or to implement other remedies (e.g., source removal, containment).

- Obtain additional data and evaluate whether Mancelona Township landfill contains chemicals above industrial, commercial, and recreational use levels, and whether the landfill is a source of groundwater contamination. Develop remedial alternatives and cost estimates to address these issues, if warranted.

- Obtain additional data and evaluate whether residential property is acceptable for unrestricted use (UU)/unlimited exposure (UE) and can be deleted from the Site, or whether additional remedial action is needed. Develop remedial alternatives and cost estimates to address this issue, if warranted.

- Collect fish samples from Nelson Lake. Evaluate risks from Nelson Lake fish ingestion, and from ingestion of fish containing lead and mercury in Peckham Lake. Develop remedial alternatives and cost estimates to address these issues, if warranted.

- Conduct monitoring well inventory. Determine if any wells should be sampled. Abandon wells that are not useable or needed.

3.0 SITE ACCESS

The Site is located in a mixed area of industrial and residential land uses; however, most of the field work will be conducted on the vacated industrial property. Public roads can be used for general access to the Tar Lake site. Access to Nelson Lake will utilize a private residential driveway, if permission is granted. Residential properties will be accessed through public roads.

Access to specific, privately owned locations in the study area is contingent on voluntary access agreements to be obtained by EPA. SulTRAC will notify the EPA work assignment manager (WAM) (Karen Cibulskis) of field access requirements, and the WAM will then notify the property owners within 1 week regarding any site-related activities. The WAM is expected to provide an initial notification of the field investigation work at the site that covers the entire duration of investigation activities. The private residents are expected to sign voluntary access agreements stipulating that the EPA and its personnel can conduct on-site work after notifying the residents a reasonable time prior to initiating the work.

Actual locations of some sampling may change from proposed locations during the field program, given the age of the neighborhood, density of residences, presence of aboveground and underground utilities, and need to obtain permission from private residents.

The general sequence for work at a specific location will be as follows:

1. SulTRAC will notify EPA of the addresses or locations where work will occur. EPA will prepare a letter requesting access to the location(s). The property owners/managers will be contacted, and access will be requested.
2. The location(s) will be field marked, and the local utilities protection service (Michigan's one call Miss Dig System) and/or the City of Mancelona will be contacted to mark utilities in the work areas. Work locations may be adjusted if necessary.
3. Each property owner/manager will be informed of the dates and duration of the work.
4. Work sites will be photographed before any intrusive work begins, and after completion, to document property condition.
5. Each property owner/manager will be notified when work is complete.

4.0 SITE SECURITY

The majority of the study area is on vacant, unsecured industrial property. A portion of the site surrounding Tar Lake is secured by a perimeter chain-link fence with locked gates. Access to Tar Lake will be through the northern or western gates. The support area from which the field investigation work will be staged is located near the northern gate within the secured area.

While the majority of activities will occur within the fenced portion of the Site, other activities such as fish sampling on Nelson Lake and soil and groundwater sampling downgradient of the Site, and residential soil sampling will occur either outside the fenced area or off-site. As a result, SulTRAC generally will not be able to control site access and security. Fish sampling generally will be conducted in a non-visible area; therefore, no site security issues are anticipated. Soil sampling at the residential area will occur outside of the fenced portion of the Site and is anticipated to be in a secure setting. As a result, SulTRAC will establish a 20-foot perimeter around the work area as an "exclusion zone," into which no unauthorized personnel will be allowed. Because activity within each residential sampling location will be temporary, the exclusion zone area will not be a physical boundary.

Typically, work sites will be vacated by the end of each work day. Heavy equipment such as drilling rigs will be transported to the Site and secured in the locked fenced area. Equipment will not be left in place overnight on public right-of-ways in unsecured areas.

Because the residential sampling is anticipated to occur in areas adjacent to or on public property, local residents or local news media likely will be interested in the scope and purpose of the field activities. SulTRAC field personnel will direct all public or media inquiries to the EPA WAM for further information. Field personnel will also notify the SulTRAC project manager of any public or media inquiries.

5.0 IDENTIFICATION AND MANAGEMENT OF INVESTIGATION-DERIVED WASTE

IDW is waste generated from investigative activities. IDW includes solid and hazardous waste, media (including soil and groundwater), and debris that contains "listed" hazardous waste or exhibits a characteristic of a hazardous waste. IDW also includes media and debris that is not hazardous but is contaminated with hazardous constituents.

IDW generated during the field sampling activities at the Site will include homogenized soil extracted from borings and monitoring well installations, purge water from well development and groundwater sampling, as well as wastewater from decontamination and equipment rinsate procedures. SulTRAC anticipates disposal of soil boring cuttings within the original borehole. Soil cuttings accumulated through monitoring well installation will be spread evenly in areas surrounding the original borehole. Visually contaminated soil (soil containing tar) will be containerized in 55-gallon drums for off-site disposal. Groundwater removed through monitoring well development or sampling will be disposed of in locations near the source of removal as directed by the Michigan Department of Natural Resources and Environmental (MDNRE) and EPA. Wastewater accumulated through decontamination procedures will be disposed of in the same manner as groundwater.

6.0 WASTE MANAGEMENT REQUIREMENTS

All IDW will be disposed of as required by Michigan and local regulations. As directed by MDNRE and EPA, most IDW will be returned to its origin, i.e. soil placed in the borehole or groundwater disposed of downgradient near the monitoring well.

6.1 SOIL

As discussed above, non-contaminated soil will be disposed of either in the original borehole or at a location near the borehole. Soil visually contaminated with tar will be containerized in 55-gallon drums for off-site disposal. Prior to off-site disposal, drums will be labeled with appropriate Department of Transportation (DOT) identification and classification information. The drums will be stored in an area that trucks can readily access in order to facilitate disposal following characterization. The storage area will be within a fenced, secure area.

6.2 WATER

Groundwater and wastewater will be disposed of in locations near the source of removal, as directed by MDNRE and EPA. As a result, no storage, or off-site removal will be required.

6.3 MISCELLANEOUS

Additional IDW generated from soil sampling will include disposable personal protective equipment (PPE). Disposable PPE will be managed according to the level of contamination encountered during field activities. In general, PPE will be managed as nonhazardous solid waste, particularly if little contact occurs with the sampling media and low levels of contaminants are involved.

7.0 REFERENCES

SulTRAC. 2010. "Sampling and Analysis Plan (SAP) for Tar Lake Site, Mancelona, Antrim County, Michigan." Prepared for U.S. Environmental Protection Agency (EPA) under Contract No. EP-S5-06-02. June.

U.S. Environmental Protection Agency (EPA). 2009. "First Five-Year Review Report for Tar Lake Superfund Site, Mancelona, Antrim County, Michigan." June.