Mr. James Saric  
Remedial Project Manager  
USEPA Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, Illinois 60604-3511

Subject:  
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Supplemental Remedial Investigations/Feasibility Studies Monthly Progress Report  
Area 1 – Morrow Dam to Plainwell Dam  
Area 2 – Plainwell Dam to Otsego City Dam (Otsego City Impoundment)  
Area 3 – Otsego Impoundment  
September 2011

Dear Jim:

Attached is the 55th monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Supplemental Remedial Investigations/Feasibility Study (SRI/FS). This progress report is submitted as per Paragraph 37 of the February 2007 Administrative Settlement Agreement and Order on Consent (AOC) for Remedial Investigations/Feasibility Studies (Docket No. V-W-07-C-864), as well as Section 7.1 of the associated Statement of Work (SOW). If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS U.S., Inc.

Michael J. Erickson, P.E.  
Vice President

Attachment

Copies:  
Michael Berkoff, USEPA  
Sam Borries, USEPA  
Paul Bucholtz, MDEQ  
Sharon Hanshue, MDNR  
Jeff Keiser, CH2M HILL  
Todd Goeks, NOAA  
Jessica Winter, NOAA  
Richard Gay, Weyerhaeuser Company  
Martin Lebo, Ph.D., Weyerhaeuser Company  
Kathy Huibregtse, ENVIRON  
Garry Griffith, P.E., Georgia-Pacific LLC
MONTHLY PROGRESS REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE SRI/FS
AREA 1 (MORROW DAM TO PLAINWELL DAM)
AREA 2 (PLAINWELL DAM TO OTSEGO CITY DAM – OTSEGO CITY IMPOUNDMENT)
AREA 3 (OTSEGO IMPOUNDMENT)

REPORT #55, SEPTEMBER 2011

PREPARED BY ARCADIS U.S., Inc.
OCTOBER 14, 2011

ON BEHALF OF GEORGIA-PACIFIC LLC

SUBMITTED TO

JAMES SARIC, REMEDIAL PROJECT MANAGER
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Significant Developments and Activities during the Period, Including Actions Undertaken Pursuant to the AOC and SOW

- September 1 is the project start date for Area 3 – former Otsego Impoundment project.

- On September 1, the United States Environmental Protection Agency (USEPA) forwarded to ARCADIS approval of the request to extend the due date for the revised Area 1 Supplemental Remedial Investigation Report (Area 1 SRI Report) to October 3rd.

- On September 1, ARCADIS forwarded to CH2M HILL and CDM the revised Risk Characterization for the Terrestrial Baseline Ecological Risk Assessment for Area 1 (Area 1 BTERA) (Section 6 of Appendix B to the Area 1 SRI Report), including tables and figures for review and feedback. These materials were forwarded to the Michigan Department of Environmental Quality (MDEQ) on September 8 for review and feedback.

- On September 1, ARCADIS forwarded to USEPA and MDEQ the revised Section 2.3 (Other Sources of PCBs), revised Section 9.1 (Summary of Prior BERA), and revised Section 6.2.4 (Off-Channel Areas) of the Area 1 SRI Report for review and feedback.

- On September 1, MDEQ forwarded to ARCADIS GIS files containing their interpretation of the geomorphic features within the Area 2 Impoundment along with comments on the differences between MDEQ and ARCADIS features.

- On September 1, CDM forwarded to ARCADIS the shape file with former Plainwell Impoundment sampling areas.

- On September 2, ARCADIS forwarded to USEPA and MDEQ the revised Section 8.1 (Summary of Previous Risk Assessment for Other Exposure Pathways) of the Area 1 SRI Report for review and feedback.

- On September 6 and 9, ARCADIS, Georgia-Pacific, USEPA, and MDEQ participated in conference calls to discuss Area 1 SRI Report interim deliverable feedback.

- On September 7, ARCADIS forwarded to MDEQ a proposed sampling locations figure associated with the Soil and Sediment Field Sampling Plan for the Otsego City Impoundment (Area 2 Field Sampling Plan).

- On September 8, ARCADIS, CH2M HILL, and CDM participated in a conference call to discuss the draft Area 1 BTERA risk characterization.

- On September 13, ARCADIS submitted to USEPA the Area 2 Field Sampling Plan.
On September 14, ARCADIS forwarded to CDM the shape files for the feature types presented in the Field Sampling Plan for Area 2.

On September 15, ARCADIS forwarded to CDM the shape files for the bank and sediment sample locations presented in the Field Sampling Plan for the Otsego City Impoundment.

On September 15, USEPA provided approval for Georgia-Pacific and ARCADIS to move forward with the floodplain and in-stream main channel sampling in Area 2. Draft comments on the Area 2 Field Sampling Plan were also provided.

On September 15, ARCADIS forwarded to USEPA and MDEQ the revised Section 6.3 (Floodplain Soil) for the Area 1 SRI Report for review and feedback.

On September 16, ARCADIS forwarded to USEPA and MDEQ the revised Section 6.2.2.2 (Hot Spot Assessment Areas) for the Area 1 SRI Report for review and feedback.

On September 20, ARCADIS forwarded to USEPA and MDEQ the revised Appendix B (Area 1 BTERA) for the Area 1 SRI Report for review and feedback.

On September 22, ARCADIS, Georgia-Pacific, and CH2M HILL participated in a conference call to discuss feedback on the Area 1 SRI Report floodplain and hot spot “storyline” text.

On September 23, ARCADIS forwarded to USEPA and MDEQ the revised Section 6.2.2.4 (River Section 8) for the Area 1 SRI Report for review and feedback.

On September 26, CH2M HILL provided to ARCADIS feedback on the floodplain soils submittal (Section 6.3) for the Area 1 SRI Report.

On September 27, ARCADIS forwarded to USEPA and CH2M HILL a proposed approach for non-PCB sampling and analysis in Area 2.

Georgia-Pacific awaits USEPA’s approval of:

- The Proposed Soil and Sediment Field Sampling Plan for the Otsego City Impoundment (Area 2) (including comments from MDEQ), and

- The draft Former Plainwell Impoundment and Plainwell No. 2 Dam Area Spring 2011 Bank Conditions Monitoring Report.
Monthly Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS – Areas 1, 2, and 3

REPORT #55, SEPTEMBER 2011

Data Collected and Field Activities Conducted during the Period

- In September, Georgia-Pacific completed control of invasive species at the former Plainwell Impoundment and Plainwell No. 2 Dam Area. The invasive species were identified during the August 10 visual inspection.

- In September, Georgia-Pacific completed the herbaceous vegetation monitoring as defined in 5.6.3 of the Former Plainwell Impoundment TCRA Final Design Report and 5.7.2 of the Plainwell No. 2 Dam Area TCRA Final Design Report. The results of the vegetation monitoring will be included in the Former Plainwell Impoundment and Plainwell No. 2 Dam Area 2011 Bank Conditions Monitoring Report.

Laboratory Data Received during the Period

- No laboratory analytical data were received in September. Additionally, no laboratory analytical data were received in July, so no validated data are included in this monthly report.

Problems

- None.

Actions Taken to Correct Problems

- None.

Developments Anticipated during the Next Two Reporting Periods

- On October 3, ARCADIS is scheduled to submit the revised Area 1 SRI Report to USEPA.

- On October 3, ARCADIS is scheduled to begin soil and sediment sampling in the Otsego City Impoundment.

- In October, ARCADIS, Georgia-Pacific, USEPA, and MDEQ are scheduled to discuss the Area 3 SRI/FS Work Plan – Otsego Impoundment.

- In October, Georgia-Pacific is scheduled to complete replacement tree planting at the former Plainwell Impoundment. Replacement tree planting in the Plainwell No. 2 Dam Area is not expected to occur until next spring. Tree planting needs were identified at the August 10 visual inspection. ARCADIS, Georgia-Pacific, USEPA, MDEQ, Michigan Department of Natural Resources, and United States Fish and Wildlife Service attended the August 10 inspection.
By November 30, the Area 3 SRI/FS Work Plan – Otsego Impoundment is due to be submitted to USEPA.

No laboratory analytical data were received in August, so no validated data will be included in the October monthly report.