United States Environmental Protection Agency

EPA Proposes Cleanup for Area 3 of Kalamazoo River

Allied Paper/Portage Creek/Kalamazoo River Site
Otsego Township, Michigan July 2021

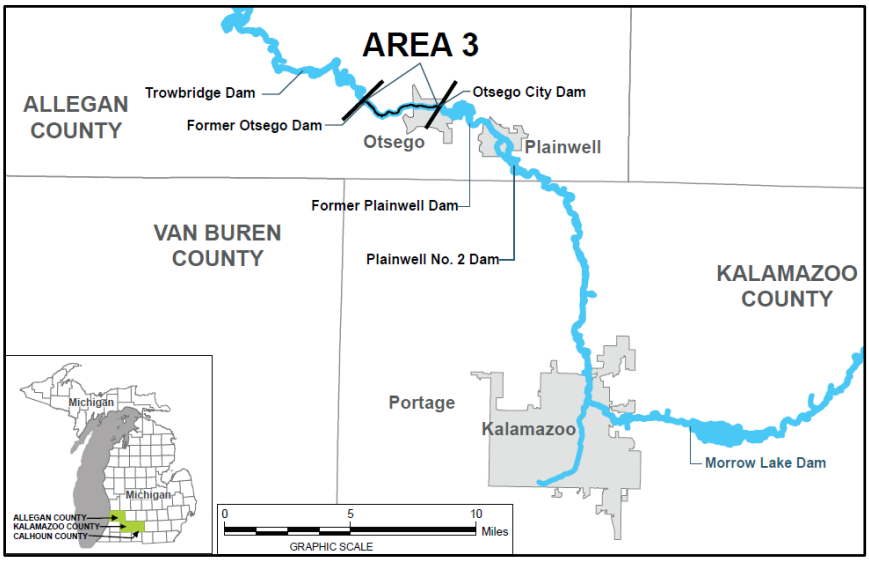
U.S. Environmental Protection Agency, working with the Michigan Department of Environment, Great Lakes and Energy, or EGLE, has proposed a plan to clean up polychlorinated biphenyl, or PCB, contamination in the part of the Kalamazoo River known as Area 3 *(see map, below)*. Area 3 is a 3.4-mile stretch of the Kalamazoo River located between the Otsego City Dam and the former Otsego Township Dam, Otsego, Michigan. This section of the river flows through forested wetland areas with predominately recreational land use, although some residential parcels exist along Area 3.

Public Comment Period for Area 3

EPA will accept comments on the proposed cleanup plan from July 8 to August 6, 2021. This fact sheet provides background information, describes cleanup options and explains EPA's recommendations.[1] EPA may modify the plan or select another solution based on new information or public comments, so your opinion is important. There are several ways to offer comments:

- Fill out and mail the enclosed comment form.
- Attend the virtual public meeting (*see "Upcoming Meeting," page 2*) and submit an oral statement.
- Go to: www.epa.gov/superfund/allied-paper-kalamazoo and click the "Public Comment Form" and fill out.

EPA must receive your comments online or in an envelope postmarked by Friday, August 6, 2021.



[1]*Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, known as the Superfund law) requires public notice about this proposed cleanup plan through a newspaper announcement, comment period, and an opportunity for a public meeting. This fact sheet summarizes information contained in the feasibility study and other documents that can be reviewed at the information repositories listed on page 2.*

You are invited

EPA invites you to discuss the proposed cleanup plan for Area 3 of the Kalamazoo River site. See the "Upcoming Meeting" box on page 2 for details.

For more information

Please contact any of the following team members with questions:

EPA
Jim Saric
Remedial Project Manager
312-886-0992
saric.james@epa.gov

Diane Russell
Community Involvement Coordinator
989-395-3493
russell.diane@epa.gov

You may also call EPA toll-free: 800-621-8431, weekdays, 9:00 a.m. to 5:30 p.m.

Webpage

For more details about the site, visit the webpage at: www.epa.gov/superfund/allied-paper-kalamazoo

Para la versión en español de esta hoja informativa, visite www.epa.gov/superfund/allied-paper-kalamazoo

Upcoming Meeting

EPA will host a virtual public meeting on July 15, 2021. After a brief presentation, EPA will answer questions about the proposed plan. EPA will then take public comments and a court reporter will record the meeting and all comments.
The public meeting will be conducted via the Zoom web platform. You can join the Zoom public meeting at any time during the event hours below or by phone toll-free at: 888-475-4499 (*please note, phone numbers will be displayed on screen. To hide your phone number, dial *67 and then dial the toll-free number*).

Date: July 15, 2021
Time: 6 – 8 p.m.
Link to join: https://bit.ly/35qsNGj

You will be instructed to provide the meeting ID and passcode listed below whether you join online or by phone:
Meeting ID – 971 2500 1013
Passcode – 227278

You can also join the meeting by going to www.epa.gov/superfund/allied-paper-kalamazoo and clicking on the posted link.

About the Allied Paper/Portage Creek/Kalamazoo River Site

In 1977, a public health advisory was issued recommending residents to not eat fish caught from the Kalamazoo River due to PCBs found in the fish. In 1990, the Kalamazoo River, as part of the Allied Paper/Portage Creek/Kalamazoo River Superfund site, was placed on the National Priorities List, a roster of the nation's hazardous waste sites needing cleanup.

Since 1998, EPA-lead response actions have removed nearly 470,000 cubic yards of contaminated material from the site, cleaned up and restored 12 miles, including the banks, of the Kalamazoo River and Portage Creek (including banks), and capped 82 acres of contaminated material.

Why is cleanup needed?

EPA has studied the risks to human health and the environment. Based on its studies, the Agency determined PCB contamination poses unacceptable hazards and risks to people eating fish caught from the Kalamazoo River. Fish advisories are currently in place to warn residents and anglers about the risks associated with eating fish from the river. The Agency also determined PCB contamination in floodplain soil may pose a risk to birds and mammals. There are currently no restrictions in place to control human exposure to sediment, soil, or surface water.

Information Repositories

EPA keeps site project information and reference materials for the public to read at local information repositories. Copies of cleanup documents for the Allied Paper/Portage Creek/Kalamazoo River site are available at the locations below. You may also access cleanup documents on EPA's site profile page at www.epa.gov/superfund/allied-paper-kalamazoo.

U.S. EPA Records Center
77 W. Jackson Blvd., 7th Floor
Chicago

Charles Ransom Library
180 S. Sherwood
Plainwell

Kalamazoo Public Library
315 S. Rose
Kalamazoo

Allegan Public Library
331 Hubbard St.
Allegan

Otsego District Library
219 S. Farmer St.
Otsego

Waldo Library
Western Michigan University
1903 W. Michigan Ave.
Kalamazoo

EPA's Evaluation Criteria

These criteria guide EPA as it weighs different cleanup alternatives. These criteria are separated into three categories: Threshold, Balancing, and Modifying Criteria. **Threshold Criteria** determines if a cleanup alternative protects human and environmental health and complies with all applicable or relevant and appropriate requirements, or **ARARs**. More generally, ARARs are the federal and state regulations that EPA must follow during a cleanup. In cases where the federal and state regulations are slightly different, EPA will follow the stricter regulations. **Balancing Criteria** are used to identify trade-offs between cleanup alternatives. **Modifying Criteria** are based on public comments, and can prompt modifications to the recommended cleanup alternative (*see figure below).*

Cleanup alternatives

EPA considered five options for cleaning up Area 3. They are summarized in the table on page 4. EPA developed these alternatives using combinations of different technologies and evaluated each option in detail against criteria established by federal law (*see figure below*).

The last two criteria, state and community acceptance, will not be evaluated until after the comment period and public meeting.

Alternative 1: No Action. EPA is required to include a no-action alternative as a basis for comparison with other cleanup options. Under this alternative, EPA would take no additional action. No cost is associated with this alternative.

Alternative 2: This alternative involves capping floodplain soil with a clean soil cover; excavating riverbank soil and sediment; site controls and capping or removal of floodplain soil from private recreational

Threshold Criteria

must be met for an alternative to be eligible.

Balancing Criteria

determines relative strengths and weaknesses among the criteria that meet threshold.

Modifying Criteria

implemented once all public comments are evaluated. They may prompt modifications to the preferred alternative to achieve the end result of a preferred alternative for cleanup in which EPA and the community can be confident.

areas; and long-term monitoring, inspections and maintenance of riverbank erosion controls. Alternative 2 includes capping approximately 18.1 acres of floodplain soil and excavating 11,300 cubic yards of riverbank soil and sediment along 6,600 feet of the river. The estimated cost of this alternative is $26.3 million.

Alternative 3: This alternative is the same as Alternative 2, except the floodplain soil containing PCBs within 50 feet of the channel will be excavated with the remainder being capped. Alternative 3 includes capping approximately 15.8 acres and excavating 8,300 cubic yards of floodplain soil, plus excavating 11,300 cubic yards of riverbank soil and sediment along 6,600 feet of the river. The estimated cost of this alternative is $28.7 million.

Alternative 4 (EPA's recommended cleanup option): This alternative is the same as Alternative 2, except the floodplain soil containing PCBs will be excavated instead of capped. Alternative 4 includes excavating approximately 58,500 cubic yards of floodplain soil and 11,300 cubic yards of riverbank soil and sediment along 6,600 feet of the river. The estimated cost of this alternative is $33.4 million.

Alternative 5: Alternative 5 includes Area-3-wide excavation of floodplain soil and sediment, restoration of floodplain areas, site controls, and long-term monitoring and maintenance. Alternative 5 includes excavating 427,000 cubic yards of floodplain soil and 94,300 cubic yards of sediment. The estimated cost of this alternative is $116 million.

EPA's recommended alternative

Based on the criteria, EPA believes that Alternative 4 provides the best balance of the evaluation criteria among all the alternatives. Alternative 4 would be protective of human health and the environment, would meet all federal and state ARARs, would achieve the remedial action objectives for this proposed cleanup, would be straightforward in its implementation, and would be effective in the long term and permanent.

Next steps

EPA, with input from Michigan EGLE and the community, will make the final decision on what cleanup alternative will be implemented. Public comments are important and could encourage EPA to modify or change its preliminary cleanup decision. EPA will review and compile responses to public comments in a document called a responsiveness summary. The final cleanup plan will be published in a document called a "record of decision" or ROD, and available for public review in the site's administrative record. The ROD (which includes the responsiveness summary) and administrative record will be available for review at www.epa.gov/superfund/allied-paper-kalamazoo and at the information repositories shown on page 2.

Bank work in Area 3.

Options	Overall protection of human health and the environment	Compliance with ARARs	Long-term effectiveness and permanence	Reduction of toxicity, mobility, or volume through treatment	Short-term effectiveness	Implementability
Alternative 1	○	⊙	⊙	N/A	○	N/A
Alternative 2	●	●	●	N/A	●	●
Alternative 3	●	●	●	N/A	●	●
*Alternative 4	●	●	●	N/A	●	●
Alternative 5	●	●	●	N/A	●	⊙

Use This Space to Write Your Comments

EPA is interested in your comments on the proposed cleanup plan for the Area 3 of the Kalamazoo River. You may use the space below to write your comments; you may attach additional sheets of paper if you run out of space below. You may submit this form by detaching, folding, stamp and mail. Comments must be postmarked by August 6, 2021. If you have any questions, please contact Diane Russell directly at 989-395-3493, weekdays 9:30 a.m. – 5:30 p.m. Comments may also be sent via the web at www.epa.gov/superfund/allied-paper-kalamazoo and link to the public comment form. Mail written comments to Diane Russell at **1300 Bluff St., Suite 140, Flint, MI 48504**

Name _____

Affiliation _____

Address _____

City _____ State _____ ZIP _____

Kalamazoo River, Area 3 Comment Sheet

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fold

Place
First
Class
Postage
Here

Diane Russell
Community Involvement Coordinator
U.S. EPA Region 5 Superfund Division
1300 Bluff St., Suite 140
Flint, MI 48504

Kalamazoo River upstream of former Otsego Twp. Dam.

Kalamazoo River after Otsego Twp. Dam removal completed in 2018.

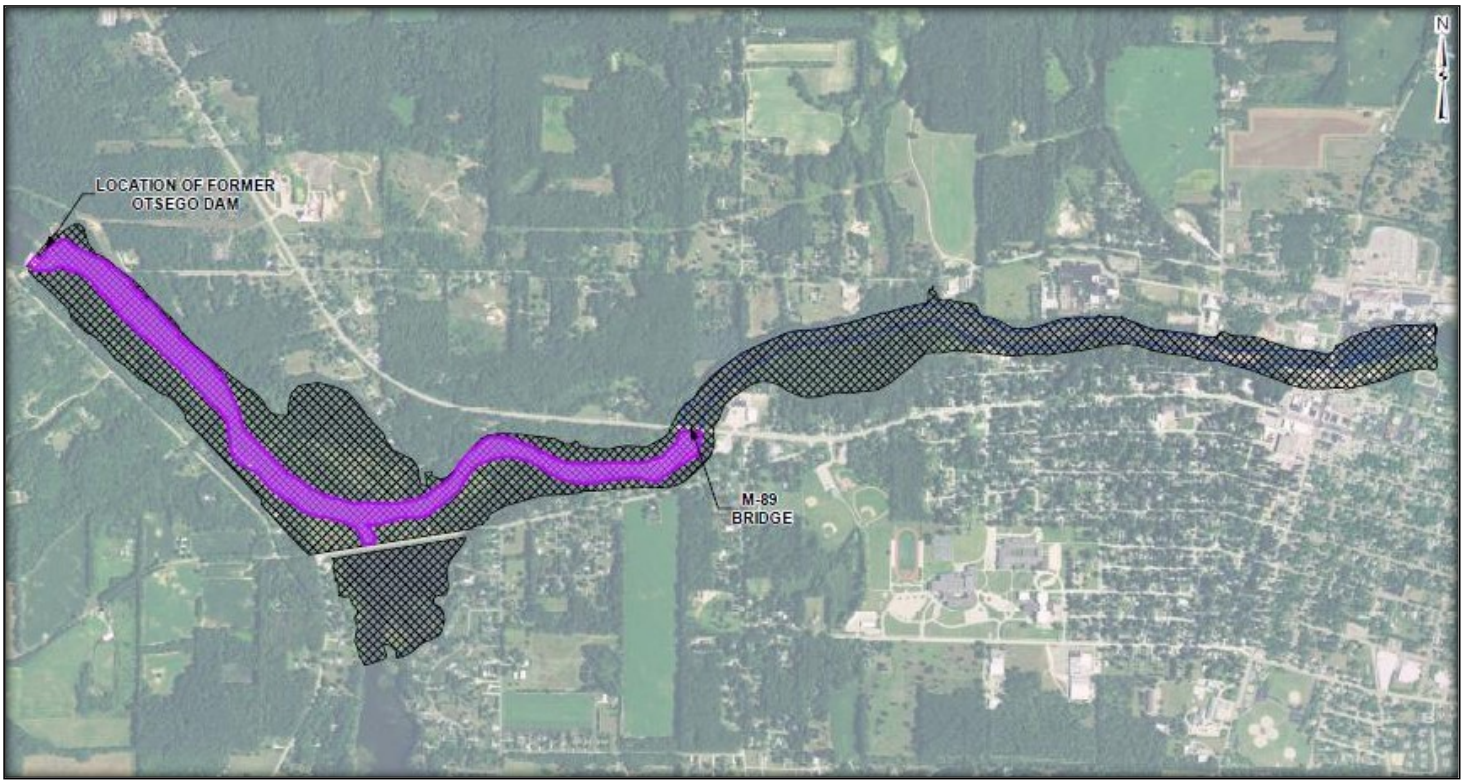

Figure showing area cleaned up by removal action upstream of former Otsego Township Dam, shaded in purple and completed in 2018. Area 3 floodplain areas evaluated for cleanup alternatives shown in grey hashing.

EPA Proposes Cleanup Plan for Area 3; Seeks Public Comments

Virtual Public Meeting

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- 6 - 8 p.m.
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- Passcode - 227278

You can also join the meeting by going to www.epa.gov/superfund/allied-paper-kalamazoo and clicking on the posted link.

If you will need special accommodations at the meeting, contact:
Diane Russell, Community Involvement Coordinator, 989-395-3493, russell.diane@epa.gov by July 12.

ALLIED PAPER/PORTAGE CREEK/KALAMAZOO RIVER SITE:
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United States
Environmental Protection
Agency

Community Information Office
1300 Bluff St., Suite 140
Flint, MI 48504

Official Business
Penalty for Private Use, $300

Address Service Requested