



EPA Proposes Cleanup Plan for Velsicol OU3

Velsicol Chemical Superfund Site
St. Louis, Michigan

July 2022

You are invited

EPA invites you to discuss the proposed cleanup plan for OU3 of the Velsicol Chemical 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

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

Webpage

For more details about the site, visit the webpage at:

www.epa.gov/superfund/velsicol-chemical-michigan

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 Operable Unit 3 (OU3) at the Velsicol Chemical Superfund Site in St. Louis, Gratiot County, Michigan (*see map, below*). OU3 is located from the St. Louis, Michigan dam to approximately 1.5 miles downstream within the Pine River. In the OU3 stretch of the Pine River, unacceptable risk was determined to exist to people catching and consuming fish caught from the Pine River, due to total contamination from the chemical DDT, an insecticide.



Public Comment Period for OU3

EPA will accept comments on the proposed cleanup plan from July 15 to August 13, 2022. This fact sheet provides background information, describes cleanup options and explains EPA’s recommendations. ¹EPA 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/velsicol-chemical-michigan and click the “Public Comment Form” and fill out.

EPA must receive your comments online or in an envelope postmarked by Saturday, August 13, 2022.



¹Section 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.



Upcoming Meeting

EPA will host a virtual public meeting on July 26, 2022. 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 Microsoft Teams web platform. You can join the Teams public meeting at any time during the event hours below.

Date: July 26, 2022

Time: 6 – 7:30 p.m.

Link to join: <https://tinyurl.com/Velsicol-Meeting-Link>

By phone: 872-813-0592

(You will be instructed to provide the Conference ID: 109 773 416#)

You can also join the meeting by going to www.epa.gov/superfund/velsicol-chemical-michigan and clicking on the posted link.

About the Velsicol Chemical Site

Since the mid-1800s, the site was used for industrial operations, including a lumber mill, oil refinery, salt plant, and chemical plant. Industrial activities stopped in the 1970s and closure activities began in 1978.

In 1994, EGLE collected fish samples and the results showed that DDT concentrations on average had more than doubled since 1989. Based upon increasing DDT levels in fish tissue, both EPA and EGLE became concerned that additional loading of DDT into the Pine River could be occurring. Additionally, sediment sampling in the Pine River and the St. Louis Impoundment near the St. Louis dam showed high DDT concentrations in fish tissue. Since 1994, several cleanup actions have taken place around the site, including removal of contaminated river sediment and removal of contaminated soils.

Why is cleanup needed?

EPA has studied the risks to human health and the environment. Based on its studies, the Agency identified dichlorodiphenyl trichloroethane (DDT), Hexabromobenzene (HBB), and Polybrominated biphenyls (PBB) as contaminants of concern in OU3. DDT is the main contaminant of concern and it poses

unacceptable hazards and risks to people eating fish caught from the Pine 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 that DDT contamination is present in stream sediment, floodplain soil, surface water, and fish samples collected downstream from the site.



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 Velsicol Chemical site are available at the locations below. You may also access cleanup documents on EPA's site profile page at www.epa.gov/superfund/velsicol-chemical-michigan.

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

T.A. Cutler Memorial Library
312 Michigan Ave.
St. Louis

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, Page 3*).

Cleanup alternatives

EPA considered two options for cleaning up OU3. 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 (EPA's recommended cleanup option):

This alternative involves excavating floodplain and riverbank soils with DDT contamination and disposing the soil at an approved landfill. The floodplains will be backfilled with clean soils to the existing grade and revegetated. The riverbank will be stabilized to prevent further erosion. Sediment is not a focus of OU3 because minimal sediment is present and fine sediment moves through the system over time and is diluted to lower concentrations. The estimated cost of this alternative is \$6.6 million.

EPA's recommended alternative

Based on the criteria, EPA believes that Alternative 2 provides the best balance of the evaluation criteria among all the alternatives. Alternative 2 would be protective of human health and the environment, would meet all federal and state ARARs, would meet cleanup objectives, would be cost effective, and would be effective in the long term.



1. Overall protection of human health and the environment.

- Is it protective?
- How are risks eliminated, reduced, or controlled?



2. Compliance with ARARs.

- Does it meet environmental laws or provide grounds for a waiver?



3. Long-term effectiveness and permanence.

- Does it provide reliable protection over time?



4. Reduction of toxicity, mobility, or volume through treatment.

- Does it use a treatment technology?
- This is preferred, if possible.



5. Short-term effectiveness.

- Will the remedy be implemented fast enough to address short-term risks, and will there be adverse effects (human health or environmental) during construction/ implementation?



6. Implementability.

- How difficult will it be to implement (e.g. availability of materials or coordination of Federal, State, and local agencies)?



7. Cost effectiveness.

- What are the estimated capital and operation and maintenance costs in comparison to other, equally-protective alternatives?



8. State acceptance.

- Does the State agree with, oppose, or have no comment on it?



9. Community acceptance.

- Does the community support, have reservations about, or oppose it?

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.

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/velsicol-chemical-michigan and at the information repositories shown on page 2.

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Alternative 2	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>

* Because contaminated soil will be disposed off-site, this alternative will not reduce the toxicity, mobility or volume through treatment.



Floodplain along the Pine River in OU3.

Velsicol Chemical, OU3 Comment Sheet

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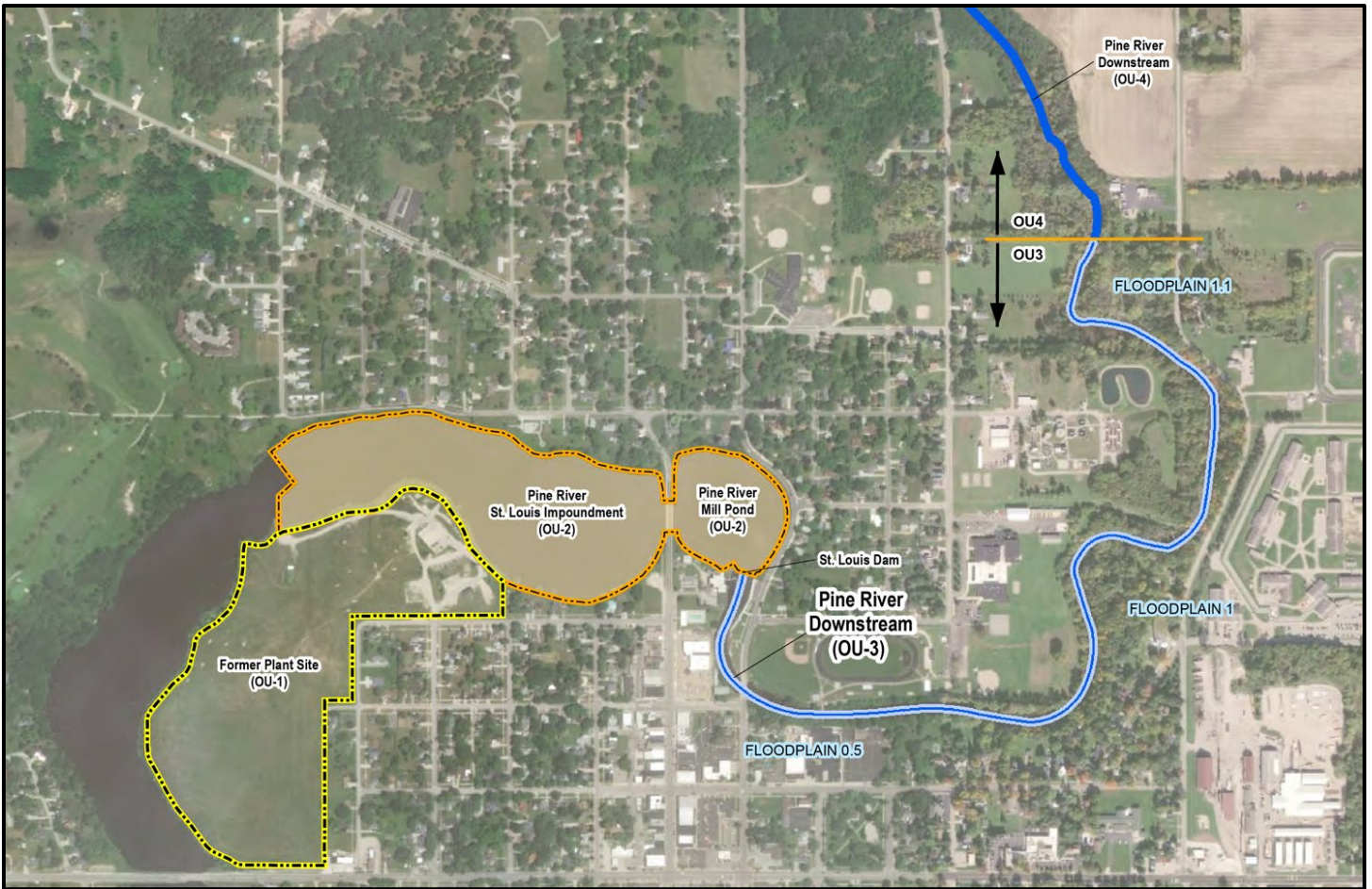


Figure showing the Velsicol site. OU3 starts at the St. Louis Dam to approximately 1.5 miles downstream within the Pine River. OU3 floodplains are shown along the river in blue.



Part of the OU3 stretch of the Pine River.

EPA Proposes Cleanup Plan for OU3; Seeks Public Comments

Virtual Public Meeting

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If you will need special accommodations at the meeting, contact:

Adrian Palomeque, Community Involvement Coordinator, 312-353-2035, palomeque.adrian@epa.gov by July 20.

VELSICOL CHEMICAL SUPERFUND SITE: EPA Proposes Cleanup for Operable Unit 3

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