



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
SE- 5J

January 10, 2023

Dan Peabody
State of Michigan Department of Environment, Great Lakes, and Energy (EGLE)
P.O. Box 30473, 525 West Allegan Street
Lansing, Michigan 48909-7973

RE: Response to State of Michigan comment letters dated September 29, 2022 and December 12, 2022 on the OU5 Area 4 Removal Work Plan Draft, Revision 1; Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site.

Dear Mr. Peabody:

The U.S. Environmental Protection Agency (EPA) received letters from the State of Michigan dated September 29, 2022 and December 12, 2022 providing comments on the above referenced Work Plan and associated supporting documents. It is EPA's understanding that the comments contained within these two letters cover all the State of Michigan's concerns on the above referenced work plan. As mentioned in EPA's December 19, 2022 letter to Mike Neller, enclosed is a spreadsheet providing a response to each State of Michigan comment submitted in both letters. The spreadsheet includes details and attempts to link each State comment to EPA's comments to the PRP disapproving the workplan on January 5, 2023.

With respect to entering both comment letters into the Administrative Record for the Site, please note that EPA does not establish an Administrative Record for approval or disapproval of work plans. Regardless, both the September 29, 2022 and December 12, 2022 letters will be included in the Site file and as appropriate will be incorporated into the Administrative Record for any future EPA actions related to Area 4 of the Site.

EPA does not anticipate further discussion with the State of Michigan on the January 5, 2023 disapproval letter or the version of the Work Plan that has been disapproved. Regardless, I am available to discuss any questions on EPA's response to the State's comments (enclosed). Finally, please be assured that EPA will continue to consult with the State of Michigan regarding subsequent submissions from the PRP.

Please contact me at (312) 919-4382 or ruesch.paul@epa.gov if you have any questions.

Sincerely,

Paul Ruesch

Paul Ruesch
On Scene Coordinator
Emergency Response Branch #2

Enclosure

cc: Mark Mills, Michigan DNR
Brian Gunderman, Michigan DNR
Luke Trumble, Michigan EGLE