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February 21, 2023

By Email ([ruesch.paul@epa.gov](mailto:ruesch.paul@epa.gov))

Mr. Paul J. Ruesch  
U.S. EPA Region 5  
77 West Jackson Blvd.  
Chicago, IL 60604

**Subject: Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site, Operable Unit 5, Area 4 Time-Critical Removal Action (“TCRA”)**

Dear Paul:

I am writing to provide, as discussed in our February 14, 2023 letter, NCR’s proposed schedule for submitting a revised work plan document in response to EPA’s January 5, 2023 disapproval of the Area 4 Removal Work Plan Draft Revision 1, which NCR had submitted on August 15, 2022. The schedule also includes the milestones for the process described in the February 14, 2023 letter, which EPA approved by email on February 16, 2023.

NCR proposes the following dates for the milestones described in the February 14, 2023 letter (item numbers refer to the numbers used in that letter) and for resubmission of the Removal Work Plan and its appendices (please note the timeline will be adjusted based on EPA’s availability):


<i><b>Milestone</b></i>	<i><b>Date</b></i>
Meeting with EPA’s modelers to provide technical detail on EPA’s Comment 2 (per Item 2.a)	March 2, 2023 (or as soon thereafter as EPA can meet)
NCR to submit written report of model issues (per Item 2.b)	22 days after work group meeting; estimated date, March 24, 2023
EPA’s response to written report of model issues (per Item 2.c)	2 weeks after report submitted; estimated date, April 7, 2023

NCR to submit conceptual-level proposal of alternative(s) to address the direction in Comment 2 to reduce the sediment transport rate, and Comment 3 (per Item 1.a)	2 weeks after EPA's response to the report on model issues; estimated date, April 21, 2023
EPA's response to NCR's proposal (per Item 1.b)	2 weeks after proposal submitted; estimated date, May 5, 2023
NCR to submit memorandum on re-evaluation of design in light of EPA's Comment 1 (per Item 3.a)	May 22, 2023
EPA's response to NCR's memorandum (per Item 3.b)	3 weeks after memorandum submitted; estimated date, June 12, 2023
NCR to submit revised Removal Work Plan draft and appendices	90 days after EPA's response to last of the three submissions above; estimated date, September 11, 2023

These dates take the place of the 45-day timeframe to provide a revised Removal Work Plan as stated in EPA's January 5, 2023 letter and paragraph 3.2 of the Statement of Work in the consent decree for *United States and State of Michigan v. NCR Corporation*, No. 1:19-cv-1041.

Please let us know if the milestones and associated dates proposed above are acceptable to EPA. In addition, please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bryan Heath", with a stylized, flowing script.

Bryan Heath