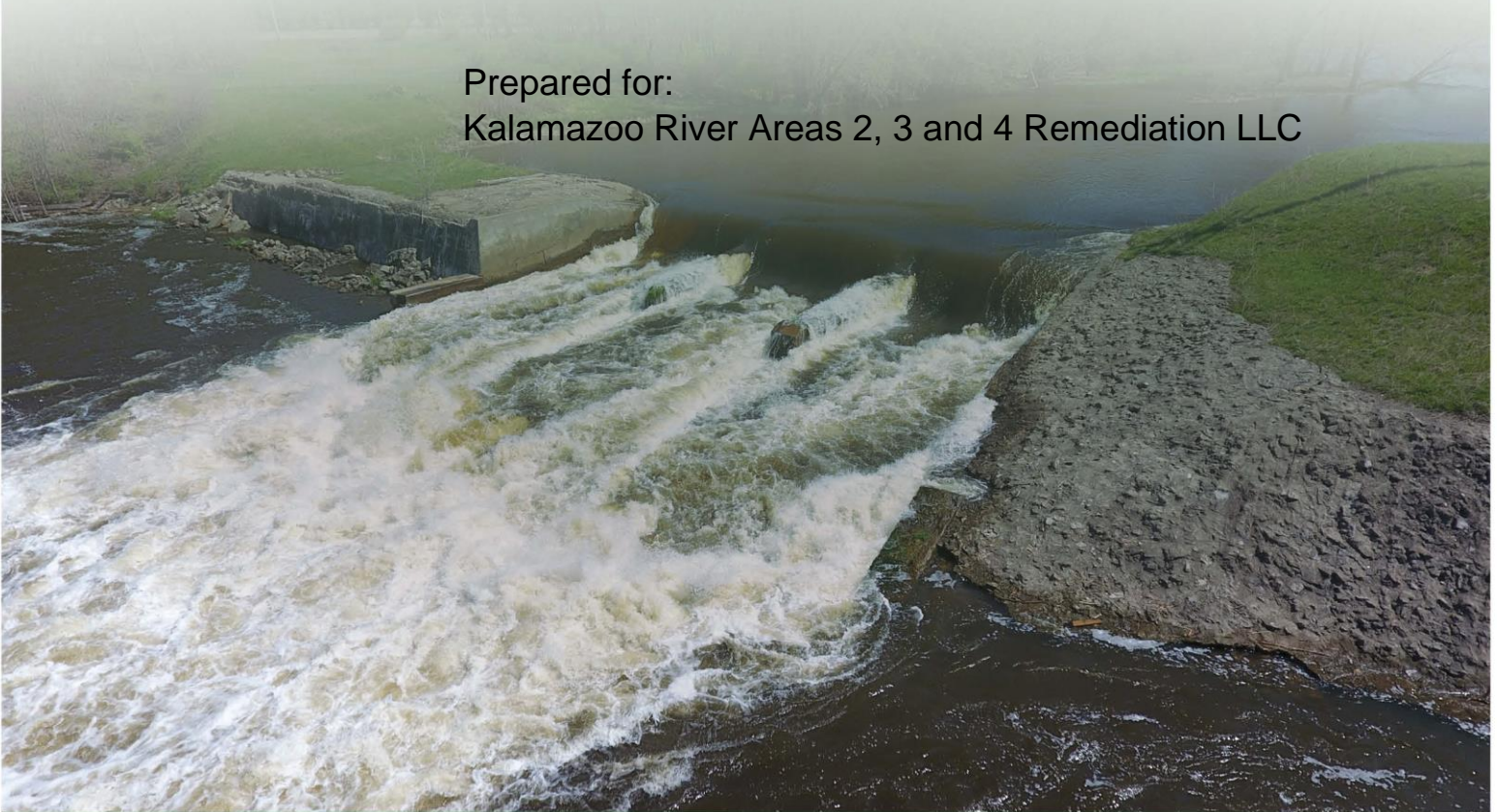


Monthly Report

OU5 Area 4 Time-Critical Removal Action Allied Paper/Portage Creek/ Kalamazoo River Superfund Site

Prepared for:
Kalamazoo River Areas 2, 3 and 4 Remediation LLC





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Table of Contents

Abbreviations and Acronyms	i
Introduction	1
1. Work Accomplished	2
1.1 Actions Taken	2
1.2 Data	4
1.3 Deliverables	4
2. Problems Encountered	5
3. Community Relations Activities	6
4. Anticipated Work	7
5. Waste Tracking	8
6. Project Schedule	9
7. References	10

Figures

1. Area 4 TCRA Schedule

Abbreviations and Acronyms

CD	Consent Decree
EGLE	Michigan Department of Environment, Great Lakes, and Energy
EPA	United States Environmental Protection Agency
FSP	field sampling plan
LLC	Kalamazoo River Areas 2, 3 and 4 Remediation LLC
MDNR	Michigan Department of Natural Resources
OSC	On-Scene Coordinator
OU5	Operable Unit 5
PCB	polychlorinated biphenyl
PDI	pre-design investigation
RDB	right descending bank
SOM	State of Michigan
SPA	sediment processing area
TBSA	Trowbridge staging area
TCRA	time-critical removal action
WTS	water treatment system

Introduction

Reporting Period: April 1 to April 30, 2025. Report #60.

GEI Consultants is pleased to provide this Monthly Report for Area 4 of Operable Unit 5 (OU5) of the Allied Paper/Portage Creek/Kalamazoo River Superfund Site (Site). This work will be performed by GEI on behalf of the Kalamazoo River Areas 2, 3 and 4 Remediation LLC, which NCR Corporation (now NCR Voyix) formed to meet certain requirements of the Consent Decree (CD) between NCR Corporation, the United States Environmental Protection Agency (EPA), and the state of Michigan.

The CD was lodged in December 2019 and entered (approved) by the United States District Court for the Western District of Michigan on December 2, 2020 and modified on October 11, 2023 to include Area 3. The CD requires NCR to conduct response activities in Areas 2, 3, and 4 of Operable Unit 5 of the Allied Paper/Portage Creek/Kalamazoo River Superfund Site. Work activities mandated by the CD include performance of a time-critical removal action (TCRA) in Area 4 and performance of remedial design and remedial action in Areas 2 and 3.

This monthly report provides updates on events pertaining to the Area 4 TCRA as defined in the Area 4 Action Memorandum (EPA, 2020).

1. Work Accomplished

1.1 Actions Taken

- Weekly construction meetings were held with GEI, LLC, J.F. Brennan, EPA, and State representatives on April 1, 8, 15, 22, and 29, 2025.
- Prove-in tests were conducted of the water treatment system (WTS) on April 1, 2025. Acceptable effluent discharge analytical results were received on April 3, 2025.
- One turbidity instrumentation barge was retrieved on April 4, 2025 after a bankfull storm event unmoored it. A replacement barge was prepared and deployed the week of April 7, 2025.
- Dredging operations began on April 7, 2025 with the hydraulic plant dredging an access path up to the first group of confirmation sampling cells and the mechanical plant excavating Osgood spit.
- Sediment processing area (SPA) activities began on April 7, 2025, including operation of the WTS, separation of sand from fines, filling geotextile bags, and dewatering dredged sediment.
- A post-bankfull event inspection was conducted with EPA representatives on April 17, 2025. No additional areas of bank erosion were identified.
- Subarea C and D bank protection measures were installed on April 17 and 18, 2025.
- The access road to the Osgood Spit was graded on April 21, 2025.
- Weekly inspections of bank protection measures began the week of April 21, 2025.
- The Site On-Scene Coordinator (OSC) and three others from the Region 5 Superfund Division toured the SPA, Trowbridge staging area (TBSA), and were given a boat tour of Area 4 by GEI and J.F. Brennan staff on April 30, 2025.
- Separated sand was sampled, gradation tested, and sent to the laboratory for chemical analysis throughout the month.
- Turbidity and air monitoring continued throughout the month.

- WTS operation, compliance monitoring testing, and effluent water discharge to the Kalamazoo River continued throughout the month.
- Dredge totals as of April 27, 2025:
 - 30,792 cubic yards of sediment removed.
 - 7,421 tons of sand separated from total sediment.
 - 54.8 million gallons of water treatment effluent discharged.
- An EGLE representative conducted a Stormwater Pollution Prevention Inspection on April 30, 2025.

1.2 Data

- WTS data were shared with EPA through Procore throughout the month.
- Sand gradation data were shared with EPA through Procore throughout the month.
- Sand analytical data were shared with EPA through Procore throughout the month.

1.3 Deliverables

- Revisions of the Confirmation Sampling Plan for Part 1 (addenda to the Field Sampling Plan) were submitted to EPA on April 1 and April 16, 2025. The plan was approved by EPA on April 22, 2025.
- The March monthly update summary was submitted to EPA on April 2, 2025.
- Email documentation was received from EPA on April 7, 2025 stating that the Traffic Control Plan and Site Security Plan were complete and accepted.
- Revisions of the Waste Management Plan were submitted on April 9 and April 28, 2025. Additional comments were received verbally from EPA on April 22 and 29, 2025.
- Field Change Form #1 (Establish bank and stream tube turbidity screen protection locations and inspection process/procedure) was approved by EPA on April 10, 2025.
- An analytical results summary memo for the TBSA and haul road pre-construction soil sampling was submitted to EPA on April 30, 2025.

2. Problems Encountered

- In June 2020, the LLC became aware of the release of sediment from Morrow Lake as a result of the Morrow Dam drawdown. Based on available information, the release has accumulated in Area 4 in areas that require remediation.

3. Community Relations Activities

- The Kalamazoo River Community Advisory Group (CAG) technical committee and the CAG public members toured the TBSA and SPA on April 24, 2025.

4. Anticipated Work

- Sediment dredging to remove PCB-impacted material is expected to continue in Osgood Spit and expected in Groups 1 – 3 for May 2025.
- Post-collection bathymetric surveys and confirmation sampling of completed CSCs are expected to begin.
- Sample collection, gradation, and analytical testing from the sand separation process are expected to continue.
- Sample collection and analytical testing from the WTS are expected to continue.
- A revised Waste Management Plan is expected to be submitted.

5. Waste Tracking

No waste was removed from the site in April 2025.

6. Project Schedule

A schedule for the Area 4 TCRA is included as Fig. 1.

7. References

EGLE (2022). Authorization to Discharge Under the National Pollutant Discharge Elimination System. MIU990043. State of Michigan: Water Resources Division, June 22.

EPA (2020). Approval for a Time-Critical Removal Action at the Trowbridge Dam Area of the Allied Paper, Inc./Kalamazoo River Superfund Site, Allegan County Michigan (EPA ID MID006007306). April 2020.

United States District Court for Western District of Michigan Southern Division (2019). Consent Decree With NCR Corporation. December 2019.

Figure 1. Area 4 TCRA Schedule

Figure 1. Area 4 TCRA Schedule		Start Date	Finish Date
Work Plans			
	Field Sampling Plan	14-Feb-20	15-May-20
	Supplemental Field Sampling Plans	7-Sep-20	11-Sep-23
	Removal Action Work Plan	1-Apr-20	23-Oct-20
	Area 4 Design Work Plans	1-Aug-20	15-Dec-21
	Programmatic/Investigation Work Plan Revisions	15-May-20	5-Jan-22
	Revise Removal Work Plan Part 1	4-Aug-23	4-Oct-23
	EPA Conditional Approval of Removal Work Plan Part 1		1-Nov-23
	Removal Work Plan Part 1, Draft 2	1-Nov-23	15-Nov-23
	Removal Work Plan Part 1, Draft 3	21-Dec-23	15-Mar-24
	Removal Work Plan Part 1, Draft 4	30-Apr-24	17-Jun-24
	Removal Work Plan Part 2	9-Feb-24	
	Dam Removal and River Stabilization Design Summary	9-Feb-24	
	Post-Removal Site Control Plan		45 days after Notice of Completion of Work
Preliminary Investigation			
	PDI Procurement & Permitting	4-Apr-20	23-Oct-20
	Sediment and Soil Sampling Phase 1	17-Jun-20	23-Oct-20
	Lab Analysis Phase 1	22-Jun-20	7-Dec-20
	Data Validation Phase 1	6-Jul-20	12-Dec-20
	Water Monitoring (velocity, turbidity, level)	10-Jul-20	Q4 2026
	Geotechnical Sampling and Analysis	26-Oct-20	7-Jan-21
	Ecological Activity (bat tree, mussel survey, etc.)	1-Jun-20	31-Oct-21
	Area 4 PDI Phase 1 Data transmittal	7-Jan-21	8-Jan-21
	PDI Fieldwork 2021 (Phase 2)	3-May-21	13-Jul-21
	PDI Fieldwork 2022 (Phase 3)	1-Jun-22	15-Aug-22
Design			
	Trowbridge Site Preparation Design & Bid	6-Apr-20	1-Apr-21
	30% TCRA Removal Design Submittal	16-Apr-20	11-May-21
	60% TCRA Removal Design Submittal	7-May-21	8-Nov-21
	Revised TCRA Removal Design Submittal	8-Nov-21	15-Aug-22
	Update Design Drawings to Reflect Part 1 Scope	1-Nov-23	15-Mar-24
	Update Design Drawings to Reflect Contractor Input	30-May-24	17-Jun-24
Construction			
	Area 4 Trowbridge Staging Area Clearing and Grading	16-Aug-21	27-Aug-21
	TCRA Part 1 Bid Package Release		15-Nov-23
	Access and Haul Road Stages 1 and 2	15-Jul-22	30-Nov-23
	Part 1 Initial Field Activities Begin	1-Feb-24	12-Mar-24
	Intent to Award Notification to General Contractor		15-May-24
	High-Level Construction Schedule with Contractor Input		17-Jun-24
	Sediment Processing Area Construction	Q3 2024	Q1 2025
	Staging and Access Construction	Q3 2024	Q4 2024
	F&G Sheeting Install	Q3 2024	Q4 2024
	Water Treatment Set-up and Operation	Q1 2025	Q4 2026
	Dredging	Q2 2025	Q4 2025
	≥50 mg/kg PCBs T&D	Q4 2025	Q4 2025
	<50 mg/kg PCBs T&D	Q1 2026	Q4 2026
	WCS Installation	Q2 2026	Q3 2026

Note: Schedule is subject to change with site conditions and contractor input. Changes will be reported in monthly progress reports.

Created by: BA 4-1-2025

Checked by: RH 4-2-2025