

**United States Environmental Protection Agency  
Region V  
POLLUTION REPORT**

**Date:** Friday, September 28, 2007

**From:** James Augustyn/Brian Schlieger, On-Scene Coordinator

<b>To:</b> Jason El-Zein, USEPA Al Taylor, MDEQ  Cheryl Howe, MDEQ Mark Johnson, U.S. EPA R5 Jeff Cahn, USEPA	David Chung, OSWER NRC Duty Officer, National Response Center Rick Karl, USEPA Todd Konechne, Dow Chemical Company Jim Sygo, MDEQ
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**Subject:** Removal Action  
Tittabawassee River Reach O  
Midland, MI  
Latitude: 43.5522  
Longitude: -84.1714

<b>POLREP No.:</b> 6	<b>Site #:</b> B5KF
<b>Reporting Period:</b>	<b>D.O. #:</b>
<b>Start Date:</b> 8/13/2007	<b>Response Authority:</b> CERCLA
<b>Mob Date:</b> 8/13/2007	<b>Response Type:</b> Time-Critical
<b>Completion Date:</b>	<b>NPL Status:</b> Non NPL
<b>CERCLIS ID #:</b> MID980994354	<b>Incident Category:</b> Removal Action
<b>RCRIS ID #:</b>	<b>Contract #</b>

### Site Description

On June 27, 2007, U.S. EPA ordered The Dow Chemical Company (Dow) to negotiate an Administrative Order on Consent, to address removal of extremely elevated levels of dioxin-contaminated sediment from within Reach O of the Tittabawassee River near Midland, Michigan. Dow agreed to the terms of the Order and on July 12, 2007, the Order was signed by the Regional Administrator and Dow. For additional background information please see the site profile.

On-Scene Coordinator (OSC) Jim Augustyn is providing oversight with assistance from U.S. EPA's START Contractor, Weston Solutions, Inc.

### Current Activities

The following tasks are currently on going:

- Collection of turbidity measurements from meters in the Tittabawassee River in order to compare downstream turbidity measurements with background turbidity.
- Continued dewatering of the RMU 4 excavation area.
- Treatment, sampling, and discharge of water generated from the impacted sediment dewatering operations.
- Transportation and off site disposal of excavated sediments from the Reach O area.

- Placement of sheet piling around the RMU 5 area.
- Removal of sheet piling around the RMU 3 area.

To view a map that depicts current site progress, please visit the Document Section of this website and open the document titled "Site features map".

The following tasks have been completed by Dow's contractor during the period from September 20 – 26, 2007:

Thursday, Sept 20th: Dow's contractor continued removing sheet piling from the RMU-1/2 area. Drain tiles were installed at RMU-4 to help sediment drainage during excavation and the sediment from the trench area was transported to the dewatering pad. Bank stabilization activities continued in RMU-3. Crews cleared trees to make access to RMU-5.

Friday, Sept 21st: Excavation and staging of impacted sediment from the RMU-4 area began today. Sheet piling removal activities at RMU-1/2 continued. Other activities included the installation of a gravel ramp leading down to RMU-5 and the turbidity meter was moved south of RMU-5.

Saturday, Sept 22nd and Sunday, Sept 23rd: No Site operations occurred.

Monday, Sept 24th: Dow's contractor continued the excavation of dioxin contaminated sediment from the RMU 4 area. Dewatering operations continued and 10 trucks with impacted soil were transported to the Salzburg Road Landfill. Waste water was discharged from the dewatering pad (7,953 gallons) and a TSS sample was collected.

Tuesday, Sept 25th: The US EPA START contractor and Dow's contractor collected three post excavation baseline samples from RMU-4. Four post excavation sediment samples were also collected from the RMU 4 area for visual characterization. All three baseline samples from the RMU 4 area were submitted to the laboratory for analysis. Contractors began constructing the access road to RMU-5. Dewatering activities continued on the dewatering pad. Crews pounded a sheet pile from RMU 3 down below the river water level and flooded the excavation area with water.

Wednesday, Sept 26th: Dow's contractor completed the construction of an access road to RMU 5. They started the removal of sheet piling from the RMU 3 area. Installation of sheet piling around the RMU 5 area began. All equipment was removed from RMU 4 in preparation for flooding of the area. Removal of sheet piling from RMU 1/2 areas was completed excluding seven sheets that were too close to the bank for the 55 ton crane to reach. Another piece of equipment will be used to remove the remaining sheet piling.

### **Planned Removal Actions**

The following tasks are soon to be implemented:

- The installation of sheet piling around the perimeter of the RMU 5 area.
- The excavation of the impacted sediment from the RMU 5 area.
- The removal of the sheet piling from the RMU 3/4 areas.

### **Next Steps**

RMU 5 is the final removal area for the Settlement Agreement.

Site restoration activities should begin with in the next several weeks.

#### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
RST/START	\$100,000.00	\$41,500.00	\$58,500.00	58.50%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	\$100,000.00	\$41,500.00	\$58,500.00	58.50%

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

#### Disposition of Wastes

As of 9/24/07, Dow has removed and transported to the Salzburg Road Landfill approximately 13,860 in-place cubic yards of impacted sediment from the Reach O site. A total of 770 truck loads, estimated at 18 cubic yards per load, have been transported for disposal. The following is a schedule of disposed waste from the Reach O:

8/31/2007	6 loads	150 in-place cubic yards
9/7/2007	84 loads	1,512 in-place cubic yards
9/8/2007	174 loads	4,350 in-place cubic yards
9/10/2007	33 loads	825 in-place cubic yards
9/15/2007	71 loads	1,278 in-place cubic yards
9/16/2007	76 loads	1,368 in-place cubic yards
9/18/2007	164 loads	2,952 in-place cubic yards
9/24/2007	162 loads	2,916 in-place cubic yards

As of 9/24/07, Dow has treated and discharged approximately 26,264 gallons of water. The wastewater treatment process includes settling and filtration using 10 micron filters. Samples are collected continuously during the discharging process and tested for Total Suspended Solids (TSS) and Total Equivalent (TEQ) concentrations of dioxin and furans. The following quantity of water discharged from the Reach O treatment operations include:

9/14/2007	Batch 1	18,311 gallons discharged
9/24/2007	Batch 2	7,953 gallons discharged

[www.epaosc.net/TittabawasseeRiverReachO](http://www.epaosc.net/TittabawasseeRiverReachO)