2005

Comment Sheet

U.S. Environmental Protection Agency is interested in your comments on the proposed cleanup plan for Willow Boulevard/A-Site Landfill. EPA will consider public comments before selecting a final cleanup remedy for the Allied Paper, Inc./Portage Creek/Kalamazoo River Willow Boulevard/A-Site. Please use the space below to write your comments, then fold and mail this form. Comments must be postmarked by the last day of the comment period. If you have general questions, contact Don de Blasio at (312) 886-4360, or through EPA's toll-free number at (800) 621-8431. Those with electronic capabilities may submit their comments to EPA via the Internet at: epa.gov/region5/publiccomment.

I strongly support your Alternative 2C cleanup plan.

However, the negative influence of PCBs on the wildlife along the Kalamazoo River has been vastly exaggerated based on the 2002 "MSU Studies on the Kalamazoo River". A copy of the Executive Summary is attached: There are no real risks.

8-4-2005

EPA Region 5 Records Ctr.
294945

Name Dr. F. Claus Globig
Address 2115 Aberdeen Drive
City Kalamazoo State MI
Zip 49008-1759

Fold on Dashed Lines, Tape, Stamp, and Mail

Name _____

Address _____

Dr. F. Claus Globig
2115 Aberdeen Drive
Kalamazoo, MI 49008-1759

Place Stamp Here

Shari Kolak
Remedial Project Manager
EPA Region 5 (SR-6J)
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Dec. 2002
24 people
involved,
incl. Dr. Giesey

MSU Studies on the Kalamazoo River

Executive Summary

Five enclosed presentations summarize site-specific field studies that have been conducted for five resident representative receptors (bald eagle, great horned owl, passerines, mink, and shrew) along the Kalamazoo River. Three poster presentations also are provided that include additional detail for three of the receptor studies (bald eagle, great horned owl, and passerines). In addition to the Kalamazoo River presentations, a presentation and study report of a comprehensive field study assessing the effects of PCBs on the American robin on the Housatonic River are included. All of the presentations and posters were presented at the national Society of Environmental Toxicology and Chemistry (SETAC) meeting in Salt Lake City in November 2002. A brief overview of the results of each receptor study follows.

Kalamazoo River Studies

Bald Eagle Risk Evaluation

- Measures of PCB concentrations in prey were higher at test site compared to reference. Mean PCB dietary concentrations at test site do not indicate risk to eagles.
- Nestling plasma PCB concentrations were higher at test site compared to reference. Productivity of test site nest was lower than at reference sites.
- Conclusions: The poor correlation of dietary PCB exposure and productivity may suggest stressors other than site-specific PCBs are influencing bald eagle nesting success.

Great Horned Owl Risk Evaluation

- Measures of dietary PCB concentrations in prey were higher at test sites compared to reference. Mean PCB dietary concentrations at test site do no indicate risk to great horned owls (GHO).
- Nestling plasma and egg PCB concentrations were higher at test sites compared to reference. However, no differences in GHO productivity were observed between test and reference sites.
- Conclusions: Both top down and bottom up approaches indicate no risk to GHO.

Passerine Risk Evaluation

- Measures of dietary PCB concentrations in prey were higher at test sites compared to reference.
- Top Down: House wren and tree swallow nestling plasma and egg PCB concentrations were higher at test sites compared to reference. However, fledging success and productivity did not differ between test and reference sites.
- Conclusions: PCB concentrations present in the Kalamazoo River appear to be below a threshold effect level for passerines.

Mink Risk Evaluation

- Measures of dietary PCB concentrations in prey were higher at test site compared to reference. However, mean PCB dietary concentrations at test site do no indicate risk to mink based on site-specific dietary composition.
- Mink liver tissue concentrations were similar between site and reference. These liver tissue concentrations do not indicate risk to mink.
- Conclusions: Good correlation was observed between the bottom up and top down approaches and both indicate no risk to mink.

Shrew Risk Evaluation

- Measures of dietary PCB concentrations in prey were higher at test site compared tc
  However, mean PCB dietary concentrations at test site do no indicate risk to shrews.
- Mean shrew tissue concentrations do not indicate risk. Trapping results indicated
  populations of shrews and other small mammals are present at the test site.
- Conclusions: Good correlation was observed between bottom up and top down approaches
  indicate little to no risk to shrews.

Housatonic River Robin Study

This study included a comprehensive top down assessment to evaluate risk to American robin populati
PCBs along the Housatonic River.

American Robin Risk Evaluation

- Nestling plasma and egg PCB concentrations were higher at test site compared to reference. M
  reproductive endpoints included clutch size, hatching success and fledging success.
- Conclusions: No evidence of adverse effects was observed on any stage of reproduction as a re
  exposure to PCBs during the 2001 breeding season in the Housatonic River floodplain.

Shrew Risk Evaluation

- Measures of dietary PCB concentrations in prey were higher at test site compared to reference. However, mean PCB dietary concentrations at test site do no indicate risk to shrews.
- Mean shrew tissue concentrations do not indicate risk. Trapping results indicated that viable populations of shrews and other small mammals are present at the test site.
- Conclusions: Good correlation was observed between bottom up and top down approaches and both indicate little to no risk to shrews.

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This study included a comprehensive top down assessment to evaluate risk to American robin populations from PCBs along the Housatonic River.

American Robin Risk Evaluation

- Nestling plasma and egg PCB concentrations were higher at test site compared to reference. Measured reproductive endpoints included clutch size, hatching success and fledging success.
- Conclusions: No evidence of adverse effects was observed on any stage of reproduction as a result of exposure to PCBs during the 2001 breeding season in the Housatonic River floodplain.

Bald Eagle Exposure to PCBs at the Kalamazoo River Superfund Site

Strause, K.P., Zwiernik, M.J., Park, C.S., Blankenship, A.L., MacCarroll, M.A., Bradley, P.W., Kannan, K., Kay, D.P., Holem, R.R., Giesy, J.P.

Presented by: Cyrus S. Park

Department of Zoology
National Food Safety and Toxicology Center
Michigan State University

MICHIGAN STATE UNIVERSITY

Bald Eagle Exposure to PCBs at the Kalamazoo River Superfund Site

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National Food Safety and Toxicology Center
Michigan State University

IICHIGAN STATE
NIVERSITY

Great Horned Owl Exposure to Chlorinated Organics at the Kalamazoo River Superfund Site

ause, K.D., Zwiernik, M.J., Park, C.S., Moseley, [illegible]
hip, A.L., Bradley, P.W., Kannan, K., Neigh, A. Pastva, S.D.,
Giesy, J.P.

ICHIGAN STATE
NIVERSITY

Zoology Dept. & National Food Safety and Toxicology Center
Michigan State University

Assessment of Risks of PCBs to Mink (*Mustela vison*) at the Kalamazoo River, Michigan

Stephanie Pastva
Alan Blankenship
Patrick Bradley
Ryan Holem
Paul Jones
K. Kannan
Denise Kay
Arianne Neigh
Cyrus Park
Karl Strause
Matthew Zwiernik
John Giesy

MICHIGAN STATE UNIVERSITY

Dept. of Fisheries and Wildlife and the National Food Safety and Toxicology Center, Michigan State University

Accumulation of PCBs and an Evaluation of Ecological Risk for Shrews and Other Small Mammals at the Kalamazoo River Superfund Site, Michigan

Alan Blankenship, ENTRIX/MSU
Matt Zwiernik, MSU
Cyrus Parks, MSU
Ryan Holem, ENTRIX
George Klemolin, MSU
Patrick Bradley, MSU
Arianne Neigh, MSU
Denise Kay, ENTRIX
K. Kannan, MSU
John Giesy, MSU

MICHIGAN STATE UNIVERSITY

Passerine Productivity and PCB Exposure at the Kalamazoo River Superfund Site, Michigan

Arianne M Neigh
Monica A MacCarroll
Carrie A Ruppert
Dr Matthew J Zwiernik
Cyrus S Park
Torrey E Moss

Ray J Adams
Ryan R Holem
Denise Kay
Dr John Newsted
Dr John P Giesy

MICHIGAN STATE UNIVERSITY

Dept. of Zoology and National Food Safety and Toxicology Center, Michigan State University

Robin Productivity in the Housatonic River Watershed

Berkshire County,
Massachusetts

Miranda Henning
Project Manager

Scott Robinson, Ph.D.
Technical Advisor

Kenneth Jenkins, Ph.D.
Project Director

Prepared for:
General Electric Company

Prepared by:
ARCADIS G&M, Inc.
24 Preble Street
Suite 100
Portland
Maine 04101
Tel 207 828 0046
Fax 207 828 0062

Our Ref.:
JS000513.0005.ME004

Date:
April 2002

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I like alternative 2C. A natural bank is much better than sheetpile. J-hook vanes could be installed if natural bank begins to erode.

Thank you for "Naturalizing" the river. We enjoy Kayaking and Fishing.

Name Jill Wesley
Address 4587 Wildmeadow
City Kalamazoo State MI
Zip 49048

Fold on Dashed Lines, Tape, Stamp, and Mail

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Address 4587 Wild Meadow

City Kalamazoo State MI

ZIP 49048

Shari Kolak

Remedial Project Manager

EPA Region 5 (SR-6J)

77 W. Jackson Blvd.

Chicago, IL 60604-3590

60604-3511

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Dear Ms. Kolak.

EPA proposal cleanup plan for landfill paper waste does not address a few issues.

1. No mention of stabilization of soil collected and placed in the landfill. Why aren't the soils being stabilized to prevent leachability? If the soils must be stabilized for off-site disposal at a permitted TSDF why aren't they stabilized at a unpermitted landfill or on-site? I strongly recommend stabilization of the PCB-contaminated soils to prevent leachability. The landfill is near a surface water or Kalamazoo river.

2. Just a great deal it is for Georgia Pacific if you allow them to transport 35,000 cubic yards of soil to the A-site from the GP mill + Hawthorne mills. That's over 1700 truck loads. Next time you put out a fact sheet for the public, please convert cubic yards to truck loads. My point is GP gets to clean up two valuable pieces of real estate and then possible sell them. Some how this doesn't seem to be right. G.P leaves their contaminated soil in Kalamazoo backyard.

3. You need to ensure that G.P. will provide long-care of this site. What happens if G.P. declares bankruptcy in the future, who takes over the long term care. No one is going to buy the property. USEPA needs/demand that G.P. establish at a minimum a long term Trust for at least 30 years. New companies like the Guardian Trust could provide this service. USEPA needs to get the deal restrictions in place before works start and put into the Consent Decree w/ G.P.

4. It was unclear in your Fact Sheet who will do the work the EPA or the PRP. I recommend that you give GP until Jan 1 2006 to sign an agreement on the GP + Hawthorne mill sites, or USEPA issue an UAO and take enforcement action along with US DOJ.

Overall I support your plan of action, if you address my concerns.

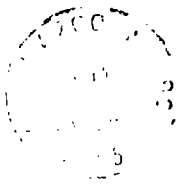
Name BRUCE NOBLE, CPG
Address 2250 W KIRBY RD
City Battle Creek State MI
Zip 49017

Fold on Dashed Lines, Tape, Stamp, and Mail

Bruce Noble
2250 W Kirby Road
Battle Creek, MI 49017

City _____ State _____

ZIP _____



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I am mildly in favor of your recommended approach. It's worrisome that this is the least expensive cleanup, and that raises questions about political/economic pressures. However, ~~Alternati~~ Alternative 2C seems effective and implementable during my lifetime.

Name John B Holmes

Address 6325 Old Log Trail

City Kalamazoo State MI

Zip 49009

Fold on Dashed Lines, Tape, Stamp, and Mail

Name

Addr

City

ZIP

Mr. John B Holmes
6325 Old Log Trl
Kalamazoo, MI 49009-9123

Shari Kolak
Remedial Project Manager
EPA Region 5 (SR-6J)
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Alternative 4: Removal of Residuals from Willow Boulevard and consolidation at A-site. Is the Best solution for the proposed cleanup plan for Willow Boulevard/A-site Landfill.

Regardless of Final Decision, Groundwater monitoring should be mandatory and included into final decision wording. Groundwater monitoring for contaminants should occur every 3 months indefinitely. Soil samples should be taken on analysis.

Name Nicole Reid
Address 9693 N. 40th St Apt C
City Hickory Corners State Michigan
Zip 49060

Fold on Dashed Lines, Tape, Stamp, and Mail

Name Nicole Reid

Address 9693 N. 40th Apt C

City Hickory Corners State Mi

ZIP 49060

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July 18, 2005

In reading your latest blurb on the Kalamazoo River Clean-up this brought to mind one of my greatest concerns, and one that I have to re-assure my Board of Directors of, and that is both, the Little Portage Creek, and the Portage River are feeder streams to the St. Joseph River, the Little Portage enters the St. Joe at Mendon, and the Portage River enters the St. Joe at Three Rivers.

We have our own problems and don't wish to take on any more. Can you assure me that none of the sediments you stir up in the Kalamazoo river will come down these two rivers and enter the St. Joe River?

I'd very much like to have something in writing on this subject, thank you,

Sincerely;

Al Smith
Executive Director/Founder
Friends of the St. Joe River Association, Inc.
P. O. Box 354
Athens, MI 49011
www.fotsjr.org
Ph. (269) 729-5174
fotsjr01@sbcglobal.net

Name _____
Address _____
City _____ State _____
Zip _____

FRIENDS OF THE ST. JOE RIVER
P.O. BOX 354, ATHENS, MI 49011

Fold on Dashed Lines, Tape, Stamp, and Mail

Name FRIENDS OF THE ST. JOE RIVER

Address P.O. BOX 354, ATHENS, MI 49011

City _____ State _____

ZIP _____

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2. Just a great deal it is for Georgia Pacific if you allow them to transport 35,000 cubic yards of soil to the A-site from the GP mill + Hawthorne mills. That's over 1700 truck loads. Next time you put out a fact sheet for the public, please convert cubic yards to truck loads. My point is GP gets to clean up two valuable pieces of real estate and then possible sell them. Some how this doesn't seem to be right. G.P leaves their contaminated soil in Kalamazoo backyard.

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Overall I support your plan of action if you address my concerns.

Name BRUCE NOBLE, CPG
Address 2250 W KIRBY RD
City Battle Creek State MI
Zip 49017

Fold on Dashed Lines, Tape, Stamp, and Mail

Bruce Noble
2250 W Kirby Road
Battle Creek, MI 49017

City _____ State _____

ZIP _____

USA

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EPA Region 5 (SR-6J)

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I attended the EPA meeting at the Kalamazoo Library on 8-3-2005 and listened to Ms. Joan Wadsworth's and Ms. Carolyn Scott's comments. The former mentioned that she has lost four dogs to cancer, and the latter stated that a lot of people in her area have a lot of heart and cancer problems.

I have studied the literature for a number of years and have not seen any clinical medical evidence that PCBs caused cancer in dogs or humans, or heart problems.

If there is a so-called cancer cluster in the area where Ms. Scott lives, I can point out another one in Kalamazoo which is far away from the Kalamazoo River and where the residents do not eat the fish caught in it. Statistically these cancer clusters are not uncommon, without any direct reason for them. Based on the most recent (2001-2003) critical reviews of the world-wide medical literature on PCBs and human health by Dr. Renate Kimbrough (a medical doctor) and other researchers, PCBs have not caused cancer in humans or any other serious illnesses (including women and children) at the PCB levels present in our environment.

More recent advances in molecular biology indicate that cancer is a gene disorder. In order to cause cancer, carcinogens have to activate oncogenes and de-activate tumor-suppressing genes by mutation of these genes. Without gene mutations there will be no cancer. If we have two of these that are healthy and resistant to mutations, we will not get cancer even with severe exposures to carcinogens.

Name Dr. F. Claus Globig
Address 2115 Aberdeen Drive
City Kalamazoo State MI
Zip 49008-1759

Fold on Dashed Lines, Tape, Stamp, and Mail

Name _____

Address _____

City _____ State _____

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I favor clean-up alternative #3. Hang the cost! Let those corporate polluting bastards, Georgia Pacific & Allied Paper, pay for their disregard of the environment. Make an example of them so that other corporations will reconsider their quests for mammon at all cost.

I also disfavor further studies which are pointless & fruitless. WE know that the K-zoo is polluted with PCB's. We know that the paper mill industry in K-zoo was the major contributor to the dumping of PCB's into the river. What the hell is the point of more studies but to keep the polluters from paying their just dues & allowing their treasury's to continue to earn interest on the recovery costs that they should pay Now!

Delay only goes to further the suspicion that EPA & MEPA are in bed with the corporate polluters.

Roy C. Hébert

Name Roy C. HEBERT
Address PO BOX 1075
City SAUGATUCK State MI
Zip 49453-1075

Fold on Dashed Lines, Tape, Stamp, and Mail

Name _____

Address _____

City _____ State _____

ZIP 49453-1075

Shari Kolak

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Chicago, IL 60604-3590

July 19, 2005

As a property owner along the Kalamazoo River, I would like to have ALL of the PCB's removed from the river and the river banks. The dams must also be removed to make the river safe for people to travel down stream. I don't that much about the Willow Creek/A-Site Landfill, but my feelings are that the paper mills owned this site, polluted this site and therefore, should completely clean the site. At this point in time, my concern is with the Otsego Dam and the Otsego City Dam. My property is on the corner of Jefferson Road and 21st Street and is near the flood plain in that area (upstream from the Otsego Dam and downstream from the Otsego City Dam). My parents purchased the property in 1950 and I lived there until I got married and moved to Kalamazoo. I always loved the property and wished that the river wasn't as polluted because I wanted to have a dock that went out on to the flood plain and then to the river. When my father passed away, I purchased the property from my mother with the intention of building a home there. However, when applying for a building permit, I was told about the PCB problem and that the ground and ground water was contaminated. The river is beautiful but is very toxic to animals and to people. Therefore, I will not settle for anything less than a total removal of the PCBs. If any of this toxic material is left in the river and on the banks, there will always be the threat, a very real threat, of continued contamination. I am a nature lover and I love the wild life around the river and would love to live near the river, but I fear for the health of my family and myself. The river could be a constant source of enjoyment for many people, canoeing, kayaking, camping, fishing, water sports, as well as just sitting in a lawn chair and watching the river roll by. It is a shame to have such a wonderful natural resource and not be able to really enjoy it. The paper companies created the pollution and they should be responsible to clean up the river and the river banks, and restore the river and river banks to a nature friendly condition. I have been attending meetings and listening to the excuses of why they can't pay for the clean up for several YEARS and I am very tired of hearing the same old song of NO MONEY. The time is NOW, get the job done, no more talk, no more studies, just take the PCBs from the river and river banks. The paper companies made millions and billions of dollars and I say the "buck stops at their doorstep." It is time to give back to the communities what the paper companies took from us, OUR RIVER. Thank you.

Dee Wood

Comment Sheet

U.S. Environmental Protection Agency is interested in your comments on the proposed cleanup plan for Willow Boulevard/A-Site Landfill. EPA will consider public comments before selecting a final cleanup remedy for the Allied Paper, Inc./Portage Creek/Kalamazoo River Willow Boulevard/A-Site. Please use the space below to write your comments, then fold and mail this form. Comments must be postmarked by the last day of the comment period. If you have general questions, contact Don de Blasio at (312) 886-4360, or through EPA's toll-free number at (800) 621-8431. Those with electronic capabilities may submit their comments to EPA via the Internet at: epa.gov/region5/publiccomment.

Name Dee Wood

Address 1575 Wood Lea Drive

City Otsego State Mi

Zip 49078

Fold on Dashed Lines, Tape, Stamp, and Mail

Name Dee Wood

Address 1575 Wood Lea Dr.

City Otsego State Mi

ZIP 49078

Place Stamp Here

Shari Kolak
Remedial Project Manager
EPA Region 5 (SR-6J)
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Internet Daemon Owner
<idaemon@mountain.epa.gov>
08/16/2005 02 42 PM

To

Subject (227154203) Willow_Boulevard_Landfill_Public Com

2-Name:Robert W. Kaufman
3-Organization:Kalamazoo Environmental Council
4-E-mail:robert.kaufman@wmich.eduk
5-Street:1000 Carolee Lane
6-City:Kalamazoo
7-State:MI
8-Zipcode:49008
9-Comments:Please type your comments here!
Comment on Willow Boulevard/ A-Site
Recomentations.

As a citizen o the state of Michigan I am appalled that more than 20 years has passed without constructive effort to relieve the apparent health hazards - heart damage and cancer among others. The fish advisorys and other evidence indicate health and reproductive prolems in certain animals. This is unacceptable policy for Michigan. A higher priority must attach to reducing and cleanup of pollution in the state.

With respect to OU2, I endorse the alternative proposed by the Kalamazoo Protection Assn. In 2001 EPA and MDEQ were advised by more than 600 citizens, many local governments and citizens groups that no landfills should be built adjacent to the river.

All contaminated waste (PCB) should be transferred from the Willow Blvd. site to the A-site and at least 150 ft. from the river edge. Appropriate natural and indigenous vegetation should be planted on the shore and additional restoration for fishery and marine animals habitat.

It is encouraging that some worthy activity is under consideration. We trust your project will reflect the input of citizens and local public officials and will be completed with high professional standards.

Thank you,

Robert W. Kaufman
Retired. Formerly, chair Kalamazoo, Black, Macatawa River Basin study. Conducted by MSU, Former Director, WMU Environmental Studies Program, Former Director, Science for Citizens Program (National Science Foundation)

submit:Send Comments

WARNING NOTICE

MEMO

DATE: 08/02/2005

TO: SHERI KOLAK

FROM: ROY C. HÉBERT

SUBJECT: EPA PROPOSED CLEANUP PLAN FOR LANDFILL PAPER WASTE
ALLIED PAPER,INC./PORTAGE CREEK/KALAMAZOO RIVER
WILLOW BOULVARD/A-SITE

I MAILED YOUR FORM RESPONSE IN WHICH I STATED THAT I FAVORED ALTERNATIVE PLAN 4.

I also wish to state that the disposal of the pollutants should be on the residential properties of the Boards of Directors and corporate officers of the various at fault polluters. The disposal should also include filling their swimming pools with pcb's, and also disposing of the material at their summer homes, winter ski lodges, and off-shore island retreats.

Corporate responsibility justifies such a remedy. And,not only should the respective at fault corporations be responsible for the clean-up costs, but the board members and the corporate officers should also have to contribute, substantially, to the remediation costs.

ROY C. HÉBERT
ATTORNEY AND COUNSELOR AT LAW
P14807
PO BOX 1075
SAUGATUCK, MI 49453-1075
TELEPHONE (269) 857-8785
FAX (269) 857-4239

FAX TRANSMITTAL COVER SHEET

DATE: 08/02/2005

FILE NO: EPA PROPOSED CLEANUP PLAN FOR LANDFILL PAPER WASTE
ALLIED PAPER,INC./PORTAGE CREEK/KALAMAZOO RIVER
WILLOW BOULEVARD/A-SITE

PLEASE DELIVER THE FOLLOWING PAGE(S) TO:

NAME: Shari Kolak, Remedial Project Mgr., EPA Region 5 (SR-6J)

COMPANY:

CITY: STATE: ZIP:

FAX NO: 312/353-1155

FROM:

TOTAL NUMBER OF PAGES (INCLUDING COVER SHEET): Two (2)

COMMENTS: Additional comments to my original response favoring Plan 4 remediation.

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ROY C. HÉBERT
ATTORNEY AND COUNSELOR AT LAW
P14807
PO BOX 1075
SAUGATUCK, MI 49453-1075
TELEPHONE (269) 857-8785
FAX (269) 857-4239

FAX TRANSMITTAL COVER SHEET

DATE: 08/02/2005

FILE NO: EPA PROPOSED CLEANUP PLAN FOR LANDFILL PAPER WASTE
ALLIED PAPER,INC./PORTAGE CREEK/KALAMAZOO RIVER
WILLOW BOULEVARD/A-SITE

PLEASE DELIVER THE FOLLOWING PAGE(S) TO:

NAME: Shari Kolak, Remedial Project Mgr., EPA Region 5 (SR-6J)

COMPANY:

CITY: STATE: ZIP:

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Comment on Willow Boulevard/ A-Site Remedy
August 3, 2005

A hybrid of Option 2B and C should be developed.

Material from the Willow Boulevard site should be removed so as to create a continuous curve in the south bank of the river (eliminate the intrusion into the riverway). If clean, uncontaminated soil exists below the waste, it can be used to contour the final site. Contaminated waste should go to the A-Site.Sheet piling should be removed and both the A-Site and Willow Boulevard Site should have a clean, contoured bank rising gently from the river to an ecologically friendly berm at the edge of the containment area. This buffer strip shoild be stabilized with appropriate flood plain vegitation. The buffer should be 100 to 200 feet wide. Careful attention must be paid to contouring of the containment area and appropriate drainage provided since the area is flood prone. Leachate collection and testing should be provided.

All aspects of alternative 2 should apply.

Submitted by: Don Brown
1624 Grand Avenue
Kalamazoo, MI 49006

Alternative
2B - 2C
(recommend
hybrid)

August 5, 2005

Shari Kolak
Remedial Project Manager
EPA Region 5 (SR-6J)
77 W. Jackson Blvd.
Chicago, ILL 60604

Dear Ms. Kolak:

This is in regard to the USEPA held public meeting in Kalamazoo, MI on August 3, 2005 concerning the proposed cleanup plan for the Willow Boulevard/A-Site landfills. I have already submitted one set of comments, these are additional comments based on the information I learned about in the public meeting.

I want to challenge USEPA on the proposed TSCA waiver for the A-Site/Willow Boulevard landfill sites. While I can agree that this might be possible for the original sites, I don't know how USEPA can legitimately justified a TSCA waiver for wastes being brought from additional sites, Georgia Pacific Mill and Hawthrone Mill (35,000 cubic yards or about 1,750 truck loads). These additional wastes would not be treated according to the proposed plan. Since these soils contain PCBs above 50 ppm they still pose a threat to human health and the environment, because the soils are not being treated (stabilized/solidified) they still pose a threat of leaching PCBs into the groundwater that will discharge to the Kalamazoo river. The exemption criteria found in 40 CFR 761.75 is not being met. And the proposed disposal of these soils in the Willow Boulevard/A-Site landfills do not meet the technical requirements found in 40 CFR 761.75(b), because the hydrologic conditions are not being meet and no leachate collection system is being installed as required by 40 CFR 761.75 (b)(7). The CSTAG recommendations state that groundwater data is not being collected for the Willow Boulevard/A-Site landfill. Since you have inadequate data for this landfill, I don't know how USEPA can legitimately justify the TSCA waiver, especially for additional wastes being brought into this landfill. You also stated that you have detected metals and PCBs in the groundwater down-gradient of the landfill, and this indicates that the landfill is leaking. In his book the Environmental Pendulum by Dr. Allan Freeze (one of fathers of modern groundwater) states that all landfills will eventually fail. The cap and proposed remedy is really only a stop gap measure that will only delay the impact these wastes will have on the environment and human health. Please do not grant a TSCA waiver for this site.

Also what plans have or will be developed if the site has a 500 year flood event or any flood/rain over the 100 year threshold. These wastes will be at the site indefinitely. Why not consider a 500 year flood event or anything over a 100 year flood event? A biannually inspection schedule by GP may not work if the site is impacted by a 500 year flood event and PCBs are washed into the river. Aren't you trying to prevent this by shoring up the landfill to prevent further movement of PCBs into the Kalamazoo river.

The residents of the nearby neighborhood would have to endure the noise and traffic from over 1,750 trucks rumbling through their homes will additional soil from the two additional sites. If you figure 3 trucks per hour over a 40 hour work week, that's a total of 72 days or 14 weeks of truck traffic. Please show on a map what route the trucks will take through the neighborhood. I am sure the residents living just south of the Willow Boulevard/A-Site landfills don't want this additional wastes placed in their backyards. I proposed that additional wastes being disposed of at a permitted TSDF or be treated by stabilization/solidification prior to landfilling them at the A-site landfill.

I also disagree with your plan to leave sheet piling along the A-site landfill. I agree with Kalamazoo River Protection Association that this sheet piling should be moved 150 feet back from the high water mark of the Kalamazoo river and hidden from view by planting vegetation cover. Also any fence should be hidden from view from the river corridor. The Willow Creek landfill should be removed and soil placed on the A-site landfill or at a minimum the Willow Creek landfill side alongside the Kalamazoo river should be pulled back and aligned with the A-site landfill. The current landfill and King Highway is an eyesore. Although there are no regulatory requirements to move the sheet piling, but the proposed plan is aesthetically unappealing and does not meet community acceptance. The proposed plan only degrades the area, which is already had too much impact from non-responsible industry. Also I am concerned about the proposed Willow Boulevard "Eco-friendly" dike. I don't know what an Eco-friendly dike is. I recently attended a seminar by Dr. Jon Burley, Professor and Certified Landscape Architect at MSU. Dr. Burley is a world renowned expert on landscape architect along river corridors and has worked restoration projects. It is his opinion that very few U.S. consulting firms know how to properly design protective barriers along river corridors. One only has to look at the dike along the Kings Highway landfill to realize what a bad job looks like, e.g., no imagination and an unappealing mess. Dr. Burley has written numerous subjects on this topic. He also has a demonstration project at the MSU, Kellogg Biological Station on Gull Lake (just north of Kalamazoo) on properly designed structures along riparian corridors. I suggest next time you visit Kalamazoo you visit this site, Ms. Jane Herbert at the MSU station can help you with a visit. I would also hope that would contact Dr. Burley and discuss with him some ideas on how to properly design a dike along the Kalamazoo river.

I would also like USEPA to establish a deadline date to finish the negotiations on the AOC for this site and GP and Hawthrone Sites. It always seems that the attorneys spend 5 times longer on agreement (that no one will look at once the works start) that it takes to implement the remedy. Get the attorneys to commit to something is a hard task, but I think in this case the community has waited long enough. GP attorneys can litigated this site until the cows come home and still be ahead on the financial impact to GP. It's cheaper to pay the lawyers that it is to do the work. Also lawyers are poor planners. A lawyer's job is to litigate rather than get the project finished. Establish a deadline date on when final negotiations have to complete and threaten an UAO under CERCLA 106 to GP if they don't negotiate in good faith and complete an AOC by a certain date (e.g., January 1, 2006).

Also at the meeting you did not have the Fish Consumption Advisory Pamphlet readily available. Please ensure that these pamphlets are available at future meetings and easily in view for the public to obtain a copy. I also think USEPA has viable PRP in GP and they should be required to post and maintain fish advisory signs along the river corridor. Why is the MDEQ having to pay for these signs? I would like to see these signs replaced by the PRP or USEPA if MDEQ does not the funding to do so. USEPA should require GP to maintain and to inspect a network of warning signs every month along with a replacement schedule if needed. Another option is to have USEPA pay for this work and seek cost recovery from GP in the final negotiations. There is no good excuse on not having these signs maintained and posted. If anything this proves that any future remediation plans to leave PCBs in place in the river sediments with institutional controls to not eat the fish, using warning signs will not work, because the existing controls does not seem to work.

I would also request that USEPA extend the public comment period on the proposed plan by additional 30 days to allow more time for comments. The summer is a busy time for people living in the SW Michigan area. The additional 30 days would allow families and the communities living in the area to provide comments on the proposed plan to USEPA. An additional 30 days would have that much impact on starting the work.

Also good work on checking to see if the administrative record in the local repositories in up to date, however it sounded like you were only checking the repository at the Kalamazoo library. USEPA has a legal requirement to keep these files up to date. I suggest that you check the repositories at the other locations as well. There are many consulting firms that do this type of work, and that you could contract with to help support you. I would strongly suggest that establish a maintenance schedule to check these repositories at least once a year.

I hope you will take my comments seriously and consider them before you issue the ROD for this site. Keep up the great work, you are doing excellent job are making good progress. If you have any questions please contact me at (269) 961-7412.

Sincerely,

Bruce Noble

Bruce Noble
2250 W. Kirby Rd
Battle Creek, MI 49017

Internet Daemon Owner
<idaemon@mountain.epa.gov>
08/16/2005 02:42 PM

To

Subject (227154203) Willow_Boulevard_Landfill_Public_Com

2-Name:Robert W. Kaufman
3-Organization:Kalamazoo Environmental Council
4-E-mail:robert.kaufman@wmich.eduk
5-Street:1000 Carolee Lane
6-City:Kalamazoo
7-State:MI
8-Zipcode:49008
9-Comments:Please type your comments here!
Comment on Willow Boulevard/ A-Site
Recomentations.

As a citizen o the state of Michigan I am appalled that more than 20 years has passed without constructive effort to relieve the apparent health hazards - heart damage and cancer among others. The fish advisorys and other evidence indicate health and reproductive prolems in certain animals. This is unacceptable policy for Michigan. A higher priority must attach to reducing and cleanup of pollution in the state.

With respect to OU2, I endorse the alternative proposed by the Kalamazoo Protection Assn. In 2001 EPA and MDEQ were advised by more than 600 citizens, many local governments and citizens groups that no landfills should be built adjacent to the river.

All contaminated waste (PCB) should be transferred from the Willow Blvd. site to the A-site and at least 150 ft. from the river edge. Appropriate natural and indigenous vegetation should be planted on the shore and additional restoration for fishery and marine animals habitat.

It is encouraging that some worthy activity is under consideration. We trust your project will reflect the input of citizens and local public officials and will be completed with high professional standards.

Thank you,

Robert W. Kaufman
Retired. Formerly, chair Kalamazoo, Black, Macatawa River Basin study. Conducted by MSU, Former Director, WMU Environmental Studies Program, Former Director, Science for Citizens Program (National Science Foundation)

Submit:Send Comments

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R. SHARI 9-12-05

PLEASE ADD OUR NAMES TO THE LIST THAT SUPPORTS THE ALTERNATIVE CLEANUP LISTED BELOW. WAITING FIFTEEN YEARS IS LONG ENOUGH! LET'S GET THE JOB DONE. THANK YOU

Marcia Taylor

Preferred Kalamazoo River Willow / A-site landfills Cleanup remedy

Alternative cleanup position recommended by the Kalamazoo River Protection Association **to US EPA's Preferred Cleanup Alternative** regarding the proposed cleanup plan for the Willow boulevard/A site on the Kalamazoo River.

US EPA's preferred remedy does not go far enough to protect the river's environment and wildlife. Also, US EPA 's preferred remedy is not consistent with the public's proposed remedy. In 2001, US EPA and the MDEQ were advised by almost 600 citizens, 28 community and environmental organizations, 22 local governmental units and officials that either wrote letters or passed resolutions recommending that **no landfills should be allowed adjacent to the river**. Also, EPA's remedy of leaving the sheet piling in place along the river's edge will have an adverse impact on aesthetics, tourism and recreational potentials. These two landfill sites are owned by Georgia Pacific Corp. Both of these landfills were placed within the natural river corridor infringing on public surface rights, particularly the Willow site as shown on various photographs. Our specific recommendations are as follows:

First: All PCB waste, approximately 150,000 cubic yards need to be excavated from the Willow site and placed into the A-site. Also, PCB residuals in the river downstream to the edge of the King Hwy site need to be removed to levels of. .3 part per million.

Second: All PCB waste, including the Willow site above must be consolidated with the A-site material and be placed at least 150 feet from the river's south edge at the A-site. This means 150 from the existing sheet piling currently at the edge of the river. This 150 foot buffer then needs to be restored along with the area excavated at the Willow site with natural and indigenous vegetation. The near shore area needs to be restored as well to meet fishery and wildlife habitat needs.

Third: The landfill needs to vaulted and covered by natural layers of soil that are covered with the best available long-term protective synthetic geomembranes and concrete to assure no surface area runoff. Also, a groundwater collection leechate systems needs to be installed along the outside edge of the landfill at the 150 foot buffer setback.

Fourth: Natural Resource Damage Assessment dollars attributable to this site need to be made a part of the final Record of Decision and settlement so that the public and the stakeholders will have final resolution for this stretch of the river. Contact KRPA at 269-686-7822, 616-218-4444 or krpa@accn.org for more info.

MARCIA & I LIVE ON THE KALAMAZOO RIVER AT 3115 RIVERBEND TRAIL, NEW RICHMOND (FENNVILLE, MI) 49408
WE LOVE OUR RIVER, HOPEFULLY ONE DAY IT WILL BE CLEANED UP, FOR EVERYONE TO ENJOY.

EPA Extends Public Comment Period

U.S. Environmental Protection Agency Region 5 has extended its public comment period to Sept. 16, 2005, for the Willow Boulevard/A-Site landfill cleanup project of the **Allied Paper/Portage Creek/Kalamazoo River Superfund site**. The extension was made at the request of area residents.

Comments may be sent by e-mail to epa.gov/region5/publiccomment; by fax to Shari Kolak, (312) 353-1155, or mailed to:

Shari Kolak
Remedial Project Manager
U.S. EPA Region 5 (SR-6J)
77 W. Jackson Blvd.
Chicago, IL 60604

Note: The proposed plan mailed to residents has a discrepancy between the cost figures for Alternative 4 on Page 6 and in the evaluation criteria chart on Page 7. The correct figure is on the chart, $15.8 million.

The proposed plan is available for review on the Internet at epa.gov/region5/sites/kalproject or the following libraries:

Allegan Public Library
331 Hubbard St.
Allegan

Charles Ransom Library
180 S. Sherwood
Plainwell

Kalamazoo Public Library
315 S. Rose St.
Kalamazoo

Otsego District Library
219 S. Farmer St.
Otsego

Saugatuck-Douglas Library
10 Mixer St.
Douglas

Waldo Library
Western Michigan University
1903 W. Michigan Ave.
Kalamazoo

For more information:
Don de Blasio
Community Involvement Coordinator
U.S. EPA Region 5
77 W. Jackson Blvd.
Chicago, IL 60604
(312) 886-4360
Toll-free (800) 621-8431, 10 a.m. to 4:30 p.m. weekdays
deblasio.don@epa.gov

Christine Johnson
<runningrivers @msn.com>
09/12/2005 08:12 AM

To

Subject kalamazoo River Clean-up

Dear Ms. Kolak,

I am writing to strongly support the KRPA alternative proposal for the cleanup of the PCB's from the Kalamazoo River.

As a **Recreation Provider** on the Kalamazoo River and as a **home owner on Lake Allegan** I have seen the pollution situation first hand. I can also testify to the beauty and recovery of the waterway. In the four years I have provided kayak livery on the lower Kalamazoo the recreational use of that section of river has at least doubled.

The Kalamazoo River can recover with your help. Please include the KRPA alternative cleanup recommendations in your final cleanup plans. Don't pass the problem on to the future with inadequate remedies that don't protect the people, the river and it's wildlife and vegitation.

Please take care of this problem the right way by adopting KRPA's alternative cleanup plan. Leaving landfillls adjacent to the river does not fix the problem, it only moves the problem around.

Thank you for your serious attention to this alternative plan.

Sincerely, Christine Johnson

RUNNING RIVERS KAYAK RENTAL

& Pine Cone Cottage Vacation Rental - *where Pets are Welcome*

269-673-3698 / www.running-rivers.com / www.pineconecottage.net

Greg Potter
<gregpotter@earthlink.net>
09/13/2005 06:28 AM
Please respond to
gregpotter@earthlink.net

To
Subject Clean up

Shari,

I have been asked to support the cleanup option proposed by the Kalamazoo River Protection Association and it appears to be a reasonable and realistic option.

As one of the poster children for the clean water act it is time to move forward and put the project on the ground. The stigma attached to the site has left many of the residents throughout the watershed with the idea that the whole system is unsafe for any use and will be through their lifetimes. The stake holders have been more then patient with starts and stops by federal and state authorities. As so many other projects wait for this one to be done let's move forward in the most beneficial way for the resource and the citizens of the Kalamazoo River Valley.

Thank you for your efforts,

Greg Potter
Kalamazoo Valley Chapter of Trout Unlimited
906 S; Kalamazoo
Marshall, MI 49068
(260) 963-2065 (269) 781-5700

Linda Lacey

From: Linda Lacey [lindalacey@mwconnections.com]
Sent: Wednesday, September 14, 2005 3:39 PM
To: 'kolak.shari@epa.gov/region5/publiccomment'
Subject: Willow Boulevard/A-Site landfill clean up project

Dear Ms Kolak:

ve been around long enough to remember when the subcontractor for the PRP's stated that the sheet piling along the river was a temporary measure. At this point the crowd roared with laughter. Of course we knew they didn't consider it temporary and suggested we could find a bridge to sell them if they thought we believed them. Now of course they have managed to do their usual arm twisting and con you into suggesting this as a solution. NO, this is not a solution.

I live on the river and have lived near water all my life. I have never seen a retaining wall last and this one won't either. The PRP's will get away with letting us pay for the needed clean up down the line when the sheet piling fails in the not all that distant future.

The EPA's preferred cleanup alternative is totally inadequate. I support the KRPA'S preferred cleanup position.

1. All PCB waste, need to be excavated from the Willow site and placed into the A-site. Also, PCB residuals in the river downstream to the edge of the King Hwy. Site need to be removed.
2. All PCB waste, including the Willow site above must be consolidated with the A-site and be placed at least 150 feet from the river's south edge at the A-site. This 150 buffer then needs to be resorted along with the area excavated at the Willow site with natural and indigenous vegetation. The near shore area needs to be restored as well to meet fishery and wildlife habitat needs.
3. The landfill needs to be vaulted and covered by natural layers of soil that are covered with the best available long-term protective synthetic geomembranes and concrete to assure no surface area runoff. Also, a groundwater collection leech ate system needs to be installed along the outside edge of the landfill at the 150 foot buffer setback.
4. Natural Resource Damage Assessment dollars attributable to this site need to be made a part of the final Record of Decision and the settlement so that the public and the stakeholders will have final resolution for this stretch of the river.

As a property owner on the Kalamazoo River I urge you to reconsider your proposed preferred cleanup alternative. I also suggest that more information be made available to the public. The secrecy surrounding this project since the EPA has taken over is troubling in a free society. I realize it is standard procedure for this administration but you and I will be around long after this administration is gone. The more information the public has and the more feed back the EPA has the better the decision made. When the only input is from the PRP's it makes the process suspect.

Sincerely,
Linda Lacey

Linda Lacey
5760 Old Allegan Rd
Hamilton MI 49419

your email address as shown in your release didn't work so tried a variation which of course didn't work either. Suggest you extend deadline for comment & fix the email. Linda Lacey

9/15/05

terms.

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<idaemon@mountain.epa.gov>
09/14/2005 01:02 PM

To

Subject (256140213) Willow_Boulevard_Landfill_Public_Comments

2-Name:Charles Ide, Ph.D.
3-Organization:, Env. Inst., Western Michigan University
4-E-mail:charles.ide@wmich.edu
5-Street:1903 West Michigan Ave.
6-City:Kalamazoo
7-State:MI
8-Zipcode:49008
9-Comments:I fully support the concerns and recommendations set forth in the comments by the Kalamazoo Environmental Council and the Kalamazoo River Protection Association in their separate responses. Any solution that is adopted must guarantee the safety of people in nearby neighborhoods, provide rejuvenated habitat to insure ecosystem health, and improve the aesthetics of the area in conjunction with future land use plans for the downtown area.

submit:Send Comments

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TSSMS: reg5oopa
Mail to File: willowblvd

Gsthebigfish @aol.com
09/15/2005 11:00 AM

To

Subject WillowBoulevard/A-Site landfill cleanup project

The EPA, s preferred remedy to clean up the Willow Boulevard/A-Site is not acceptable no landfills should be allowed adjacent to the river. Also, EPA remedy of leaving the sheet piling along the river will have an adverse impact on wildlife aesthetics, tourism and recreational potentials lets do the job right I support the proposed remedy presented by the Kalamazoo River Protection Association which has the support of 28 community and environmental organizations and 22 local government units
Sincerely,
Gerrit Sturrus
Saugatuck Township Resident

Internet Daemon Owner
<idaemon@mountain.epa.gov>
09/15/2005 12:17 PM

To

Subject (257131703) Willow_Boulevard_Landfill_Public_Comments

2-Name:Kay Chase
3-Organization:Kalamazoo Environmental Council
4-E-mail:chase@wmich.edu
5-Street:7000 North Westnedge
6-City:Kalamazoo
7-State:MI
8-Zipcode:49009-6309
9-Comments:EPA PROPOSED CLEANUP PLAN FOR LANDFILL PAPER WASTE
Allied Paper, Inc./Portage Creek/Kalamazoo River
Willow Boulevard/A-Site
Kalamazoo, Michigan July 2005

The Kalamazoo Environmental Council is always gratified when some forward progress is made on the clean-up of the Kalamazoo River Superfund Site, even as we deplore the generally slow pace of the process over the last 15 years.

The proposal for clean-up of the Willow Boulevard / A Site moves generally in a direction that we can support. The EPA preferred alternative has the advantage of being readily achievable and relatively low cost. We would urge, however, certain additions to the proposal that we feel will achieve a more satisfactory long term solution and a more acceptable restoration of a wildlife corridor along the south bank of the river.

Concerns that we have with the proposal as it stands include:

1. uncertainties about the groundwater contribution of PCBs to the river, a data gap pointed out in the CSTAG memorandum of 12/9/04;

2. uncertainties about possible human health effects from wind borne sediments that may contain PCB residuals;

3. failure to deal with instream PCB-contaminated sediments in the adjoining stretch of river and downstream to the area of Portage Creek

4. inadequacy of the preferred alternative to restoration of wildlife habitat along the riverbank;

5. aesthetics of the proposed riverbank treatment in light of the City of Kalamazoo's vision for riverfront development and for optimal recreational use of this stretch of the river.

Our recommendations are:

1. in addition to monitoring groundwater surrounding the landfill, install a leachate collection system so that migrating contamination may be remedied more promptly should it be necessary;

2. minimize truck transport of contaminated soils through the adjoining residential neighborhood; utilize the best available technology for excavating and transporting contaminated soils in order to minimize any possible human health risk;

3. remove PCB residuals from the Olmstead and Willow drainageways

and from the river between Davis Creek and the mouth of Portage Creek;

4. remove all contaminated soil from Willow Boulevard and place it in the A-site; restore Willow site to its natural condition

5. pull back the A-site 150' from the river's edge;

6. ensure the integrity of the A-site to withstand a 100-year flood;

7. remove existing sheet piling along the river's edge and restore the natural condition of the riverbank from Davis Creek to the mouth of the Willow drainageway

8. utilize Natural Resource Damage Assessment monies commensurate with this site to remediate the resource damages simultaneously with the clean-up.

submit:Send Comments

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TSSMS: reg5oopa
Mail to File: willowblvd

Steve Hamilton
<hamilton@kbs.msu.edu>
09/15/2005 03:54 PM

To

Subject Willow Blvd/A Site comments from KRWC

Hello Don, Shari,

Attached please find comments on the Willow Blvd/A Site cleanup plan from the Kalamazoo River Watershed Council. We appreciate the extension of the deadline, which gave us the time we needed in a busy time of year.

Best regards,

Steve Hamilton

Willow Blvd cleanup plan KRWC comments.pdf

14 September 2005

The Kalamazoo River Watershed Council is pleased to provide its comments for the public record concerning the US EPA's Cleanup Plan for the Willow Boulevard/A-Site.

Our evaluation derives from two major principles:

1. Contaminated paper waste containing PCBs should not be left on a flood plain subject to hydrological dynamics that might disperse the wastes into the river. Future releases of the buried material could occur gradually via groundwater movement, particularly because flood plains in this area are sites of substantial upwelling of groundwater on its way from adjacent uplands to the river and these landfills are not sealed underneath the material. Equally concerning is the possibility for floodplain landfills to be compromised during flood events, either through high river discharges, ice damming, or overland runoff from nearby urbanized areas. Hydrological data for the Kalamazoo River extend back only to the 1930s and thus the statistical estimates of flood magnitudes and recurrence intervals are quite uncertain, and increasing urban development is changing the runoff patterns in the watershed. All of these uncertainties mean that storage of hazardous material in a floodplain landfill is a very unwise long-term solution.
2. The Kalamazoo River should be restored to the most natural contour possible, with the highest visual and esthetic values practicable. Landfills in close proximity to the river with sheet piling or other structural containment are inconsistent with this goal.

We recognize the immediate benefit of isolating the paper wastes from the river, but believe that the Cleanup can include components that better fit the above principles, even though we find it difficult to endorse any long-term waste storage on the river's flood plain. If this must be done, then it is imperative that measures be taken to minimize potential movement of contaminants, and these should be projected to remain effective for at least 50 years and ideally longer and to survive any conceivable flood event.

If floodplain landfill storage is chosen, we generally support the statements of the Kalamazoo River Protective Association (KRPA) and the Kalamazoo Environmental Council (KEC), which include many features consistent with these principles.

If complete removal to an upland site is impossible, we believe that a combination of elements of the cleanup options presented will best satisfy our major principles and the outcomes presented by the KRPA and KEC. Our recommended strategy is:

1. Totally excavate Willow Boulevard. The aerial photos, cross sections and core sampling shows that this site is unstable, has no bottom seal to prevent transport into the groundwater feeding the river, and has some of the highest levels of contamination in the combined sites. There appear to be sufficient data to support removal of the worst contaminated soils to a TSCA hazardous waste site, with the less contaminated soils being added to A Site.
2. Dredge all surrounding former water courses and the river downstream past at least the Kings Highway site. Handle the dredge spoils in the same manner as

above. Hydraulic dredging would provide for the use of Geotube containment for transport of the most contaminated soils to a hazardous waste site.

3. Cut down or pull the sheet piling at A Site. If the sheet piling provides any seal against groundwater movement between the site and river then the lower elements should stay.
4. "Hot Spot" the "A Site" and remove the most contaminated soils to a TSCA hazardous waste site.
5. We concur with the 150' buffer from the river. Removal of significant amounts of highly contaminated soils will provide room for less contaminated soils from Willow Boulevard, Georgia Pacific and the areas surrounding A Site. Bank structuring to achieve the most natural possible contours is essential. We prefer that a bank stabilization method be chosen that will eventually allow the establishment of tree and shrub growth to mask any engineered structures visible on the banks after initial installation.

We further point out that the detailed analysis of remediation alternatives concluded that the potential hazards presented by PCB exposure to workers and local residents by airborne dust from major excavation of these landfills was *unlikely* to be significant as long as proper procedures were followed. In spite of that conclusion, this issue seems to be used as a justification to discard alternatives that entail major excavation.

Internet Daemon Owner
<idaemon@mountain.epa.gov>
09/16/2005 10:23 PM

To

Subject (258232348) Willow_Boulevard_Landfill_Public_Comments

2-Name:Judy Mayo and Sid Aaron
3-Organization:
4-E-mail:judymayo@sidaaronconsultants.com
5-Street:4318 Lakeside Drive
6-City:Kalamazoo
7-State:MI
8-Zipcode:49008
9-Comments:Please type your comments here
Sid and I have participated in the river cleanup discussions for almost 20 years. Part of that time I was chair of the Kalamazoo Environmental Council representing the League of Women Voters. I am still the KEC delegate for the LWV of the Kalamazoo area. I have repeatedly been disappointed in the state and federal agencies management of the Kalamazoo River cleanup as they either postponed cleanup remedies or proposed insuffient plans. The latter is the case with the current Willow / A-site landfills proposed remedy. Sid and I support the position taken by the Kalamazoo River Protection Association (KRPA) which includes a more appropriate excavation plan for PCBs at the Willow Site and in the river downstream to the King Hwy stie. It also has a better plan for the landfilling of the PCB waste and the placement/ restoration/maintenance of the landfill.

Please consider our comments in your discussions. Sincerely, Judy Mayo and Sid Aaron
submit:Send Comments

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September 16, 2005

To: Shari Kolak
Remedial Project Manaager
U.S. EPA Region 5 (SR-6J)
Fax: 312-353-1155

From: Kathleen Schwegel
6385 120th Avenue
Fennville, MI 49408

Re: Willow Boulevard/A-Site landfill cleanup project of the Allied Paper/Portage Creek/Kalamazoo River Superfund site

US EPA's preferred remedy does not go far enough to protect the river's environment and wildlife and is not consistent with the public's proposed remedy. No landfills should be allowed adjacent to the river. The two Georgia Pacific landfill sites were placed within the natural river corridor infringing on public surface rights.

I very strongly support the alternative cleanup position recommended by the Kalamazoo River Protection Association to US EPA's preferred cleanup alternative. The KRPA's specific recommendations are:

1. All PCB waste should be excavated from the Willow site and placed into A-site. Also, PCB residuals in the river downstream to the edge of the King Highway site should be removed to levels of .3 part per million.

2. All PCB waste must be consolidated with the A-site material and be placed at least 150 feet from the river's south edge at the A-site. This means 150 from the existing sheet piling currently at the edge of the river. This 150-foot buffer should be restored along with the area excavated at the Willow site with natural and indigenous vegetation. The near shore area should be restored as well to meet fishery and wildlife habitat needs.

3. The landfill should be vaulted and covered by natural layers of soil that are covered with the best available long-term protective synthetic geomembranes and concrete to ensure no surface area runoff. Also, a groundwater collection leechate system needs to be installed along the outside edge of the landfill at the 150-foot buffer setback.

4. Natural Resource Damage Assessment dollars attributable to this site should be made a part of the final Record of Decision and settlement so that the public and the stakeholders will have final resolution for this stretch of the river.

As you know, this has been an extremely long process involving much work and innumerable meetings. Let us get the best possible outcome to reward everyone's efforts. Thank you very much for extending this comment period and for your attention.

Internet Daemon Owner
<idaemon@mountain.epa.gov>
09/16/2005 08:23 PM

To

Subject (258212310) Willow_Boulevard_Landfill_Public_Comments

2-Name:Theresa Krickow
3-Organization:
4-E-mail:
5-Street:1673 108th Ave.
6-City:Otsego
7-State:MI
8-Zipcode:49078
9-Comments:Please type your comments here
it makes the most cents (pun intended) to do this right the first time. the plan to just move the pcb sludge over alittle and wait for it to possibly go into the water table causing more costs down the road is silly. the mess is made...so clean it up right. it should go to a landfill made to prevent the contaminents from seeping into ground water. it's a shame that tax payers are left to foot the bill and may never have the recreational possibilities of the a once vibrant river if all goes as thus far. 46 million is a drop in the bucket compared to the benifits to doing the best clean up with correct equipment and training of workers.
submit:Send Comments

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TSSMS: reg5oopa
Mail to File: willowblvd

Marilyn Johnson
<mjohnson@fennville.org>
09/16/2005 04:55 PM

To

Subject public comment on Willow Blv. A-site

9-16-05

Shari Kolak
Remedial Project Manager
U.S. EPA Region 5

Thank you for extending the public comment period on the proposed cleanup remedy for the Kalamazoo River Willow Blvd./A-site. I am a board member of the Kalamazoo River Protection Association and have followed this issue for several years. I feel very strongly about making revisions to the EPA's proposed plan for the cleanup of the Willow Blvd / A-site. The EPA's plan does not go far enough to protect human health and wildlife. In 2001, the U.S. EPA and MDEQ were advised by almost 600 citizens, 28 community and environmental organizations, and 22 local governmental units and officials via letters or passed resolutions that no landfills should be allowed adjacent to the river. The EPA's current proposed plan would allow PCB contaminated sediments to remain next to the river. Also, the EPA's proposed plan would leave sheet piling in place along the banks, impairing recreational potential, tourism, and aesthetics. The two landfill sites are owned by Georgia Pacific Corp., both were placed within the natural river corridor, infringing on public surface rights, particularly the Willow site. For these reasons and many more, I strongly support the KRPA's proposed altenative cleanup remedy. The proposed changes to make to the EPA's plan are as follows:

FIRST: All PCB waste, approximately 150,000 cubic yards need to be excavated from the Willow site and placed into the A-site. Also, PCB residuals in the river downstream to the edge of the King Hwy site need to be removed to levels of 0.3 ppm.

SECOND: All PCB waste, including the Willow site above must be consolidated with the A-site material and placed at least 150 feet from the river's south edge at the A-site. This means 150' from the exisiting sheet piling currently at the edge of the river. This 150' buffer then needs to be restored along with the area excavated at the Willow site with natural and indigenous vegetation. The near shore area needs to be restored as well, to meet fishery and habitat needs.

THIRD: The landfill needs to be vaulted and covered by natural layers of soil that are covered with the best available long-term protective synthetic geomembranes and concrete to assure no surface area run-off. Also, a groundwater collection leechate system needs to be installed along the outside edge of the landfill at the 150 foot buffer setback.

FOURTH: Natural Resource Damage Assessment dollars attributable to this site need to be made a part of the final Record of Decision and settlement so that the public and stakeholders will have the final resolution for this strech of the river.

Thank you again for extending the public comment period, please take public opinion seriously and make the above revisions to the proposed plan. We are all relying on you, as the EPA project manager, to support a cleanup plan that will protect us from the adverse affects of persistant toxins in our communities. Thank you for your time and

efforts.

Sincerely,

Marilyn Johnson
5129 116th Ave.
Fennville, MI 49408
mjohnson@fennville.org

Internet Daemon Owner
<idaemon@mountain.epa.gov>
09/16/2005 05:11 PM

To

Subject (258181129) Willow_Boulevard_Landfill_Public_Comments

2-Name:Barbara Wygant
3-Organization:WMU Evaluation Center
4-E-mail:barbara.wygant@wmich.edu
5-Street:1223 Lane Blvd.
6-City:Kalamazoo
7-State:MI
8-Zipcode:49001
9-Comments:I am a resident of the Edison neighborhood in the City of Kalamazoo, Michigan. I agree with the statements put forth during this comment period by the Kalamazoo Environmental Council and the KRPA concerning the Willow Blvd./A-Site. I am concerned about PCB storage so close to where I live. I see the economic consequences of these hazardous waste sites that exist in our city so close to the downtown, residential, and campus areas. Around these sites vibrant community development is lacking—there are very few restaurants, shopping centers, recreation areas, etc. There is also a steep decrease in property values in these areas.

I demand the steel sheeting be removed from the river banks and a more aesthetic, natural landscape along the river be established. This part of the river could be a great recreation link, but as it is, the steel sheeting is frightening and cold to observe or recreate by (such as in my kayak). I am also disappointed that the PCB's are not being moved out of the area. I demand that no further PCB's be brought to this area. I worked with researchers in WMU Environmental Institute and I know for a fact that PCB's cause neurological damage, endocrine disruption, and more. There was once an article in the Kalamazoo Gazette that Kalamazoo had the highest Ritalin prescription rate in the US.

The economic consequences of the PCB contamination in the river are huge. I buy all my fish at large markets and never eat local or Lake Michigan fish. I recently spent $64 for a 4 pound wild salmon (on sale) from a river in Alaska. It's a shame that my money is not going to local resources; but I fear the health effects of our polluted rivers. I once had a WMU student ask me questions about the environment in Kalamazoo because his girlfriend thought it was terribly polluted. I honestly could not give him any indication otherwise. They were looking to move away from this city after graduation because of issues like these. I, at age 40, also evaluate living in a more environmentally sound area (outside of Southwest Michigan) in the future, as I find the idea of so much PCB storage downwind and downstream of me dismaying. I worry very much about my water supply and my health. Even though I have a very health lifestyle, I have severe ADD, terrible skin problems, and as! thma that no other biological family member does. These family members do not live near Kalamazoo. I also see the long-term degradation of my neighborhood that is near such a depressing, dark, hidden no man's fenced-in area part of town (i.e., hazardous waste site).

I encourage you to do as much possible to protect human health and wildlife by truly containing the PCB's with the upmost ethical standards of long-term safety. This area has huge changes in weather, especially lake-effect severe winter weather. Kalamazoo weather is much more severe than Battle Creek, Lansing, or Detroit because of its proximity to Lake Michigan and wind patterns. I am very doubtful that a 'cap' will be a long-term solution and will only pose huge, dire economic consequences to citizens later in the future. I strongly wish the PCB's were all being hauled to a landfill away

Gsthebigfish @aol.com
09/15/2005 11:00 AM

To

Subject WillowBoulevard/A-Site landfill cleanup project

The EPA, s preferred remedy to clean up the Willow Boulevard/A-Site is not acceptable no landfills should be allowed adjacent to the river. Also, EPA remedy of leaving the sheet piling along the river will have an adverse impact on wildlife aesthetics, tourism and recreational potentials lets do the job right I support the proposed remedy presented by the Kalamazoo River Protection Association which has the support of 28 community and environmental organizations and 22 local government units
Sincerely,
Gerrit Sturrus
Saugatuck Township Resident

Dana Johnson
<djohnson@fennville.org>
09/16/2005 04:36 PM

To

Subject Public Comment Willow Blvd. A-site

9-16-05

Shari Kolak
Remedial Project Manager
U.S. EPA Region 5

Thank you for extending the public comment period on the proposed cleanup remedy for the Kalamazoo River Willow Blvd./A-site. The cleanup of the entire Kalamazoo River Superfund site is extremely important to me. I live and work within the watershed, I learned of the severe PCB contamination in the river sediments about 10 years ago. At that time, the Kalamazoo River Protection Association had already been advocating for a cleanup plan that would protect human health, wildlife, and restore the natural river community. For the past 25 years, the KRPA has attended countless public meetings, updated the local community on the superfund process, and many have volunteered time, effort, and money to support the appropriate and full cleanup of the toxic waste in the Kalamazoo River. In 2001, the U.S. EPA and MDEQ were advised by almost 600 citizens, 28 community and environmental organizations, and 22 local governmental units and officials that we want the persistant toxins removed from the banks of the Kalamazoo and stored in highly advanced landfills to be located outside of the 500 year flood plain of the river. The public opinion is clear, all of the above mentioned have written letters or passed resolutions stating that no landfills should be allowed adjacent to the river.

The EPA's current proposed plan would allow PCB contaminated sediments to remain next to the river. This is not acceptable. Also, the EPA's proposed plan would leave sheet piling in place along the banks, impairing recreational potential, tourism, and aesthetics. The two landfill sites are owned by Georgia Pacific Corp., both were placed within the natural river corridor, infringing on public surface rights, particularly the Willow site. This is not acceptable. The Kalamazoo River is one of the worst sites for PCB contamination in the U.S., putting residents of this area, both human and non-human, at risk. This is not acceptable. Mink in the Kalamazoo River have the highest level of PCB's in their bloodstream anywhere in the nation. This is not acceptable. Eagles and other wildlife can not reproduce normally, due to the bioaccumulative effects of PCB's put into the river by multinational corporations making millions in annual profits. This is not acceptable. We are warned by the MDEQ not to eat the fish from the Kalamazoo River, or to restrict consumption, as to avoid the further build up of PCB's in our own bloodstreams and in mother's milk. This is not acceptable. There are many poor families who still must rely on fish to supplement their diets and there are many who would like to fish in the Kalamazoo, but will not because the fish are toxic. This is not acceptable. For these reasons and more I strongly support the KRPA's proposed altenative cleanup remedy. The proposed changes to make to the EPA's plan are as follows:

FIRST: All PCB waste, approximately 150,000 cubic yards need to be excavated from the Willow site and placed into the A-site. Also, PCB residuals in the river downstream to the edge of the King Hwy site need to be removed to levels of 0.3 ppm.

SECOND: All PCB waste, including the Willow site above must be

consolidated with the A-site material and placed at least 150 feet from the river's south edge at the A-site. This means 150' from the exisiting sheet piling currently at the edge of the river. This 150' buffer then needs to be restored along with the area excavated at the Willow site with natural and indigenous vegetation. The near shore area needs to be restored as well, to meet fishery and habitat needs.

THIRD: The landfill needs to be vaulted and covered by natural layers of soil that are covered with the best available long-term protective synthetic geomembranes and concrete to assure no surface area run-off. Also, a groundwater collection leechate system needs to be installed along the outside edge of the landfill at the 150 foot buffer setback.

FOURTH: Natural Resource Damage Assessment dollars attributable to this site need to be made a part of the final Record of Decision and settlement so that the public and stakeholders will have the final resolution for this strech of the river.

Thank you again for extending the public comment period, please consider the needs of those who live in this watershed as the R.O.D. is prepared. Public opinion could not be more clear on this matter, please make the above revisions to the proposed plan. We are all counting on you as the EPA project manager to support a cleanup plan that will protect us from the adverse affects of persistant toxins in our communities. It is a very important job. Thank you for taking on this heavy responsibility. I know you will make the right decision for all of us.

Sincerely,
Dana Johnson
5127 116th Ave.
Fennville, MI 49408
djohnson@fennville.org

From: Internet Daemon Owner <idaemon@mountain.epa.gov>
To: Shari Kolak/R5/USEPA/US@EPA

Date: Tuesday, September 13, 2005 09:54AM
Subject: (255105449) Willow_Boulevard_Landfill_Public_Comments

---

2-Name:Carol Doeringer
3-Organization:
4-E-mail:carol@midwestconsult.com
5-Street:3782 Damal Drive
6-City:Allegan
7-State:MI
8-Zipcode:49010
9-Comments:Please type your comments here

My home is located on Lake Allegan and I am most interested in seeing the EPA initiate the river clean-up. Trusting th at the EPA has sound reasons for choosing its recommended c lean-up method for the Willow Blvd/A Site Landfill, I suppo rt that recommendation and earnestly implore you to take ac tion--begin the clean-up process--as soon as possible. It is time to take action, to place the project on an accelera ted schedule and to make all effort to accomplish the full river clean-up of pcbs within a period of years, not decade s.

submit:Send Comments

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Kalamazoo River
Protection Association

Environmental activism since 1975
Protecting the Kalamazoo River Watershed and the Great Lakes

(616) 686-7822 / 857-1791
krpa@accn.org

P.O. Box 408
325 Hubbard Street
Allegan, MI 49010

Preferred Kalamazoo River Willow / Asite landfills Cleanup remedy

Alternative cleanup position recommended by the Kalamazoo River Protection Association **to US EPA's Preferred Cleanup Alternative** regarding the proposed cleanup plan for the Willow boulevard/A site on the Kalamazoo River.

US EPA's preferred remedy does not go far enough to protect the river's environment and wildlife. Also, US EPA 's preferred remedy is not consistent with the public's proposed remedy. In 2001, US EPA and the MDEQ were advised by almost 600 citizens, 28 community and environmental organizations, 22 local governmental units and officials that either wrote letters or passed resolutions recommending that **no landfills should be allowed adjacent to the river**. Also, EPA's remedy of leaving the sheet piling in place along the river's edge will have an adverse impact on aesthetics, tourism and recreational potentials. These two landfill sites are owned by Georgia Pacific Corp. Both of these landfills were placed within the natural river corridor infringing on public surface rights, particularly the Willow site as shown on various photographs. Our specific recommendations are as follows:

First: All PCB waste, approximately 150,000 cubic yards need to be excavated and placed into the A-site. Also, PCB residuals in the river downstream to the edge of the King Hwy site need to be removed to levels of. .3 part per million.

Second: All PCB waste, including the Willow site above must be consolidated with the A site material and be placed at least 150 feet from the river's south edge at the A-site. This means 150 from the existing sheet piling currently at the edge of the river. This 150 foot buffer then needs to be restored along with area excavated at the Willow site with natural and indigenous vegetation. The near shore area needs to be restored as well to meet fishery and wildlife habitat needs.

Third: The landfill needs to vaulted and covered by natural layers of soil that covered with proved long-term protective synthetic geomembranes and concrete to assure no surface area runoff. Also, a groundwater collection leechate systems needs to be installed along the outside edge of the landfill at the 150 foot buffer setback.

Fourth: Natural Resource Damage Assessment dollars attributable to this site need to be made a part of the final Record of Decision and settlement so that the public and the stakeholders will have final resolution for this stretch of the river.