UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

Date: Dec. 7, 2012

Memorandum

To: Michael J. Erickson, PE ARCADIS

From: Ramon Mendoza, On-Scene Coordinator, United States Environmental Protection Agency (EPA) Michael Blevey for RM

Subject: Field Inspection Former Plainwell Impoundment, Dec. 3, 2012

The purpose of this Memo is to document findings of the field inspection conducted Dec.3, 2012, of the entire length of the banks at the Former Plainwell Impoundment by representatives from MDEQ, MDNR, EPA, Georgia Pacific, and ARCADIS. The field inspection was conducted by boat and foot under the Administrative Order on Consent (AOC). Please note that the AOC, including paragraphs V.A.2 and 10 of the Action Memoranda, require that the response action shall ensure stable riverbanks post-removal

The purpose of the inspection was to identify any areas which need to be repaired in the Former Plainwell Impoundment. These areas would be in addition to areas identified for repair in the ARCADIS Bank Repair Plan: Former Plainwell Impoundment and Plainwell No. 2 Area Fall 2012 Bank Repair Plan Technical Memorandum Revised November 2012 (dated November 15, 2012).

The representatives also visited the eroded bank in Removal Area 10A, Pipeline Crossing (see photos 6 &7 Enclosure). U.S. EPA continues to request that the exposed waste and bank in this area be sampled and analyzed to determine the level of PCBs present. I request another meeting to discuss this issue as soon as possible.

Based on the inspection we have identified the following additional areas in need of repair (note GPS coordinate may be only accurate to within 20 feet):

1. Approximate Location: Bank area RA 2A east (south) end.
   Lat 42.45002 Long -85.65005. The bank is serverely eroded with contaminated residuals exposed. (See Photo 1 Enclosure). Continued erosion in this area has the potential to expose additional contaminated residuals.

Requested Repair: Cover the exposed area with geotextile fabric and rocks using the conceptual design for RA Area 4A as described in the Bank Repair Plan Technical Memorandum Revised November 2012 (Dated November 15, 2012).

2. Approximate Location: West end (north) of RA 4A to start of RA 5. Lat 42.45406 Long -85.65257. The area shows signs of erosion (See Photo 2 Enclosure). Continued erosion in this area has the potential to expose contaminated residuals.

   Requested Repair: Extend the current downstream boundary of repairs in RA 4A to the bend up to the border of Removal Area 5A, using the same conceptual design in the November 15, 2012 Bank Repair Plan.

3. EPA and MDEQ observed the following areas where the rock armoring has fallen off the bank exposing the geotextile fabric beneath. We request that these areas be repaired by replacing the rock to avoid bank failure:

   a) Approximate Location: Removal Area 3A, Lat 42.45127 Long -85.65054 (see Photo 3 Enclosure)

   b) Approximate Location: Removal Area 4B, Lat 42.45181 Long -85.65208 about 20 feet upstream of the open area where we off loaded our boats (See Photo 4, Enclosure)

   c) Approximate Location: Removal Area 9A, Lat 42.45505 Long -85.66090

   d) Approximate Location: Removal Area 9A approximately 200 feet upstream of: Lat 42.45505 Long -85.66090.

   e) Approximate Location: Western Channel Area, upstream of planned repair area. Lat 42.5521 Long -85.66835. (See Photo 5, Enclosure.)

   Should you have any questions please contact me at Mendoza.ramon@epa.gov or at 312-886-4314,

CC: P. Buckholtz, MDEQ
J. Alfano , MDEQ
S.Hanshue, MDNR

ENCLOSURE:

Photo 1, Approximate location RA 2A east end. Bank is severely eroded with contaminated residuals exposed. (Mendoza, 12/3/12).

Photo 2, Approximate location: West end of RA 4A. Severely eroded bank. (Mendoza, 12/3/12)

Photo 3, Approximate location, Removal Area 3A. Exposed geotextile (Mendoza, 12/3/2012)

Photo 4, Approximate location, Removal Area 4B Exposed geotextile (Mendoza, 12/3/12)

Photo 5, Approximate location, Western Channel Area, upstream of the planned repair area. (Mendoza, 12/3/12)

Photo 6, Removal Area 10A showing the eroded bank with exposed contaminated material. (Mendoza, 12/3/12)

Photo 7, Removal Area 10 A closeup of eroded bank and exposed contaminated material (Mendoza, 12/3/12).