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

REPLY TO THE ATTENTION OF:

SE-5J

July 1, 2009

Steve Garbaciak, Jr. P.E.
Vice-President
ARCADIS
30 West Monroe St., Suite 1710
Chicago, Illinois 60448-2404

Re: Notification of Revisions to the Plainwell No. 2 Dam Area Time-Critical Removal Action Draft Design Report, May 2009

Dear Steve:

Attached are comments from the United States Environmental Protection Agency (U.S. EPA) and the Trustees on the above-referenced document. No additional comments are expected to be forthcoming.

Please revise the draft document to incorporate the attached comments and submit a revised Work Plan within 15 days of receipt of this letter. If you have any questions or concerns regarding these comments, please do not hesitate to contact me at (312) 886-4592.

Sincerely,

Mike Ribordy
On-Scene Coordinator
U.S. Environmental Protection Agency

Attachment

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cc: Jim Saric, USEPA
Leslie Kirby-Miles, USEPA
Paul Buckholtz, MDEQ
Sharon Hanshue, MDEQ
Lisa Williams, USFWS
Todd Goeks, NOAA

Comments on the Plainwell Dam #2 Draft Design Report

General Comments

Comment 1 - The design report does not indicate how the information from this Removal Action will be incorporated into the Remedial Investigation (RI) and Feasibility Study (FS) reports Operable Unit 5, Area 1. Since this Removal Action is occurring after the development of the RI Work Plan, it must be clear that the nature, objectives and results of this Removal Action will be incorporated into the RI and FS reports. Further, the effectiveness of this removal must be discussed in the RI report to include, at a minimum, water quality analysis, soil and sediment pre- and post- removal concentrations as well as mass removal, and fish monitoring results.

Comment 2 - The document does not include any discussion of fish monitoring for determining the effectiveness of the TCRA. Although this information may not be part of the Design Report, a reference to how fish tissue analysis to further evaluate the effectiveness of the TCRA must be included in this document.

Specific Comments

Section 1.5, Page 1-13 - Objective 5 is not applicable to the activity proposed and should be removed or reworded to indicate that the Trustees will make a determination if compensatory restoration is accomplished at the site.

Section 1.6, Post-Construction Monitoring and Maintenance, Page 1-17 – The first sentence of this section should be modified as follows: "As described in Section 5, post-construction activities will focus on monitoring and maintenance activities." The Administrative Order on Consent for Plainwell Dam #2 requires a separate proposal for post-removal site control to be submitted in accordance with the Work Plan (Design Report) schedule. Discussions regarding monitoring and reporting frequency are more appropriate during the development of the post-removal site control plan. The Design Report schedule should specify when the draft post-removal site control plan will be submitted to U.S. EPA.

Section 2.2, Page 2-5 - At the end of the sentence that reads "Removal will be completed to a neat line to be established in the final design, (insert) "with confirmation sampling as described in Section 5.4."

Section 2.6, Page 2-12 - It is our understanding that you are revisiting the proposed earthen berm to access the first island and we support a temporary structure that spans the water surface to the extent possible in lieu of blocking it.

Section 2.6, Sediment Removal, Page 2-13 – U.S EPA strongly recommends using a sealed closed-bucket clamshell during the removal. If a visor bucket is used, there should be no drain holes in the back of the bucket.

Section 3.7 – This section should indicate that access roads left behind and areas where excavated material will be managed will be verified to be clean as specified in the access agreements with each individual property owner.

Section 5.1, Page 5-1 – The description of the turbidity monitoring equipment is different throughout this section. This section needs to clarify that turbidity monitoring devices with associated telemetry equipment will be installed at the locations upstream and downstream of the removal area.

Section 5.4, Page 5-7, First Bullet – The first paragraph should clarify that the excavation will initially be considered complete when the removal is performed to the cut line based on the maximum depth of penetration of the bucket as measured by the RTK GPS system, and the bottom elevation is shown to be within 6 inches of the cut line.

Section 5.4, Page 5-7, First Bullet – The first paragraph should also state that when confirmation data is above 1 mg/kg, an additional 6 inches will be removed. This is consistent with the removal goal of removing sediments with PCB concentrations greater than 1 mg/kg.

Section 5.4, Page 5-7, First Bullet – The text in the second paragraph should be revised as follows: "Following any additional excavation of sediments, sub-samples will again be collected from a random location in each grid cell, composited, and submitted for laboratory PCB analysis. If the PCB concentration from the second round of sampling is less than or equal to 5 mg/kg, no further excavation of the area will be required. However, if the PCB concentration remains greater than 5.0 mg/kg, an additional 6 inches may be removed and the sampling process and analysis repeated at the direction of the OSC. "

U.S. EPA recognizes that although the goal of the removal action is to remove sediments with PCB concentrations above 1 mg/kg, this may be technically impracticable given the removal methods being used for the Time-Critical Removal Action. Final confirmation data collected as part of this removal action will be used in developing the final Record of Decision for Area 1.

Section 5.4, Page 5-8 - At each sampling location, the thickness of soft sediment should be recorded by pushing the core to refusal when collecting confirmation sediment samples or using a rod to measure the thickness.

Section 5.4, Page 5-8 – The document should state that samples collected from each 75'x30' decision unit will not include sediment from the toe.

Soil samples collected for confirmation sampling in Bank, toe-of-bank, and floodplain surface soils should not be taken at 6 inches below the floor of the

excavation, but rather of the top 6 inches of the floor of the excavation and composited.

The document needs to reflect that the split samples taken at 5% of the confirmation units, will be analyzed and compared to the composite data within 60 days after the removal action is complete, for use in the future evaluation of removal and/or remedial projects.

Design Drawing G-5.1, Part 2.03(I). Some of the larger diameter live stakes at Plainwell #1 had poor survival. We would ask for an assessment of the 3" diameter stake performance to ensure adequate survival before using this size again.

Design Drawing G-5.2, Table A footnote - Design drawing G5.2, Table A and footnote indicate different rates of seed application, we would encourage consideration at the 33 lb per acre rate.