Briefing Paper for HQ – May 2013
ALLIED PAPER/PORTAGE CREEK/KALAMAZOO RIVER SUPERFUND SITE
ALLIED LANDFILL (OU1)
Kalamazoo, Michigan

SITE SUMMARY:

- The Allied Paper Landfill is the largest of four disposal areas in the Allied Paper/Portage Creek/Kalamazoo River Superfund site, which also includes, five former paper mill properties, and more than 80 miles of the Kalamazoo River and Portage Creek, all contaminated with polychlorinated biphenyls (PCBs).

- PCB contamination at Allied Landfill ranges from non-detect to 2500 ppm with approximately 5% of the waste containing PCBs above 500 ppm. Site data indicate that the contamination poses an on-site risk of direct contact and ingestion exposure to human and ecological receptors. Off-site, erosion and runoff of uncontained contamination poses an ingestion risk to fish, and human consumers of these fish, in Portage Creek and the down gradient Kalamazoo River.

CURRENT STATUS:

- EPA is currently evaluating alternatives ranging from consolidation and capping ($39 million) to complete removal ($336 million) and favors consolidation and capping because it is completely protective and cost-effective. All of the remedies in the final array meet the threshold criteria of being protective and meeting ARARs.

- The City of Kalamazoo and most citizen groups insist that complete removal and relocation is the only acceptable option and will fight any alternative that would leave waste in place citing threats to the city drinking water and the hazards posed by a landfill adjacent to residential areas that are Environmental Justice communities.

- The City of Kalamazoo has a quote from Environmental Quality, a TSCA landfill operator in Michigan for complete removal at $118 million. EPA is currently scheduling a meeting with the City of Kalamazoo and EQ to compare cost estimates.

- Superfund management has met with the mayor of Kalamazoo on March 12 and April 16, 2013. During the latter meeting, the mayor and other council members stated their intent to fight any alternative other than complete removal. Beginning on March 19th an alliance of citizen groups and the City have garnered strong attendance weekly meetings aimed at building support for their stance.

- EPA intends to propose the consolidation and capping remedy to the public during spring 2013.

- EPA plans to conduct further outreach to the public (availability sessions and factsheets) ahead of the release of the proposed plan.

BACKGROUND:

- The former Bryant Mill Pond (the section Portage Creek within the Allied Landfill OU which was once impounded) contained high concentrations of PCBs that were also mobile to Kalamazoo River System. Contamination from the Bryant Mill Pond was consolidated into the main body of the landfill in a 1998-1999 EPA conducted removal action. This action contained the mobile material addressing the greatest risk posed by Allied Landfill.

- In 2007, the larger PRP group planned to dispose of contaminated paper residuals excavated from the river at Allied Landfill. Due to opposition from the City of Kalamazoo and its residents, the contaminated material was disposed of in commercial landfills. That organized opposition continued into the present push for total removal of Allied Landfill.

- Michigan Department of Environmental Quality (MDEQ) completed the RI for EPA approval in March 2008. MDEQ had taken over the RI from the PRP Millennium Holdings. RI findings:

    - Groundwater from Allied Landfill does not flow toward the well field and that PCB contamination does not appear to leave Allied Landfill via groundwater. Therefore, groundwater from Allied Landfill does not pose a risk to the City of Kalamazoo well field.
    - PCBs are tightly bound to the paper residuals as evidenced by soil and groundwater data. PCBs detections above 10 ppm are in paper residuals as documented by boring logs. PCBs are not detected in groundwater wells outside of the waste. PCB detections in groundwater occur at wells within or immediately adjacent to the contaminated paper residuals. These lines of evidence strongly suggest that PCBs at Allied Landfill do not pose a risk to off-site groundwater.
    - Contamination at Allied Landfill poses an on-site direct contact or ingestion risk to human and ecological receptors. The off-site risks posed by Allied Landfill, ingestion of contaminated material by fish or fish consumers would come from erosion and runoff of contaminated material into Portage Creek.

- Consolidation and capping would readily address these risks. A comprehensive monitoring system would be required to monitor the performance of the remedy.

- In 2009, the parent company of Millennium Holdings (Lyondell Corp) went bankrupt. EPA was able to secure approximately $50 million dedicated to work at Allied Landfill (Lyondell's former property) and another $50 million which can be used site-wide.

- As a consequence of the Lyondell Bankruptcy, EPA is completing the FS for Allied Landfill.

- A consolidation and capping remedy would address the risks posed by Allied Landfill, exposure via direct contact and erosion and off-site migration of contaminated paper residuals.