

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

Date: Friday, September 21, 2007

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

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

POLREP No.: 5	Site #: B5KF
Reporting Period: September 13 – 19, 2007	D.O. #:
Start Date: 8/13/2007	Response Authority: CERCLA
Mob Date: 8/13/2007	Response Type: Time-Critical
Completion Date:	NPL Status: Non NPL
CERCLIS ID #: MID980994354	Incident Category: Removal Action
RCRIS ID #:	Contract #

Site Description

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

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

Current Activities

The following tasks are currently on going:

- Collection of turbidity measurements from meters in the Tittabawassee River in order to compare downstream turbidity measurements with background turbidity.
- Continued dewatering of the RMU 3 / 4 excavation areas.
- Preparation for the removal of sheet piling from the RMU 1 / 2 areas.
- The treatment, sampling, and discharge of water generated from the impacted sediment dewatering operations.

- The transportation and off site disposal of excavated sediments from Reach O.

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

The following tasks have been completed by Dow's contractor during the period from September 13 – September 19, 2007:

Thursday, Sept. 13th: Dow's contractor continued the dewatering of Removal Management Unit (RMU) 1/2 and RMU 3. Began installation of sheet piling around the perimeter of the RMU 4 area.

Friday, Sept. 14th: Excavation and staging of impacted sediment from the RMU 3 area began. Dow's contractor began the treatment, sampling and discharge of wastewater generated from the dewatering of the excavated sediments. Dewatering activities at the RMU 1/2 area were terminated. Laboratory analytical results from post excavation samples indicated concentrations of dioxin below 15 ppt.

Saturday, Sept. 15th: Dow's contractor continued excavation of sediment from the RMU 3. Other site activities included; the transportation of contaminated sediment to the Salzburg Landfill for disposal, the continued installation of the sheet piling around the perimeter of the RMU 4 area, and treatment and discharge of wastewater to the Tittabawassee River.

Sunday, Sept 16th: Continued excavation of sediment from the RMU 3. Other site activities included transportation of contaminated sediment to the Salzburg Landfill for disposal. Dow's contractor completed the installation of the sheet piling around the perimeter of the RMU 4 and began dewatering operations.

Monday, Sept. 17th: Excavation of impacted sediment within RMU 3 was completed. Impacted sediment within the RMU 3 area adjacent to the sheet piling along the southern perimeter, and the impacted sediment below the gravel access ramp in the southeast corner of the RMU 3 area will be removed as part of the RMU 4 excavation activities. Dewatering operations continued in the RMU 3 and RMU 4 excavation areas.

Tuesday, Sept. 18th: The US EPA START contractor and Dow's contractor collected four (4) post excavation baseline samples from the RMU 3 area. All four (4) samples were submitted to the laboratory for analysis. Four (4) post excavation sediment samples were also collected from the RMU 3 area for visual characterization. Dewatering operations continued in the RMU 3 and RMU 4 area. All impacted sediment from the RMU 3 area was transported off site for disposal at the Salzburg Landfill. Barges have been mobilized on site in order to remove the sheet piling at RMU 1 / 2 areas.

Wednesday, Sept. 19th: Dow's contractor continued mobilizing materials and equipment for the removal of sheet piling at the RMU 1 / 2 areas. Heavy equipment will be placed on barges in order to remove the sheet piling. Other site activities included the removal of equipment and materials from the RMU 4 area in preparation for the upcoming excavation activity.

Planned Removal Actions

- The preparation for creating access to the RMU 5 area.
- The excavation of the impacted sediment from the RMU 5 area.
- The removal of the sheet piling from the RMU 1 / 2 areas.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
RST/START	\$100,000.00	\$33,000.00	\$67,000.00	67.00%
Intramural Costs				
Total Site Costs	\$100,000.00	\$33,000.00	\$67,000.00	67.00%

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

Disposition of Wastes

As of 9/19/07, Dow has removed and transported to the Salzburg Landfill approximately 10,944 in-place cubic yards of impacted sediment from the Reach O site. A total of 608 loads, estimated at 18 in-place cubic yards per load, have been transported for disposal.

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

As of 9/19/07, Dow has treated and discharged 18,311 gallons of water. The wastewater treatment process includes settling and filtration using 10 micron filters. Samples are collected continuously during the discharging process and tested for Total Suspended Solids (TSS) and Total Equivalent (TEQ) concentrations of dioxin and furans.

9/14/2007 – 9/15/07 Batch 1 18,311 gallons

www.epaosc.net/TittabawasseeRiverReachO