United States Environmental Protection Agency  
Region V  
POLLUTION REPORT

Date: Thursday, October 04, 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

Subject: Tittabawassee River Reach O  
Midland, MI  
Latitude: 43.5522  
Longitude: -84.1714

POLREP No.: 7  
Site #: B5KF  
Start Date: 8/13/2007  
D.O. #:  
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:

- The collection of turbidity measurements from meters in the Tittabawassee River in order to compare downstream turbidity measurements with background turbidity.
- The treatment, sampling, and discharge of water generated from the impacted sediment dewatering operations.
- The transportation and off site disposal of excavated sediments from the Reach O area.
- The placement of sheet piling around the RMU 5 area.
- The removal of sheet piling around the RMU 4 area.
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 contractors during the period September 27 – October 3, 2007:

Thursday, Sept 27th: Dow’s contractor continued removing sheet piling from the RMU 3 area and continued to install sheet piling at RMU 5. Dewatering activities continued in RMU 4.

Friday, Sept 28th: Dow’s contractor began disassembling the temporary dewatering pad adjacent to the current dewatering pad. Continued removing sheet piling from the RMU 3 area and continued to install sheet piling at RMU 5. Dewatering activities continued in RMU 4 while non-impacted soil from the excavation was piled up against the river bank to minimize bank erosion.

Saturday, Sept 29th and Sunday, 30th: No Site activities occurred.

Monday, Oct 1st: Site operations were suspended due to severe weather conditions.

Tuesday, Oct 2nd: Dow’s contractor continued to disassemble the temporary dewatering pad. Completed the removal of sheet piling from the RMU 3 area and began removing sheet piling from RMU 4. Installation of sheet piling at the RMU 5 area continued.

Wednesday, Oct 3rd: Dow’s contractor completed the breakdown of the temporary dewatering pad. Continued the removal of sheet piling from RMU 4 area. Installation of sheet piling around RMU 5 area continued.

**Planned Removal Actions**
The following tasks are soon to be implemented:

- Excavation of impacted sediment from RMU 5 area.
- Transportation and disposal of the impacted sediment from the RMU 4 and RMU 5 to the Salzburg Road Landfill.
- Treatment and discharge of water from the sediment dewatering operations.
- Removal of sheet piling from RMU 5 area.

**Estimated Costs** *

<table>
<thead>
<tr>
<th></th>
<th>Budgeted</th>
<th>Total To Date</th>
<th>Remaining</th>
<th>% Remaining</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Extramural Costs</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>RST/START</td>
<td>$100,000.00</td>
<td>$46,500.00</td>
<td>$53,500.00</td>
<td>53.50%</td>
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<tr>
<td><strong>Intramural Costs</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Total Site Costs** | $100,000.00 | $46,500.00 | $53,500.00 | 53.50%

* 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 10/03/07, Dow has removed and transported to the landfill approximately 13,860 in-place
cubic yards of impacted sediment from the Reach O site. A total of 770 loads, estimated at 18 in-
place cubic yards per load, have been transported to the Salzburg Road Landfill for disposal. The
following waste disposed from the Reach O area includes:

<table>
<thead>
<tr>
<th>Date</th>
<th>Loads</th>
<th>In-Place Cubic Yards</th>
</tr>
</thead>
<tbody>
<tr>
<td>8/31/2007</td>
<td>6</td>
<td>150</td>
</tr>
<tr>
<td>9/7/2007</td>
<td>84</td>
<td>1,512</td>
</tr>
<tr>
<td>9/8/2007</td>
<td>174</td>
<td>4,350</td>
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<tr>
<td>9/10/2007</td>
<td>33</td>
<td>825</td>
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<tr>
<td>9/15/2007</td>
<td>71</td>
<td>1,278</td>
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<tr>
<td>9/16/2007</td>
<td>76</td>
<td>1,368</td>
</tr>
<tr>
<td>9/18/2007</td>
<td>164</td>
<td>2,952</td>
</tr>
<tr>
<td>9/24/2007</td>
<td>162</td>
<td>2,916</td>
</tr>
</tbody>
</table>

As of 10/03/07, Dow has treated and discharged approximately 26,264 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. The following quantity of water
discharged from the Reach O treatment operations include:

<table>
<thead>
<tr>
<th>Date</th>
<th>Batch</th>
<th>Gallons Discharged</th>
</tr>
</thead>
<tbody>
<tr>
<td>9/14/2007</td>
<td>Batch1</td>
<td>18,311</td>
</tr>
<tr>
<td>9/24/2007</td>
<td>Batch2</td>
<td>7,953</td>
</tr>
</tbody>
</table>

www.epaosc.net/TittabawasseeRiverReachO