United States Environmental Protection Agency  
Region V  
POLLUTION REPORT

Date:       Wednesday, October 10, 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

From:  
David Chung, OSWER  
NRC Duty Officer, National Response Center  
Rick Karl, USEPA  
Todd Konechne, Dow Chemical Company  
Jim Sygo, MDEQ

Subject:  (Removal Action)  
Tittabawassee River Reach O  
Midland, MI  
Latitude: 43.5522  
Longitude: -84.1714

POLREP No.:  8  
Site #:  B5KF  
Reporting Period:  October 3 – October 10, 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:

- The collection of turbidity measurements from meters in the Tittabawassee River in order to compare downstream turbidity measurements with background turbidity.
- The removal of sheet piling from the RMU 3 and RMU 4 areas.
- The reconstruction of the access ramp to the RMU 5 area in preparation for the removal of the sheet piling.

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 during the period from October 3 – October 10, 2007:
Thursday, October 4: Dow completed the installation of the sheet piling around RMU 5 area and continued pumping river water from inside the enclosed area. Dow completed the construction of the access ramp from the shore to RMU 5 area. Removal of impacted sediment from RMU 5 began. Dow began discharging Batch #3 of treated wastewater and collected a water sample for TSS and TEQ laboratory analysis.

Friday, October 5: Excavation of the cellulosic material from RMU 5 area was completed. The EPA and Dow conducted a visual inspection of the area and collected post excavation sediment samples. Dow transported the remaining sediment from the RMU 4 area, the temporary dewatering pad, and all sediment excavated from RMU 5 area to the Salzburg Road Landfill for disposal.

Saturday, October 6 and Sunday, October 7: No Site operations conducted.

Monday, October 8: Logs removed from all five RMU areas were moved and staged inside the dewatering pad. Dow removed the remaining pieces of sheet piling from the northeast corner of RMU 1/2 area and started site restoration activities on the sand borrow area located approximately ¼ mile north of the site.

Tuesday, October 9: Dow continued the relocation of the logs to the dewatering pad and began the reconstruction of the access ramp in preparation for the removal of the sheet piling from RMU 5.

Wednesday, October 10: Dow completed the movement of the logs to the dewatering pad. Residual material was removed from the logs in preparation for disposal at the Municipal Landfill. Approximately 266 logs were staged in the dewatering pad. Dow completed the reconstruction of the access ramp to RMU 5 and remobilized equipment in preparation for the removal of the sheet piling from the area.

**Planned Removal Actions**

The following tasks are soon to be implemented:

- The removal of the sheet pilings from the RMU 5 area.
- The removal, transportation and disposal of the soil used in the construction of the temporary haul roads and dewatering pad.
- The development and implementation of a Site Restoration Plan.
- The decontamination and demobilization of heavy equipment.

**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>$51,800.00</td>
<td>$48,200.00</td>
<td>48.20%</td>
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<tr>
<td><strong>Intramural Costs</strong></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total Site Costs</strong></td>
<td>$100,000.00</td>
<td>$51,800.00</td>
<td>$48,200.00</td>
<td>48.20%</td>
</tr>
</tbody>
</table>

*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 10/10/07, Dow has removed and transported to the landfill approximately 15,246 in-place cubic yards of impacted sediment from the Reach O site. A total of 847 loads, estimated at 18 in-place cubic yards per load, have been transported to the Salzburg Road Landfill for disposal. The following disposed waste dredged and disposed from the Reach O area includes:

<table>
<thead>
<tr>
<th>Date</th>
<th>Loads</th>
<th>Cubic Yards</th>
</tr>
</thead>
<tbody>
<tr>
<td>8/31/2007</td>
<td>6</td>
<td>150 in-place cubic yards</td>
</tr>
<tr>
<td>9/7/2007</td>
<td>84</td>
<td>1,512 in-place cubic yards</td>
</tr>
<tr>
<td>9/8/2007</td>
<td>174</td>
<td>4,350 in-place cubic yards</td>
</tr>
<tr>
<td>9/10/2007</td>
<td>33</td>
<td>825 in-place cubic yards</td>
</tr>
<tr>
<td>9/15/2007</td>
<td>71</td>
<td>1,278 in-place cubic yards</td>
</tr>
<tr>
<td>9/16/2007</td>
<td>76</td>
<td>1,368 in-place cubic yards</td>
</tr>
<tr>
<td>9/18/2007</td>
<td>164</td>
<td>2,952 in-place cubic yards</td>
</tr>
<tr>
<td>9/24/2007</td>
<td>162</td>
<td>2,916 in-place cubic yards</td>
</tr>
<tr>
<td>10/5/2007</td>
<td>77</td>
<td>1,386 in-place cubic yards</td>
</tr>
</tbody>
</table>

As of 10/10/07, Dow has treated and discharged approximately 48,942 gallons of water. The wastewater treatment process includes settling and filtration using 25 and 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>Batch 1</td>
<td>18,311</td>
</tr>
<tr>
<td>9/24/2007</td>
<td>Batch 2</td>
<td>7,953</td>
</tr>
<tr>
<td>10/4/2007</td>
<td>Batch 3</td>
<td>22,678</td>
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</tbody>
</table>

www.epaosc.net/TittabawasseeRiverReachO