

US EPA ARCHIVE DOCUMENT



Glenn Springs Holdings, Inc.

Clint Babcock
Project Manager
Direct Dial (972) 687-7506

5005 LBJ Freeway, Suite 1350
Dallas, TX 75244-6119
Facsimile (972) 687-7524

January 10, 2011

Mr. Kenneth S. Bardo
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard
Corrective Action Section (LU-9J)
Chicago, IL 60604-3590

RE: Occidental Chemical Corporation, Montague, Michigan - MID 006 014 906
2010 Fourth Quarter Corrective Measures Implementation Progress Report

Dear Mr. Bardo:

The following is a progress report for the corrective measures implementation (CMI) at the Occidental Chemical Corporation site in Montague, Michigan. This report is submitted pursuant to the United States Environmental Protection Agency's (U.S. EPA's) Administrative Order (Docket No. V-W-009-'93) Section VI.D.2 and Attachment 4 to the Order and to the "Amended Final Decision and Response to Comments for Occidental Chemical Corporation, Montague Township, Michigan" (October 2010). Glenn Springs Holdings, Inc (GSH) is submitting this quarterly report on behalf of Occidental Chemical Corporation (OCC). Both companies are subsidiaries of Occidental Petroleum Corporation.

1. A description of the CMI completed to date and projected work.

On October 12, 2010, U.S. EPA issued the Amended Final Decision and Response to Comments for Occidental Chemical Corporation Montague Township, Michigan. Under the Amended Final Decision, progress reports are now due quarterly. GSH is proceeding to implement the requirements of the Amended Final Decision, including the voluntary actions.

Operations and Monitoring: During the quarter, GSH continued to collect and treat contaminated groundwater using the existing purge well system located at White Lake. GSH also continued to perform long-term groundwater monitoring in accordance with the Groundwater Monitoring Plan approved by U.S. EPA in January 2004, revision 01. These activities will continue in the next quarter.

Energy Audit: GSH is in the process of preparing an energy audit and assessment of waste management practices to optimize the existing purge well system and minimize its long-term energy use and carbon emissions. Through 2011, GSH anticipates making changes to the purge well system in response to this process and will submit a final report on the process to U.S. EPA by October 12, 2011.

Soil Vapor Evaluation: During the fourth quarter of 2010, GSH began to prepare a work plan to characterize the vertical concentration of volatile organic compounds (VOCs) and hexachloroethane in soil gas above the defined groundwater contaminant plume south of Old Channel Trail, including the locations of potential receptors at private residences along Old Channel Trail and McFall Drive, and resort buildings on OCC property. GSH will submit the

work plan to U.S. EPA by January 10, 2011. The schedule for implementation of the soil gas study will be included in the work plan submitted to U.S. EPA.

Abandon Two Residential Wells: GSH is using best efforts to plug and abandon two residential wells owned by other parties. GSH has arranged to have one well plugged, and this activity is scheduled for Friday, January 7 pending weather or other delays. GSH is still working out access with the second owner. When both wells have been plugged, or if access is denied for the second well, GSH will submit a letter documenting the plugging activities.

Periodic Technical Review Assessment Report: The first three-year technical review assessment report is due to U.S. EPA in January 2014. GSH is continuing to monitor technical developments and work toward completing the following elements that will be included in the report:

- Literature review to assess whether potentially applicable technologies have become available
- Research programs funded by GSH to study DNAPL at the OCC facility in Montague
- Technical review of long-term groundwater monitoring program and integrity of the remedy

Financial Assurance: During the fourth quarter of 2010, GSH submitted a cost for capitol and OM&M activities for the operation of the purge well system. A 50-year period of analysis was used based on discussions with U.S. EPA. On January 4, 2011 the U.S. EPA issued an extension for the deadline to obtain financial assurance in order that OCC may address the Montague corporate guarantee at the same time as our financial assurance obligations at its other sites. Documentation of financial assurance will be submitted to U.S. EPA by March 31, 2011 in accordance with the extension granted by U.S. EPA.

Voluntary Conservation Easement: GSH continues to work toward development of a conservation easement to formalize preservation of the undeveloped and natural setting along portions of Occidental's lakefront property. GSH has been in discussion with the Muskegon Conservation District who will be the easement holder. GSH plans to have the conservation easement finalized and in place by 2012.

Voluntary Environmental Stewardship Program through Muskegon Conservation District (MCD): During the fourth quarter of 2010, GSH assisted the MCD in creating and staffing a White Lake Community Outreach and Environmental Stewardship Coordinator position. This position will support and promote the ongoing efforts of the White Lake Public Advisory Council while:

- Assist in coordination of White Lake Great Lakes Restoration Initiative (GLRI) shoreline projects
- Establishing monitoring for White Lake GLRI sites
- Assisting in coordination of White Lake AOC delisting criteria
- Working with Public Advisory Council to delist appropriate Beneficial Use Impairments (BUIs)
- Facilitating seeking funds for restoration and research projects necessary to delist BUIs
- Coordinating BUI work with public and private stakeholders
- Coordinating community wildlife and fisheries enhancement projects and facilitating community-wide partnerships for the long-term conservation, preservation, and restoration of White Lake.

GSH has provided the MCD with funding, in advance, for this position through 2013.

Additional Voluntary On-Site Habitat Improvement: During the fourth quarter of 2011, GSH continued its own voluntary efforts to improve wildlife habitat at the site. In some of the historically industrialized areas the top soil was not developed and lacked organic matter and nutrients to support robust habitat improvements. GSH amended some areas with clean top soils and composted materials brought in from off-site and seeded these areas with a mix of native grasses and flowers that was recommended by the Muskegon Conservation District.

Additional Voluntary Shoreline Habitat Improvement: GSH continues to work with the Muskegon Conservation District (MCD) as they implement the "White Lake AOC Habitat Restoration Initiative for BUI Delisting: Great Lakes Restoration Initiative EPA-R5-GL2010-1". GSH is coordinating with MCD in shoreline

restoration activities that will include shoreline owned by OCC. This work will improve the habitat in the area where GSH is preparing the voluntary conservation easement. MCD issued a request for qualifications and proposals along with the "Project Specifications and Bid Documents" on November 29, 2010, MCD held the pre-bid meeting on December 6, 2010, and proposals were due on December 10, 2010. A notice to proceed was issued in December. Survey and design work is scheduled for the first quarter of 2011, and construction is scheduled to start during the second quarter of 2011.

2. Monitoring Data

The purge well performance report is attached.

3. Summaries of all changes made to the CMI.

The Final Decision was amended with the issuance by the U.S. EPA of the "Amended Final Decision and Response to Comments for Occidental Chemical Corporation, Montague Township, Michigan" in October 2010. In addition, the U.S. EPA granted an extension for submittal of financial assurance to March 31, 2011.

4. Summary of problems or potential problems and actions being taken to rectify.

None.

5. Changes in personnel.

None.

If you have any questions concerning this information, please contact me at (972) 687-7506.

Sincerely,
Glenn Springs Holdings, Inc.



Clinton J. Babcock
Project Manager

Enclosures

cc: Dan Dailey, MDEQ (P.O. Box 30241, Lansing, MI 48909)
James Tolbert, AECOM