

US EPA ARCHIVE DOCUMENT



Glenn Springs Holdings, Inc.

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April 8, 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
2011 First 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 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 quarter, GSH submitted, received comments, and revised the 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. The plan was approved at the end of the first quarter. GSH will begin to implement the approved work plan during the second quarter of 2011. During

the second quarter, the soil vapor points are scheduled to be set and sampled, and the monitoring wells are scheduled to be sampled.

Abandon Two Residential Wells: GSH has used best efforts to plug and abandon two residential wells owned by other parties. GSH has arranged to have one well plugged (see attached abandonment report), and this activity was completed for Friday, January 7. The second owner (Carrol) declined to allow access and prefers to keep the former residential well. This well has been decommissioned and has no pump equipment or physical attachment to the Carrol residence.

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: Documentation of financial assurance was submitted to U.S. EPA on 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 Muskegon Conservation District and the White Lake Public Advisory Council in the following capacities: (also see attachment)

- 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 MCD funding, in advance for this position through 2013.

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.

None.

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.

A handwritten signature in blue ink that reads "Clint Babcock" followed by a stylized flourish or initials.

Clint Babcock
Project Manager

Enclosures

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



Quarterly Report for January-March 2011

Chad Hipshier, *Project Manager*
Muskegon Conservation District

White Lake Area Projects

- Finished education/outreach RFP and sent it out for bid
 - Reviewed RFP replies and selected a candidate for the education/outreach service personnel
- Created data forms for groups working on the White Lake AOC Habitat Restoration Project
- Attended coordinating meeting with the selected engineering firms to talk about engineering designs
- Attended White Lake PAC public meeting about BUIs at White Lake Library
- Developed the Project Management and Engineering Design QAPP to be submitted to EPA
- Attended meetings with landowners, municipalities and engineers at the Causeway, Boat Launch, Oxy Chem, Mill Pond Park, and Svenson Park to review the sites with all respected groups that are involved and collected thoughts and other input about the design of the areas
- Met with MDOT to talk about permitting and shutting a lane down for construction on the Causeway this season
- Creating specification sheets to accompany the construction RFP
- Project Management and Engineering Design QAPP, Education and Outreach QAPP and Marsh Monitoring QAPP were submitted to EPA
- Collected Soil samples from Tannery Bay East, Mill Pond Park, Svenson Park, Montague Boat Launch and Causeway
- Conducted White Lake water bathymetric surveys at Tannery Bay East and Causeway
- Conference call about White Lake AOC monies and future needs for delisting
- Attended AOC meeting in Lansing
- Worked on White River Agricultural Wetland Acquisition Grant
- Worked on Simila Property (south Mill Pond Park)-Michigan Areas of Concern Land Acquisition Grant
- Worked on Koon Creek (southern Boat Launch area)-Michigan Areas of Concern Land Acquisition Grant
- Worked on Great Lakes Fish and Wildlife Restoration Act Pre-Proposal Grant
- Talking with property owners about Phragmites removal for 2011
- Worked on North American Wetlands Conservation Act Proposal
- Worked on White River Watershed Monitoring Project (time will be considered match)
- Attended Phragmites Symposium in East Lansing March 29-30