

US EPA ARCHIVE DOCUMENT



Glenn Springs Holdings, Inc.

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July 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 Second 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).

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 continues 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 continuing 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 second quarter, GSH began the implementation of the *Work Plan for Soil Gas Investigation South of Old Channel Trail near Montague, Michigan* dated February 7, 2010 and approved by the U.S. EPA on February 28, 2011. SGMPs were installed at the Site from May 16 to 18, 2011 using direct-push Geoprobe for intermediate and deep SGMPs and hand-auger methods in the shallow SGMPs. Three SGMPs were installed at each of seven locations, for a total of 21 SGMPs. The work plan proposed installing the SGMP with formation backfill. However, the boreholes at all 21 SGMPs remained open up to terminal depth of 30 feet. Global

#0 sand pack was poured around the SGMP, and the remaining borehole filled with native sand and bentonite from 5-feet to 1-foot. Soil gas purging and sampling were performed during the week of May 23, 2011. Soil gas results were received at the end of the quarter and are currently being summarized for presentation to U.S. EPA under separate cover as an interim submittal.

The *Work Plan for Soil Gas Investigation South of Old Channel Trail near Montague, Michigan* includes a second round of soil gas samples to be collected in the fall, and this work is scheduled to proceed.

During the third quarter, GSH will submit an interim update on the first round of soil gas results to U.S. EPA and discuss actions to be taken during the third quarter of 2011.

Abandon Two Residential Wells: GSH implemented best efforts to plug and abandon two residential wells owned by other parties. GSH has arranged to have the well at 7211 McFall Drive plugged (see attached well abandonment log) In accordance with the wishes of the property owner of 7250 McFall Drive, the well remains unplugged but functionally unusable as the well pump and plumbing connection was removed many years ago. GSH will submit a letter documenting the plugging activities as a separate submittal.

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: This task has been completed.

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 MCD funding, in advance for this position through 2013. Attached is a summary of community outreach and environmental stewardship activities completed as a result of our support of this position.

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. Since the last update, project design has been completed and contractors are in place to begin restoration work this summer.

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.

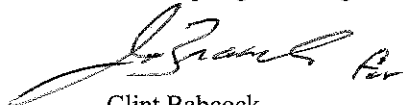
As noted above, the *Work Plan for Soil Gas Investigation South of Old Channel Trail near Montague, Michigan* proposed installing SGMPs with formation backfill around the screened interval. However, the boreholes at all 21 SGMPs remained open up to terminal depth of 30 feet. Global #0 sand pack was poured around the SGMP, and the remaining borehole filled with native sand and bentonite from 5-feet to 1-foot.

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.



Clint Babcock
Project Manager

Enclosures

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

2011 Quarterly (April, May and June) List of Projects in the White Lake Area

- Continued talks with property owners about Phragmites removal for 2011-2012 along White Lake
- Finished amphibian marsh monitoring survey for sites on the North side of White Lake
- Started and finished two bird marsh monitoring surveys for sites on the North side of White Lake
- Finalized White River Watershed Monitoring grant revisions requested by DEQ (time will be considered match)
- Finalized and submitted lake-wide Phragmites permit application for treatment of White Lake during 2011 (has been approved)
- Developed preliminary site design for Eagles restoration site dealing with the White Lake AOC Habitat Restoration Initiative (they decided not to continue)
- Created a sub-award agreement with GVSU for White Lake monitoring
- Finished checking engineering plans to check volume calculations for Svensson site
- Attending pre-bid meetings for construction and planting on White Lake sites
- Finalizing permits for Svensson and Causeway sites
- Creating routs, posting and collecting natural features inventory of 14 sites for marsh monitoring project in White Lake area
- White River Watershed Monitoring Project (time will be considered match)
- Finalizing engineering plans, submitted QAPPs and taking soil samples for the White Lake AOC Habitat Restoration Initiative
- Held informational meeting for construction and landscape services for White Lake AOC Habitat Restoration Initiative
- Attended Pre-bid meeting at Montague Boat Launch
- Attended Occidental Chemical Pre-bid meeting
- Working with Tanya Cabala on education and outreach service aspects
- Phragmites and Cattail treatment at Svensson site
- Took John Perrecone around the White Lake sites and talked about each of the designs