



CAG COMMENTS ON PROPOSED CLEANUP PLAN FOR MIDDLEGROUND ISLAND

FINAL, 3/27/20

I. Subject:

CAG Comments and Recommendations on the *EPA Proposed Cleanup Plan for Middleground Island*.

II. Background and Information Considered:

Presentation by EPA Remedial Project Manager Mary Logan at the March 10, 2020 meeting of the CAG and the Public Meeting. EPA Fact Sheet.

III. Agency Proposal:

EPA presented two proposals, one placing a clean cover over the contaminated residential soils, and one for complete removal of contaminated residential soils with clean backfill. EPA proposed complete removal and backfill.

IV. CAG Recommendations

The CAG supports EPA's overall cleanup approach and appreciates that the remedy will seek complete removal of contaminated soils without the need for additional long-term monitoring or institutional controls. The CAG offers the following comments and recommendations with regard to the planning and implementation of this remedy:

1. **Preservation of Mature Trees.** The CAG feels strongly that every effort should be made to preserve mature and healthy trees, and that landscaped areas be restored in keeping with the care and effort that property owners put into them. EPA and Dow have a positive history of saving trees throughout the Tittabawassee River floodplain cleanup and the CAG is appreciative of these efforts. We recognize that this cleanup requires a lot of property-specific planning and strongly encourage that Dow work closely with property owners and that their concerns about their property be used to guide cleanup to the extent reasonable.
2. **Erosion Management.** As a result of the historically high levels of the river, the CAG would like to understand the risks of erosion prior to and during the cleanup efforts and the mitigation efforts that will be used to ensure erosion is kept to a minimum. The CAG would like Dow to undertake regular monitoring of shoreline areas and take immediate interim control measures at signs of erosion.

3. **Close Contamination.** The CAG is concerned about contaminated soils close to people's homes and the transport of contamination onto steps, porches, and into homes. The CAG would like to better understand the degree to which this contamination may be present, and believes that further testing is essential to ensure that any soil close to houses and children's play areas, and any areas of the home are not contaminated. Plans should also be put into place that any contamination is fully remediated.
4. **River Levels.** The CAG understands that river levels have historically fluctuated over time and could be assumed to drop significantly in the near future in keeping with the historical record. However, we also recognize that the Corps of Engineers does not think this will happen again, and that continuing water level rise in the Great Lakes is a considerable risk moving forward. As such, the CAG believes that it is important for EPA and EGLE to not simply assume that the lake level will drop, but to recognize that we might be in a new normal, and plan accordingly by making appropriate contingency plans for river levels to stay at the current heights and even higher.
5. **Traffic Plan Considerations.** The road is very narrow and there will be limited room for larger vehicles increasing congestion and the potential for adverse impacts. There are a number of new wells that are being installed and need to be protected, and an active deer population. The CAG would like to see the wells clearly marked and flagged to ensure visibility and that slow speed limits be enforced to protect local children and limit the potential for deer strikes. The narrow road and existing congestion combined with the planned truck traffic will make it difficult for owners to access Evergreen Drive. The CAG would like to see clear lane management and flagging, and/or a temporary traffic signal considered during peak hours of activity.
6. **Sharing Results with Property Owners.** The CAG feels strongly that all results be shared with and explained to all property owners, not just those whose properties exceed the limits.
7. **Understanding Contamination on non-Cleanup Properties.** The CAG would like to understand the results for residential properties that did not exceed the cleanup level of 250 ppt but were still significantly contaminated. For instance, how many properties were between 200 and 250 ppt? For those properties that have significant contamination but do not exceed 250, the CAG would like for EPA and Dow to explore further sampling to better understand the contamination on their property. Using the composite sampling method, it is possible that some properties could have hot spots that exceed the cleanup level while the overall composite does not. We would like to see borderline contamination properties be cleaned up if the evidence suggests higher levels could exist.
8. **Property Owner Access to Cleanup.** The CAG would like EPA and Dow to explore opportunities for non-cleanup properties to have access to yard cleanup at a reasonable cost while the project is under mobilization, especially those whose contamination levels approach 250 ppt.