

SAGINAW-TITTABAWASSEE RIVERS CONTAMINATION COMMUNITY ADVISORY GROUP RESPONSE TO REQUEST FOR RECOMMENDATION

I. Subject: The Saginaw-Tittabawassee CAG has received a request for recommendation for the following:

Cleanup Action for Small Island (early action on Island MM)

II. Background and Information Considered:

Controlling Contaminant Movement at Reach MM Island: Options and EPA's Preferred Option (presented to CAG April 18, 2011)

Contaminant Movement at Island MM: Informal CAG Feedback (presented to CAG February 28, 2011)

Best Management Practices for Soil Erosion (presented to CAG March 21, 2011)

Public comments at CAG meeting (April 18, 2011)

Public comments at EPA Public Meeting (April 28, 2011)

EPA Proposes Cleanup Action for Small Island (April 2011)

III. Agency Proposal:

3 alternatives presented:

1. Stabilization

2. Above-water sediment removal and in-place containment

3. Removal of all targeted sediment

EPA favors Alternative 2

IV. Summary of CAG Discussion:

In general, the CAG supports the EPA decision to take early action on Island MM. Based on available information, we believe that some action is warranted this year, however we also want to make sure that we are not being short-sighted in selecting the appropriate action. There is a great deal of important information that is not yet available, which we believe is critical to making an informed and responsible decision.

Our basic support for this early action is based on the following assumptions:

- The erosion of the island presents a near-term contamination problem.
- Accelerated action will benefit the overall cleanup and better protect area residents.
- This accelerated action will not affect resources or timing of the main cleanup.
- The island has no inherent economic, recreational, or environmental value.
- There is no private ownership of the island.
- Owners of the adjacent properties will support the required access.

We offer the following observations about this action:

- The following information is not yet available and should be further investigated and presented as the actions are implemented:
 - Impacts of the island on nearby erosion of banks, contamination levels on the river banks,
 - Configuration of contamination beneath the island

- The cost estimates provided for the three options are general and do not take into account the cost of future monitoring and/or final actions for options 1 and 2, as opposed to option 3 which may not require additional monitoring. These cost estimates also do not take into account any additional costs related to the final cleanup action if the island needs to be addressed again.

Conclusions:

- A flexible approach to the cleanup action should be pursued which provide reasonable options based on conditions found in the field.
 - Additional sampling will be required to understand the condition of debris and sediments and the scope of contamination beneath the island.
 - The planned hydrological studies of the river must be conducted and analyzed prior to making a final decision, with heavy weight given to the configuration that best protects the existing river banks.
- We believe that this decision must be made in full consideration of the longer-term consequences to the total cleanup. In particular, if the action is assumed to require no further action, then a simple comparison of current costs make sense. However, if future actions to remove some or all of the remaining material are likely, then the cost of restoring and/or stabilizing the island now may actually make the total costs of the final cleanup higher than for a full removal. As a result, full life-cycle costs of the actions should be considered in making this decision.

V. Comments received from members of the Public

VII. Recommendation:

- We do not believe sufficient information exists for the decision to be finalized before the action begins. We suggest that EPA plan the project in such a way that allows the implementation of option 2 or option 3. This will allow final decisions to be made based on both knowledge of the long-term impacts and costs of the two options and the actual conditions found in the field.
- If the ultimate removal of the island appears to be necessary to achieve a long-term solution, and the hydrologic study suggests this is a reasonable configuration for the river, we suggest that a complete removal be conducted now as outlined in Option 3.
- If complete removal of the island does not appear to be necessary for the long-term protection of human health and the environment and a stabilized island presents the best configuration for the river system to prevent long-term bank erosion, then we recommend that EPA pursue Option 2.
- Whatever action is taken involving in-stream work, appropriate turbidity and sedimentation controls must be employed to minimize downstream sediment transport.

VI. CAG Values which pertain to the resolution of the subject:

Protection of Public Health

- Design all decisions and activities to protect the health and safety of the residents, visitors and workers.

Environmental Protection and Restoration

- Strive to achieve a clean and healthy environment.
- Respect and preserve the natural resources within the Tittabawassee River, Saginaw River and Saginaw Bay, including fish and wildlife.
- Coordinate and balance the short and long term goals to ensure that the rivers and Saginaw Bay, as natural resources continue for future generations.
- Be mindful of the historic and traditional, as well as the current, uses of the river in formulating restoration activities.
- Strive for a positive outcome of a clean and sustainable watershed.

Provide Economic and Community Benefits

- Plan and manage activities in order to protect ongoing uses of the rivers and bay, including commercial, tourism and recreation uses.
- Encourage activities which protect property values within the communities in which the rivers and bay are located.

Consider Diverse Factors in End Uses

- Be mindful that no single use predominates or controls the decision making process.
- Strive to achieve a balance between uses such as, but not limited to, the following:
 - Recreation.
 - Agriculture.
 - Groundwater recharge.
 - Quality of life.
 - Commerce.

Integrity of the Process

- Encourage timely completion of response activities

Dated: May 19, 2011

Signed and delivered electronically

By: Deborah R. Huntley, President

Response by Environmental Protection Agency (to be attached)