

## **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:

*Preferred Cleanup Method or Methods for Segment 2 of the Tittabawassee River*

**II. Background and Information Considered:**

EPA presentation on Segment 2 approach at the July 15, 2013 CAG meeting.

**III. Agency Proposal:**

- SMAs 2-1 and 2-2 – Monitor and maintain existing caps.
- SMAs 2-3 and 2-4 – Dig up contaminated sediment and remove it.
- SMA 2-5 – Cover contaminated sediment to keep it safely in place.
- BMA 2-1 and BMA 2-2 – Monitor and maintain existing cleanups that stabilizes the contaminated riverbank and stops erosion.
- BMAs 2-3 through 2-7 – Apply a cleanup method to stabilize the bank and stop erosion based on input from the property owner and features of the riverbank.

**IV. Summary of CAG Discussion:**

Segment 2 of the Tittabawassee River is a “mixed use” segment of the River, with residential, commercial and recreational activities all represented along its course. This section of the River has been the site of previous remediation work, in which methods for remediating and stabilizing contaminated sediments were implemented to assess their viability as long term solutions for the River clean-up. The contamination in this Segment is primarily in the dioxin / furan family.

Key attributes of this segment, per the CAG, as follows:

- Overall, the CAG supports the proposed plan for Segment 2. It is consistent with previous activities and provides a reasonable balance to provide long-term removal and isolation of contaminated materials.
- The stretch of river within Segment 2 is mixed use, with residential, commercial and recreational activities common along its course. The CAG is concerned that the mix may change and the potential for human contact may increase over time. As such, the EPA is encouraged to

implement solutions that will bring contamination levels to or below those currently in force for residential properties.

- Segment 2 is quite large in area and it is reasonable that the EPA may need to use its own discretion when implementing additional clean-up measures in any one SMA or BMA, for example capping and monitoring an SMA if there is risk or no clear benefit in removing sediment materials once they are exposed. Deviations from the plan, as originally presented, should be summarized and presented to the CAG in the next regular public meeting.
- There are portions of Segment 2 that experience low water conditions at various parts of the year and there is concern within the CAG that capping materials may pose a risk to watercraft navigating the River. It is suggested that this possibility should be communicated, through signs or other visual aids, to those using the river for recreational reasons.
- The number of properties affected is somewhat vague. The CAG would encourage the EPA to provide additional information on the number and type of properties affected. This information should be provided retroactively for Segment 2 and should be part of future remediation proposals for the Tittabawassee River, as this information may impact the recommendations of the CAG.
- The current proposal calls for ongoing monitoring of the Segment post-cleanup, to ensure its efficacy. The CAG would like to see additional detail on the nature of this monitoring and would encourage the EPA to develop a concise method for communicating the long term monitoring of this and other River segments.

## **V. Comments received from members of the Public**

One member of the public voiced a question concerning the ultimate destination for contaminated sediments. EPA noted that testing of these materials is standard, with most eligible to be disposed of in a municipal landfill. Heavily contaminated materials may be subject to further treatment and/or disposal in a special waste disposal facility.

## **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 residential, commercial, tourism and recreation uses.
- Promote economic growth of the Great Lakes Bay Area for both current and future commercial and industrial development.
- 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.

### **Cooperative Cleanup Process**

- Respect the opinions and views of others.
- Build and strive for cooperation, trust and collaboration in the decision making process.

### **Integrity of the Process**

- Recognize that the actions of the CAG are for and on behalf of the greater community which is represented, and not the members themselves. To that end, proceedings should endeavor to be:
  - Commerce.
  - Open and transparent.
  - Rational and analytical, not led by emotions.
  - Factual based.
  - Fair, equitable and consistent.
- Work toward prompt completion of the CAG's review and recommendation responsibilities
- Encourage timely completion of response activities
- Work cooperatively with all stakeholders, including the greater community, to address issues and solve problems.

## **VII. Recommendation:**

It is the consensus of the Saginaw-Tittabawassee Rivers Contamination Community Advisory Group that:

- EPA proceed with the design, engineering and implementation of its recommended alternatives.
- EPA continue to keep the CAG and the public informed of the progress and results of the cleanup in Segment 1 and any changes in the proposed methodologies.

The above constitutes the response for recommendation of the Saginaw-Tittabawassee Rivers CAG. A formal response is requested from the Environmental Protection Agency.

Dated: August 12, 2013

Saginaw-Tittabawassee Rivers Contamination  
Community Advisory Group

*Signed and hand delivered*

By: \_\_\_\_\_  
Deborah Huntley, President

Response by The U.S. Environmental Protection Agency (to be attached)