Soil to be Removed Soon; Long-term Plan Approved

Grand Traverse Overall Supply
Greilickville, Michigan March 2008

Public meeting

EPA will update the community on cleanup activities at the GTOS site during a public meeting scheduled for:

Tuesday, March 18, 6:30 p.m.
Norris Elementary School Cafeteria
10781 E. Cherry Bend Road
Traverse City, Mich.

If you have any questions or need special accommodations for the meeting contact:
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For questions on the removal phase contact:
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On-Scene Coordinator
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For more information

Visit EPA's Web page for the GTOS site: www.epa.gov/region5/sites/grandtraverse/index.htm

Official documents about the site can be viewed at the Traverse Area District Library, 610 Woodmere Ave., Traverse City, Mich.

U.S. Environmental Protection Agency short- and long-term cleanup activities for the Grand Traverse Overall Supply site have progressed since last fall. This is an update on what's already been done, as well as planned short-term (removal) program and long-term (remedial) program actions.

Removal program cleanup activities

In the next few weeks, residents can expect to see increased activity at the site as EPA gets ready to remove contaminated soil. EPA plans to start digging on or around March 29, which is in conjunction with Norris Elementary School's spring break. The work is expected to continue throughout April.

EPA needs to remove contaminated soil during this school year because the pollutants continue to move away from the site, and funds are available now to do the work. EPA will work closely with the school administration to make sure trucks are not moving in or out of the site when classes are starting or dismissing.

Excavated soil will be handled in one of two ways depending on the level of contamination. A comprehensive sampling effort earlier this winter helped identify where the contamination is and how much soil must be removed.

About 1,000 tons will be disposed of as hazardous waste because it contains elevated levels of tetrachloroethylene, better known as PCE. EPA expects to dig up and haul the hazardous soil away in four to five days. This will be done while the students are not in school. The soil will be taken to a regulated facility for treatment and disposal.

Once the hazardous soil is removed, EPA will dig up about another 10,000 tons of soil that will be handled as non-hazardous waste. Contaminant levels in this soil are not high enough to classify it as hazardous waste, but levels are above the cleanup goal of 100 parts per billion. EPA and Michigan Department of Environmental Quality agreed on this goal, which is a very protective soil level. The less-contaminated soil will be hauled to a local landfill according to appropriate regulations.

After all contaminated soil has been removed, the area will be filled with clean sand. In addition, the property may be covered with a new layer of asphalt. In all, the Agency estimates this work may take five weeks to complete.

EPA will do extensive air sampling and monitoring while cleanup work is being done. Technicians will conduct real-time air monitoring for dust particles and volatile organic compounds throughout each work shift. They will also collect and ship VOC samples to a laboratory for analysis. EPA works closely with state and federal health officials to set standards that will protect people near the site and workers on the site. In addition, the Agency

will prevent dust and vapors from traveling off-site. Workers will use water-misting to control dust, and the existing soil-vapor extraction system to control vapors if necessary.

In late January and early February, EPA's contractors spent three weeks collecting almost 400 soil and ground-water samples across the GTOS property. These samples showed how much contamination there is at the site and below ground. Based on the sampling, in most areas soil will be removed to ground-water level, about 10 feet deep. The extensive sampling program has allowed EPA to identify where the most contaminated soil is located and how much must be dug up and disposed of.

Because of the sheer number of soil and ground-water samples collected, EPA does not expect to encounter any contamination other than what has been identified so far. However, the Agency can stop digging if any new contamination issues arise.

In early- to mid-December, EPA removed all waste from the GTOS building to prepare for demolition. Workers tore down the building in five days during late December – while Norris Elementary was on winter break – and hauled the debris to a landfill in Maple City, Mich. Almost 14,000 tons of steel was recycled. Workers conducted air monitoring and sampling throughout the demolition phase. Analysis showed no dust particles or lead detected above regulatory limits.

EPA's removal program will have completed its actions at the GTOS site once the soil is excavated and the hole is filled with clean soil. However, the Agency's remedial program will continue to address other contamination issues at the GTOS site.

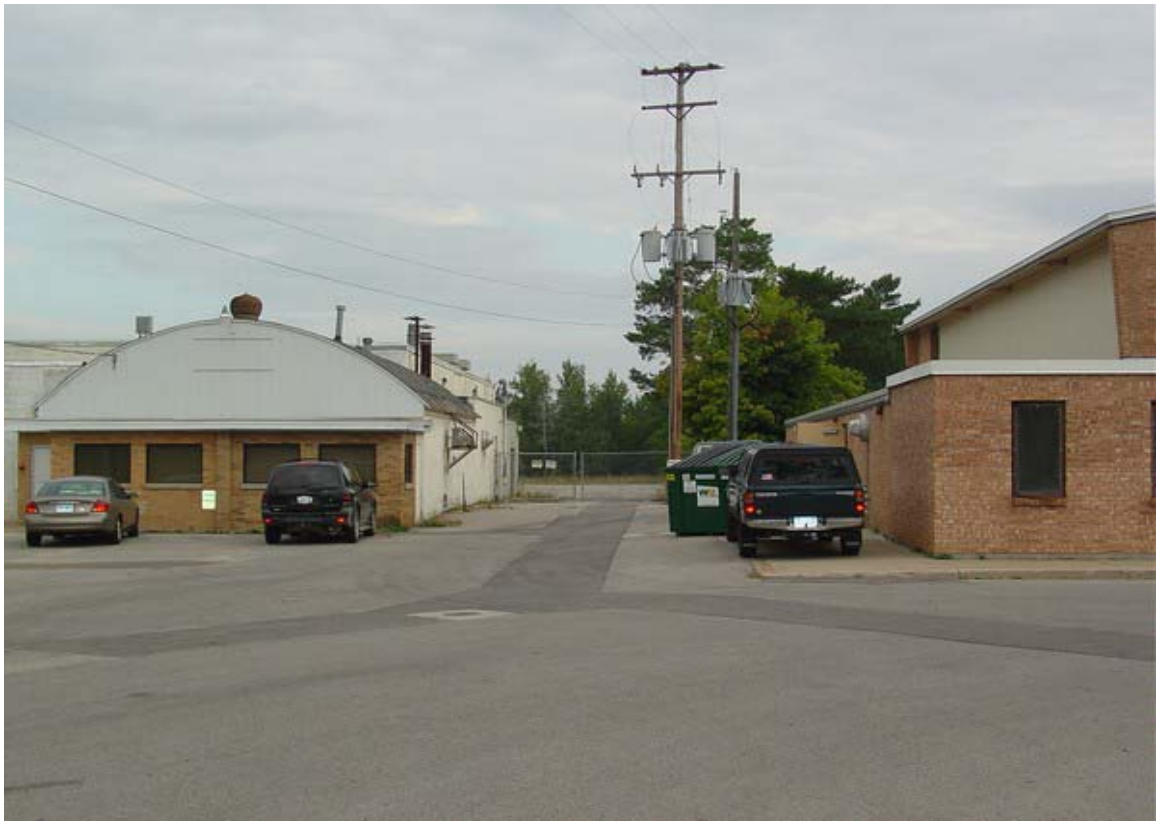
Remedial program cleanup activities

On March 3, EPA completed the cleanup plan, called a "Record of Decision," for the GTOS site. It's similar to what was discussed at the public meeting in November.

The major components of the cleanup plan include:

- Limited action on removing any remaining soil contamination that exceeds the preliminary cleanup goals following the emergency cleanup authorized on Sept. 4.

- Institutional controls restricting ground water and land use. These controls may include



This photo shows the GTOS building on the left and Norris Elementary School to the right.

negotiation of restrictive covenants for contaminated property and ground water, working with local municipalities to draft and implement zoning ordinances, working with the public health department or agencies to draft and implement appropriate health regulations, or similar controls.

- Ground-water extraction, treatment and discharge with a contingency for on-site treatment if necessary.

- Continued operation of the soil-vapor extraction system that is operating at the Norris Elementary School. The Agency will also develop and implement a nonintrusive vapor-monitoring program to ensure there are no other vapor issues associated with the soil and ground water contamination.

The cleanup plan covers the entire site and addresses the soil, ground water and vapor.

An addition to the cleanup plan

MDEQ raised concerns regarding vapor issues associated with other structures in the area. Under its removal program, EPA conducted vapor studies, but did not detect elevated vapor levels associated with PCE.

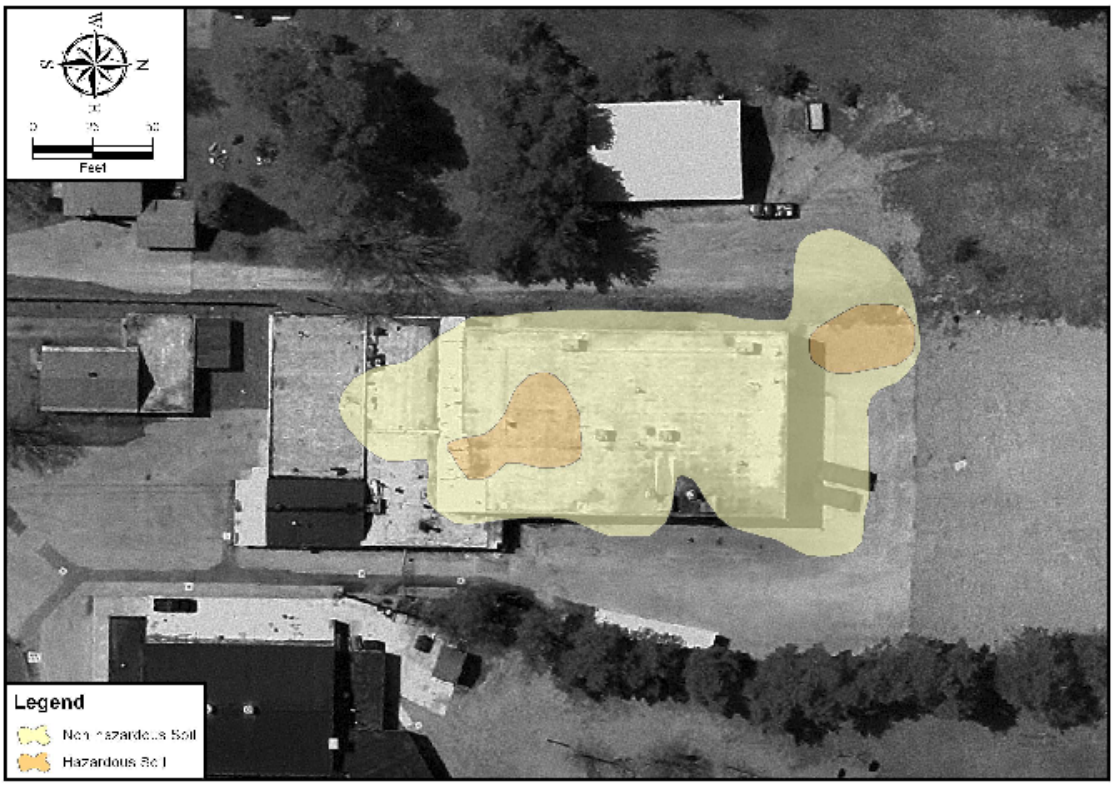
The Agency will continually evaluate soil and ground-water vapors that may contaminate indoor air, and other areas that could be affected by the ground-water plume, using nonintrusive sampling procedures.

Next steps

EPA received more than 75 comments during the public comment period. All support the proposed remedy. However, one area of concern that was raised in a majority of the comments involves the discharge of treated ground water from the ground-water extraction system.

EPA experts are designing the ground water pump-and-treat system, and are still evaluating the two discharge options presented at the public meeting. They will return as the evaluation process moves forward to discuss the discharge strategy in more detail.

This photo shows the cleared site after the building and all waste was removed.



Darker shading (smaller interior areas) on this aerial photograph indicates the location of soil that will be dug up and disposed of as hazardous waste while school is not in session. Lighter shading(larger area) shows the location of less-contaminated soil that is considered non-hazardous. This soil will be dug up and disposed of as well.

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