

Below is a list of what the CAG has done to not only promote a better cleanup, but to try to ensure reuse and redevelopment of polluted areas (including the river).

### **EPA PROPOSED DRAWDOWN**

Once EPA saw that the levels of DDT in the river sediment were “off the scale,” they initiated an Emergency Removal Action (ERA). Under ERA guidelines, there is little the EPA is forced to do with community input and even input from local and state regulatory agencies. They can come in and do almost what they want.

Their initial proposal for installing the sheet piling to build the coffer dams involved drawing down the river 6 feet at the dam. They would then drive out in the dry riverbed and install the sheet piling with heavy equipment.

The CAG objected vociferously but the EPA quoted their own guidelines under Emergency Removal that said, frankly that they didn’t have to listen to us.

Alma College conducted a scientific study that measured the river bottom profile, river flow and river levels. They then plugged in these numbers into a simple mathematical model that would predict how river flow would be affected and how much sediment would be exposed if the river was drawn down 3, 5 and 6 feet. The conclusions were:

1. A drawdown of only 3 feet would expose 40% of the river sediment from the St. Louis dam all the way up to Cheesman Road Bridge. A drawdown of 6 feet would expose between 70%-80% of the contaminated river sediment.
2. A drawdown of only 3 feet would be enough to increase the river velocity high enough to mobilize and wash contaminated sediment downstream.
3. The proposed drawdown posed a serious human health risk for St. Louis and for downstream communities.

We presented these findings at a CAG meeting in front of the press and because of that, the EPA changed their plan and actually saved money in the process. Later, Beth Reiner, the EPA project manager told a group of Alma College students that if they hadn’t done that study, the drawdown would have occurred.

### **TESTING FOR CONTAMINANTS OTHER THAN DDT**

The EPA’s plan under their feasibility study and Record of Decision stated that they only had to get DDT levels at or below 5 ppm in the sediment and they had met their cleanup obligation to the community. The CAG, going on information provided us by Gene Kenaga, a retired Dow chemist, argued that there were many more chemicals in the river that could be more dangerous to human health than DDT. We wanted EPA to test for more than just DDT and PBB, but for other chemicals we knew were manufactured or used at the plant.

Because of this, the EPA now tests for contaminants other than DDT and PBB (and many harmful chemicals have been found...and cleaned), and has changed their cleanup strategy to go down as far as they can physically dig (to the hardpan). Even if they get DDT levels at 5ppm or less, if they are not at the hardpan, they will dig deeper and effectively get A MAJORITY of ALL the chemicals in the river. This has resulted in a cleanup that is many times cleaner than their original plan.

### **INTRODUCED ST. LOUIS TO BROWNFIELD MONIES**

Initially, the CAG wanted to see some sort of development occur on the former Michigan Chemical Site. We established a standing committee to address this issue headed by Gary Smith, long-time St. Louis resident. The committee toured other facilities in the State that have been developed, and initiated a dialog between the CAG, the City of St. Louis, Don Shure, (Gratiot County Development), EPA and Michigan Brownfield agents. We also had Alma College economic and business students conduct a study for the CAG on what it would take for the former plant site to be developed under Brownfield laws.

The study showed that 4 major barriers have to be overcome before development can take place. As a result, the former plant site cannot be developed at this time, but the City of St. Louis could apply for brownfield monies for other projects. The study can now serve as a model for what needs to be done in order to develop that site.

### **FORCED INVESTIGATION INTO SLURRY WALL LEAKING**

One of the major obstacles to any brownfield development of a contaminated site is knowing what contamination exists on or below the site and whether or not contamination is migrating off site. These were issues the CAG fought to have investigated from our inception. Beth Reiner from the EPA fought us on this issue stating that the former plant site (operable unit 1) was exempt from EPA investigation under the original Consent Judgment. She refused to take samples or do anything that would give us information into the plant site leaking issue.

It was only through letter writing to MDEQ (and local and federal representatives) convincing them that there needs to be an investigation into this that finally got some action. Because of this effort, the following has occurred:

1. The plant site currently has a full-scale investigation into whether or not it's leaking and/or how it is leaking. The plant site has been discovered to be leaking into the Pine River recontaminating the areas now being cleaned by EPA.
2. We now know what contaminants are leaking from the plant site which may account for some contamination downstream.

3. NWI has relinquished reports on what contaminants have been in the site and MDEQ has taken samples to know what is in the site presently.

From this knowledge, we can request that EPA and MDEQ lay out what they plan to do to this site to ensure future development (and compare their plans with our study). We need to keep pressure on the EPA and MDEQ regarding this issue.

### **AVOIDED UNNECESSARY NEGATIVE PRESS: ACTED AS A LIAISON BETWEEN COMMUNITY AND EPA REGARDING CLEANUP ISSUES**

The CAG has been a sounding board and advocate for local residents regarding cleanup issues such as dust, noise and traffic. Though not all problems have been resolved, we have managed to keep at least two high profile (and potentially litigious) complaints out of the press and in negotiations where they have been settled.

Also, there have been a number of issues that the CAG has dealt with behind the scenes and not in front of the press at the request of the City Council. One example involved a local resident and another example involved the coffer dam breach. The CAG went out of its way to avoid any press on the issue and even questioned in the press the EPA's methodology of installing sheet piling as a "safe" method when the cause was clearly not due to EPA activities.

### **FORCED FURTHER INVESTIGATION INTO THREAT OF RADIOACTIVE WASTE SITE IN BRECKENRIDGE**

CAG pushed the Nuclear Regulatory Commission (NRC) to take a risky position in forcing NWI to do an investigation proving the Breckenridge low-level radioactive waste site poses no risk to human health or environmental health. NWI has been on site with their consultants and we are awaiting results. The NRC continues to monitor the progress of this site. Without CAG's badgering of NRC and federal representatives, this site would remain untouched.

### **FORCED TOXICITY TESTING OF WATER TREATMENT SYSTEM ON SUPERFUND SITE**

The EPA was only testing for DDT and PBB in its wastewater it discharges back into the Pine River (after pumping it out from inside the coffer dams so equipment can scoop up the contaminated sediment). According to federal law, the EPA was not required to test for anything else, including whether or not the wastewater going into the river was toxic to life in the river.

The CAG forced a very reluctant State of Michigan to imposed their own guidelines on EPA and have the wastewater tested for toxicity. The results of that test showed that the wastewater going into the Pine River at the Superfund Site was some of the most toxic wastewater ever tested in the State of Michigan. EPA and MDEQ worked on identifying

the source of the toxicity and have made changes to the system which now discharges wastewater into the Pine River at toxicity levels within acceptable guidelines.

### **SURVEY OF RESIDENTS' CONCERNS ABOUT THE ENVIRONMENT**

At the last Community Day event in St. Louis, the CAG had an informational booth and handed out a survey. The survey asked residents of St. Louis and the surrounding communities several questions related to what they wanted to see done concerning environmental issues. The following results are what the community said they wanted to see ranked in order of most common answer:

1. Health studies of people in St. Louis and Gratiot County
2. A thorough (as opposed to a quick) cleanup of the river
3. Address all contamination in the region including upstream contamination from Alma
4. Getting polluter to pay for the cleanup

These issues are all issues that have been and continue to be addressed by the CAG. With the CAGs insistence, the MDEQ is finally including the Pine River into its "Area of Concern" of the Saginaw River Basin. This allows more studies to be done and places us a high priority for restoration by the MDNR and Fisheries and Wildlife.

On a related note, Alma College conducted a survey of people found fishing in the Pine River (Pine River has a total consumption ban on all fish from the Alma Dam downstream). Survey showed that 83% of the people who fish, eat the fish, many of them as subsistence diet. We presented these findings to the MDNR and Fisheries and Wildlife. Because people are still fishing and eating the fish, the Pine River can qualify for restoration monies for restocking and grant monies to develop the river as a recreational resource. This can only be addressed as we move closer to completing the cleanup.

### **MADE THE EPA AND MDEQ MORE COMMUNITY-FRIENDLY**

In the beginning of the EPA cleanup, the CAG would frequently be kept of the loop in important issues regarding the cleanup process. Through some vigorous insistence over time, we have managed to develop a workable relationship that has been a model for the nation.

EPA and MDEQ frequently call CAG members and include them in decisions that are clearly easier for them to make unilaterally. We have a free-flow of information and have abandoned the cumbersome FOIA system for obtaining documents. We don't always agree, but we work as a team and respect each other.

We have also made the EPA and MDEQ more approachable by the average citizen. As a result of CAG activities in the community, more people are reporting evidence of contamination and MDEQ has responded. The community is empowered in helping to guide its own destiny regarding the cleanup of contaminated sediment, soils and water.