



November 29, 2021

Mr. Jeff Kakuk
Western Upper Peninsula Trails Specialist
Michigan Department of Natural Resources
Baraga State Park Management Unit
1300 US-41 South, Baraga, MI 49908

Re: Due Care Actions Letter Report
Lake Linden Route trail (a.k.a. Trail No. 3)
Ripley, Houghton County, Michigan

Dear Mr. Kakuk:

The Mannik & Smith Group, Inc. (MSG) is pleased to provide this letter report for the Michigan Department of Natural Resources (MDNR) Lake Linden Route trail (a.k.a. Trail No. 3) (site) in Ripley, Houghton County, Michigan. The purpose of this letter report is to document the due care response actions completed by the MDNR, adjacent parcel owner, and the U.S. Environmental Protection Agency (EPA) during 2021. The following sections summarize the site location and history, and details the completed 2021 interim response actions. Attachment A provides figures for this letter report and Attachment B presents a photographic log.

SITE LOCATION AND HISTORY

The **site consists of the MDNR's multi-user** recreational trail where it traverses three non-contiguous parcels (Julio Properties) along the north shoreline of the Portage Canal in Ripley, Houghton County, Michigan (Figures 1 and 2 in Attachment A).

The Julio Properties include:

- Julio Salvage (20675 Royce Road).
- Julio Contracting/Formers Standard Oil Company (21021 Royce Road).
- Julio Scrap Yard & Tower (address unknown).

Based on potential environmental concerns related to prior land uses along the Ripley waterfront, the Michigan Department of Environment, Great Lakes, and Energy (EGLE) Remediation and Redevelopment Division (RRD) evaluated the results of past inspections and studies (MSG 2018) and undertook site investigation (SI) activities. These activities identified potential risks to human and ecological receptors at the Julio Properties and users of the traversing MDNR trail (MSG 2019). In addition to physical hazards, human health risks included those from direct contact with surface soils contaminated with polychlorinated biphenyls (PCBs) and metals, residual process materials, abandoned containers, waste/debris piles, and inhalation of particulates and asbestos. Based on the SI findings, EGLE requested assistance from the U.S. Environmental Protection Agency (EPA) to address the potential risks posed by the Julio Properties.

In 2018 into 2019, EGLE RRD provided their SI findings to the MDNR (trail owner), adjacent property owner (Julio), and the Western Upper Peninsula Health Department (WUPHD). WUPHD in turn requested assistance from the Michigan Department of Health and Human Services (MDHHS) in review of the SI findings. The MDHHS provided a



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public health hazard determination that concluded “...there are physical and chemical hazards currently present at the Julio Properties that could cause harm to people on or near the properties resulting in injury or disease now or in the future. In addition, there is the potential for presence of imminent hazards” (MDHHS 2019). Subsequently, on September 30, 2019, the WUPHD issued an advisory regarding the Julio Properties and users of the MDNR trail (WUPHD 2019). The advisory for activity on the trail was temporarily suspended once the area was snow covered, but re-issued on May 7, 2020 (WUPHD 2020a). Based on WUPHD’s health advisory the MDNR closed the trail.

To mitigate potential risks identified in the WUPHD advisory, EGLE RRD, MDNR, and the adjacent property owner, prior to and after issuance of the advisories, undertook interim response actions during 2019. The EPA prepared a technical memorandum that identified the potential for threats to human health and/or the environment and described the completed and contemplated response actions (Tetra Tech 2020a). The MDHHS and WUPHD reviewed the technical memorandum and concluded that the completed and contemplated response actions would address the public health hazards identified in the WUPHD health advisory for users of the MDNR trail (MDHHS 2020a).

The pandemic prevented EPA from fully implementing the contemplated response actions in 2020. To maintain trail continuity until the contemplated response actions could be fully implemented the EPA, MDNR, and adjacent property owner proposed to conduct additional interim response actions in 2020 to further address concerns posed by the Julio Salvage Parcel (MDNR 2020a). The WUPHD concurred with the proposed interim response actions in an electronic mail message dated June 11, 2020 (WUPHD 2020b). The interim response actions were completed at the Julio Salvage parcel on July 2, 2020 (Tetra Tech 2020b). The MDNR reported the completed interim response actions to the WUPHD (MDNR 2020b). In reviewing the MDNR report the MDHHS concluded that with the current mitigation exposure mitigation measures in place, no apparent public health hazards were present on or near the trail (MDHHS 2020b). The WUPHD concurred (WUPHD 2020c) and on July 24, 2020, the WUPHD lifted the public health advisory (WUPHD 2020d), and the MDNR re-opened the trail on July 27, 2020.

INTERIM RESPONSE ACTIONS COMPLETED IN 2021

In 2021 the EPA, MDNR, and adjacent property owner completed the remaining planned response actions to further mitigate concerns posed by the Julio Properties. The response actions, completed in October 2021, are depicted on Figures 3, 4, and 5 in Attachment A and in the Photographic Log in Attachment B included:

Julio Salvage Parcel

- The parcel owner removed, staged, and/or transported off site for recycling previously accumulated salvageable materials from near and on the MDNR trail, cleared Priority Areas 1, 2, and 7 of abandoned containers and scrap metal, cleared Priority Areas 1 and 2 of trees, and scrapped surficial debris/soil in Priority Area 7 into piles.
- EPA removed and disposed of off-site soil/waste/mercury and PCB-containing equipment, encapsulated on-site equipment that is asbestos containing, placed a vegetated strip adjacent to the MDNR trail, and placed and graded a gravel or vegetated cover to promote drainage and further mitigate residual direct contact and wind and water erosion concerns near the MDNR trail.
- Following completion of parcel owner and EPA activities, the MDNR graded and graveled the designated trail, and installed fencing and signage directing trail users to stay on the designated trail.

Julio Contracting/Former Standard Oil Company Parcel

- The MDNR graded and graveled the designated trail, and installed fencing and signage directing trail users to stay on the designated trail.

Julio Scrap Yard & Tower Parcel

- The parcel owner removed, staged, and/or transported off site for recycling previously accumulated salvageable materials from near and on the Berm in the northern portion of the parcel.

- EPA placed a vegetated cover over the Berm, removed and disposed off-site PCB-contaminated soils associated with the Tank Car and placed a vegetated cover, and decommissioned the Tank Car.
- Following completion of parcel owner and EPA activities, the MDNR graded and graveled the designated trail, and installed fencing and signage directing trail users to stay on the designated trail.

REFERENCES

The Mannik Smith Group (MSG). 2018. Historical Data Review and Compilation Technical Memorandum for Abandoned Mining Wastes Torch Lake Non-Superfund Site, Quincy Mining Company – Portage Operations Area, Houghton County, Michigan. August.

MSG. 2019. Unpublished Site Investigation Findings for Abandoned Mining Wastes Torch Lake Non-Superfund Site, Quincy Mining Company Portage Operations Area, Houghton County, Michigan included in the EPA Referral Package. September.

Michigan Department of Health and Human Services (MDHHS). 2019. Julio Properties Public Health Hazard Determination. September.

MDHHS. 2020a. Draft Julio Properties Public Health Hazard Evaluation of Completed and Contemplated Cleanup Activities. April.

MDHHS. 2020b. Julio Properties Evaluation of Completed Interim Response Action. July.

Michigan Department of Natural Resources (MDNR). 2020a. Interim Trail Plan. June.

MDNR. 2020b. Report on Completed Interim Response Actions. July.

Tetra Tech, Inc. (Tetra Tech). 2020a. Completed and Contemplated Response Actions Technical Memorandum – Revision 0. March.

Tetra Tech. 2020b. Completed Interim Response Actions Letter Report – Revision 1. August.

Western Upper Peninsula Health Department (WUPHD). 2019. Julio Scrapyards in Ripley Advisory. September.

WUPHD. 2020a. Julio Scrapyards in Ripley Advisory Re-issuance. May.

WUPHD. 2020b. Electronic Mail Re: MDNR reply letter – MDHHS and WUPHD support commencement of work. June.

WUPHD. 2020c. Approval of MDNR Interim Response Actions. August.

WUPHD. 2020d. Lifting of Advisory for Julio Scrapyards in Ripley. July.

If you have any questions regarding this letter report, please contact me at (906) 281-3404.

Sincerely,



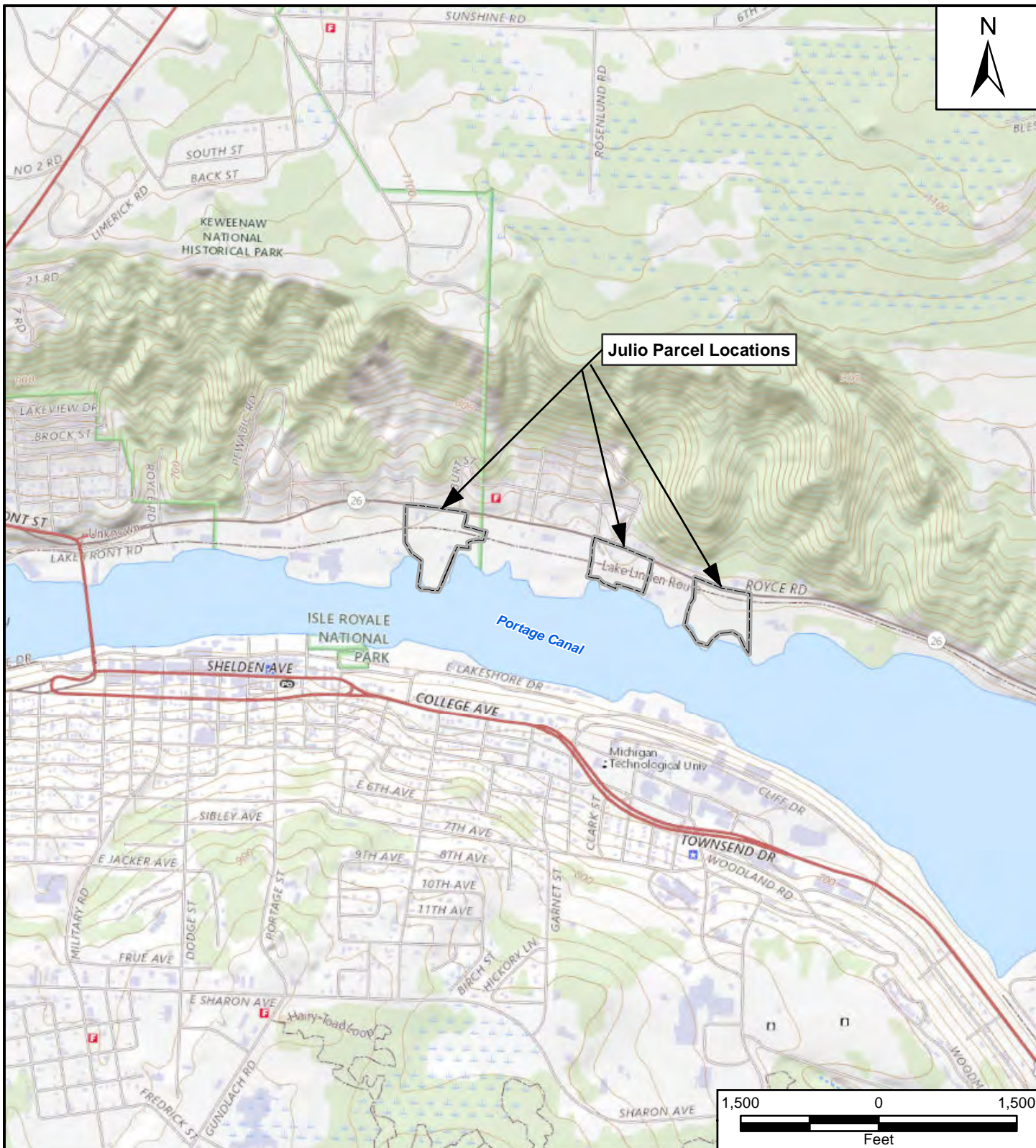
Jeffrey S. Binkley
Senior Project Manager

Attachments:

- A – Figures
- B – Photographic Log

ATTACHMENT A
FIGURES





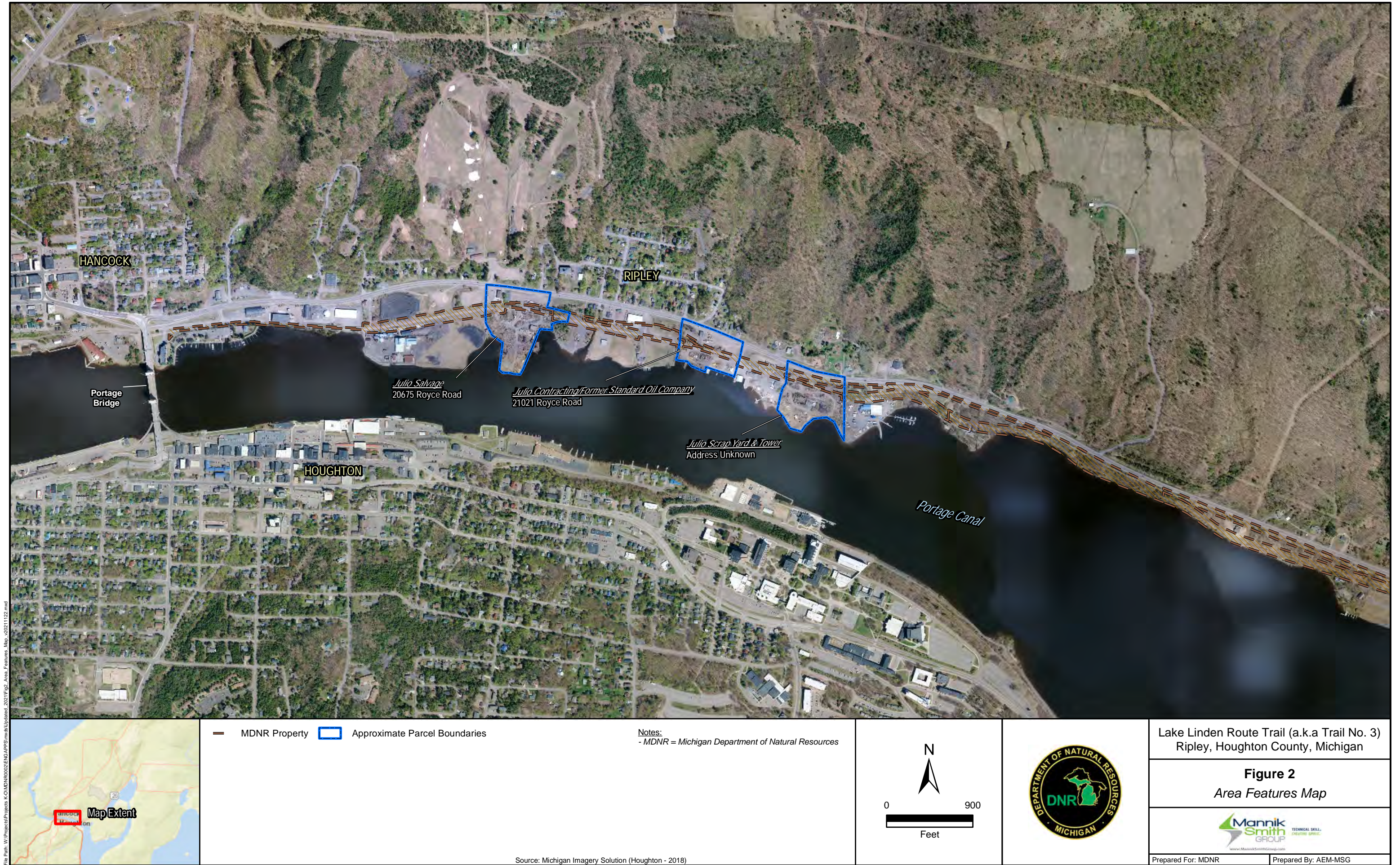
Source: ESRI USGS Topo Maps map service, based on
USGS 7.5-Minute Topographic Quadrangle Map:
Hancock, 2017; Chassell, 2017; Point Mills, 2017; Laurium 2014

Lake Linden Route (Trail No. 3)
Ripley, Houghton County, Michigan

Figure 1
Project Location




Prepared For: MDNR

Prepared By: MSG - AEM

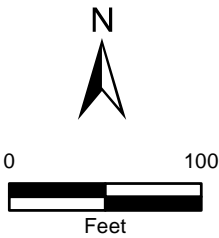






-  MDNR Designated Trail
-  MDNR Property
-  Approximate Parcel Boundary

Notes:
- Michigan Department of Natural Resources (MDNR) graded and graveled the designated trail.



Lake Linden Route Trail (a.k.a Trail No. 3)
Ripley, Houghton County, Michigan



Figure 4
Response Actions Completed in 2021
(Julio Contracting/Former Standard Oil Company)



Prepared For: MDNR Prepared By: AEM-MSG

Underlying Imagery: Michigan Imagery Solution (Houghton - 2018)



<p>➔ MDNR Designated Trail</p> <p>MDNR Property</p> <p>Approximate Parcel Boundary</p>	<p>⬡ Capped</p> <p>⬢ Soil/Waste Removed, Disposed, and Vegetative Cover</p>	<p>Notes:</p> <ul style="list-style-type: none">- Michigan Department of Natural Resources (MDNR) graded and graveled the designated trail.- Parcel owner cleared berm and tank car areas of abandoned containers, scrap materials, and trees.- EPA completed the following:<ul style="list-style-type: none">• Placed vegetated cover over berm as indicated by yellow hatching;• Removed and disposed soil near tank car and placed vegetated cover as indicated by blue hatching; and,• Decommissioned tank car including removal and disposal of contents, cleaning, and rendering unusable.	<p>N</p> <p>0 100</p> <p>Feet</p>		<p>Lake Linden Route Trail (a.k.a Trail No. 3) Ripley, Houghton County, Michigan</p> <p>Figure 5 Response Actions Completed in 2021 (Julio Scrap Yard & Tower)</p> <p> TECHNICAL SKILL. CREATIVE SPIRIT.</p> <p>Prepared For: MDNR Prepared By: AEM-MSG</p>
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ATTACHMENT B
PHOTOGRAPHIC LOG





Photo 1: View looking southeast of the designated trail through the Julio Salvage Parcel following MDNR's grading and graveling, and Priority Area 1 following EPA's removal and placement of gravel cover including a vegetated buffer adjacent to the south side of the designated trail.



Photo 2: View looking east of the MDNR installed fencing and signage directing users to stay on the designated trail through the Julio Salvage Parcel.



Photo 3: View looking south of MDNR installed signage at the Julio Salvage Parcel directing users to **stay on the designated trail, and Priority Area 2 following EPA's removal and placement of a vegetated cover adjacent to the designated trail.**



Photo 4: View looking west of the designated trail through the Julio **Salvage Parcel following MDNR's** grading, graveling, and installation of fencing to direct users to stay on the designated trail.



Photo 5: View looking west of the designated trail through the Julio Contracting/Former Standard Oil Company Parcel following MDNR's grading, graveling, and installation of signage directing users to stay on the designated trail.



Photo 6: View looking east of the designated trail through the Julio Contracting/Former Standard Oil Company Parcel following MDNR's grading, graveling, and installation of signage directing users to stay on the designated trail.



Photo 7: View looking east of the designated trail through Julio Scrap Yard Parcel following MDNR's grading, graveling, and installation of signage directing users to stay on the designated trail.



Photo 8: View looking west of the designated trail through Julio Scrap Yard Parcel following MDNR's grading and graveling.