

United States Environmental Protection Agency

Share your opinions:

EPA invites you to a public meeting on the former Bronson Reel facility in Bronson, Mich. The meeting is:

Thursday, Aug. 10, 2006, 7 p.m. Bronson City Office 141 S. Matteson St.

EPA invites your questions and comments at the meeting or in writing during the public comment period, July 28 to Aug. 28.

Comments can be made orally at the meeting or by mail, e-mail or fax, to:

Terese Van Donsel

Remedial Project Manager EPA Region 5 (SR-6J) 77 W Jackson Blvd. Chicago, IL 60604-3590 vandonsel.terese@epa.gov (800) 621-8431, Ext. 36564 weekdays 10 a.m. - 5:30 p.m. Fax: (312) 886-4071

or complete the online comment form at:

epa.gov/region5/sites/ bronsonreel

Review documents at the local site information repository:

Bronson Branch Library 207 N. Matteson St.

EPA Proposes No Further Cleanup For Contaminated Site in Bronson

Former Bronson Reel Facility

Bronson, Michigan

July 2006

No additional cleanup work would be done at the former Bronson Reel facility in Bronson under a plan proposed by U.S. Environmental Protection Agency. The proposal recommends measures known as "institutional controls" that would limit future use of the site.¹

EPA and Michigan Department of Environmental Quality agree that previous cleanup work made the site suitable for industrial use in the future. However, EPA has published a proposed plan with two options to ensure that soil under the facility is checked for contamination and cleaned up, if necessary, as part of any future development. EPA also wants to restrict use of ground water under the property because of area-wide contamination.

The Agency is seeking public comments on the proposed plan before making a final decision. Once the plan is finalized, the property may be redeveloped for commercial or industrial use.

History of the site

The Bronson Reel Co. began manufacturing fishing reels in 1928 at 505 N. Douglas St. (see map on Page 3). Employees made their own dies, tools and fixtures in a machine shop. They also did their own plating and anodizing. In 1963, the company was purchased by Bronson Specialties. Production of fishing reels declined and was discontinued in 1968. Although plating operations stopped at that time, metal tooling and other manufacturing operations continued at the facility until the early 1990s. These industrial activities contaminated soil on the property.

The first steps toward cleanup were taken in 1988 when MDEQ ordered the property owner to contain waste storage drums and metal shavings, and to remove contaminated soil. The property owner – at the time, a company known as Kuhlman/New BSI – had more than 10,000 tons of soil removed and sent to a regulated landfill. An underground storage tank was also removed, as was a portion of the industrial sewer along the northern edge of the property.

¹ Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA known as the Superfund law) and Section 300.430(f)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan require public participation in the process of approving a proposed cleanup plan. This fact sheet summarizes the technical documents about the former Bronson Reel facility that are available for viewing at the official site repository located in the Bronson Branch Library.

Supplemental investigation

However, when ground water in the northern industrial area of Bronson was found to be contaminated, EPA and MDEQ asked for further investigation of the former Bronson Reel facility. The two agencies wanted to know if the site was a source of pollutants such as the common industrial solvent trichloroethylene, better known as TCE.

ITT Industries Inc. (now ITT Corp.) agreed to study the problem in 2002. (ITT's connection to the site is a 1972 stock purchase of the company that once owned Bronson Reel.) ITT's investigation found that the site is not a source of TCE contamination in ground water. The study also found that soil contamination levels are very low. In fact, they meet Michigan standards for industrial and commercial properties. Ground-water contamination is being addressed separately.

Proposed plan addresses issues

EPA and MDEQ evaluated the results of ITT's investigation and determined that the previous cleanup of the Bronson Reel facility was sufficient. They agreed that there are no unacceptable risks from exposure to soil at the site.

However, soil underneath the buildings was never evaluated. While there is no reason to suspect any contamination under the buildings, EPA wants to ensure there is a plan in place to deal with the issue. The property is likely to be redeveloped and buildings could be torn down. Because contaminated ground water is an area-wide problem, EPA also wants to ensure that future developers are prevented from tapping into underground water supplies.

Two alternatives

Alternative #1: No Further Action

Under this alternative, it would be assumed the property owner would follow state law and fulfill what are known legally as "due care" responsibilities if any building foundations were removed. That means the law requires property owners to investigate and take care of any contamination found on the property during redevelopment. Under this alternative, there would be no property-specific restriction on the use of ground water.

Because there would still be uncertainty about soil under the buildings, EPA would review the site every five years to ensure the soil still meets Michigan standards.

Alternative #2: No Further Action with Institutional Controls (EPA's recommended alternative)

Under this alternative, EPA would place restrictions on the property deed. These restrictions would require an investigation of the soil underneath the buildings if in the future the buildings and foundations are removed. If any contamination were found in the soil, it would then be cleaned up. There would also be a restriction on the use of ground water.

EPA will review this alternative every five years to determine its effectiveness.

Recommended alternative

EPA and MDEQ recommend Alternative #2. The deed restrictions ensure that if in the future the buildings and foundations are removed, the soil underneath the buildings would be investigated and any contamination found under the buildings on the Bronson Reel site would be cleaned up. In addition, the ground-water use restriction would help protect people and the environment by keeping developers from using ground water underneath the property.

What happens next?

From now until Monday, Aug. 28, members of the public have an opportunity to express their opinion of the proposed plan (see box on Page 1). When EPA has evaluated all comments, the Agency will issue a final decision, which will include a response to comments received. The final decision will effectively open the former Bronson Reel property for redevelopment.

Evaluating choices against the nine criteria

EPA evaluated the two alternatives against eight of the nine criteria the agency uses in deciding which plan is best (see "Explanation of evaluation criteria" on Page 7). The ninth criterion, community acceptance, will be evaluated after EPA receives public comments. The degree to which the two choices meet the evaluation criteria, as determined by EPA, is shown in the table below.

Evaluation Criteria	Alternative 1	Alternative 2
Overall Protection of Human Health and the Environment		
Compliance with Applicable or Relevant and Appropriate Requirements		
Long-Term Effectiveness and Permanence		
Reduction of Toxicity, Mobility, or Volume through Treatment	Not applicable	Not applicable
Short-Term Effectiveness		
Implementability		
Cost	\$73,800	\$83,800
State Acceptance		
Community Acceptance	To be determined based on public comment.	To be determined based on public comment.

^{■ =} Meets Criteria ■ = Does Not Meet Criteria ◆ = Partially Meets Criteria

Use This Space to Write Your Comments

Your input on the proposed plan for the former Bronson Reel site is important to EPA. Comments provided by the public are valuable in helping EPA select a final remedy for the site.

Aug. 28, 2006. If you have any questions about the pub	hen detach, fold and mail. Comments must be postmarked by blic comment process, please contact Terese Van Donsel at 800) 621-8431, ext. 36564. People can also e-mail their
comments to: vandonsel.terese@epa.gov.	, , ,
	Name
	Affiliation
	Address
	CityState

Zip__

Former Bronson Reel Facility Site Comment Sheet

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Terese Van Donsel Remedial Project Manager Superfund Division (SR-6J) EPA Region 5 77 W. Jackson Blvd. Chicago, IL 60604-3590

Explanation of evaluation criteria

- 1. Overall protection of human health and the environment addresses how well an option protects people and the environment. This standard can be met by reducing or removing pollution or by reducing exposure to it.
- 2. Compliance with applicable or relevant and appropriate requirements ensures that options comply with federal, state and local laws.
- 3. Long-term effectiveness and permanence evaluates how well an option will work over the long-term, including how safely remaining contamination can be managed.
- **4.** Reduction of toxicity, mobility or volume through treatment addresses how well the option reduces the danger, movement and amount of pollution.

- 5. Short-term effectiveness compares how quickly an option can help the situation and how much risk there will be while the option is under construction.
- **6. Implementability** evaluates how feasible the option is and whether materials and services are available in the area.
- 7. Cost includes not only buildings, equipment, materials and labor but also the cost of maintaining the option for the life of the cleanup.
- **8. State acceptance** considers whether the state agrees with the selected option. EPA evaluates this criterion after receiving public comments.
- 9. Community acceptance considers whether the local community agrees with the selected option. EPA checks this standard after a public meeting and comment period.

For more information

For further information on the former Bronson Reel site, please contact:

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EPA Proposes Institutional Controls and No Further Cleanup for the Former Bronson Reel Facility in Bronson, Michigan

Comments accepted through Aug. 28, 2006

Public Hearing

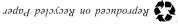
Date: Thursday, Aug. 10

Time: 7 p.m.

Location: Bronson City Office

141 S. Matteson St.

See inside for more information



EPA Proposes Institutional Controls and No Further Cleanup

Region 5 Office of Public Affairs (P-19J) 77 W. Jackson Blvd. Chicago, IL 60604-3590

> United States Environmental Protection Agency

