

ROCK-TENN REMOVAL ACTION
FORMER ROCK-TENN SITE
431 HELEN AVE
OTSEGO, ALLEGAN COUNTY, MICHIGAN
EMERGENCY CONTINGENCY PLAN
JANUARY 20, 2012

The site is comprised of a former paper mill in which representatives of Allegan County discovered over 200 drums, totes, and containers. The site is currently abandoned. The geographical coordinates for the site are lat 42.464421 and long -85.706537 (Figure 1 – Site Location Map). The site occupies an approximate area of 17 acres in an industrial setting and is surrounded by West River Street to the north, John Street and N. North Street to the east, the Kalamazoo River to the south, and vacant land to the west.

MacSimBar Paper Company began papermaking at the site in 1906. Paper and related products were produced at the site for 98 years during which time the facility was operated under several different names. The plant shut down in 2004. Cogswell Property LLC, of Redford Township, bought the site in 2006. The property entered foreclosure in 2011 after Cogswell failed to pay property taxes. Currently, the county owns the property.

In November and December 2011, U.S. EPA and Terra Contracting LLC, on behalf of Rock-Tenn Company, conducted assessments of the property. Both Terra and U.S. EPA identified drums and containers believed to contain acids, bases, oil, and other unknown substances. There is evidence of trespassing and vandalism at the site.

Terra has initiated a removal action to clean up the abandoned drums and containers. The cleanup will likely take 30-60 days. A security guard will be on site 24/hr a day during the cleanup.

In the event of a required response by local emergency authorities during the cleanup, the following protocols provide suggested guidance:

Vandalism/ Theft/ Trespass
Medical Emergencies
Fire/ Explosion

Vandalism/ Theft/ Trespass

Vandalism/theft/trespass are known to be a problem at the site. In the event of vandalism/theft of contractor's property or interference by trespassers with work activities, the City of Otsego Police Department will be notified. Responding agencies

are requested to coordinate with Terra's Project coordinator, due to chemical and physical hazards at the site. Terra and U.S. EPA recommend local emergency agencies do not enter the site buildings, but apprehend suspects as they exit.

Medical Emergencies

Rescue operations are to be conducted only if it is not possible for the injured person to be brought outside to Emergency Medical Service (EMS) personnel. The exclusion zone will be established during removal activities and will be clearly marked. If possible, response to medical emergencies will include decontaminating and removing injured personnel from the exclusion zone to the support zone (main entry gate along Helen Avenue). Terra crew members will decontaminate the victim(s) prior to the arrival of ambulance service.

For emergencies requiring transport to a hospital, the victim should be transported to Borgess-Pipp Hospital located at 411 Naomi Street in Plainwell, MI. The phone number is (269) 685-0700. A map showing directions to the hospital is attached as Figure 2. The site is in a 911 area.

Fire/ Explosion

In the event of a fire during working hours, the Terra site superintendent will be notified. If the fire is small, it will be extinguished using on site fire extinguishers located adjacent to the office trailer, within waste collection area and mounted on off road vehicles (ORVs) which will accompany each collection crew..

If a large fire occurs, personnel will immediately exit the exclusion zone through the nearest exit and meet at either the main gate located off at Helen Avenue and John Street (for crews working along the west side of the plant) and at the small outbuilding located at the north west corner of the property. Upon arrival at the designated muster points, all crew members are to report directly to the site superintendent for a "head" count. No one is to enter the exclusion zone for fire fighting purposes without personal protective equipment that meets NFPA standards. The Otsego Fire Department will be contacted to respond to fires/explosions and should work in coordination with the Terra site superintendent. The fire department will evacuate residents as necessary. Telephone numbers of personnel who should be contacted in the event of an incident are listed below:

At a minimum, the following personnel should be notified:

- Local Fire Department via 911
- Terra site superintendent, Tim Draft 616-885-2079
- Terra Director of Health & Safety, Keith Schillo 269-420-7379
- U.S. EPA On-Scene Coordinator, Brian Kelly 734-740-9019

In the event of heavy smoke, an evacuation may be necessary. Terra will assist with site and perimeter air monitoring.

**FORMER ROCK-TENN SITE
OTSEGO, ALLEGAN COUNTY, MICHIGAN**

LIST OF CONTACTS

[illegible]

Figure 1. Site Location Map

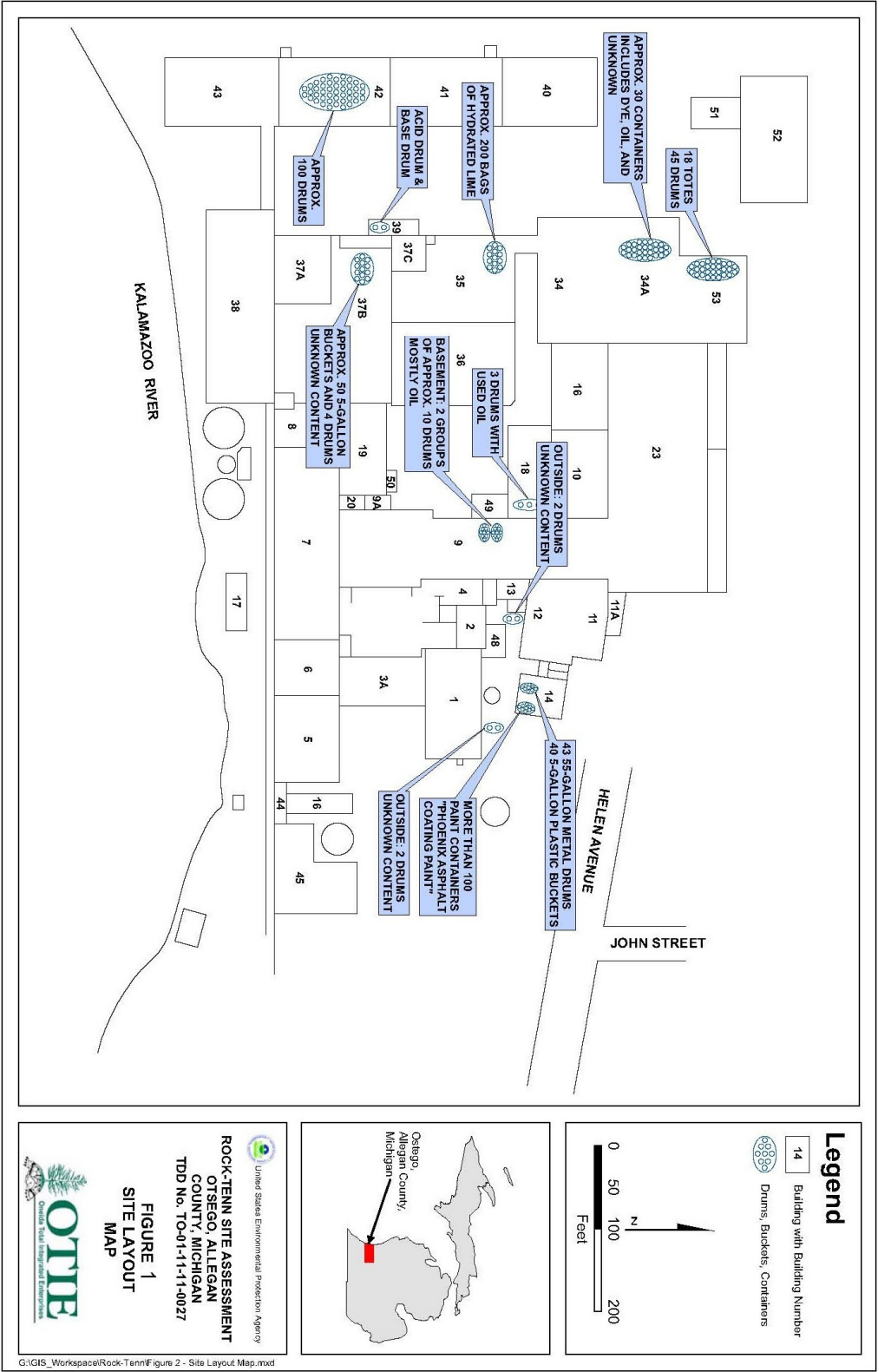
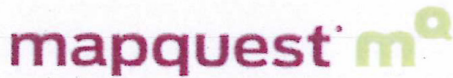


Figure 2: Route to Hospital Map

Driving Directions from 431 Helen Ave, Otsego, Michigan 49078 to 411 Naomi St, Plain... Page 1 of 1



Notes

Trip to:

411 Naomi St

Plainwell, MI 49080-1222

3.27 miles / 6 minutes



431 Helen Ave, Otsego, MI 49078-1037



1. Start out going **east** on **Helen Ave** toward **John St**. [Map](#)

0.1 Mi

0.1 Mi Total



2. Take the **1st right** onto **N North St**. [Map](#)

0.2 Mi

0.4 Mi Total

N North St is 0.1 miles past John St

If you reach Short you've gone a little too far



3. Take the **2nd left** onto **M-89 E**. [Map](#)

2.8 Mi

3.2 Mi Total

M-89 E is just past Water St

If you are on S North St and reach W Orleans St you've gone a little too far



4. Turn **right** onto **Naomi St**. [Map](#)

0.07 Mi

3.3 Mi Total

Naomi St is 0.3 miles past River Rd

Bob's Big Boy is on the left

If you reach Fairlane St you've gone a little too far



5. **411 NAOMI ST** is on the **right**. [Map](#)

If you reach Benhoy Ave you've gone a little too far



411 Naomi St, Plainwell, MI 49080-1222

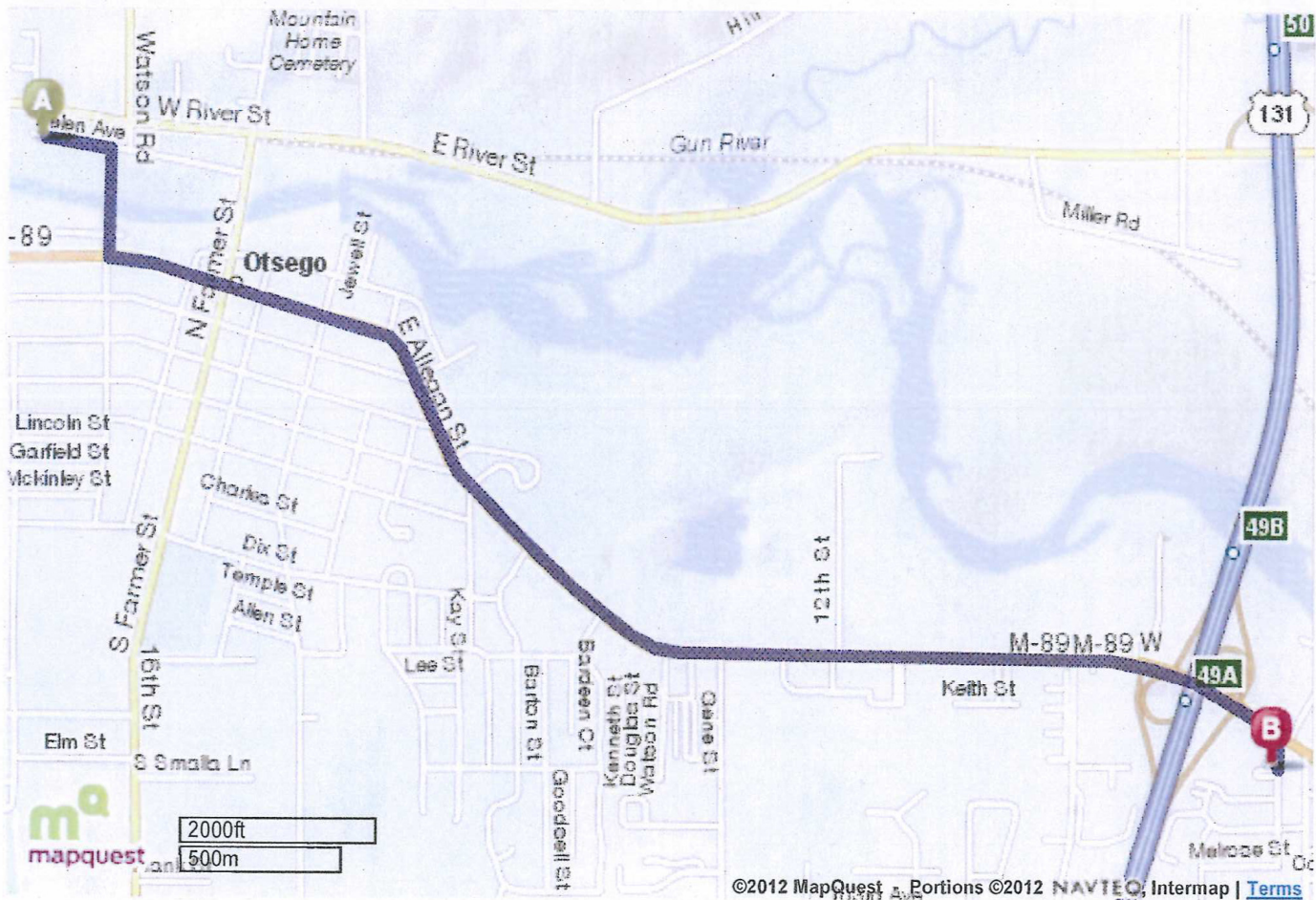
Total Travel Estimate: 3.27 miles - about 6 minutes

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Map to Hospital

Driving Directions from 431 Helen Ave, Otsego, Michigan 49078 to 411 Naomi St, Plain... Page 2 of 2

Total Travel Estimate: 3.27 miles - about 6 minutes



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