



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO ATTENTION OF:  
SE-5J

**VIA EMAIL**

October 3, 2018

Mr. Dan Peabody  
Remediation & Redevelopment Division  
Michigan Department of Environmental Quality  
Constitution Hall – 3<sup>rd</sup> Floor South  
P.O. Box 30426  
Lansing, Michigan 48909

RE: Request for State Applicable, Relevant and Appropriate Requirements  
(ARARs) for the Rock-Tenn Superfund Site, Otsego, Allegan County, Michigan

Dear Mr. Peabody:

This letter requests that the Michigan Department of Environmental Quality identify all Applicable, Relevant, and Appropriate Requirements (ARARs) for an anticipated time-critical removal action at the Rock-Tenn Site, located in Otsego, Allegan County, Michigan. Any State ARARs identified in a timely manner for this removal action will be complied with to the extent practicable.

The United States Environmental Protection Agency (EPA) is preparing an Action Memorandum to conduct a time-critical removal action at the Rock-Tenn Site. The removal action will likely include:

- 1) Developing and implementing a Site Health and Safety Plan, which will include a Perimeter Air Monitoring and Sampling Plan and measures to control asbestos containing material (ACM) dust during the removal and deconstruction of the powerhouse building;
- 2) Developing a site-specific sampling plan to conduct additional characterization of the Site and thereby determine the nature and extent of ACM in the building debris;
- 3) Deconstruct the powerhouse building at the Site to remove, excavate, recycle, load, transport, and dispose of readily identifiable ACM;
- 4) Remove debris and clean subsurface foundation of the powerhouse

building, leaving exterior walls of foundation below grade intact, and backfill with suitable materials agreeable to the City of Otsego and Allegan County;

- 5) Removal of asbestos-contaminated debris in and around the Site that presents an unacceptable risk to public health and the environment;
- 6) Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants at an EPA-approved disposal facility in accordance with EPA's Off-Site Rule (40 C.F.R. §300.440);
- 7) Conducting post-confirmation sampling in accordance with the site-specific sampling plan to confirm the removal action's efficacy;
- 8) Backfilling excavated areas with clean material and topsoil, restoring other disturbed areas; and
- 9) Taking other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the EPA On Scene Coordinator determines may pose an imminent and substantial endangerment to public health or the environment.

These activities will be planned for completion over an estimated 90 days. After the completion of the proposed time-critical removal action, EPA will coordinate with the City of Otsego and Allegan County to ensure that the appropriate measures are taken to secure the Site.

The work plan documents may specify other project requirements to be completed as part of this time-critical removal action.

If you have any questions regarding this letter, please feel free to contact me at (312) 886-7898. Thank you for your assistance in this matter.

Sincerely,

*Paul Ruesch*

Paul Ruesch  
On-Scene Coordinator

cc: Mike Ribordy, USEPA  
Erik Olson, USEPA