

EMERGENCY CONTINGENCY PLAN DRAFT

U.S. EPA REGION 5 ROCK-TENN SITE REMOVAL ACTION OTSEGO, ALLEGAN COUNTY, MICHIGAN

Spring, 2019

INTRODUCTION

The U.S. Environmental Protection Agency (EPA) prepared this Emergency Response Contingency Plan for distribution to local response agencies to make them aware of ongoing work and associated hazards at the Rock-Tenn Site (Site), located at 431 Helen Avenue in Otsego, Allegan County, Michigan. The Site occupies an area of 17 acres and consists of over 40 buildings and structures within a fenced area. The building of interest for the removal assessment is the Power House building located in the east central portion of the property (see Attachment A). The Site is bounded to the north by W. River Street, to the south by the Kalamazoo River, to the west by vacant land, and to the east by John Street and N. North Street. Nearby land uses include industrial, commercial, residential, and agricultural.

The Site was formerly utilized as a paper mill from 1906 until 2004. A removal assessment was performed at the Site in April 2018 where Site reconnaissance and sampling was performed. Asbestos containing material (ACM) was confirmed in sample analytical results inside the Power House building. The Site is still currently vacant with evidence of trespassing documented during removal assessment activities.

SITE HISTORY

In 2011, Allegan County and the State of Michigan referred the Rock-Tenn Site to EPA Region 5 Superfund Division to conduct a removal assessment to determine the contents of approximately 200 containers of material found on-site. A removal action to dispose of the drums and containers at the Site was performed in 2012. In response to a request from the City of Otsego and Allegan County for an updated assessment, EPA conducted a removal assessment of the Power House at the Site in April 2018. Analytical results from the assessment confirmed the presence of ACM inside the Power House. Based on these findings and a subsequent request for assistance from Allegan County and the City of Otsego in June 2018, a time critical removal action by EPA is scheduled for Spring 2019.

HOURS OF OPERATION

EPA will initiate a time critical removal action in Spring of 2019 with mobilization of personnel and equipment. When the removal begins, EPA and contractor work crews will be on-site Monday through Friday (normally 0700 to 1800 hours). A copy of this Emergency Contingency Plan will be posted and available on-site in all job trailers.

SITE ENTRY PROCEDURES

All visitors must sign-in with the on-site security guard. A Site entry and exit clipboard will be maintained during the day/evening.

Organization	Primary Contact
Otsego Fire Department	Chief Brandon Weber
Otsego Police Department	Chief Gordon Konkle
Michigan Department of Environmental Quality (MDEQ)	Ray Spaulding
Allegan County Department of Emergency Management & Homeland Security	Scott Corbin
EPA Region 5	Paul Ruesch
START Contractor - Sustainment and Restoration Services, LLC (SRS)	Emily Koryto
ERRS Contractor - Environmental Quality Management, Inc. (EQM)	Gary Butcher
Subcontractor(s)	TBD

*All personnel entering the Site exclusion zone must have up to date HAZWOPER & medical certificates.

Any other visitors must be approved by EPA OSCs Paul Ruesch or Tricia Edwards.

ADDITIONAL INFORMATION

EPA has posted the following website for further information:

<https://response.epa.gov/rocktenn2>

SITE CONTINGENCIES

In the event of a required response by local emergency authorities during Site removal activities, the following protocols provide necessary guidance for the following potential response events:

Vandalism/Trespass

Medical Emergencies

Fire/Explosion

Building Collapse

VANDALISM/TRESPASS

In the event of vandalism/trespass at the Site, the City of Otsego Police Department (OPD) will be notified. Attempts will be made by the law enforcement to apprehend the offenders on the Site property up to the removal exclusion zone (Site Layout Map – See Attachment A). If the offenders are within the building area, communication via loudspeaker will be conducted prior to apprehending the offenders following their exit from the work zone. OPD will immediately advise EPA OSCs Paul Ruesch or Tricia Edwards of any incidents of trespass or vandalism.

MEDICAL EMERGENCIES

Rescue operations on the Site property, if necessary, should be conducted by personnel wearing Level D personal protective equipment with disposable latex booties. Disposable PPE will be staged in the contamination reduction zone. The victim should be decontaminated to the maximum extent possible, paying particular attention to the areas of the body or clothing that were in contact with contaminants or the ground. If the injury is minor, a full decontamination should be completed and first aid administered prior to transport. If the victim's condition is serious, at a minimum emergency decontamination should be completed. If possible, decontamination and removal of injured personnel from the exclusion zone will be conducted prior to arrival of emergency medical services (EMS). EMS will pick up injured personnel at the EPA Command Post office trailer.

For emergencies requiring transport to a hospital, **911** will be called. The caller will identify that the emergency is located at 431 Helen Avenue in Otsego, Michigan. The victim may be transported to Ascension Borgess-Pipp Hospital, located at 411 Naomi Street in Plainwell, Michigan 49080, (269) 685-0700 (approximately 3.3 miles) or to any other location as decided by EMS. See Attachment B for Hospital Route Map.

FIRE/EXPLOSION

In the event of a fire or explosion, all Site personnel will evacuate to the office trailer area (see Attachment A) for accounting and further instruction.

To activate fire department resources, the City of Otsego Communications Center dispatcher will be notified by calling **911**. The caller will identify that the Site is located at 431 Helen Avenue in Otsego, Michigan. In addition, EPA OSCs Paul Ruesch or Tricia Edwards will be notified of the fire.

During a hazardous materials incident, law enforcement will control perimeter access; however, they are not equipped with protective clothing and their main function will be Site control and preventing

unauthorized persons from entering the hazard area. Law enforcement should not enter the exclusion zone (inside the building area).

The responding Fire Department has the duty and responsibility to save lives, prevent injuries, reduce property loss, and to restore vital services. Command of the emergency will be established by the officer of the first arriving fire company. The command will be transferred utilizing fire department staff, under the Incident Command System. The Fire Chief will oversee the incident until such time that he or she relinquishes that authority.

Telephone numbers of personnel who should be contacted in the event of an incident are listed on the attached page. At a minimum, the following personnel will be notified:

EPA OSC Paul Ruesch	(312) 919-4382
Otsego Fire Department	911

In the event of heavy smoke or toxic gas emission, the fire department may initiate “shelter-in-place” of the neighboring areas. If this is necessary, it should proceed according to Allegan County Emergency Operations guidelines. EPA’s START contractor will also be available to assist with perimeter air monitoring. Air monitoring may consist of:

- 1) DustTraks (dust particulates)
- 2) AirCons and laboratory analysis (asbestos)
- 3) Gilian pumps and laboratory analysis (asbestos)

STRUCTURAL COLLAPSE

In the event of a structural collapse, all Site personnel will assist each other if necessary and evacuate to the office trailer area (see Attachment A) for accounting and further instruction.

The City of Otsego Fire Department will be notified. To activate fire department resources, the City of Otsego Communications Center dispatcher will be notified by calling **911**. The caller will identify that the Site is located at 431 Helen Avenue in Otsego, Michigan. In addition, EPA OSC Paul Ruesch will be notified at (312) 919-4382.

During a structural collapse incident, law enforcement will control perimeter access; however, they are not equipped with protective clothing and their main function will be Site control and preventing unauthorized persons from entering the hazard area. Law enforcement should not enter the exclusion zone (inside the building area).

The responding Fire Department has the duty and responsibility to save lives, prevent injuries, and to restore vital services. Command of the emergency will be established by the officer of the first arriving fire company. The command will be transferred utilizing fire department staff, under the Incident Command System. The Fire Chief will oversee the incident until such time that he or she relinquishes that authority.

**CONTACT LIST
ROCK-TENN SITE
OTSEGO, ALLEGAN COUNTY, MICHIGAN**

LOCAL AGENCY	PHONE	CONTACT
Otsego Fire Department	911 (request Otsego area) Cell # (269) 207-6634	Emergency Dispatcher Chief Brandon Weber
Otsego Police Department	911 (request Otsego area) (269) 692-6111	Emergency Dispatcher Non-Emergency
Otsego Public Works Department	Cell # (269) 998-3040	Mike Bosch
Otsego City Manager	Cell # (269) 501-1863	Aaron Mitchell
Allegan County Health Department.	(269) 673-5411	Angelique Joynes
Allegan County Board	Cell # (269) 998-6558	Dan Wedge
Ascension Borgess-Pipp Hospital	(269) 685-0700	General Office Number
Allegan County Local Emergency Planning Committee (LEPC)	(269) 673-0571	Scott Corbin
<u>FEDERAL/STATE</u>		
EPA On-Scene Coordinator	Cell # (312) 919-4382 Cell # (734) 740-9016	Paul Ruesch Tricia Edwards
National Response Center	(800) 424-8802	24-hour Spill Reporting
EPA Region 5 Spill Phone (Emergency Only)	(312) 353-2318	24-hour # Chicago office
MDEQ Pollution Emergency Alerting System (PEAS)	(800) 282-9378	24-hour Spill Reporting
MDEQ Kalamazoo District	(269) 567-9440 (269) 567-3532	General Office Number Ray Spaulding
<u>U.S. EPA CONTRACTORS</u>		
SRS (START)	Cell # (312) 805-2850	Emily Koryto
EQM (ERRS)	Cell # (304) 629-0166	Gary Butcher
Subcontractor(s)	TBD	TBD

ATTACHMENT A
Site Layout Map



Legend

-  Office Trailers/Staging
-  Roll-off/ConEx Box Staging
-  Site (Power House Building)
-  Primary Meeting Location



United States Environmental Protection Agency

Rock - Tenn Site - RV

Ostego, Allegan County, Michigan

TDD No. 0001/S05-0001-19-02-300

Emergency Contingency Plan

Figure 2

Site Layout Map



ATTACHMENT B
Hospital Route Map

**HOSPITAL ROUTE MAP
ROCK-TENN SITE**

431 Helen Avenue, Otsego, Allegan County, Michigan

TO

Ascension Borgess-Pipp Hospital, 411 Naomi Street, Plainwell, Michigan 49080

Phone: (269) 685-0700

3.3 miles (8 minutes)

