

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Rock-Tenn - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #1  
Initial POLREP  
Rock-Tenn  
C5A2  
Otsego, MI  
Latitude: 42.4647444 Longitude: -85.7043547

**To:**  
**From:** Brian Kelly, OSC  
**Date:** 1/23/2012  
**Reporting Period:**

1. Introduction

1.1 Background

<b>Site Number:</b>	C5A2	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	1/24/2012	<b>Start Date:</b>	1/24/2012
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	YES
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

1.1.1 Incident Category

CERCLA Time-Critical Removal. PRP Voluntary Action.

1.1.2 Site Description

The site is comprised of a former paper mill in which representatives of Allegan County found abandoned drums, totes, and containers.

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. In 2004, the Rock-Tenn mill closed. Cogswell Property LLC, of Redford Township, bought the mill site in 2006. The property entered foreclosure in 2011 after Cogswell failed to pay property taxes. Currently, Allegan county owns the property.

1.1.2.1 Location

431 Helen Ave, Otsego, Allegan County, Michigan 49078

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On November 16 and 17, 2011, and December 14, 2011, EPA conducted a site assessment that found drums and totes of corrosive hazardous waste. Sampling for polychlorinated biphenyls found only trace levels. (see the Site Assessment Report for more details).

An inventory by Rock-Tenn documented:

50 1-Gallon Paint Cans  
875 1-Gallon Roofing Patch w/asbestos  
160 1-Gallon Flammable Paint  
800 1-Pt Cans  
3 30-Gallon Acid Drums  
103 5-Gallon Pails  
216 55-Gallon Drums  
7 Batteries - Car Type

4 Empty Totes  
6 Fire Extinguishers  
18 Full Totes  
20 Hydrated Lime Pallets  
9 MT 55-Gallon Drums  
4 Propane Tanks 100 lb  
62 Propane Hilo Tanks  
30 Qt - Pints  
2 Refrigeration Units  
64 Spray Bombs - Most MT  
1 Transformers

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

Terra Contracting LLC, on behalf of Rock-Tenn Company, has initiated a removal action to clean up the abandoned drums and containers. Terra will conduct a container sweep of the buildings, sample and consolidate wastes streams, and ship the waste off-site for disposal. The cleanup will likely take 30-60 days. A security guard will be on site 24/hr a day during the cleanup.

The Project Objectives include

- 1) Assure that all activities completed at the project site will be in compliance with State, Federal and local applicable rules and regulations;
- 2) Assure the safety of on-site personnel;
- 3) Assure the safety of the community;
- 4) Assure security of the project site during removal activities; and
- 5) Assure efficient and accurate characterization, consolidation and off-site disposal of all totes, drums, small containers and other identified chemical hazards at the project site.

#### 2.1.2 Response Actions to Date

None

#### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Rock-Tenn Company is performing a voluntary removal action.

#### 2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

### 2.2 Planning Section

No Information available at this time.

### 2.3 Logistics Section

No information available at this time.

### 2.4 Finance Section

No information available at this time.

### 2.5 Other Command Staff

No information available at this time.

## 3. Participating Entities

No information available at this time.

## 4. Personnel On Site

No information available at this time.

## 5. Definition of Terms

No information available at this time.

## 6. Additional sources of information

No information available at this time.

#### **7. Situational Reference Materials**

No information available at this time.