

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #3
Removal Complete - Final POLREP
Rock-Tenn
C5A2
Otsego, MI
Latitude: 42.4647444 Longitude: -85.7043547

To:
From: Brian Kelly, OSC
Date: 4/2/2012
Reporting Period:

1. Introduction

1.1 Background

Site Number:	C5A2	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/24/2012	Start Date:	1/24/2012
Demob Date:	3/28/2012	Completion Date:	4/2/2012
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	YES
FPN#:		Reimbursable Account #:	

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).

After being notified of the site, Rock-Tenn volunteered to remove the containerized wastes. In January, Rock-Tenn distributed a site contingency plan to local agencies and submitted a work plan to EPA. The company's initial assessment found

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 Hi lo 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

The Project Objectives included

- 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, 2012

Between January and the end of March, Rock-Tenn (and Rock-Tenn's consultant Terra) and EPA completed three sweeps of the buildings finding 277 drums, 21 totes, 515 bags of lime, 1807 paint cans, and 576 misc containers. The wastes were transferred to the containment area in buildings 41 and 42. These buildings are separate from the main complex and located at the edge of the west parking lot. Samples were collected, and after laboratory results, the wastes were organized into like groups for disposal. Drums were kept in a heated tent during sampling to prevent the contents from freezing. Air monitoring was conducted both for worker safety and at the perimeter of the site. No elevated readings were found.

During the first week of March, Terra had completed sampling and consolidation of wastes, dismantled the staging tent and cleaned out and cut up the empty drums and totes. Paint drums and totes were prepared for off-site shipment and sent to Autumn Hills RDF in Zeeland, Michigan. A vac truck was used to pump out used oil and wash water from drums. A company called White Pigeon Paper picked up the bags of lime that were in good condition. Non-hazardous drums and scrap metal were loaded into separate roll-off boxes for disposal.

On March 20, EPA, City of Otsego, Allegan County, and Rock-Tenn meet on site to review the cleanup and discuss transfer of the site back to the County.

Between mid March and April 2, Terra loaded a dry van, demobilized all equipment, shipped scrap steel and construction and demolition debris, finalized disposal, and cleaned the staging areas.

The removal is complete.

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

Rock-Tenn Company performed 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>
Regulated Medical Waste (Urine Samples)	Liquid	30 lbs	004045511		
Drummed Latex Paint	Liquid	3025 G			
Used Oil and Wash Water	Liquid	3000 G			
Small Containers Latex Paint	Liquid	4 Tons			
Weak Acids	Liquid	340 G			
Liquid Dyes	Liquid	635 G			
PM-9906	Liquid	600 G			
Caustic Cleaners	Liquid	750 G			
Wax/Grease/Tar	Liquid	510 G			

Neutral Solids	Solid	440 G			
Solid Powders and Dyes	Solid	4.75 Tons			
Non-Hazardous Powder	Solid	55 G			
AP-8020	Liquid	1500 G			
Strong Acids	Liquid	220 G			
AF-4471	Liquid	900 G			
PM-9001	Liquid	1200 G			
Neutral Liquids	Liquid	880 G			
RCRA Empty Drums	Solid	1.22 Tons			
MT Drums, Lime, DE, & Hot Tar Pot combined	Solid	20 Yds			
General C&D	Solid	20 Yds			
Propane Containers		19 units			
Fire Extinguishers		46			
Scrap Metal	Solid	5.97 Tons			
Hydrated Lime	Solid	515-50 Lbs bags			
Waste Flam. Liquid (LP)	Liquid	419 G			
Waste Paint (LP)	Liquid	70 G			
Waste Toxic, Corr. (LP)	Liquid	2 G			
Waste Corrosive (LP)	Liquid	8 G			
Waste Aerosols (LP)	Liquid	130 Lbs			
Waste Methylacetylene (LP)	Liquid	2 Lbs			
Waste Perto. Gas (LP)	Liquid	10 Lbs			
Waste Corr. Flam (LP)	Liquid				
Non-Haz Liquids (LP)	Liquid	220 G			
Waste Comp. Gas (LP)		4 Lbs			
Env Haz Sub. (HG)		20 Lbs			
Env Haz Sub. (NiCd Battery)		7 Lbs			
Batteries- Lead Acid	Solid	300 Lbs			

	Miles of river systems cleaned and/or restored	0
This is an Integrated River Assessment. The numbers should overlap.	Cubic yards of contaminated sediments removed and/or capped	0
	Gallons of oil/water recovered	5000
	Acres of soil/sediment cleaned up in floodplains and riverbanks	0
Stand Alone Assessment	Acres Protected	10
	Number of contaminated residential yards cleaned up	0
	Human Health Exposures Avoided	30
	Number of workers on site	15

2.2 Planning Section

No further removal work is planned. Allegan County plans to conduct a brownfields assessment of the property.

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**3.1 Unified Command**

EPA - Brian Kelly

City of Otsego - Dave Rayman and David Dutton

Allegan County - Kevin Ricco

Rock-Tenn - Steve Hamilton

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.