

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** **POLREP #1**  
**Initial/Final Fund-Lead Emergency Response**  
**Rock-Tenn**  
**C5A2**  
**Otsego, MI**  
**Latitude: 42.4647444 Longitude: -85.7043547**

**To:**  
**From:** Brian Kelly, OSC  
**Date:** 10/1/2012  
**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>	9/4/2012	<b>Start Date:</b>	9/4/2012
<b>Demob Date:</b>		<b>Completion Date:</b>	10/1/2012
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	YES
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

**Incident Category**

Fund-lead CERCLA Emergency Response.

**Site Description**

The emergency response took place on the powerhouse of an abandoned paper mill. The response was necessitated due to illegal stripping of asbestos pipe insulation and the severe deterioration of the building structure, which combined, presented an asbestos exposure risk to the surrounding community. To prevent this exposure risk, EPA placed boards on the windows and doors of the facility.

The site was referred to EPA's Emergency Response Branch (ERB) by EPA's Criminal Investigative Division (CID).

Previously, Rock-Tenn performed a PRP lead removal that removed 277 drums, 21 totes, 515 bags, 1,807 paint cans, and 576 misc containers of waste.

The illegal stripping of pipe insulation was done after Rock-Tenn sold the facility to Cogswell Property LLC.

**Location**

431 Helen Ave, Otsego, Allegan County, Michigan 49078

**Preliminary Removal Assessment/Removal Site Inspection Results**

CID provided ERB with an asbestos survey (see documents).

**2. Current Activities**

**2.1 Operations Section**

**Response Actions to Date**

Between September 4 and October 1, EPA secured the powerhouse building with boards. The second and third floor windows were reached by use of man lifts and the boards were secured to the building using frames.

Allegan County is the property owner through tax foreclosure and is working on redevelopment of the property and final removal of the asbestos. Allegan County is responsible for post-removal site control.

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

The responsible party is Cogswell Property LLC and its owner. The OSC contacted the owner several times in an effort to get him to secured the building without sucess.

**Progress Metrics**

R5 Priorities Summary	
Miles of river systems cleaned and/or restored	0
Cubic yards of contaminated sediments removed and/or capped	0
Gallons of oil/water recovered	0
Acres of soil/sediment cleaned up in floodplains and riverbanks	0
Acres Protected	4
Number of contaminated residential yards cleaned up	0
Human Health Exposures Avoided	30
Number of workers on site	8
Contaminant(s) of Concern	
Asbestos	

**2.2 Planning Section****Anticipated Activities**

EPA ERB plans no further action. Allegan County is working on redevelopment of the property, which will include removal of the asbestos.

**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.