

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Otsego Township Dam Area - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
Initial
Otsego Township Dam Area
059B
Otsego Township, MI
Latitude: 42.4601694 Longitude: -85.7199333

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From: Paul Ruesch, OSC

Date: 8/16/2016

Reporting Period: 8/01/2016 - 8/15/2016

1. Introduction

1.1 Background

Site Number:	059B	Contract Number:	
D.O. Number:		Action Memo Date:	4/6/2016
Response Authority:	CERCLA	Response Type:	PRP Oversight
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	NPL	Operable Unit:	5
Mobilization Date:	8/1/2016	Start Date:	8/1/2016
Demob Date:		Completion Date:	
CERCLIS ID:	MID006007306	RCRIS ID:	
ERNS No.:		State Notification:	DEQ
FPN#:		Reimbursable Account #:	059B

1.1.1 Incident Category

Time Critical Removal Action - PRP Oversight

1.1.2 Site Description

The project area consists of in-stream sediments and bank soils/sediments along an approximate 1.7 mile stretch of river which is contaminated with polychlorinated biphenyls (PCBs). The area is located in Area 3 of OU5 of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site. PCB contamination originated from waste waters discharged from historical paper mills located along the Kalamazoo River.

1.1.2.1 Location

The project area is located within and along the Kalamazoo River between the M-89 (Lincoln Road) bridge (approximate RM 51.5) and the Otsego Township Dam (approximate RM 49.5). The area is located in Otsego Township, Allegan County, Michigan. The project command center is located at 2063 Covault Lane, Otsego, Michigan 49078.

1.1.2.2 Description of Threat

The Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site was listed on the NPL in 1990 due to the presence of PCBs in fish, sediments, and surface water. Remedial investigations over the years have found levels of PCBs present in in-stream sediments, riverbank soils/sediments, and floodplain soils which exceed risk-based cleanup criteria for both human health and the environment. US EPA presented a detailed description of the threat posed by the Otsego Township Dam Area in an 'Action Memorandum' dated April 6, 2016, which can be found in the 'Documents' section of the website.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Previous investigations in Area 3 of OU5 were conducted as part of a Supplemental Remedial Investigation

(SRI) completed in April 2016. The SRI found levels of PCBs as high as 156 milligrams/kilogram (mg/kg) PCBs in riverbank/floodplain soil and 120 mg/kg PCBs in in-stream sediments.

The SRI investigations also indicate riverbank erosion and sloughing were contributing PCB-contaminated sediments to the Kalamazoo River. The SRI report concluded that the erosion and sloughing would continue to occur under both 'dam-in' and 'dam-out' scenarios. A summary of the investigation results can be found in the '0U5 Kalamazoo River Superfund Site Area 3 Supplemental Remedial Investigation Report,' which can be found in the 'Documents' section of the project website.

A pre-design investigation was conducted in July 2016. Preliminary results show PCB concentrations in bank soils and sediments are above cleanup levels of 5 ppm and 1 ppm respectively,

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The overall project will take place over multiple construction seasons in two phases, with completion anticipated in mid-2018.

Contractors and oversight personnel mobilized to the area to begin preparations for contaminated sediment and riverbank soil excavation activities, which are expected to start in early September. The project command center and forward staging/support zone for the first area to be addressed in Phase 1, known as Bank Removal and Stabilization Area (BRSA) 1, were established. BRSA 1 is located along the left-descending (south) bank of the Kalamazoo River near the Pine Creek Dam.

2.1.2 Response Actions to Date

A pre-design investigation involving surveying and sampling of riverbank soils and in-stream sediments was conducted between the M-89 bridge and the Otsego Township Dam from July 11-29 in preparation for the start of removal activities. Field surveying and sampling activities were conducted by AMEC-FW with oversight by US EPA.

Field reconnaissance and habitat assessments of state-listed endangered mussels were conducted between M-89 and Pine Creek in July 2016. A report summarizing the findings of the field survey and proposed relocation of the four species found (*A. ligamintina*, *A. marginata*, *L. complanata* & *L. siliquoidea*) was submitted on July 29 along with the required permits.

The project command center was established at 2063 Covault Lane where US EPA, AMEC-FW and Envirocon temporary offices will be located for the duration of the project. In addition, entry to a forward staging area located off Jefferson Road at the Pine Creek Dam was established along with initial construction activities on a staging pad for contaminated sediments, a waste water treatment plant, equipment staging area, and access roads to the riverbanks in BRSA 1. Another staging area was cleared and secured with fencing on an empty lot located on the south side of the M-89 bridge.

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

US EPA issued a Unilateral Administrative Order (UAO) to respondents Georgia-Pacific, International Paper Company, and Weyerhaeuser Company on April 14, 2016, which went into effect on May 12, 2016. The UAO, which is available on the project website, requires that a TCRA be conducted to address PCBs in riverbank soils and sediments within a portion of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site defined in Section 1.1.2.

2.1.4 Progress Metrics

None to report as of this time.

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

2.2 Planning Section

2.2.1 Anticipated Activities

During the next reporting period, the following activities are expected to occur:

- Relocate state-listed endangered mussels in the anticipated excavation area;
- Close the Kalamazoo River channel from the M-89 bridge to the Otsego Township Dam;
- Invasive species control measures for BRSA 1 and BRSA 3;
- Complete construction of BRSA 1 staging area, including the contaminated sediments staging area, waste water treatment plant, support areas, and riverbank access roads;
- Install water management structures necessary to de-water areas where excavation activities will take place; and
- Mobilize equipment, supplies and materials necessary to begin excavation of contaminated sediments

and riverbank soils.

2.2.1.1 Planned Response Activities

See Section 2.2.1

2.2.1.2 Next Steps

See Section 2.2.1

2.2.2 Issues

US EPA requested consultation from the US FWS and submitted a request for concurrence on "not likely to adversely effect" determination for the federally endangered Northern Long Eared Bat and Indiana Bat on August 15.

2.3 Logistics Section

The project command center is located at 2063 Covault Lane, Otsego, MI 49078. A forward staging area to support activities in BRSA 1 is located on Jefferson Road just east of the Pine Creek Dam.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

U.S. EPA: Paul Ruesch, OSC

AMEC-FW: Cam Baron, Project Manager

Envirocon: Tony Etherington, Site Safety Officer

2.5.2 Liaison Officer

Diane Russell of US EPA is serving in the role of Community Involvement Coordinator (CIC).

An availability session was held for residents on July 14 at Otsego City Hall. Approximately 15 residents of the neighborhoods surrounding the project attended the meeting.

US EPA also directly contacted local police, fire, public works, roads, drain, health and emergency management agencies along with federally-recognized Native American tribes to notify them of the project.

Two field tours were conducted at the site on August 9. A group of 31 students and faculty from Western Michigan University a second group of 22 personnel from the Michigan DEQ Office of Great Lakes were provided a project briefing and a tour of the area.

A public meeting is scheduled for August 23 at the Otsego District Public Library at 6:00 pm. An update will be provided on the project along with other cleanup projects within the overall Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site.

2.5.3 Information Officer

Phillipa Cannon, Francisco Arcaute, and Rachel Bassel (US EPA) served in this role during the reporting period. A press release was issued on August 4 announcing the start of field activities. Several articles appeared in the weeks leading up to the project in local and state news outlets.

A public website was established to communicate information on the project at the following address:
<https://www3.epa.gov/region5/cleanup/kalproject/>.

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

City of Otsego (Mayor's Office, City Manager, Police, Fire, Public Works)

Otsego Township (Roads, Drains)

Allegan County (Roads, Drain, Sheriff, Health, EMA)

State of Michigan (DNR, DEQ, AG, DOT)

Gun Lake Tribe

Pine Creek Indian Reservation

US FWS

US DOJ

NOAA

4. Personnel On Site

On average, the following personnel were present on site during the reporting period:

US EPA - 1

START (US EPA contractor) - 1

Envirocon (general contractor): 8

AMEC-FW (project consultant): 2

TOTAL: 12

5. Definition of Terms

GC	General Contractor
AMEC-FW	AMEC Foster Wheeler
BRSA	Bank Removal and Stabilization Area
mg/kg	milligrams per kilogram
Michigan AG	Michigan Attorney General
Michigan DEQ	Michigan Department of Environmental Quality
Michigan DNR	Michigan Department of Natural Resources
NOAA	National Oceanographic & Atmospheric Administration
NPL	National Priorities List
OSC	On Scene Coordinator
PCB	polychlorinated biphenyl
ppm	parts per million
PRP	Potentially Responsible Party
RI	Remedial Investigation
RM	River Mile
SRI/FS	Supplemental Remedial Investigation/Feasibility Study
TCRA	Time Critical Removal Action
UAO	Unilateral Administrative Order
US EPA	United States Environmental Protection Agency
US DOJ	United States Department of Justice
US FWS	United States Fish & Wildlife Service

6. Additional sources of information

6.1 Internet location of additional information/report

<http://www.epaosc.org/otsegodam>

<https://www3.epa.gov/region5/cleanup/kalproject/>

6.2 Reporting Schedule

POLREPs will be generated every two weeks during active field activities.

7. Situational Reference Materials

None at this time