

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #6  
Progress  
Otsego Township Dam Area  
059B  
Otsego Township, MI  
Latitude: 42.4601694 Longitude: -85.7199333

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**From:** Paul Ruesch, OSC

**Date:** 10/28/2016

**Reporting Period:** 10/13/2016 - 10/26/2016

**1. Introduction**

**1.1 Background**

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

**1.1.1 Incident Category**

Time Critical Removal Action - PRP Oversight

**1.1.2 Site Description**

See PolRep #1

**1.1.2.1 Location**

See PolRep #1

**1.1.2.2 Description of Threat**

See PolRep #1

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

See PolRep #1

**2. Current Activities**

**2.1 Operations Section**

**2.1.1 Narrative**

The GC continues excavating contaminated sediments and bank soils and restoring excavated grids in BRSA 1. Contaminated material is being loaded out from the staging pad for transport & disposal at an EPA approved landfill facility.

### 2.1.2 Response Actions to Date

The following activities took place during the reporting period:

- Excavation of contaminated soils with confirmation sampling results received from grids 31-36, 38, 47-48, and 53-58 (see table below for results). Grids not included in this sequence were either still awaiting analytical results from the laboratory or required additional excavation to meet cleanup objectives. A total of 43 grids have now been excavated. There are 58 grids in BRSA 1. The target clean-up goal in the riverbank soils is 5 mg/kg total PCBs.

BRSA 1 GRID	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)
31	38	0.25
32	41	0.22
33	42	0.58
34	42	2.10
35	43	1.30
36	46	3.10
38	40	2.10
47	36	ND
48	38	ND
53	28	0.42
54	17	0.54
55	18	0.87
56	15	0.54
57	8	3.60
58	22	0.41

ND = non-detect

- Reconstruction / restoration of excavated grids in BRSA 1 (see attached photo);
- Transport/disposal of approximately 1,402 tons of excavated soils to an EPA approved landfill facility. A total of 2,943 tons of excavated soils have been transported from BRSA 1 for disposal to date;
- Treatment of contact water from contaminated grids and the contaminated soils staging pad in the on site WWTP. Approximately 56,292 gallons were treated during the reporting period. A total of approximately 219,000 gallons have been treated since the start of the project. Sampling results continue to confirm non-detect levels for total PCBs in treated water;
- Daily particulate monitoring (PM10) around the perimeter of BRSA 1 with no detections off site of particulates above the action level of 1.5 mg/m<sup>3</sup>; and
- Turbidity control measures and monitoring in Kalamazoo River around the BRSA 1 (1 upstream monitor and 2 downstream monitors) with no sustained exceedances of the action level of 50 NTUs above upstream levels.

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

See PolRep #1

### 2.1.4 Progress Metrics

The following materials were managed during the reporting period.

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Cardboard	solid	110 lbs	NA	recycling	Otsego Recycling Center
Plastic	solid	40 lbs	NA	recycling	Otsego Recycling Center
Contaminated soil (< 50 ppm PCBs)	solid	1401.87 tons	various	disposal	Republic Ottawa County Farms Landfill, Coopersville, MI
Contact water	liquid	56,292 gal	NA	on-site WWTP	On-site reuse/discharge to Kalamazoo River

## 2.2 Planning Section

**2.2.1 Anticipated Activities**

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

- Excavation of contaminated sediments and bank soils in remaining grids of BRSA 1, including TSCA material (soils > 50 mg/kg total PCBs) from grid 29;
- Reconstruction & restoration of excavated grids in BRSA 1;
- Solidification/staging/transport of contaminated sediments & bank soils for disposal;
- Treatment of contact water in the on site WWTP;
- Operation of dust and turbidity control/monitoring systems; and
- Maintenance/monitoring of the temporary WCS.

**2.2.1.1 Planned Response Activities**

See Sections 2.2.1 & 2.2.1.2.

**2.2.1.2 Next Steps**

- A draft Technical Memorandum outlining the approach for BRSA 2 & 3 was submitted on October 21. EPA is currently coordinating review of the document with state, federal and local partners.

**2.2.2 Issues**

None

**2.3 Logistics Section**

See PolRep #1

**2.4 Finance Section**

**2.4.1 Narrative**

See PolRep #3. US EPA (estimated) costs only include on site (personnel, travel, contractor) costs from the beginning of field work (August 1).

**Estimated Costs \***

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
START	\$365,000.00	\$282,000.00	\$83,000.00	22.74%
<b>Intramural Costs</b>				
US EPA - Direct	\$150,000.00	\$32,000.00	\$118,000.00	78.67%
US EPA - InDirect	\$150,000.00	\$25,000.00	\$125,000.00	83.33%
<b>Total Site Costs</b>				
	\$665,000.00	\$339,000.00	\$326,000.00	49.02%

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

**2.5 Other Command Staff**

**2.5.1 Safety Officer**

See PolRep #1

**2.5.2 Liaison Officer**

The OSC and CIC are serving in this role.

**2.5.3 Information Officer**

The OSC and CIC are serving in this role.

**3. Participating Entities**

**3.1 Unified Command**

**3.2 Cooperating Agencies**

See PolRep #1

#### 4. Personnel On Site

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

US EPA - 1

Michigan DEQ - 2

Michigan DNR - 1

START - 2

Envirocon: 20

AMEC-FW: 3

Spicer Group: 1

TOTAL: 30

#### 5. Definition of Terms

AMEC-FW	AMEC Foster Wheeler
BRSA	Bank Removal and Stabilization Area
CIC	Community Involvement Coordinator
in	inches
mg/kg	milligrams per kilogram
mg/m <sup>3</sup>	milligrams per cubic meter
Michigan DEQ	Michigan Department of Environmental Quality
Michigan DNR	Michigan Department of Natural Resources
ND	non-detect
NTU	Nephelometric Turbidity Unit
OSC	On Scene Coordinator
PCBs	Poly-chlorinated biphenyls
PM	Particulate Matter
PolRep	Pollution Report
PRP	Potentially Responsible Party
TSCA	Toxic Substances Control Act
US EPA	United States Environmental Protection Agency
WCS	Water Control Structure
WWTP	Waste Water Treatment Plant

#### 6. Additional sources of information

##### 6.1 Internet location of additional information/report

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

[www.epa.gov/superfund/allied-paper-kalamazoo](http://www.epa.gov/superfund/allied-paper-kalamazoo)

##### 6.2 Reporting Schedule

PolReps are generated every two weeks during active field activities.

#### 7. Situational Reference Materials

No information available at this time.