

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #7
Progress
Otsego Township Dam Area
059B
Otsego Township, MI
Latitude: 42.4601694 Longitude: -85.7199333

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Date: 11/11/2016

Reporting Period: 10/27/2016 - 11/9/2016

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

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 completed excavation of contaminated sediments & bank soils in BRSA 1, including two grids which contained levels of contamination exceeding 50 mg/kg PCBs, which were managed pursuant to TSCA regulations. Restoration activities continue throughout BRSA 1. Contaminated soils/sediments remaining on site are being loaded out for transport & disposal at EPA approved landfill facilities. Decommissioning and demobilization of the WWTP, heavy equipment, and infrastructure/materials are underway in BRSA 1, with completion expected in the next few weeks.

2.1.2 Response Actions to Date

The following activities took place during the reporting period:

- Excavation of contaminated sediments and bank soils in remaining grids of BRSA 1, including TSCA material (soils > 50 mg/kg total PCBs) from an area designated as 'T1' within grids 29 & 30. A special work plan was developed, submitted and approved for this area. These contaminated sediments & soils are staged on site awaiting transport for disposal;

- All 58 grids of BRSA 1 have now been excavated to the target clean-up goal of 5 mg/kg total PCBs in riverbank soils (see below table). Note that previous POLREPs 4-6, which contained portions of the table below, have been corrected to show actual excavation depths in all grids;

BRSA 1 GRID	TOTAL EXCAVATION DEPTH (in)	FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)
1	48	3.10
2	14	2.30
3	30	0.17
4	13	0.18
5	16	ND
6	21	0.49
7	21	0.34
8	12	0.51
9	13	0.14
10	12	0.24
11	8	0.064
12	11	0.032
13	19	ND
14	14	ND
15	18	ND
16	11	ND
17	9	0.22
18	17	0.27
19	36	ND
20	41	0.17
21	36	ND
22	36	0.5
23	37	0.15
24	37	0.17
25	35	ND
26	42	0.083
27	42	0.11
28	35	ND
29	40	ND
T1*	50	0.14
30	39	0.33
31	38	0.25
32	41	0.22
33	42	0.58
34	42	2.10
35	43	1.30
36	46	3.10
37	55	0.38
38	40	2.10
39	42	0.78
40	37	2.70
41	42	0.75
42	42	1.60
43	42	1.10
44	42	ND
45	39	ND
46	40	0.12
47	36	ND
48	38	ND
49	35	0.071

50	35	0.084
51	34	0.12
52	28	3.40
53	28	0.42
54	17	0.54
55	18	0.87
56	15	0.54
57	8	3.60
58	22	0.41

* Grid T1 was a polygon spanning Grids 29 & 30 that contained contaminated soils in excess of 50 mg/kg PCBs according to pre-design sampling. This area was managed in accordance with TSCA regulations, with excavated sediments/soils managed apart from other materials.

- Reconstruction / restoration / inspection of excavated grids in BRSA 1 (see attached photo);
- Transport/disposal of approximately 3212.90 tons of excavated sediments/soils to an EPA approved landfill facility. A total of 6186.14 tons of excavated sediments/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 55,970 gallons were treated during the reporting period. A total of approximately 263,726 gallons have been treated since the start of the project. Sampling results continue to confirm non-detect levels for total PCBs in treated water;
- Investigatory geotechnical borings to determine the stability of side slopes in BRSA 5 (see photograph);
- 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/m3; and
- Turbidity control measures and monitoring in Kalamazoo River around the BRSA 1 with no sustained exceedances of the action level of 50 NTUs above upstream levels. As excavation activities have been completed, the turbidity monitors were removed from the river on November 8.

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. A new column has been added with project totals to date.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Total</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Cardboard	solid	100 lbs	410 lbs	NA	recycling	Otsego Recycling Center
Plastic	solid	20 lbs	120 lbs	NA	recycling	Otsego Recycling Center
Steel	solid	4560 lbs	4570 lbs	various	recycling	Broken Arrow Recycling
Contaminated soil (< 50 ppm* PCBs)	solid	3212.90 tons	6186.14 tons	various	disposal	Republic Ottawa County Farms Landfill, Coopersville, MI
Contaminated soil (> 50 ppm* PCBs)	solid	tons	tons		disposal	US Ecology Michigan, Belleville, MI
Contact water	liquid	55,970 gal	263,726 gal	NA	on-site WWTP	On-site reuse/discharge to Kalamazoo River

Note: 1 ppm = 1 mg/kg

2.2 Planning Section

2.2.1 Anticipated Activities

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

- Complete reconstruction & restoration of all excavated grids in BRSA 1;
- Complete load out & transport of all remaining contaminated sediments & soils for disposal, including those subject to TSCA regulations;
- Treatment of all remaining contact water in the on-site WWTP;
- Decommissioning & demobilization of the on-site WWTP;
- Complete investigatory geotechnical soil borings in BRSAs 5 & 7;
- Operation of dust 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

- EPA provided comments to AMEC-FW on a draft Technical Memorandum outlining the approach for BRSAs 2 & 3 submitted

on October 21. AMEC-FW is working to address the issues raised by EPA and other state/federal/local partners. AMEC-FW plans to submit a second draft Technical Memorandum for BRSAs 2&3 for approval by December 9.

2.2.2 Issues

None

2.3 Logistics Section

See PolRep #1

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

See PolRep #1

2.5.2 Liaison Officer

- A tour of the site was conducted for 22 representatives of the Michigan Statewide Public Advisory Group on October 27;
- A site update was provided at a meeting of the Kalamazoo River Cleanup Coalition on October 27; and
- A tour was provided for Michigan State Representative Mary Whiteford on November 2 (see attached photograph).

2.5.3 Information Officer

The OSC and CIC continue 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: 15
AMEC-FW: 3
Spicer Group: 1
TTL Associates, Inc. (geotechnical drilling contractor): 2

TOTAL: 27

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 ³	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
ppm	parts per million

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

6.2 Reporting Schedule

PolReps are generated every two weeks during active field activities.

7. Situational Reference Materials

No information available at this time.