

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #16
Progress
Otsego Township Dam Area
059B
Otsego Township, MI
Latitude: 42.4601694 Longitude: -85.7199333

To: Douglas Ballotti, EPA
Thomas Short, EPA
Samuel Borries, EPA
Mike Ribordy, EPA
Jim Saric, EPA
Mark Mills, MDNR
Dan Peabody, MDEGLE
Polly Synk, MDAG
Randy Rapp, Allegan County Health Dept
Dan Wedge, Allegan County
Cyndi Trobeck, City of Otsego
Bryan Winn, Otsego Township
Lisa Williams, U.S. FWS
Valincia Darby, U.S. DOI
Greg Baker, NOAA

From: Paul Ruesch, OSC

Date: 5/26/2017

Reporting Period: 5/13/2017 - 5/26/2017

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

Excavation of contaminated riverbank soils is complete in BRSA 3. Contaminated soils/sediments continue to be loaded out for transport & disposal. Preparation for excavation activities in BRSA 4 continues, with installation of coffer dams in the river to isolate in-stream sediments requiring removal.

2.1.2 Response Actions During Reporting Period

- Excavation of contaminated soils with confirmation sampling results received from remaining grids (10-18) in BRSA 3 (see table below for clearance sampling results). There were 18 total grids in BRSA 3, with each grid consisting of approximately 50 lineal feet of riverbank. The target clean-up goal in the riverbank soils is 5 mg/kg total PCBs;

BRSA 3 GRID	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)
10	24	ND
11	24	ND
12	24	ND
13	24	ND
14	24	0.067
15	36	3.8
16	36	4.5
17	24	0.76
18	24	2.1

Note: Confirmatory sampling takes place immediately following excavation of contaminated soils in accordance with procedures outlined in the Field Sampling Plan and the Technical Memorandum for BRSA 3. Both documents can be found in the 'Documents' Section of the project website.

- Transport/disposal of approximately 1847 tons of excavated soils to an EPA-approved landfill facility (see Section 2.1.4);
- Treatment of approximately 39,000 gallons of contact water from contaminated grids and contaminated soils staging pad in the on site WWTP (see Section 2.1.4). Sampling results continue to confirm non-detect levels for total PCBs in treated water;
- Construction of both sand bag and steel sheet pile coffer dams in BRSA 4 to prepare for contaminated riverbank soil & in-stream sediment removal (see photo);
- Daily particulate monitoring (PM10) around the site perimeter with no sustained exceedance off site of particulates above the action level of 1.5 mg/m3;
- Turbidity control measures and monitoring in Kalamazoo River around the BRSA 3 - 9 excavation area (1 upstream monitor and 2 downstream monitors), with no sustained exceedance of the action level of 50 NTUs above upstream levels; and
- Monitoring & maintenance of the temporary WCS.

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

See PolRep #1

2.1.4 Progress Metrics

Both quantities during the reporting period ('Quantity' column) and totals to date ('Total' column) are included in the table.

Waste Stream	Medium	Quantity	Total	Manifest #	Treatment	Disposal
Cardboard	solid	20 lbs	640 lbs	NA	recycling	Otsego Recycling Center
Plastic	solid	10 lbs	210 lbs	NA	recycling	Otsego Recycling Center
Steel	solid	20 lbs	9120 lbs	various	recycling	Broken Arrow Recycling
Contaminated soil (< 50 ppm* PCBs)	solid	1874 tons (est)	9200 tons (est)	various	disposal	Republic Ottawa County Farms Landfill, Coopersville, MI

Contaminated soil (> 50 ppm* PCBs)	solid	0 tons	103.91 tons	various	disposal	US Ecology Michigan, Belleville, MI
Contact water	liquid	39,000 gal	351,475 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:

BRSA 3

- Reconstruct & restore riverbanks;
- Complete transport of contaminated sediments & bank soils for disposal; and
- Decommission and demobilize WWTP along with other equipment from staging area.

BRSA 4

- Complete construction of staging area, stabilization pad & on site WWTP; and
- Continue installation of sand bag and steel sheet pile coffer dams to prepare for excavation of contaminated sediments.

SITEWIDE

- Operate dust and turbidity control/monitoring systems; and
- Maintain/monitor temporary WCS.

2.2.1.1 Planned Response Activities

See Sections 2.2.1 & 2.2.1.2

2.2.1.2 Administrative Activities / Next Steps

- Planning discussions continue on a draft TM for BRSA 7 & 8, which include plans for removal of the temporary WCS.
- On May 19, US EPA responded to a May 12 letter from MDEQ concerning the proposed approach in BRSA 7 & 8 (see 'documents' section).
- US EPA met with representatives of Michigan Gas Utilities on May 16 to discuss a proposed natural gas line installation that may impact the area in the vicinity of the project command center located at 2063 Covault Lane.
- AMEC-FW submitted a revised draft TM for BRSA 4, 5, 6 & 9 for review and approval on May 24. The TM components dealing with BRSA 4 were already conditionally approved on April 10, so review is only focused on the TM sections relating to BRSA 5, 6 & 9.
- Draft restoration plan proposals for the spillway area adjacent to the temporary WCS (BRSA 8 entrance), and the end of 19th Street (BRSA 6 entrance) were prepared by START in coordination with Michigan DNR and Allegan County Road Commission for incorporation into draft TM documents.

2.2.2 Issues

Four representatives of a local labor union began sporadic demonstration activity at the entrances of BRSA 3 on May 16 and BRSA 4 on May 25. Though this activity has not impacted work progress, it has presented a safety hazard with respect to traffic both passing by and entering/exiting the staging area(s).

2.3 Logistics Section

See PolRep #1

2.4 Finance Section

2.4.1 Narrative

See PolReps #3 and #7

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
START	\$665,000.00	\$560,000.00	\$105,000.00	15.79%
Intramural Costs				
US EPA - Direct	\$150,000.00	\$85,000.00	\$65,000.00	43.33%
US EPA - InDirect	\$150,000.00	\$70,000.00	\$80,000.00	53.33%
Total Site Costs	\$965,000.00	\$715,000.00	\$250,000.00	25.91%

* 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

A safety meeting is held prior to start of work each day. The meeting is led by on-site safety officer(s) representing both Envirocon and AMEC-FW.

2.5.2 Liaison Officer

OSC Ruesch met with union business representative Joseph Schippa on May 16 to inform him of current site activities and relay concerns about traffic safety in the vicinity of staging area entrances as well as for traffic along Lincoln Road (M-89). US EPA notified Michigan DNR, Michigan DEQ, Allegan County Sheriff, Otsego City Police, Michigan DOT, Allegan County Road Commission, property owners, and neighboring residents of the union activity on May 16-17.

2.5.3 Information Officer

A flyer was distributed door to door to neighbors in the vicinity of BRSA 4 notifying them of the possibility of increased noise from steel sheet pile installation.

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
START - 1
Michigan DNR - 1
Michigan DEQ - 1
Envirocon: 24
AMEC-FW: 2
Spicer Group: 1

TOTAL: 31

5. Definition of Terms

AMEC-FW	AMEC Foster Wheeler
BRSA	Bank Removal and Stabilization Area
GC	General Contractor
mg/kg	milligrams per kilogram
MDEQ	Michigan Department of Environmental Quality
MDNR	Michigan Department of Natural Resources
MDOT	Michigan Department of Transportation
OSC	On Scene Coordinator
PCBs	Poly-chlorinated biphenyls
PolRep	Pollution Report
ppm	parts per million
PRP	Potentially Responsible Party
START	Superfund Technical Assessment & Response Team (US EPA contractor)
TM	Technical Memorandum
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

The next PolRep will be generated on June 9.

7. Situational Reference Materials

No information available at this time.