

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #17  
Progress  
Otsego Township Dam Area  
059B  
Otsego Township, MI  
Latitude: 42.4601694 Longitude: -85.7199333

**To:** Douglas Ballotti, EPA  
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**From:** Paul Ruesch, OSC

**Date:** 6/9/2017

**Reporting Period:** 5/27/2016 - 6/9/2017

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

Riverbank restoration activity continues in BRSA 3. Excavation of contaminated riverbank soils is underway in BRSA 4.

2.1.2 Response Actions During Reporting Period

BRSA 3

- Backfilling of excavated riverbanks was completed in all 18 grids;
- Installation of the first of two 'J-hook' vanes installed (see photo) to control erosion of BRSA 3 riverbanks; and

- Transport/disposal of approximately 334 tons of excavated soils to an EPA-approved landfill facility (see Section 2.1.4).

The final excavation depths and reported confirmation sampling results are found in the table below.

<b>BRSA 3 GRID</b>	<b>TOTAL ACTUAL* EXCAVATION DEPTH (in)</b>	<b>FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)</b>
1	20	0.57
2	20	0.59
3	19	0.44
4	22	0.69
5	23	1.20
6	24	0.44
7	23	0.18
8	24	0.043
9	26	ND
10	34	ND
11	35	ND
12	36	ND
13	37	ND
14	41	0.067
15	53	3.8
16	47	4.5
17	54	0.76
18	44	2.1

Notes: \*Depth values rounded to the nearest inch. Confirmatory sampling takes place immediately following excavation of contaminated soils in accordance with procedures outlined in the FSP and the TM for BRSA 3. Both documents can be found in the 'Documents' Section of the project website.

**BRSA 4**

- Construction of the staging area, stabilization pad, and on-site WWTP was completed;
- Construction of both sand bag and steel sheet pile coffer dams to prepare for contaminated riverbank soil & in-stream sediment removal was completed (see photo);
- Excavation of contaminated soils commenced in BRSA 4 with initial excavation in several grids underway (see photo).

There are 50 total grids in BRSA 4, 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.

**OVERALL SITE**

- 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 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.

<b>Waste Stream</b>	<b>Medium</b>	<b>Quantity</b>	<b>Total</b>	<b>Manifest #</b>	<b>Treatment</b>	<b>Disposal</b>
Cardboard	solid	10 lbs	700 lbs	NA	recycling	Otsego Recycling Center
Plastic	solid	30 lbs	240 lbs	NA	recycling	Otsego Recycling Center
Steel	solid	50 lbs	9170 lbs	various	recycling	Broken Arrow Recycling
Contaminated soil (< 50 ppm* PCBs)	solid	334 tons (est)	9534 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	0 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:

#### BRSAs 3

- Reconstruct & restore riverbanks;
- Complete construction of 'J-hook' vane erosion control structures;
- Complete transport of contaminated sediments & riverbank soils for disposal; and
- Decommission and demobilize WWTP along with other equipment from staging area.

#### BRSAs 4

- Excavation of contaminated riverbank soils;
- Treatment of contact water from contaminated grids and contaminated soils staging pad in the on-site WWTP; and
- Transport of contaminated soils and sediments for disposal.

#### 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

- On June 2, US EPA approved the revised draft TM for BRSAs 4, 5, 6 & 9 submitted by AMEC-FW on May 24;
- On June 8, an extension was granted by US EPA until June 23 for the draft TM for BRSAs 7 & 8; and
- Planning discussions continue on a draft TM for BRSAs 7 & 8, which include plans for removal of the temporary WCS.

### 2.2.2 Issues

Representatives from a local labor union continue displaying banners at the BRSA 3 or BRSA 4 entrances. Law enforcement from the Allegan County Sheriff's Office, Michigan DNR, and Michigan State Police were called to the site on three occasions by impacted property owners reporting trespassing and vehicle operators reporting safety hazards posed by blocked sight lines.

At the request of legal counsel for the union, a meeting was held between US EPA OSC Ruesch and union representative Mr. Joseph Schippa on June 2 to attempt and locate a safer area. A location was not identified. On June 5 and 7, meetings were held between representatives from US EPA, Michigan State Police, Michigan DNR, Michigan DOT, Allegan County Sheriff's Office, Michigan Attorney General's Office, and Allegan County Prosecutor's Office to discuss safety and legal concerns posed by the protesters.

## 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

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

A tour was provided for 4 representatives of the Kalamazoo Nature Center on May 30. The focus of the tour was on the restoration in BRSA 1.

### 2.5.3 Information Officer

## 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: 29  
Milbocker & Sons, Inc. (sheet piling sub-contractor): 4  
AMEC-FW: 2  
Spicer Group: 1  
  
TOTAL: 40

## 5. Definition of Terms

AMEC-FW	AMEC Foster Wheeler
BRSA	Bank Removal and Stabilization Area
FSP	Field Sampling Plan
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](http://www.epa.gov/superfund/allied-paper-kalamazoo)

### 6.2 Reporting Schedule

The next PolRep will be generated on June 23.

## 7. Situational Reference Materials

No information available at this time.