

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #18
Progress
Otsego Township Dam Area
059B
Otsego Township, MI
Latitude: 42.4601694 Longitude: -85.7199333

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Date: 6/23/2017

Reporting Period: 6/10/2017 - 6/23/2017

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

Riverbank restoration activity continues in BRSA 3. Excavation of contaminated riverbank soils and in-stream sediments commenced in BRSA 4. Mobilization of equipment and materials to the staging area is underway into BRSA 6.

2.1.2 Response Actions During Reporting Period

BRSA 3

- Placement of rock and top soil, also known as 'joint planting,' was completed;

- Feeder stream crossings which connect water draining from floodplains to the river were re-established; and
- Transport/disposal of approximately 645 tons of excavated soils to an EPA-approved landfill facility (see Section 2.1.4).

BRSA 4

- Excavation of contaminated soils commenced with excavation completed in Grids 1-20. 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;
- Excavation of contaminated in-stream sediments commenced with excavation underway in the first of two 'stream tubes' in BRSA 4, which is located within the river channel immediately adjacent to Grids 15-24. The target clean-up goal for in-stream sediments is 1 mg/kg total PCBs;

The final excavation depths and reported confirmation sampling results are found in the tables below for riverbank grids (Table 1) and in-stream sediments (Table 2):

BRSA 4 RIVERBANK GRID	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)
1	6	ND
2	6	0.25
3	6	ND
4	6	ND
5	6	ND
6	6	0.082
7	6	0.44
8	6	0.91
9	6	0.15
10	6	0.48
11	6	3.5
12	24	ND
13	24	0.9
14	36	0.84
15	36	0.32
16	36	ND
17	36	ND
18	36	ND
19	36	0.14
20	36	ND

Table 1. BRSA 4 Riverbank Grid Confirmatory Sampling Results

BRSA 4 STREAM TUBE GRID*	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)
15	6	ND
16	6	0.78
17	6	ND
18	6	0.29
19	6	0.29
20	6	0.17

Table 2. BRSA 4 Stream Tube Confirmatory Sampling Results

Table Notes: Confirmatory sampling takes place immediately following excavation of contaminated soils and/or sediments in accordance with procedures outlined in the FSP and the TM for BRSA 4, 5, 6 & 9. Both documents can be found in the 'Documents' Section of the project website. Stream Tube grids are numbered consistent with the riverbank grid they are located adjacent to. A figure showing the location of both riverbank grids and stream tubes can be found on Figure 8 of the BRSA 4, 5, 6 & 9 TM.

- Transport/disposal of approximately 1,134 tons of excavated soils to an EPA-approved landfill facility (see Section 2.1.4).

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;
- Treatment of approximately 70,550 gallons of contact water from contaminated grids and contaminated soils staging pads in the two on site WWTPs located in BRSA 3 & 4 (see Section 2.1.4). Sampling results from both WWTPs continue to confirm non-detect levels for total PCBs in treated water;
- Mussel relocation activities (see photo) are underway in BRSA 7 & 8. The threatened mussels are being inventoried,

measured, tagged and moved to an adequate area upstream and outside the work area;
 - Japanese Knotweed (an aggressive invasive plant) near the BRSA 8 staging area was inventoried and marked for treatment;
 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.

Waste Stream	Medium	Quantity	Total	Manifest #	Treatment	Disposal
Cardboard	solid	30 lbs	730 lbs	NA	recycling	Otsego Recycling Center
Plastic	solid	20 lbs	250 lbs	NA	recycling	Otsego Recycling Center
Steel	solid	50 lbs	9220 lbs	various	recycling	Broken Arrow Recycling
Contaminated soil (< 50 ppm* PCBs)	solid	1,779 tons (est)	11,313 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	70,550 gal	422,025 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

- Continue riverbank restoration;
- Complete transport of contaminated sediments & riverbank soils for disposal; and
- Decommission and demobilize WWTP along with other equipment from staging area.

BRSA 4

- Continue excavation of contaminated riverbank soils and in-stream sediments;
- Treatment of contact water from contaminated grids and contaminated soils staging pad; and
- Transport of contaminated soils and sediments for disposal.

BRSA 6

- Commence construction of staging area and stabilization pad;
- Mobilize WWTP along with other supporting equipment into staging area; and
- Construct access roads to improve access to riverbanks.

SITEWIDE

- Operate dust and turbidity control/monitoring systems;
- Complete mussel relocation;
- Treat invasive Japanese Knotweed; 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

- The draft TM for BRSAs 7 & 8 was submitted by AMEC-FW on June 23 for review and comment.

2.2.2 Issues

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, which includes warm up and stretching exercises led by a crew

member (see photo). 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 26 students from the Western Michigan University (WMU) - Hydrogeology Field Course on June 20.
- Dr. Lisa Williams and Kelly Bakayza of US FWS toured the site on June 21. Dr. Williams is a Natural Resource Trustee for the State of Michigan.

2.5.3 Information Officer

- A community meeting is being planned to update residents on work progress and work plans for the rest of 2017. A flyer will be distributed door to door announcing the date and location, which is anticipated for late July.

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: 35
AMEC-FW: 2
Spicer Group: 1
Environmental Solutions & Innovation, Inc. - 5

TOTAL: 47

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
US FWS	United States Fish & Wildlife Service
WCS	Water Control Structure
WMU	Western Michigan University
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 July 7.

7. Situational Reference Materials

No information available at this time.