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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #21**
Progress
Otsego Township Dam Area
059B
Otsego Township, MI
Latitude: 42.4601694 Longitude: -85.7199333

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From: Paul Ruesch, OSC
Date: 8/4/2017
Reporting Period: 7/22/2017 - 8/4/2017

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 and in-stream sediments along with restoration are near completion in BRSA 4. The staging area is constructed and removal operations began in BRSA 6.

2.1.2 Response Actions During Reporting Period

BRSA 4 & 5
- Excavation of contaminated soils continues with excavation completed and confirmation results received in riverbank grids 39-

43 and 47-51 (grids 44-46 are yet to be excavated). Due to field adjustments, there are now 51 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;
- Completed removal of sheet piling in first 'stream tube'; and
- Completed excavation of contaminated in-stream sediments in the second 'stream tube' in BRSA 4, which is located within the river channel immediately adjacent to riverbank grids 47-50. The target clean-up goal for in-stream sediments is 1 mg/kg total PCBs.
- Due to field adjustments, in-stream sediments were excavated from a single stream tube in BRSA 5.

Estimated excavation depths and confirmation sampling results are found in the table below for riverbank grids (Table 1), 'stream tube' grids (Table 2), and a 'stream tube' grid in BRSA 5 (Table 3):

BRSA 4 RIVERBANK GRID	TOTAL ESTIMATED EXCAVATION DEPTH (in)	FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)
39	12	<0.066
40	48	<0.072
41	48	0.08
42	48	<0.058
43	48	<0.072
44	to be excavated	-
45	to be excavated	-
46	to be excavated	-
47	36	<0.039
48	24	0.091
49	12	<0.034
50	12	<0.036
51	12	<0.042

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)*
47	*6*	*0.72*
48	*6*	*0.14*
49	*6*	*0.066*
50	*6*	*0.26*

Table 2. BRSA 4 Stream Tube Confirmatory Sampling Results

BRSA 5 STREAM TUBE	*TOTAL ESTIMATED EXCAVATION DEPTH (in)*	*FINAL CONFIRMATION TOTAL PCBs RESULT (mg/kg)*
1	*6*	*0.14*

Table 3. BRSA 5 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 BRSAs 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 (preliminary) riverbank grids and stream tubes can be found on Figure 8 of the BRSA 4, 5, 6 & 9 TM.

- Transport/disposal of approximately 2486 tons of excavated soils to an EPA-approved landfill facility (see Section 2.1.4).

BRSA 6
- Completed construction of staging area and stabilization pad (see aerial photo);
- Completed assembly and tested WWTP;
- Constructed coffer dam systems to facilitate removal of riverbank soils and in-stream sediments in grids 1-10; and
- Installed sheet pile coffer dam system in first 'stream tube'.

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 265,264 gallons of contact water from contaminated grids and contaminated soils staging pads in the on-site WWTP located in BRSA 4 (see Section 2.1.4). Sampling results from the WWTP continues to confirm non-detect levels for total PCBs in treated water; 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	50 lbs	850 lbs	NA	recycling	Otsego Recycling Center
Plastic	solid	30 lbs	315 lbs	NA	recycling	Otsego Recycling Center
Steel	solid	20 lbs	9270 lbs	various	recycling	Broken Arrow Recycling
Contaminated soil (< 50 ppm* PCBs)	solid	2486 tons (est)	16,299 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	265,264 gal	860,194 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 4
- Complete excavation of contaminated riverbank soils (grids 44-46);
- Continue restoration of all excavated river bank and in-stream sediment areas;
- Treat contact water from contaminated grids and contaminated soils staging pad; and
- Transport contaminated soils and sediments for disposal.

BRSA 6
- Excavation of contaminated riverbank soils and in-stream sediments;
- Installation of sand bag and sheet pile coffer dam systems;
- Apply treatment to control invasive plants;
- Treat contact water from contaminated grids and contaminated soils staging pad; and
- Transport contaminated soils and sediments for disposal.

BRSA 9
- Commence construction of staging area;
- Apply treatment to control invasive plants; and
- Begin transport of equipment, supplies and materials to staging area.

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
- AMEC-FW is preparing responses to agency comments and will hold meetings to resolve outstanding issues and concerns on the draft TM for BRSAs 7 & 8.

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

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

2.5.2 Liaison Officer

- A site tour was held on July 26 for management representatives from MDEQ, MDNR and US EPA; and
- A site tour was held on July 27 for students from Michigan State University and Western Michigan University.

2.5.3 Information Officer

A neighbors meeting was held on July 26 at the Otsego City Hall. A project update along with plans for the rest of the 2017 construction season were presented.

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
Milbocker & Sons, Inc.: 4
AMEC-FW: 3
Spicer Group: 2

TOTAL: 48

5. Definition of Terms

AMEC-FW	AMEC Foster Wheeler
BRSA	Bank Removal and Stabilization Area
FSP	Field Sampling Plan
mg/kg	milligrams per kilogram
MDEQ	Michigan Department of Environmental Quality
MDNR	Michigan Department of Natural Resources
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 August 18.

7. Situational Reference Materials

No information available at this time.